

**BROADLAND VILLAGE CLUSTERS – SITE SUMMARIES**

## BLOFIELD HEATH & HEMBLINGTON CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	BLOFIELD HEATH & HEMBLINGTON OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	11
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 2 Object, 8 Comment

The Blofield Heath and Hemblington cluster has 1 c/f allocation (BLO5), 1 preferred site (1048), 0 reasonable alternatives and 5 sites which are judged to be unreasonable.

Main issues:

- Preferred Site GNLP1048 – site promoter questions whether a larger number of homes on the site could be appropriate. Blofield Parish Council suggest looking at the Renenergy scheme and implications for the size of the site.
- Unreasonable site GNLP2080 now has planning permission

Sites not commented on through the consultation:

### Unreasonable Residential Sites

- GNLP0099
- GNLP0288
- GNLP0300
- GNLP2172

### Blofield Heath and Hemblington Cluster – General Comments

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Blofield Heath – Title (General Comments)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Blofield Parish Council	Comment	<ul style="list-style-type: none"> <li>• Site on Blofield Corner Road shouldn't be approved as drainage strategy is into a blind ditch, it would be useful to link that evidence to this response. Due to drainage, not much has been done on site.</li> <li>• The site beside Heathlands on Woodbastwick Road also proposes to link up to this drainage path, there's the issue of whether that also renders this site unworkable because of drainage.</li> <li>• The drainage strategy passed for Dawsons Lane is non-compliant and site specific for 12 properties and a small section of adoptable road, rest to be porous brick within the development itself. However this is now back with a new planning application to increase flow rate from 1.5l/sec to 18.8l/sec i.e. much changed drainage rate. For the GNLP it may be worth noting the site will not hold the 43 for either drainage or access reasons, as the</li> </ul>		Comments noted	None

		road type 6 will only cover a max of 25 + possible 1 and the 12 plus 4 Dawsons Lane dwellings and the access of number 80 now onto this road and not Blofield Corner, there is not the capacity to go for more than a further 9 on the rest of the field, unless another access is made, and the drainage strategy would then need to be pumped uphill if it is to keep to the currently dug system			
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### Blofield Heath and Hemblington Cluster – Preferred Site

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP1048 Land east of Woodbastwick Road, Blofield Heath (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 Object, 2 Comments

<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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the Public	Object	<ul style="list-style-type: none"> <li>No connectivity between Blofield Heath &amp; Hemblington, and Blofield – should be dealt with separately</li> <li>Infrequent bus service</li> <li>Woodbastwick Road is dangerous, in poor condition and floods regularly</li> <li>Pavements are narrow and dark.</li> <li>Children can't safely walk/cycle to school.</li> <li>School building is poor, part is temporary construction and detached from main building.</li> <li>Mill Road unable to cope with school traffic</li> <li>Residents require car to travel</li> </ul>		The issues and concerns raised are acknowledged but new housing needs to be provided through the GNLP and this site is considered to be suitable for residential development, subject to consideration of the boundary amendment put forward by the promoter through the	None

		<ul style="list-style-type: none"> <li>• No doctors surgery, park needs improving</li> <li>• No play space planned</li> <li>• Maximum number of housing should be defined</li> <li>• Permissive footpaths should be considered from back of this development to Hemblington</li> </ul>		Reg 18C consultation.	
Anglian Water	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None
Hugh Crane Ltd via Savills	Support	<ul style="list-style-type: none"> <li>• Fully support site identification for allocation</li> <li>• Strong support for draft policy GNLP 1048 for 15-20 dwellings but considered should plan for additional housing at site.</li> <li>• Submission supported by 'Highways Feasibility Assessment' by Create Consulting Engineers to address HELAA concerns about access</li> <li>• Landscape impact is amber on HELAA – Blofield Parish Neighbourhood Plan does not categorise area as important view or vista and a planning application would adequately mitigate any impact.</li> <li>• 33% affordable housing needs justification with up to date, robust evidence.</li> </ul>	Consider whether a larger number of homes on the site could be appropriate	Agree to amend the site area from 0.95ha to 0.64ha to take account of the recent extension of Renenergy as suggested by the site promoter through their Reg 18C representation. Revised site considered appropriate to accommodate 20 dwellings, a larger site/increased number of dwellings is not considered appropriate due to	Amend boundary of site as suggested by the promoter and allocate for 20 dwellings

		<ul style="list-style-type: none"> <li>• Site boundary needs amending to reflect recent employment development.</li> </ul>		the high levels of existing commitment in the Blofield parish as a whole.	
Blofield Parish Council	Comment	<ul style="list-style-type: none"> <li>• Part of site has been taken by the extension of Renenergy – is there sufficient space now to deliver minimum number of dwellings?</li> <li>• 25-33% of site appears to now be lost</li> </ul>	Look at the Renenergy scheme and implications for the size of the site	Agree to amend the site area from 0.95ha to 0.64ha to take account of the recent extension of Renenergy as suggested by the site promoter through their Reg 18C representation. Revised site considered appropriate to accommodate 20 dwellings	Amend boundary of site as suggested by the promoter and allocate for 20 dwellings

**Blofield Heath and Hemblington Cluster – Carried Forward Allocation**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy BLO5 Land to the north of Blofield Corner, opposite 'Heathway', Blofield Heath (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 Object, 3 Comments

<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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the Public	Comment	Planning application 20162199 & 2019790 show a larger site?		The principle of the BLO5 allocation has already been agreed through the Broadland Local Plan so it is carried forward unchanged into the GNLP for 36 dwellings. It is not intended to change the boundary of the allocation to reflect the planning permission but any	None

				additional dwellings delivered will be taken account of in housing calculations.	
Anglian Water	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None
Blofield Parish Council (posted under title)	Comment	Should not have been passed as drainage strategy was into a blind ditch, be useful to link evidence to this response		The principle of the BLO5 allocation has already been agreed through the Broadland Local Plan so it is carried forward unchanged into the GNLP. Drainage matters on site should be dealt with through the planning application process	None

### Blofield Heath and Hemblington Cluster – Unreasonable Site

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2080 Dawsons Lane, Blofield Heath (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 2 Comments

<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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the public	Comment	<ul style="list-style-type: none"> <li>• Access is now provided to the site and 12 units under construction</li> <li>• Site is at risk of surface water flooding</li> </ul>	Look at details of planning permission	Part of site now has planning permission for 12 dwellings (20190844) granted after the base date of the GNLP. This will be counted in updated windfall figures. .	None
Blofield Parish Council	Comment	Access and drainage agreed for existing permission is inadequate for the additional proposed scale of development.	Look at details of planning permission	Part of site now has planning permission for 12 dwellings	None

				(20190844) granted after the base date of the GNLP. This will be counted in updated windfall figures. Access and drainage issues should have been dealt with through the planning consent	
Agent for landowner	Object	Site has permission on appeal and subsequent permission. All issues raised have been dealt with through these processes.	Look at details of planning permission.	Part of site now has planning permission for 12 dwellings (20190844) granted after the base date of the GNLP. This will be counted in updated windfall figures.	None

## BUXTON WITH LAMAS AND BRAMPTON CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	BUXTON WITH LAMAS AND BRAMPTON OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	13
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	5 Support, 1 Object, 7 Comment

The Buxton with Lamas and Brampton cluster has 1 c/f allocation (BUX1), 1 preferred site (0297) and 5 sites which are judged to be unreasonable.

Main issues:

- Preferred Site GNLP0297, further consideration of water capacity needed, in liaison with Environment Agency and Anglian Water
- Unreasonable Site GNLP0294, detailed representation submitted requesting site be relooked at for allocation. Cross boundary site so further discussion of proposal needed with North Norfolk District Council to clarify their position.

Sites not commented on through the consultation:

### Unreasonable Residential Sites

- GNLP3015

### Buxton with Lamas and Brampton Cluster – Preferred Site

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP 0297 Land east of Aylsham Road, Buxton with Lamas (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the Public	Support	<p>Least disruptive site for area. Access to affordable housing needed for young people in village. Policy should include the following;</p> <ul style="list-style-type: none"> <li>• extension of speed limit,</li> <li>• footpath access (including bike &amp; pram access) and improvement to connect via bure valley car park to the school to minimise school traffic impact,</li> <li>• replace any trees and hedgerows that need to be removed to ensure buffer between developments and agricultural land,</li> <li>• include allotments, and</li> <li>• only allow vehicle access by Aylsham road ensuring pathways are in place for</li> </ul>		Support for site is noted. The policy requirements were based on comments from the local highway authority and a number of these suggestions are already included in the policy e.g. extension of the speed	None

		bikes/pedestrians to get to school, the bure valley path and to Bally park		limit, vehicular access via Aylsham Road and footways to connect to the school	
Anglian Water	Comment	No reference to water efficiency forming part of design.	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None
Environment Agency (Eastern region)	Comment	Not enough capacity in Aylsham WRC permit to accommodate development and no plans to upgrade in terms of flow in PR19, only plans to increase storage at intermittent CSOs. Development will require phasing in line with upgrades to WRC – need to see evidence of liaison with Anglian Water regarding this	Further consideration of water capacity, in liaison with Environment Agency and Anglian Water	Noted	Add policy requirement and supporting text to reference that development will need phasing in line

					with upgrades to the Aylsham Water Recycling Centre with evidence of liaison with Anglian Water.
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### Buxton with Lamas and Brampton Cluster – Carried Forward Allocation

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy BUX 1 Land East of Lion Road, Buxton (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 Object, 2 comments

<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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the Public	Comment	<p>Policy should take into account the following;</p> <ul style="list-style-type: none"> <li>• Vehicular access from existing point on Aylsham &amp; Lion Roads (currently farm access only) - not through Mead close (due to flood risk in lower parts of village).</li> <li>• Green Infrastructure buffers between existing and new sites (via allotments/hedges/green play areas) to ensure sufficient water management and drainage. Current drainage insufficient to cope with any increase in volume/speed of surface water flow.</li> <li>• Footpath/cycle access/improvements to Crown Road and Bally park to avoid</li> </ul>		<p>The principle of the BUX1 allocation has already been agreed through the Broadland Local Plan so it is carried forward unchanged into the GNLP for 20 dwellings. Vehicular access and foot/cycleway improvements are already included</p>	None

		increasing traffic in village and minimising road safety impacts.		in the policy. No evidence has been provided relating to drainage matters and the need for GI buffers and these could be dealt with through any planning application.	
Anglian Water	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None

### Buxton with Lamas and Brampton Cluster – Unreasonable Sites

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0294 Land off Scottow Row (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the Public	Support	Comments in support of the site being unreasonable: <ul style="list-style-type: none"> <li>• Outside development area and too large.</li> <li>• Would increase traffic</li> <li>• Alter rural nature of the villages.</li> <li>• Insufficient infrastructure in place.</li> <li>• Increased surface run off would potentially increase flooding.</li> <li>• Land should remain agricultural.</li> </ul>		Comments noted	None
Glavenhill Ltd Agent: Lanpro	Object/ Comment	Since its early promotion the emerging development proposals have been refined, viability tested and worked up into a deliverable residential-led mixed use scheme. The scheme is an extension to the	Whether North Norfolk District Council are looking for large scale growth in Scottow.	This site is too large for the numbers being sought in the Buxton with	None

		<p>village of Badersfield and Scottow Enterprise Park within the former RAF Coltishall airbase.</p> <p>The total site is cross boundary with part being located within North Norfolk. The land promoted within the Broadland District is immediately available for use and will deliver:</p> <ul style="list-style-type: none"> <li>• Approx. 300 dwellings, including affordable housing and first homes</li> <li>• Allotment growing spaces for each new dwelling</li> <li>• 1 ha of land and sufficient pupils for a new 210 pupil, one form entry primary school</li> <li>• New commercial employment and retail units</li> <li>• Large areas of new semi-natural publicly access open space</li> <li>• 100,000 new trees (also across North Norfolk area) to capture 200,000 tonnes of CO2 each year</li> <li>• Funding to deliver and sustain a new peak hours bus service</li> <li>• Water positive drainage infrastructure to capture waste-water for use on site and surrounding farmland and</li> <li>• A new HGV route from the B1150 to Scottow Enterprise Park</li> </ul> <p>The site is being promoted as an alternative to nil housing growth in Wroxham and the 20-25 dwellings proposed for the Coltishall</p>		<p>Lamas cluster, although it is recognised that the site is being promoted as an alternative to nil growth in Wroxham, a key service centre. It is considered that this site would only really work in the context of the GNLP if it were to come forward as a strategic scale development alongside the land promoted in North Norfolk. North Norfolk District Council have said they have no intention to seek large scale growth in Scottow so therefore this site is considered to be unreasonable for allocation at the current time.</p>	
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		<p>Cluster. (Also planned as an alternative to growth in Hoveton and North Walsham in North Norfolk). Delivery of the complete vision will require cross boundary working between authorities.</p> <p>Concern regarding the overreliance on the wider village clustering approach as there could be a clear disconnect between the main employment and services centres such as Scottow Enterprise Park and the more rural village clusters. This scheme will reduce motor car use and further the Local Plans stated climate change ambitions.</p> <p>Employment growth target should be more ambitious and increased to 45,000 jobs over the plan period. This new number should be specified in Policy 1 that does not currently identify any target figure.</p> <p>Objection to merging allocation BAW2 (Bawburgh and Colney Lakes). It is not effective as it is privately owned, currently let to a third party, no public access is achievable and it is not available to offset the impacts of housing growth. Allocation is unsound and should be removed from the emerging Plan</p> <p>To conclude:</p> <ul style="list-style-type: none"> <li>• The scheme will deliver a net environmental gain and act as a UK</li> </ul>		<p>Comments regarding the BAW 2 allocation and overall employment numbers will be dealt with under the relevant sections of the plan.</p>	
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		<p>benchmark for sustainable planned housing and employment growth;</p> <ul style="list-style-type: none"> <li>• The provision of a large new publicly accessible semi-natural open space will act as a local recreation and leisure destination to reduce the pressure of the network of Natura 2000 sites in Broadland District including The Broads National Park;</li> <li>• It will deliver transport and community infrastructure improvements to sustain and grow jobs;</li> <li>• The site has no over-riding constraints that would prevent its development;</li> <li>• The site benefits from a willing landowner and a committed land promoter that will bring the site forward for development within the emerging Local Plan period;</li> <li>• The scheme delivers sustainable water infrastructure improvements to reduce flooding and ground water abstraction in Norfolk;</li> <li>• The public open spaces, water storage reservoir and allotments proposed will be valuable recreational spaces to improve health and well-being locally;</li> <li>• The new native woodland proposed will enhance natural landscape beauty locally and deliver recreational, landscape and carbon capture benefits to the City of Norwich;</li> <li>• The site is attractive to small and medium-sized housebuilders who</li> </ul>			
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		<p>currently find it difficult to compete for and deliver larger strategic sites and will provide additional choice to the local housing market;</p> <ul style="list-style-type: none"><li>• Siting the new Primary School next to the woodland and semi-natural spaces (and encouraging the School to make the most of this green space) could allow children greater access to nature in and outside of School;</li><li>• It has received good interest from local house builders, who offer their support to these representations; and</li><li>• The scheme facilitates the delivery of a new Primary School.</li></ul>			
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0387 Land at Back Lane, Buxton with Lamas (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Members of the public - various	Support	<p>Comments in support of the site being unreasonable:</p> <ul style="list-style-type: none"> <li>• The land slopes to a narrow beck and flooding would increase.</li> <li>• Back Lane is a very narrow road with no space for widening, unsafe for pedestrians.</li> <li>• The site is outside of the village and building would be detrimental to the overall character of the village</li> <li>• Site is important habitat as a hay meadow.</li> <li>• Residents identified that area should be protected in neighbourhood plan consultation exercise</li> </ul>		<p>Comments noted.</p> <p>No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.</p>	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0601 Land West of Coltishall Road, Buxton With Lamas (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Members of the public - various	Support/ Comment	<p>Comments in support of site being unreasonable:</p> <ul style="list-style-type: none"> <li>• No safe pedestrian access to village facilities – Coltishall Road has blind turn between two houses</li> <li>• Site outside village edge</li> <li>• Numerous landmark trees</li> <li>• Detrimental to character of village</li> <li>• Already been extensions to developments behind birdcage farm, so if only for 1 or 2 houses and a foot/cycle path made to link to back lane that could be publicly used then development may be ok</li> <li>• Back Lane a narrow road with no space for widening, unsafe for pedestrians</li> </ul>		<p>Comments noted</p> <p>No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.</p>	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP3016 Feofee Cottages, North of Crown Road, Buxton with Lamas (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the public	Comment	Would like to have seen site endorsed as existing allocation or reasonable alternative. With current unreasonable classification it looks like it is not considered reasonable which is not the case. Would be positive development for village.		The unreasonable classification refers to the fact that the site is not preferred for allocation not to the fact that it is unreasonable for development per se. Its central village location within the settlement limit lends itself better to a planning application to deliver the affordable rented housing proposed	None

				rather than needing to wait for the local plan to progress. No objection to this approach has been received from the site promoter and therefore no change is proposed.	
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## CANTLEY CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	CANTLEY OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	0
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	-

The Cantley cluster has 0 c/f allocations, 0 preferred sites, 0 reasonable alternatives and 1 site which is judged to be unreasonable.

Main issues:

- None

Sites not commented on through the consultation:

### Unreasonable Residential Sites

- GNLP0281

## CAWSTON, BRANDISTON AND SWANNINGTON CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	CAWSTON, BRANDISTON AND SWANNINGTON OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	9
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 7 Object, 2 Comment

The Cawston, Brandiston and Swannington cluster has 2 c/f allocations (CAW1 & CAW2), 1 preferred site (0293), 0 reasonable alternatives and 2 sites which are judged to be unreasonable.

Main issues:

- Promoter argues that unreasonable site GNLP0126 A&B is a better alternative than the preferred site and carried forward allocation CAW2

Sites not commented on through the consultation:

### Unreasonable Residential Sites

- GNLP2134

**Cawston, Brandiston and Swannington Cluster – Preferred Site**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0293 Land east of Gayford Road, Cawston (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 2 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Promoters of Site 0126 A&B	Object	<p>Comments objecting to the preferred site:</p> <ul style="list-style-type: none"> <li>• Prospect of massive number of houses being built on area</li> <li>• The smaller allocation of site has not been delivered in last 3 years</li> <li>• Better alternative off Fred Tuddenham Drive; it's deliverable and in better location</li> </ul>		This representation is suggesting that site GNLP0126 A& B would be a better alternative for allocation than GNLP0293. This is not supported as serious highway concerns were raised regarding access via Fred Tuddenham Drive and the ability to provide a safe	None

				pedestrian route to school. No evidence has been submitted to counter these concerns and prove that GNLP0126 A& B would be a better choice of site so no change is proposed to the preferred option.	
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**Cawston, Brandiston and Swannington Cluster – Carried Forward Allocations**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy CAW 1 Land to the west of the existing cemetery, Cawston (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED 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	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy CAW 2 Land east of Gayford Road, Cawston (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 2 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Promoters of Site 0126 A&B	Object	<p>Comments objecting to the carried forward allocation:</p> <ul style="list-style-type: none"> <li>• Poor location</li> <li>• Danger of significant extension to existing proposal</li> <li>• Originally allocated in 2016 and not been deliver, should not be rolled forward</li> <li>• Better site off Fred Tuddenham Way</li> </ul>		This representation is suggesting that site GNLP0126 A& B would be a better alternative for allocation than CAW2. This is not supported as serious highway concerns were raised regarding access via Fred Tuddenham Drive and the ability to provide a safe pedestrian route to school. No	None

				evidence has been submitted to counter these concerns and prove that GNL0126 A& B would be a better choice of site so no change is proposed to the preferred option.	
Anglian Water	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy.	None

**Cawston, Brandiston and Swannington Cluster – Unreasonable Site**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0126 A&B Land off Fred Tuddenham Drive, Cawston (Unreasonable Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 3 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Site Promoters	Object	<p>Comments objecting to the site being unreasonable:</p> <ul style="list-style-type: none"> <li>• Well situated to existing settlement</li> <li>• Immediately deliverable</li> <li>• No access issues + footpath route</li> <li>• No threat of further development</li> <li>• Sustainable and well located for employment</li> <li>• Land devoid of environmental merit</li> </ul>		This site is not supported as serious highway concerns were raised regarding access via Fred Tuddenham Drive and the ability to provide a safe pedestrian route to school. No evidence has been submitted to counter these concerns and prove that GNLP0126 A& B would be a better	None

				choice of site so no change is proposed to the preferred option.	
CAM Architects (Norwich) Ltd	Object	<p>Comments objecting to the site being unreasonable:</p> <ul style="list-style-type: none"> <li>• Housing will service need for employment in village and nearby Reepham</li> <li>• Will provide much needed affordable homes in area</li> <li>• Sustainable location with no landscape impact issues</li> </ul>		<p>This site is not supported as serious highway concerns were raised regarding access via Fred Tuddenham Drive and the ability to provide a safe pedestrian route to school. No evidence has been submitted to counter these concerns and prove that GNLP0126 A&amp; B would be a better choice of site so no change is proposed to the preferred option.</p>	None

## COLTISHALL, HORSTEAD AND STANNINGHALL AND BELAUGH CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	COLTISHALL, HORSTEAD AND STANNINGHALL OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	65
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 56 Object, 8 Comment

The Coltishall, Horstead and Stanninghall Cluster has 2 c/f allocations (COL1 and COL2), 1 preferred site (2019), 0 reasonable alternatives and 4 sites which are judged to be unreasonable.

Main issues:

- Preferred Site GNLP2019 – highway and school capacity issues raised. Query informal agreement and acceptability of the scheme with Highways. Further discussion needed with Children’s Services regarding school capacity.
- Soundness issue – no climate change assessment for Village Clusters. To be dealt with through Part 1 of the Plan
- Unreasonable Site GNLP0388 – request to reconsider for allocation instead, or as well as, GNLP2019. Further discussions needed with Highways.

Sites not commented on through the consultation:

### Unreasonable Residential Sites

- Site GNLP0265
- Site GNLP2072

**Coltishall, Horstead with Stanninghall and Belaugh Cluster – Preferred Site**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2019 Land at Rectory Road and south of the Bure Valley Railway, Coltishall (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	50
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 44 Object, 5 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Magnus Magnusson on behalf of Crocus Homes	Support	<p>Support identification of the site as a preferred option and confirm the suitability, availability and achievability of the site for development.</p> <p>Site would be masterplanned with adjacent COL1 (which has outline permission).</p> <p>Additional RAG assessment undertaken showing all criteria as 'green'.</p> <p>Crocus Homes have an option on the land and are in the process of buying it from two willing landowners.</p>		<p>Support for the site is noted</p> <p>The highway authority has confirmed that an informal agreement was made for the site to be accessed via COL1. The access was required to be located as far north as possible and further consideration of</p>	None

		Informal agreement in place with highways for 50 dwelling development.	Further investigation of informal agreement with highways	walking route to school required with possible works requirement to improve facilities.	
CPRE Norfolk	Object	<p>Allocation of this site would lead to unacceptable encroachment into the countryside beyond the current settlement limit.</p> <p>Access to site would be congested and lead to an unacceptable increase in traffic on Rectory Road, with associated safety concerns.</p> <p>If allocated this site should be kept on a reserve list to ensure that more suitable allocated sites in the JCS are developed before the less suitable new GNLP sites.</p>	Confirm highways acceptability with NCC highways	<p>The allocation of sites beyond current settlement limits is necessary to meet the housing requirement identified in the GNLP. It is not considered this site would lead to an unacceptable encroachment into the countryside.</p> <p>The local highway authority have acknowledged that the highway network at Coltishall is difficult and all the sites promoted to the GNLP have engineering challenges. Agreement has been reached with</p>	None

				<p>highways that GNLP2019 is suitable for development subject to vehicular and pedestrian access via COL1. The developers will need to undertake a Transport Assessment and various improvements in the vicinity will be necessary.</p> <p>It is not considered to be possible to have a reserve list of sites in the GNLP or to delay deliverable sites coming forward.</p>	
Coltishall Parish Council	Object	<p>Question accuracy and validity of documents:</p> <ul style="list-style-type: none"> <li>• Public transport links are not good</li> <li>• School and health practice are at capacity with no plans for further funding</li> <li>• Significant traffic issues on Rectory Road, improvements would damage streetscape in designated conservation area</li> </ul>	Confirm highways acceptability with NCC highways	Relative to some other villages Coltishall is considered to have a good range of services and facilities. With regard to traffic issues on Rectory Road agreement	None

		<ul style="list-style-type: none"> <li>• Questions regarding Crocus Homes prior knowledge of GNLP plans</li> <li>• No climate change assessment made for village clusters</li> <li>• Concern the Chair of GNLP has a conflict of interest as a developer.</li> </ul>	<p>Strategic issues such as climate change assessments to be dealt with through Part 1 of the Plan</p>	<p>has been reached with the local highway authority that GNLP2019 is suitable for development subject to vehicular and pedestrian access via COL1 and need for the developers to undertake a Transport Assessment and undertake any subsequent mitigation work required.</p> <p>More strategic issues such as the need for a climate change assessment for village clusters will be dealt with through Part 1 of the Plan.</p> <p>Regarding other issues; Crocus Homes had no prior knowledge of</p>	
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				GNLP plans and the GNLP Chair's interest are recorded and there is no conflict of interest	
Anglian Water Services Ltd	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design.</p> <p>Also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None
Horstead with Stanninghall Parish Council	Object	<p>Not in favour of GNLP2019, instead supporting development of GNLP1056 at Horstead.</p> <p>GNLP2019 is in wrong place connecting to the existing highway network at a narrow, one way, congested road with safety concerns.</p>	Confirm highways acceptability with NCC highways	Comments noted but GNLP1056 is not favoured for allocation as it is some distance from the primary school and other services and facilities in Coltishall and there are site access and landscape issues.	None
Colin Dean on behalf of Governors of Coltishall Primary School	Object	<p>Support that the majority of sites have been assessed as unreasonable due to concerns about traffic and school capacity.</p> <p>Disappointed to see additional housing proposed at Rectory Road. School is oversubscribed and Governors are</p>		Comments noted but the selection of the site has agreement from Children's Services and the local highway authority so no	None

		<p>strongly opposed to any expansion as it would be detrimental to ethos and environment.</p> <p>Rectory Road is severely congested and hazardous for children.</p>		changes are proposed.	
Lanpro Services Ltd on behalf of Glavenhill	Object	Object to level of growth within the Coltishall with Horstead/Belaugh cluster as it is located on the edge of the Norfolk Broads National Park. New development would be better focussed around Scottow Enterprise Park away from the Broads.		The level of growth and the approach towards selecting sites in Coltishall is consistent with the agreed approach for village clusters across the plan area. Focussing new development around Scottow Enterprise Park would be contrary to the agreed principles.	None
Joanna Coplestone. District Councillor for Coltishall Ward	Object	<p>Total amount of development proposed (80 homes) is disproportionate for the size of the cluster which lacks key services and facilities.</p> <p>Traffic constraints and safety concerns about Rectory Road. Developer should pay for a new roundabout on the B1150 to counteract effect of additional traffic.</p> <p>The Bure Valley Railway and Bure Valley Path adjacent to sites COL1 and</p>	Confirm highways acceptability with NCC highways	Relative to some other villages Coltishall is considered to have a good range of services and facilities. With regard to traffic issues on Rectory Road agreement has been reached with the local	Add words to supporting text 'The site is adjacent to the Bure Valley Railway and Bure Valley path, which are important tourism and GI assets that should be protected.

		<p>GNLP2019 is important for tourism and GI and such green spaces should be protected.</p>		<p>highway authority that GNLP2019 is suitable for development subject to vehicular and pedestrian access via COL1 and need for the developers to undertake a Transport Assessment and undertake any subsequent mitigation work required.</p> <p>The site does not include the Bure Valley Railway or Bure Valley path so these should not be directly affected. However these are important tourism and GI assets so agree to add words to the supporting text for GNLP2019 to refer to the need for</p>	
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				them to be protected.	
Members of the public – various	Object/ Comment	<p>Various concerns raised including:</p> <p><b>Traffic/Accessibility</b></p> <ul style="list-style-type: none"> <li>• Traffic congestion and safety concerns on Rectory Lane and nearby roads</li> <li>• Capacity of railway bridge to accommodate additional traffic</li> <li>• Status of informal agreement with highways</li> <li>• Ability of buses to navigate Rectory Lane</li> <li>• Impact of construction traffic</li> <li>• One-way system and speeding drivers</li> <li>• Traffic increase in village since opening of NDR and new housing developments in North Walsham, Hoveton/Wroxham</li> <li>• Possibility of providing disabled access to the Bure Valley Railway path from the site.</li> <li>• No road layout or transport plan available for public comment</li> </ul> <p><b>Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Schools and doctors at capacity with no plans/scope for expansion</li> <li>• Public transport limited and expensive</li> <li>• Statement that Coltishall has a wide range of services is incorrect</li> </ul>	Confirm highways acceptability with NCC highways	<p>Relative to some other villages Coltishall is considered to have a good range of services and facilities. With regard to traffic issues on Rectory Road agreement has been reached with the local highway authority that GNLP2019 is suitable for development subject to vehicular and pedestrian access via COL1 and need for the developers to undertake a Transport Assessment and undertake any subsequent mitigation work required.</p> <p>More strategic issues such as the</p>	None

		<ul style="list-style-type: none"> <li>• Site too far from services in the centre of the village</li> <li>• Issues with water/gas leaks and power cable failure in vicinity of the site within the last 5 years.</li> <li>• Surrounding villages better suited for growth to maintain their schools and services.</li> <li>• Fears surface water flooding on Rectory and Westbourne Roads will increase. Storm drains are regularly overwhelmed and houses on Rectory Road have regular problems with drains and sewerage</li> <li>• Potential damage/contamination to local underground aquifer</li> </ul> <p><b>Landscape and Wildlife</b></p> <ul style="list-style-type: none"> <li>• Impact on wildlife and landscape</li> <li>• Impact on conservation area and character of village as important tourist destination in the Broads</li> <li>• Field currently in highest level tier of agri environment scheme</li> <li>• Nearby woods classified as priority for woodland improvement</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>• No development in addition to COL1 and COL2</li> <li>• Develop brownfield sites instead of greenfield (alternative brownfield site)</li> </ul>		<p>need for a climate change assessment for village clusters will be dealt with through Part 1 of the Plan.</p> <p>Regarding other issues; the GNLP needs to find additional homes across the plan area to 2038 so land will need to be allocated outside current development boundaries regardless of the current 5 year land supply situation. The site has been subject to public consultation at Reg 18C and there is not requirement to submit site plans indicating types of houses and layout at this stage. This level of detail will be negotiated</p>	
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		<p>possibility on the B1150, just north of the village centre).</p> <ul style="list-style-type: none"> <li>• No need for additional houses in Coltishall and there is a 5 year land supply</li> <li>• Outside development boundary</li> <li>• No public consultation, plans going under the radar</li> <li>• Cancellation of consultation event by Crocus Homes means consultation deadline should have been extended</li> <li>• No indication of the type of houses to be built or site layout plans</li> <li>• No climate impact assessment carried out</li> </ul>	<p>Strategic issues such as climate change assessments to be dealt with through Part 1 of the Plan</p>	<p>through any planning application on site. The consultation event planned by Crocus Homes was not associated with the GNLP so there was no reason to extend the Reg 18C deadline.</p>	
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**Coltishall, Horstead with Stanninghall and Belaugh Cluster – Carried Forward Allocations**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy COL1 Land at Rectory Road, Coltishall (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	9
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 8 Object, 1 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>DRAFT GNL RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Anglian Water Services Ltd	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design.  Also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None
Members of the public - various	Object	Various concerns raised including: <b>Traffic/Accessibility</b> <ul style="list-style-type: none"> <li>• Essentially a single lane road not suitable for additional traffic</li> <li>• Traffic congestion at peak times, accident record ignored.</li> <li>• Not safe for children to walk to school</li> <li>• Traffic in the village has increased since the NDR opened</li> </ul>		The principle of the COL1 allocation has already been agreed through the Broadland Local Plan. No evidence has been submitted to suggest it is	None

		<ul style="list-style-type: none"> <li>• No plans for managing construction or residents traffic have been presented</li> </ul> <p><b>Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Infrastructure not sufficient to support new development</li> <li>• School at capacity and doctors oversubscribed</li> <li>• Few jobs in the villages so occupiers will have to commute</li> <li>• Mains services have restricted capacity with 5 failures in last 2 years</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Cynical application to access the whole site</li> <li>• Greenfield site outside the settlement boundary approved against local opposition</li> <li>• Site is next to a tourist attraction that sells itself on the beautiful scenery</li> <li>• Broadland housing figures show no need for the development.</li> </ul>		<p>undeliverable so it is carried forward unchanged into the GNLP for 30 dwellings. The site will be masterplanned with adjacent site GNLP2019 to bring forward a cohesive development for 50 dwellings. The site assessment process for GNLP2019 has looked at highway and infrastructure constraints in the area.</p>	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy COL2 Land at Jordans Scrapyard, Coltishall (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 2 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the public	Comment	Do not feel that any development on this side of the River Bure is appropriate but if there has to be any then a carefully designed scheme on this site is preferable to desecrating greenfield sites and leaving an ex-scrapyard in the centre of a lovely but increasingly traffic bruised village.		The principle of the COL2 allocation has already been agreed through the Broadland Local Plan. No evidence has been submitted to suggest it is undeliverable so it is carried forward unchanged into the GNLP for 25 dwellings.	None
Member of the public	Object	An already busy road, with limited parking, and close to a school will		The principle of the COL12 allocation has	None

		become even busier. The local school and Dr's surgery are already at capacity.		already been agreed through the Broadland Local Plan. No evidence has been submitted to suggest it is undeliverable so it is carried forward unchanged into the GNLP for 25 dwellings.	
Anglian Water	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design.</p> <p>Also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None
Historic England	Object	<p>Whilst there are no designated heritage assets within the site boundary, there is a grade II listed limekiln just to the north east of the site and the Coltishall and Horstead Conservation Area and its associated listed buildings lies to the south of the site. Any development of the site has the potential to impact upon the setting of these heritage assets. There is currently no mention of the Conservation Area and listed buildings within the policy or supporting text or of the requirement to conserve and enhance the significance of these heritage assets.</p>		It is accepted that the policy should acknowledge the potential for harm to the heritage assets and the requirement for measure to address this.	Add policy requirement to COL 2 to read: 'Any development must conserve and enhance the significance of the grade II listed limekiln to the north east of the site and the Coltishall and Horstead conservation area and its associated

		<p>Suggested Change: Amend the policy and supporting text to make reference to the Lime Kiln and Coltishall and Horstead Conservation Area and associated listed buildings and the need to conserve and enhance the significance of the heritage assets (including any contribution made to that significance by setting).</p>			<p>listed buildings to the south of the site, including any contribution made to that significance by setting'.</p>
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**Coltishall, Horstead with Stanninghall and Belaugh Cluster – Unreasonable Sites**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0388 Land at St Johns Close, Coltishall (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 0 Comments

<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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Savills on behalf of the Diocese of Norwich and Mr P Playford	Object	<p>Concerns about draft allocation GNLP2019 (highway constraints, residential amenity and intrusion into the countryside) and carried forward allocation COL2 (questions over deliverability) and suggest that GNLP0388 represents a more realistic and attractive option whether it comes forward in full or in part. GNLP0388 is sustainable and deliverable.</p> <p>The GNLP identifies Coltishall as suitable for 50-60 new homes but only makes an allocation for 20-25 new homes. GNLP0388 could make up the other 25-30 homes.</p>	<p>Look at deliverability of COL2 carried forward allocation.</p> <p>Re-evaluation of site GNLP0388 against the preferred site GNLP2019</p> <p>Consider further allocation to make up short fall in dwellings for the cluster.</p>	<p>Further investigation has been undertaken regarding this site in response to comments raised through the Reg 18C consultation. The site was considered to be unreasonable for allocation on highway grounds. An access strategy has been provided which has been</p>	

		<p>GNLP0388 considered to be unreasonable on highways grounds. A Highway Technical Note is being prepared to address the issues raised. Previous highway advice has indicated that a suitable access can be achieved from St Johns Close.</p> <p>Development of GNLP0388 could improve pedestrian accessibility to the school and surgery through a new footpath and cycleway through the allotments in conjunction with the Parish Council. The site could also facilitate additional parking at the school.</p> <p>The site is owned by two parties who are working together to bring the site forward.</p>	<p>Consider Highway Technical Note when available and discuss with highway colleagues</p>	<p>considered by the local highway authority. Their view is that the provided access strategy neither confirms the width of St Johns Close, nor the available visibility at its junction with Rectory Road. As such justification for the allocation has not been provided and in the absence of evidence to the contrary it is believed that St Johns Close is of an insufficient standard to support further development. For this reason the site remains unreasonable for allocation.</p>	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	GNLP1056 Land at Buxton Road, Horstead (Unreasonable Residential 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Horstead with Stanninghall Parish Council	Object	The Horstead with Stanninghall Neighbourhood Plan, which is shortly to be published, comments that "Whilst it is a fact that none of the major landowners in the parish have expressed any intention of making land available for development, there are some opportunities in and around the village of Horstead and across the parish as a whole. Small parcels of land immediately adjacent to the settlement limit of the village are available....." The Parish Council feels that GNLP1065 would meet these requirements.		Comments noted.  No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.	None

## FOULSHAM AND THEMELTHORPE CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	FOULSHAM AND THEMELTHORPE OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	18
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 16 Object, 2 Comments

The Foulsham and Themelthorpe Cluster has 1 c/f allocation (FOU2), 1 preferred site (0605), 0 reasonable alternatives and 3 sites which are judged to be unreasonable.

Main issues:

- None

Sites not commented on through the consultation:

### Unreasonable Residential Sites

- Site GNLP0275
- Site GNLP0607
- Site GNLP2001

### Foulsham and Themelthorpe Cluster – Preferred Site

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0605 Land west of Foundry Close, Foulsham (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	15
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 14 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Foulsham Parish Council	Object	Very poor access – Aubrey Rix Close has poor paving for pedestrians and development would bring them into close proximity with traffic.		The site is supported by the Highway Authority subject to connection at Aubrey Rix Close	None
Members of the public - various	Object	Comments objecting to the preferred site include: <ul style="list-style-type: none"> <li>• Too much traffic currently – local roads and junctions unable to cope</li> <li>• Many single roads nearby, dangerous to pedestrians/cyclists</li> <li>• Site wildlife haven – possible conservation area</li> <li>• Affect wildlife corridor backing Foundry Close</li> </ul>		The site is supported by the Highway Authority subject to connection at Aubrey Rix Close. It is recognised that there is an alternative brownfield site in the village but this	None

		<ul style="list-style-type: none"> <li>• Pedestrian route to school is unsafe</li> <li>• Increase in noise, pollution and stress to local residents and infrastructure</li> <li>• No village bus service, have to walk a mile to use another village's with no footways or street lighting</li> <li>• Would affect privacy of nearby residents</li> <li>• Parking issues locally, would make worse</li> <li>• Alternate brownfield sites within village</li> </ul>		was not considered to be reasonable for allocation due to highway and surface water flood issues. That site is within the settlement limit so could come forward as a planning application without needing to be allocated. The south of the site abuts the conservation area but there are no protected wildlife areas identified.	
Anglian Water	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None
Historic England	Object	<ul style="list-style-type: none"> <li>• Number of grade II listed buildings to south</li> <li>• Foulsham conservation area to south and east</li> <li>• Suggest amending policy and text to reference Foulsham Conservation Area</li> </ul>		It is accepted that the policy should acknowledge the potential for harm to the heritage assets and the	Amend policy requirement to read: 'Any development must conserve and enhance the

		and associate listed buildings and need to conserve and enhance significance of heritage assets.		<p>requirement for measures to address this.</p> <p>The policy already includes mention of the grade II listed buildings to the south of the site but not the conservation area to the south and east.</p>	<p>significance of grade II listed buildings to the south of the site, particularly Station Farmhouse and Bracken Brae, 5 Station Road and the Foulsham conservation area to the south and east, including any contribution made to that significance by setting'.</p>
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### Foulsham and Themelthorpe Cluster – Carried Forward Allocation

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy FOU2 Land at Old Railway Yard, Station Road, Foulsham (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 2 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the public	Object	<p>Comments objecting to the carried forward allocation:</p> <ul style="list-style-type: none"> <li>• Should build on brownfield sites first – to approve would go against policy</li> <li>• Stringers Lane/Aubrey Rix is single lane.</li> <li>• Stringers Lane/Foundry Close Junction has become dangerous already</li> <li>• Field is wildlife haven</li> <li>• Concern for trees &amp; hedgerows</li> <li>• This is a conservation area</li> </ul>		The principle of the FOU2 allocation has already been agreed through the Broadland Local Plan so it is carried forward unchanged into the GNLP for employment use.	None
Anglian Water	Comment	<ul style="list-style-type: none"> <li>• Policy is ambiguous in relation to whether an odour assessment will be</li> </ul>	<ul style="list-style-type: none"> <li>• Clarify whether an odour assessment is needed</li> </ul>	This matter is dealt with under Policy 2 that	Clarify policy to state that an odour assessment

		<p>required to be submitted with an application on this site.</p> <ul style="list-style-type: none"> <li>No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2</li> </ul>	<ul style="list-style-type: none"> <li>Consistent policy approach to water efficiency needed</li> </ul>	<p>applies to all sites. It is not necessary to include it in the allocation policy.</p> <p>Clarify the policy to state that an odour assessment will be required to assess the impact of the nearby Sewage Treatment Works</p>	<p>will be required due to proximity to Sewage Treatment Works</p>
Historic England	Object	<ul style="list-style-type: none"> <li>Potential impact on Foulsham Conservation Area to north east of site</li> <li>Text should be amended to reference this</li> </ul>		<p>It is accepted that the policy should acknowledge the potential for harm to the heritage asset and the requirement for measures to address this.</p>	<p>Add additional policy requirement to read: 'Any development must conserve and enhance the significance of the Foulsham conservation area to the north east of the site, including any contribution made to that significance by setting'.</p>

## FREETHORPE, HALVERGATE AND WICKHAMPTON CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	FREETHORPE, HALVERGATE AND WICKHAMPTON OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 3 Comments

The Freethorpe, Halvergate and Wickhampton Cluster has 1 c/f allocation (FRE1), 1 preferred site (2034), 0 reasonable alternatives and 1 site which is judged to be unreasonable.

Main issues:

- Water capacity issues to be resolved for preferred site GNLP2034
- Amend policy for carried forward allocation FRE1 to include reference to listed buildings and the need for landscaping to mitigate impact

Sites not commented on through the consultation:

### Unreasonable Residential Sites

- Site GNLP2033

### Freethorpe, Halvergate and Wickhampton Cluster – Preferred Site

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2034 South of Bowlers Close, Freethorpe (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 Object, 2 Comments

<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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED 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	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None
Environment Agency (Eastern Region)	Comment	Freethorpe WRC is currently flow non-compliant. However, we have received an application to increase the dry Weather Flow of the sewage works, which should bring it compliant with the permit. There should be no development until the capacity has been upgraded.	Water capacity issues to be resolved	Add policy requirement to recognise that no development should take place until the capacity at Freethorpe WRC has been upgraded	Add additional policy requirement to read: 'Development should not take place until the capacity of Freethorpe Water Recycling Centre

					has been upgradeded'.
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### Freethorpe, Halvergate and Wickhampton Cluster – Carried Forward Allocation

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy FRE1 Land north of Palmer’s Lane, Freethorpe (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 1 Support

<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>DRAFT GNL RESPONSE</b>	<b>PROPOSED 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	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy.	None
Historic England	Object	<ul style="list-style-type: none"> <li>Grade II listed Walpole Almshouses lie to north west of site.</li> <li>Landscaping along northern edge would mitigate impact.</li> <li>Recommend amending policy to reference buildings, mention landscaping and need to conserve and enhance these assets</li> </ul>		It is accepted that the policy should acknowledge the potential for harm to the heritage asset and the requirement for measures to address this.	Add a policy requirement to read: ‘Any development must conserve and enhance the significance of the grade II listed Walpole Almshouses to the

					north west of the site, including any contribution made to that significance by setting. This includes but is not limited to landscaping along the northern boundary of the site'.
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## FRETtenham CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	FRETtenham CLUSTER OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	9
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	4 Support, 3 Object, 2 Comment

The Frettenham Cluster has 0 c/f allocations, 0 preferred sites, 0 reasonable alternatives and 3 sites which are judged to be unreasonable (2 residential, 1 non-residential).

Main issues:

- Unreasonable site GNLP0492 – request to re-evaluate the brownfield part of the site, although some public opposition to development.

Sites not commented on through the consultation:

- None

### Frettenham Cluster – Unreasonable Sites

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0492 Land South of Harbord Road, Frettenham (Unreasonable Site – Residential)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	5
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	4 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Members of the public - various	Support	<p>Comments in support of the site being unreasonable include:</p> <ul style="list-style-type: none"> <li>• Previously rejected at highest appeals procedure, nothing has since changed</li> <li>• Harbord Road/Post Office Road junction unsuitable for increased traffic</li> <li>• No need given housing in Sprowston and Rackheath</li> <li>• Contested by villagers and Parish Council</li> <li>• Adjacent to country wildlife site</li> <li>• Outside settlement area of village</li> <li>• Part of woodland corridor within Broadland</li> <li>• Many trees on site</li> </ul>		Comments in support of site being unreasonable are noted	None
Lanpro Services Ltd	Object	Comments objecting to the site being unreasonable:	Re-evaluate the potential on the	Further discussions have taken place regarding this site	None

		<ul style="list-style-type: none"> <li>• Council considers village could accommodate 50-60 additional homes. Reliance on windfall to fulfil this growth not appropriate, needs to be properly planned</li> <li>• Only the former gas storage works site (which is previously developed land) is for development.</li> <li>• CWS does not affect this area and the CWS is not currently accessible to public, nor is it managed. Possibility of public access to be explored.</li> <li>• Development can be achieved without impact on TPOs</li> <li>• Quantum of development on site is flexible</li> <li>• Within easy and safe walking distance of school</li> <li>• Adjacent to existing residential development</li> <li>• Junction improvements could be made to improve visibility if deemed necessary</li> <li>• Possible to surface alternate access if needed.</li> </ul>	brownfield part of the site.	following comments raised through the Reg 18C consultation. Even if only the brownfield part of the site were to be developed it is still not considered to be reasonable for allocation, primarily on highway grounds. The plots recently granted to round off development at the bottom of Harbord Road make access into the site more difficult. The Highway Authority has confirmed that a scheme to provide visibility from Harbord Road was agreed in 2011 but requires third party land at the north side of the Pound Hill/Post Office Road junction. It is not considered feasible to provide an	
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				acceptable access for the proposed site using highway land and they remain of the view that the applicant cannot provide acceptable access into the proposed site.	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2076 Adjacent 10 Buxton Road, Frettenham (Unreasonable Site – Non Residential)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Frettenham Parish Council	Comment	In favour if footpath along Pound Hill is included		Comments noted.	None
Matthew Hewitt via Nicole Wright (Agent)	Object	There are currently 10 tenants occupying the units on the site. A number of new enquiries received over the past 24 months demonstrate a reasonably high demand for additional spaces for start-ups. A planning application for a mixed-use low carbon scheme at the site is currently being prepared for submission in 2020. These include proposals for new footpath links to the village.		To justify a local plan allocation for employment use in this location more evidence would be required about the need for the proposal and how it would be delivered and this has not been provided through this representation. The promoter states that a planning application for a	None

				<p>mixed-use low carbon scheme is being prepared for submission in 2020, including new footpath links to the village but no further details have been provided. A proposal of this scale would probably be better dealt with through the planning application process.</p>	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2078 Adjacent 10 Buxton Road, Frettenham (Unreasonable Site – Residential)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Frettenham PC	Comment	In favour if footpath along Pound Hill is included		Comments noted	None
Matthew Hewitt via Nicole Wright (Agent)	Object	Plans are underway to provide a new footpath to link the site to the rest of the village. It is also adjacent to existing employment opportunities where proposals are in place to introduce new starter units for small businesses and community facilities. A planning application for a low carbon mixed use development is currently being prepared to be submitted in 2020. The proposals demonstrate how the amenity of new and existing residents would be protected and enhanced. Ecology and other technical surveys show that there are no insurmountable constraints to delivering a viable proposal		This site is considered to be unreasonable for allocation as it is remote from the main built up area of the village with no safe pedestrian route to Frettenham Primary School. The promoter states that plans are underway to provide a new footpath link to the rest of the village but no detail has been provided to	None

				<p>allow its suitability to be assessed.</p> <p>The site appears to be surrounded by commercial development so residential uses would not be a good fit here because of potential amenity issues. The promoter states that a planning application for low carbon mixed use development is being prepared which will demonstrate how the amenity of new and existing residents would be protected and enhanced, but again no detail has been submitted.</p>	
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## GREAT AND LITTLE PLUMSTEAD CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	GREAT AND LITTLE PLUMSTEAD OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	23
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	16 Support, 4 Object, 3 Comments

The Great and Little Plumstead Cluster has 0 c/f allocations, 0 preferred sites, 0 reasonable alternatives and 10 sites which are judged to be unreasonable (8 Residential, 2 Non-Residential).

Main issues:

- Comments regarding non-allocation of any sites in the cluster
- Site GNLP0420R – further consideration of highway statement regarding vehicular access and footpath provision
- Site GNLP0483 – re-evaluate site on revised boundary
- Site GNLP3014 – re-evaluate site on revised boundary

Sites not commented on through the consultation:

- None

## Great and Little Plumstead Cluster – General Comments

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	General Comments, Great and Little Plumstead
<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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Glavenhill limited via Lanpro Services Ltd	Object	<p>Comments on village clusters Policy 7.4 (with particular reference to GNLP0483)</p> <ul style="list-style-type: none"> <li>• Policy considered to be neither positively prepared, justified or effective in delivering houses needed within village over plan period and is therefore unsound.</li> <li>• Cluster considered appropriate for 50-60 new homes, but area has been deemed unnecessary to carry forward any previous allocations or set new ones, instead relying on windfall strategy.</li> <li>• Para70 of NPPF is clear that windfall strategy should be based on compelling evidence that they will provide a reliable source of supply.</li> </ul>		Further discussion has taken place regarding the suitability of sites for allocation in the Great and Little Plumstead cluster based on comments received through the Reg 18C consultation and none of the sites promoted in the cluster are considered to be suitable for	None

		<ul style="list-style-type: none"> <li>• No such evidence provided in this instance.</li> <li>• More effective and deliverable strategy would be to allocate series of small sites (12-25 homes) that have been confirmed as being deliverable.</li> </ul>		<p>allocation for the reasons given.</p> <p>(Comments regarding the strategy for the village cluster of Great and Little Plumstead added to Soundness Log)</p>	
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### Great and Little Plumstead Cluster – Unreasonable Sites

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0328 Land east of Salhouse Road, Great and Little Plumstead (Unreasonable Site – Residential)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Great and Little Plumstead Parish Council	Support	Comments in support of site being unreasonable: <ul style="list-style-type: none"> <li>• Outside settlement boundary, defined as Service Village in JCS</li> <li>• Goes against policy 1&amp;2 of SE and GC4 and EN4 of DMDPD.</li> <li>• Salhouse Road which borders is 60mph and not wide enough for large volumes of traffic.</li> <li>• Witton Lane equally unsuitable.</li> <li>• Brick Kiln junction known for accidents and unsuitable for further traffic</li> </ul>		No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.	None
Ingram Homes via One Planning	Support	Comments in support of site being unreasonable:		No evidence submitted through Regulation 18C	None

		<ul style="list-style-type: none"> <li>• Not suitable due to required improvements that would be required to Brick Kiln junction.</li> <li>• Not well related to services and facilities.</li> <li>• Impact upon landscape</li> <li>• Flood risk</li> <li>• Loss of Grade 1 and 2 agricultural land</li> </ul>		<p>consultation to justify changing the classification of the site so it remains unreasonable for allocation.</p>	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0330 Land west of Salhouse Road, Great and Little Plumstead (Unreasonable Site – Residential)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Great and Little Plumstead Parish Council	Support	Comments in support of site being unreasonable: <ul style="list-style-type: none"> <li>• Outside settlement boundary</li> <li>• Against policy 1&amp;2 of SE and GC4 and EN4 of DMDPD</li> <li>• Salhouse Road 60mph and not wide enough.</li> <li>• Witton Lane unsuitable as exit for development</li> <li>• Brick Kiln junction known for accidents and not suitable for further traffic</li> </ul>		No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation	None
Ingram Homes via One Planning	Support	Comments in support of site being unreasonable: <ul style="list-style-type: none"> <li>• Impact on landscape</li> <li>• Flood risk</li> <li>• Loss of grade 1 and 2 agricultural land</li> </ul>		No evidence submitted through Regulation 18C consultation to justify changing the classification	None

		<ul style="list-style-type: none"><li>• Not well related to existing developments and services/facilities</li><li>• Requires significant highway improvements for Brick Kiln junction</li></ul>		of the site so it remains unreasonable for allocation	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNL0420R Land at Hare Road, Great and Little Plumstead (Unreasonable Site – Residential)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 2 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>DRAFT GNL RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Great and Little Plumstead Parish Council	Support	Comments in support of site being unreasonable: <ul style="list-style-type: none"> <li>• Hare Road not fit for further traffic as narrow and permanent flooding reducing road to single lane.</li> <li>• Outside settlement boundary</li> <li>• No social, environmental or economic reason for development</li> <li>• Drainage and absorption concern in area</li> <li>• Only serviced by hourly bus</li> <li>• No shops or schools in village</li> </ul>		Comments noted	None
Ingram Homes via One Planning	Object	Comments objecting to the site being unreasonable: <ul style="list-style-type: none"> <li>• Suitability Assessment concluded original, larger site was well related to services and character of village and that access constraints could be overcome through development.</li> </ul>	Further consideration of highway statement regarding vehicular access and footpath provision	A revision to the site was submitted through the Reg 18C consultation. Further discussion has taken place regarding this site	None

		<ul style="list-style-type: none"> <li>• Revised smaller site assessed in HELAA states; development fronting Hare Road would broadly repeat existing pattern of development with no significant impact on landscape and whilst some constraints it is considered suitable</li> <li>• However as site already assessed it will not contribute additional capacity to HELAA addendum without double counting and is therefore unsuitable. This does not mean sites itself is unsuitable, merely it should not be double counted for HELAA purposes.</li> <li>• Highways statement has been undertaken to demonstrate satisfactory access can be achieved – two options for improvements are outlined, these will improve current issues.</li> <li>• Outline planning application currently under consideration ref: 20191938 for 10 dwellings (7 open market, 3 affordable) incl. access.</li> <li>• Site is currently available and no fiscal/environmental reasons why cannot be delivered within next 5 years (expected to commence 2020/2021).</li> <li>• Site is deliverable and developable.</li> <li>• Footpath proposed along site frontage to connect to existing footpath providing safe continuous footpath between site and facilities, incl. school.</li> <li>• Bus stop close by with regular bus service.</li> </ul>		<p>and the Highway Authority are of the view that the revised proposals do not appear to satisfactorily address the previously expressed highway safety concerns. Current planning application 20191938 looks likely to be refused and at 10 dwellings the site is too small for allocation. In addition, further linear development in that location is not considered to be appropriate. For these reasons the site continues to be considered unreasonable for allocation.</p>	
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		<ul style="list-style-type: none"> <li>Existing hedgerow to be removed (with exception of Oak Tree) for footpath (stated to be low overall value and in poor form). Detailed landscaping scheme will form part of any application to replace and improve lost vegetation.</li> <li>Site in Flood Zone 1, where possible SUDs will be used – this will be explored and provided as part of detailed application.</li> <li>Highway surface water drains along entire length of site have been replaced by client as part of other ongoing developments which has resolved highway flooding issues.</li> <li>Part of proposal is new drain being installed along proposed footpath. These will resolve Hare Road flooding.</li> <li>No known utilities connection issues.</li> <li>Site is more favourable location than others in village and comments have been made on each of the other sites.</li> </ul>			
Landowner via Bidwells	Object	<p>Comments objecting to the site being unreasonable:</p> <ul style="list-style-type: none"> <li>Site is suitable, achievable, viable, deliverable and available</li> <li>Great and Little Plumstead identified in Appendix 5 of GNLP draft as having higher potential to accommodate 50-60 dwellings due to there being a primary school, village shop, village hall, playing field, playground, church, allotments and</li> </ul>	Further consideration of highway statement regarding vehicular access and footpath provision	A revision to the site was submitted through the Reg 18C consultation. Further discussion has taken place regarding this site and the Highway Authority are of the view that the revised proposals do not appear to	None

		<p>bowling green. A community shop/café with post office is also being constructed.</p> <ul style="list-style-type: none"> <li>• Hourly bus service to Norwich within walking distance of site.</li> <li>• No sites in area have been identified for growth due to significant existing commitments in village cluster – no commentary on these on whether these are deliverable or if they are included in the 995 dwelling across Broadland Village Clusters considered deliverable in Policy 1 of GNLP draft strategy.</li> <li>• Allocation in Broadland Village clusters identified in Appendix 5 as being 358-517 dwellings meaning no guarantee of required 480 being met.</li> <li>• Site is central within village, adjacent existing dwellings representing a logical extension to existing settlement.</li> <li>• Site will also provide delivery of footpath links which resolves an issue identified in the neighbourhood plan.</li> <li>• Traffic calming measures will be delivered.</li> <li>• Site will contribute to small sites target.</li> <li>• Site can allow for expansion of Hare Road, also for footpath to be provided.</li> <li>• Tree belt to frontage of Church Road is being removed due to current development which will improve visibility to west.</li> <li>• Highways statement has been prepared by Pritchard Civil Infrastructure Design</li> </ul>		<p>satisfactorily address the previously expressed highway safety concerns. Current planning application 20191938 looks likely to be refused and at 10 dwellings the site is too small for allocation. In addition, further linear development in that location is not considered to be appropriate. For these reasons the site continues to be considered unreasonable for allocation.</p>	
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		<p>presenting two viable options to deliver improvements to create sufficient visibility splays to east.</p> <ul style="list-style-type: none"><li>• The statement also concludes no highways safety concerns precluding development at site and that local road network can accommodate this amount of growth.</li><li>• The Environment Agency don't recognise site as being located within area of surface water flooding, HELAA confirms.</li><li>• Highway surface water drains have been replaced to eradicate surface flooding on corner of Church Road and Water Lane, similar enhancements can be achieved at Hare Road.</li></ul>			
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0441R, Land at Middle Road, Great and Little Plumstead (Unreasonable Site – Residential)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Great and Little Plumstead Parish Council	Support	Comments in support of site being unreasonable: <ul style="list-style-type: none"> <li>• No footpaths on Middle Road and not possible to create in certain parts due to pre-existing houses.</li> <li>• Road is narrow and cars can only just pass each other, not suitable for further traffic.</li> <li>• Outside settlement boundary.</li> <li>• Against policies 1 &amp; 2 of ICE and GC4 and EN4 of DMDPD</li> </ul>		No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0483 Land East of Salhouse Road, Great and Little Plumstead (Unreasonable Site – Residential)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 0 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Glavenhill Limited via Lanpro Services Ltd	Comment	<p>Site was previously awaiting outcome of outline application for 84 dwellings. This was refused and dismissed at appeal as provides excess of the 10-20 dwellings. Also concern over lack of foot and cycleways and infrequency of buses.</p> <p>An updated masterplan was sent to GNGB in 2019 with reduced dwellings (35), new care housing provision, community allotments, community uses, land being given to Parish as open space and provision of footpath and road calming measures. Despite this the site was still being considered for its original proposal - 86 dwellings, 5.83ha of GI and new play equipment.</p>	Re-evaluate site on revised boundary	A revision to the site was submitted through the Reg 18C consultation. Further discussion has taken place regarding this site and although the Highway Authority are of the view that a maximum of 25 dwellings could potentially be provided subject to carriageway widening and footway provision, Development	None

		<p>Parish considered appropriate for 50-60 houses but no sites carried forward or allocated making Policy 7.4 unsound, unjustified and ineffective. A series of small sites (12-25 homes) should be allocated.</p> <p>Site is now being submitted for between 20-25 dwellings which means it will have limited impact on Brick Kiln junction, will provide affordable housing, logical extension to settlement limit and allows easy and safe pedestrian access to local primary school.</p>		<p>Management colleagues point to the history of refusals in the area, both on this site and adjacent GNLP3007R. They consider that existing development around the Brick Kilns crossroads is of a separate character to the development to the south on Salhouse Road and separation should be maintained. For these reasons the site continues to be considered unreasonable for allocation.</p>	
Great & Little Plumstead Parish Council	Support	<p>Comments in support of site being unreasonable:</p> <ul style="list-style-type: none"> <li>• Outside of settlement boundary</li> <li>• Goes against policies 1&amp;2 of SE and policies GC4 and EN4 of DMDPD</li> <li>• Salhouse road which borders is 60mph and not wide enough to have large volume of traffic.</li> </ul>		Comments noted	None

		<ul style="list-style-type: none"> <li>• Witton Lane equally unsuitable as exit for development.</li> <li>• Brick Kiln junction known for accidents and not suitable for further traffic.</li> </ul>			
Ingram Homes via One Planning	Support	<p>Comments in support of site being unreasonable:</p> <ul style="list-style-type: none"> <li>• Would require significant highway improvements to Brick Kiln Junction.</li> <li>• Impact to surrounding landscape</li> <li>• Loss of high quality agricultural land</li> <li>• Impact on trees and ecology</li> </ul>		Comments noted	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2040 South of Broad Lane, Great and Little Plumstead (Unreasonable Site – Residential)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Great and Little Plumstead Parish Council	Support	Comments in support of site being unreasonable: <ul style="list-style-type: none"> <li>• Outside settlement boundary</li> <li>• against policies 1&amp;2 of SE and GC4 and EN4 of DMDPD</li> <li>• Due to closure of Broad Lane all residents would use facilities in Rackheath rather than the Plumsteads. Rackheath has a large amount of development and this application provides no services or amenities for residents.</li> </ul>		No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.	None
Ingram Homes via One Planning	Support	Comments in support of site being unreasonable: <ul style="list-style-type: none"> <li>• Remote from main development of the Plumsteads.</li> <li>• Lacks safe pedestrian access to existing services and facilities.</li> <li>• Flood risk</li> <li>• Landscape impact</li> </ul>		No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains	None

				unreasonable for allocation	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2107 North of Octagon Business Park, Great and Little Plumstead (Unreasonable Site – Non-residential)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 Object 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Great and Little Plumstead Parish Council	Support	Comments in support of site being unreasonable: Road network struggling to cope with current traffic on Highbrow Lane and Hospital Road/Water Lane		Comments noted	None
Joe Wiley via Nicole Wright (Agent)	Comment	Zero carbon starter units for small businesses		To justify a local plan allocation for employment use in this location more evidence would be required about the need for the proposal and how it would be delivered and this has not been provided through this	None

				representation. A proposal of this scale would probably be better dealt with through the planning application process.	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP3007 East of Salhouse Road, South of Belt Road, Great and Little Plumstead (Unreasonable Site – Residential)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Great and Little Plumstead PC	Support	Comments in support of site being unreasonable: <ul style="list-style-type: none"> <li>• Outside settlement boundary</li> <li>• Against Policy 1&amp;2 of SE and GC4 and EN4 of DMDPD</li> <li>• Salhouse road which borders is 60mph and is not wide enough for large volumes of traffic.</li> <li>• Witton Lane equally unsuitable as exit for site.</li> <li>• Brick Kiln junction is known for accidents and not suitable for further traffic.</li> </ul>		Comments noted.  A revision to this site was submitted through the Reg 18C consultation reducing it to 0.47ha for 8-10 dwellings. It is now classified as a 'small site' and will be dealt with through work on reviewing settlement boundaries.	None
Ingram Homes via One Planning	Support	Comments in support of site being unreasonable: <ul style="list-style-type: none"> <li>• Requires significant highway improvements to Brick Kiln junction.</li> </ul>		Comments noted.  A revision to this site was submitted	None

		<ul style="list-style-type: none"><li>• Impact on Landscape</li></ul>		through the Reg 18C consultation reducing it to 0.47ha for 8-10 dwellings. It is now classified as a 'small site' and will be dealt with through work on reviewing settlement boundaries.	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP3014 Home Farm, Water Lane, Great and Little Plumstead (Unreasonable Site – Residential)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 1 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Land owner via Gary Collier (Agent)	Object	<p>Comments objecting to the site being unreasonable:</p> <ul style="list-style-type: none"> <li>• On rare occasions only small amount of water lays on grid ref 5332 and 6524 which is low lying.</li> <li>• Land for future development includes front field (7.08 acres) and 2nd field (8.55 acres), each acre allowing for 10 dwellings.</li> <li>• Smaller amount of land on Home Farm could be considered.</li> <li>• Starter, family or retirement homes could be considered, or local shop/supermarket.</li> <li>• Remaining 15 acres could be used for open space or recreation.</li> </ul>	Re-evaluate site on revised boundary	A revision to the site boundary was submitted through the Reg 18C consultation. Further discussion has taken place regarding this site and although the Highway Authority have said that small scale development could be acceptable subject to access and pedestrian/cycle connections it is unlikely that previous	None

				townscape and landscape concern can be overcome so the site is still concerned to be unreasonable for allocation.	
Great and Little Plumstead Parish Council	Support	<p>Comments supporting the site being unreasonable:</p> <ul style="list-style-type: none"> <li>• Outside settlement boundary</li> <li>• Against policies 1&amp;2 of SE and GC4 and EN4 of DMDPD.</li> <li>• Water Lane is narrow and is (not?) suitable for amount of traffic large development would cause.</li> </ul>		Comments noted	None
Ingram Homes via One Planning	Support	<p>Comments supporting the site being unreasonable:</p> <ul style="list-style-type: none"> <li>• Potential to cause significant landscape and character impact.</li> <li>• Unclear if satisfactory access could be achieved onto Water Lane</li> <li>• Flood Risk</li> <li>• Loss of Grade 2 agricultural land.</li> </ul>		Comments noted	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP3034 East of Brook Farm, Great and Little Plumstead (Unreasonable Site – Non-residential)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Great and Little Plumstead PC	Support	Comments supporting the site being unreasonable: <ul style="list-style-type: none"> <li>• Roads surrounding site unsuitable for extra traffic.</li> <li>• Toad Lane extremely narrow country lane.</li> <li>• No exit onto A1270 as 70mph.</li> <li>• Broad Lane/Norwich Road junction has very poor visibility</li> </ul>		No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.	None

**GREAT WITCHINGHAM, LENWADE, WESTON LONGVILLE, ALDERFORD, ATTLEBRIDGE, LITTLE WITCHINGHAM AND MORTON ON THE HILL CLUSTER**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	GREAT WITCHINGHAM, LENWADE, WESTON LONGVILLE, ALDERFORD, ATTLEBRIDGE, LITTLE WITCHINGHAM AND MORTON ON THE HILL OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	8
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 Object, 6 Comments

The Great Witchingham, Lenwade, Weston Longville, Alderford, Attlebridge, Little Witchingham and Morton on the Hill Cluster has 0 c/f allocations, 1 preferred site (0608), 0 reasonable alternatives and 7 sites which are judged to be unreasonable (6 residential and 1 non-residential).

Main issues:

- Request that site GNLP0548 should be considered for allocation alongside site GNLP0608

Sites not commented on through the consultation:

Unreasonable Residential Sites

- Site GNLP0460
- Site GNLP0553
- Site GNLP0586
- Site GNLP2129

- Site GNLP2184

Unreasonable Non-Residential Sites

- Site GNLP2144

**Great Witchingham, Lenwade, Weston Longville, Alderford, Attlebridge, Little Witchingham and Morton on the Hill Cluster  
– Preferred Site**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0608 Land at Bridge Farm Field, St Faiths Close, Great Witchingham (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	6
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 Object, 5 Comments

<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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Site Owners via Parker Planning Services	Support	<ul style="list-style-type: none"> <li>• Site is 1.75ha and has the potential to accommodate 15-20 dwellings</li> <li>• Site is suitable, available, achievable, viable and deliverable</li> <li>• Landowner actively promoting the site</li> <li>• RAG assessment undertaken showing all HELAA criteria as green so site is considered to have no major constraints</li> </ul>		Revision submitted through Reg 18 C consultation which reduces the site in size from the original proposal of 1.75ha to a smaller 0.72ha. The original preferred site proposed 1ha of residential development with the remainder of the site as open	Amend the site to reflect the revised boundary submitted through the Reg 18C consultation

				space. The revised site will only accommodate the residential element of the proposal. With no evidence of need for the open space part of the proposal the revision is considered to be acceptable.	
Anglian Water	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None
Norfolk Wildlife Trust	Comment	Adjacent to Lenwade Pits West CWS which will be resurveyed in summer. Further comments can be provided once this survey has been undertaken		Comments noted	None
Environment Agency (Eastern Region)	Comment	Boundary has been drawn to exclude current and future flood zones to north so the sequential approach has been correctly applied		Noted	None
Historic England	Comment	Whilst there are no designated heritage assets within the site boundary, the grade II listed Bridge Public House lies to the south east of the site. Any development of the site has the potential to impact upon the setting		Noted  Policy requirement to be re worded to reflect standard	Reword policy requirement to reflect standard text used elsewhere:

		of the listed building. We welcome bullet point 4 which refers to the listed building.		text used elsewhere	'Any development must conserve and enhance the significance of the grade II listed Bridge House to the east of the site, including any contribution made to that significance by setting'.
SMG Architects Ltd	comment	Redline plan + masterplan attached		Revision submitted through Reg 18 C consultation which reduces the site in size from the original proposal of 1.75ha to a smaller 0.72ha. The original preferred site proposed 1ha of residential development with the remainder of the site as open space. The revised site will only accommodate the residential element of the proposal. With no evidence of need	Amend the site to reflect the revised boundary submitted through the Reg 18C consultation

				for the open space part of the proposal the revision is considered to be acceptable.	
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**Great Witchingham, Lenwade, Weston Longville, Alderford, Attlebridge, Little Witchingham and Morton on the Hill Cluster  
– Unreasonable Site**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP 0548 Council Field, Great Witchingham/Lenwade (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Landowner via Parker Planning Services	Object	<p>Comments objecting to the site being unreasonable:</p> <ul style="list-style-type: none"> <li>• Available, achievable, deliverable, suitable and viable.</li> <li>• Site would constitute sustainable development and should be allocated alongside GNLP0608 as this would mean there is less pressure to allocate less sustainable sites across the village clusters</li> <li>• Site could accommodate approx. 20 dwellings</li> <li>• RAG assessment undertaken which shows all criteria as green so site is</li> </ul>		The site is not considered to be suitable for allocation as Heath Lane is narrow with no footway and there is no scope for improving the carriageway width of providing a footway, therefore it is not possible to deliver a safe route to school. No evidence has	None

		considered to have no major constraints		been submitted to demonstrate how these highway concerns can be overcome so the site continues to be unreasonable for allocation	
SMG Architects Ltd	Comment	Red line plan + Masterplan attached		The site is not considered to be suitable for allocation as Heath Lane is narrow with no footway and there is no scope for improving the carriageway width of providing a footway, therefore it is not possible to deliver a safe route to school. No evidence has been submitted to demonstrate how these highway concerns can be overcome so the site continues to be unreasonable for allocation	None

## HAINFORD AND STRATTON STRAWLESS CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	HAINFORD AND STRATTON STRAWLESS OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 3 Object, 1 Comment

The Hainford and Stratton Strawless Cluster has 0 c/f allocations, 0 preferred sites, 0 reasonable alternatives and 9 sites which are judged to be unreasonable.

Main issues:

- Unreasonable sites GNLP0393 and 2162 promoted as suitable to accommodate the 50-60 dwellings identified for the cluster. Proposal from the promoter of GNLP2162 to facilitate safe walking route to school.

Sites not commented on through the consultation:

### Unreasonable Residential Sites

- Site GNLP0065
- Site GNLP0069
- Site GNLP0181
- Site GNLP0190
- Site GNLP0512

- Site GNLP0582
- Site GNLP2035

## Hainford and Stratton Strawless Cluster – General Comments

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Hainford General Comments
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Councillor Dan Roper	Comment	<ul style="list-style-type: none"> <li>• Endorse there being no currently identified suitable sites.</li> <li>• Hainford has limited infrastructure, narrow roads and lack of safe walking path to the school.</li> <li>• Question why village is clustered with Stratton Strawless, little in common with each other. Would be better for village to standalone.</li> </ul>		<p>Comments noted.</p> <p>Hainford is clustered with Stratton Strawless as the village clusters are based on primary school catchments</p>	None
Member of the public	Object	<p>Ref small site GNLP3046 - Support this site being considered unreasonable for future development as per the GNLP on the basis of:</p> <ul style="list-style-type: none"> <li>• Constraints by flooding, drainage issues, no safe route to local school by foot</li> </ul>		<p>Small site to be considered through settlement boundary revision work</p>	None

### Hainford and Stratton Strawless Cluster – Unreasonable Sites

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNL0181 Land at Hall Road, Hainford (Unreasonable Residential 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>DRAFT GNL0 RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Site Promoter	Object	Revised site boundary submitted.		This site has been revised from 1.16ha to 1.04ha. The original site was considered to be unreasonable for allocation as there was no safe walking route to primary school. No evidence has been submitted with the revised site to demonstrate how a safe walking route could be	None

				achieved so the site is still considered to be unreasonable for allocation.	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0393 Land at Hainford, Hainford (Unreasonable Residential 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Savills on behalf of Diocese of Norwich	Object	<p>Comments objecting to the site being unreasonable:</p> <ul style="list-style-type: none"> <li>• Site can meet identified housing need (50-60 as identified in sites document)</li> <li>• Village Hall, primary school (which has spaces) and public transport within walking/cycling distance of site.</li> <li>• Site is immediately adjacent to school, and Diocese could facilitate school expansion if necessary and part of the site could accommodate a car park for use by the school</li> <li>• Area is well related to Norwich with A140 close by and bus stop 150m from site.</li> </ul>		Despite its location adjacent to the primary school this site is not considered to be reasonable for allocation due to significant surface water flood issues and heritage concerns about impact on nearby church. The LLFA have commented that a flow path crosses the site from east to west and mitigation	None

		<ul style="list-style-type: none"> <li>• Well related to existing settlement and it's boundary. Allocating the site would connect the school to the village.</li> <li>• Access will be via Newton Road. Current access and carparking for the school would be incorporated into overall development plan for the site.</li> <li>• Client has already installed a TROD footpath to provide access to the school and this could be upgraded through development</li> <li>• Could incorporate SUDs to address pressures on site drainage and run off. Not locate on a flood zone 2 or 3, not subject to any PROW.</li> <li>• Electric, water, sewerage and telecoms all available.</li> </ul>		<p>would be required for heavy constraints with significant information required at a planning stage. Without additional evidence the deliverability of the site is uncertain</p>	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2162 Harvest Close, Hainford (Unreasonable Residential 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Westmore Homes, Agent: Armstrong Rigg Planning	Object	<p>Land adjacent to site has been acquired so it is now possible to provide a safe continuous segregated footway from Harvest Close to the primary school via a new 1.5m wide footpath to Newton Road then a further footway along the highway verge.</p> <p>There are no other constraints and building here will provide up to 60 dwellings including a proportion of affordable housing in line with GNLP policy as well as public open space and a new children's local area of play.</p>	Liase with Highways colleagues regarding suitability of footpath proposals	Further discussions have taken place with the highway authority regarding this site. Their view remains that the current road network is not of sufficient standard to support development traffic. Newton Road is presently narrower than the minimum required width of 5.5m and the proposal seeks	

				<p>to further reduce the width of the road to provide a narrow footway. Therefore the site is still considered to be unreasonable for allocation. The highway authority have also stated they would be likely to object to any planning application that comes forward on the site.</p>	
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## HEVINGHAM CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	HEVINGHAM OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 0 Comment

The Hevingham Cluster has 0 c/f allocations, 0 preferred sites, 0 reasonable alternatives and 2 sites which are judged to be unreasonable.

Main issues:

- None

Sites not commented on through the consultation:

### Unreasonable Residential Sites

- Site GNLP0292

## Hevingham Cluster – Unreasonable Site

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2002 6 The Turn, Hevingham (Unreasonable Residential 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Site Owner	Object	<p>Comments objecting to site being unreasonable:</p> <p>The Turn is a dead-end road. There is access to the school via a right of way to Westgate Street. Children do not walk to school from the Heath due to the mud on the road and flooding. Mothers take their children by car.</p> <p>Facilities in the village apply to the Heath, both the school and the village hall have the capacity to expand. The road has two good access points from the Heath.</p>		Comments noted but this representation does not provide any evidence to address the issues identified with the site. The site is some distance to the west of the services and facilities in the main part of Hevingham village, where there is currently no settlement limit.	

		<p>This is an infill site with housing all around, if the site is not considered suitable for building perhaps the frontage could be looked at as a separate site.</p> <p>The proposed site entrance is not into The Turn as you have shown but is directly on to the main road through the Heath.</p>		<p>The Turn is a narrow lane without footpaths with limited possibility for improvement. No solution has been offered so therefore it is assumed that a safe walking route to Hevingham Primary School is not achievable.</p>	
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## HORSFORD, FELTHORPE AND HAVERINGLAND CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	HORSFORD, FELTHORPE AND HAVERINGLAND OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	27
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	13 Support, 9 Object, 5 Comment

The Horsford, Felthorpe and Haveringland Cluster has 0 c/f allocations, 1 preferred site (0264), 0 reasonable alternatives and 28 sites which are judged to be unreasonable (26 residential and 2 non-residential).

### Main issues:

- General objection to the method of assessment for village clusters being based on unpublished Children’s Services information
- General comment that as the 9<sup>th</sup> largest settlement in the Plan area Horsford should have a higher level of growth and at least be identified as a Service Centre.
- Suggestion that unreasonable site GNLP0283 should be considered for allocation in place of preferred site GNLP0264
- Preferred Site GNLP0264 requires WFD compliance assessment
- The designation of sites GNLP0332R and 0334R as unreasonable negatively impacts on the brand new community hub for Horsford
- Suggestion that unreasonable site GNLP0422 should be allocated to make up for the shortfall in Horsford’s housing numbers
- Suggestion that the HELAA for unreasonable site GNLP2160 has not been appropriately reviewed and updated

Sites not commented on through the consultation:

Unreasonable Residential Sites

- GNLP0222
- GNLP0251
- GNLP0302
- GNLP0333
- GNLP0359R
- GNLP0469
- GNLP1043
- GNLP3004
- GNLP3005

Unreasonable Non-Residential Sites

- GNLP2154

### Horsford, Felthorpe and Haveringland Cluster – General Comments

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Horsford Title Comments (General Comments)
<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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Savills on behalf of Barratt David Wilson Homes	Object	<p>The ‘Sites Assessment Booklet’ for Horsford states: “HORSFORD, FELTHORPE AND HAVERINGLAND The catchment of Horsford Primary School brings Horsford, Felthorpe and Haveringland into a village cluster. The school currently has limited capacity. It is considered that as well as existing commitments and windfall development, approximately 20-50 new homes are appropriate for the Horsford cluster. In addition to the primary school, services include a shop, doctor’s surgery, village hall, library and public house.”</p> <p>The introduction to the Site Assessment Methodology, states (para. 1.5): “The</p>	Objection to method of assessment for village clusters being based on unpublished Children Services information.	Objections to the wider methodology used to calculate housing numbers in village clusters will be dealt with under Policy 7.4 – Village Clusters, it is not simply a settlement specific issue.	None

	<p>scale of growth proposed within each 'village cluster' reflects school capacity or ability to grow, plus the availability of other accessible services. Taking account of the timescales for delivery and other uncertainties, such as pupil preference, it has been assumed that a minimum scale of allocation (12- 20 dwellings) can be accommodated in all clusters if appropriate sites are available. To guide development all village clusters have been rated 'red' (12- 20 dwellings), 'amber' (20-50 dwellings) or 'green' (50- 60 dwellings) based on information provided by Children's Services, although this is a starting point and there is flexibility within these ratings, depending upon the quality of sites and the circumstances of individual schools." As a methodology, this statement is distinctly insufficient and places undue and unjustified emphasis on unpublished advice from 'Children's Services'. With the Booklet stating that 'it is considered that ... approximately 20-50 new homes are appropriate' for Horsford, it is assumed that the village has been rated 'amber' "based on information provided by Children's Services'.</p> <p>There is no other justification as to how the GNDP has arrived at the figure of '20-50' for Horsford.</p>			
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### Horsford, Felthorpe and Haveringland Cluster – Preferred Site

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0264 Dog Lane, Horsford (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 2 Comments

<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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
MDPC Town Planning on behalf of Carl Palmer & Wellington	Object	<p>This representation is submitted in support of unreasonable allocation site GNLP0283 and seeks to highlight how GNLP0283 should be considered as a preferable site to the currently proposed preferred allocation GNLP0264 – explored in the ‘Connectivity Assessment’. The representation does not object to the development of GNLP0264 as such, more that it should not be considered as favourably.</p> <p>Negatives of site GNLP0264 are the industrial use which will remain adjacent to the site, possibility of contamination from the current industrial use, flood risk, restrictions on acceptable vehicle access</p>	Issues raised in representation promoting consideration of GNLP0283 in place of this preferred allocation	<p>The benefits of developing site 0264, a brownfield site, are considered to outweigh the potential negative issues.</p> <p>This representation is asking for site GNLP0283 to be considered as an alternative site for allocation. A revision to site</p>	None

		location and requirement for segregation of vehicles between the residential and industrial use and higher accident record in the local area compared to area of site GNLP0283.		GNLP0283 was submitted through the Reg 18C consultation but was not thought to be suitable due to the site not being well located, distance from service and facilities. Planning permission on the site has recently been refused, although an appeal has been lodged.	
Anglian Water Services Ltd	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design  Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None
Environment Agency (Eastern Region)	Comment	Site intersects with water course, It should undertake a WFD compliance assessment for the watercourse receiving the runoff, maintain a buffer of 20 m between the watercourse and gardens and secure opportunities for riparian habitat restoration.	Requires WFD compliance assessment	Noted, add additional requirement to policy	Add policy requirement to read 'The site intersects with a water course. A WFD compliance assessment for the watercourse receiving the

					runoff will be needed. A buffer of 20m between the watercourse and gardens will need to be maintained and opportunities for riparian habitat restoration will need to be secured'.
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**Horsford, Felthorpe and Haveringland Cluster – Unreasonable Sites**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0059 Bramley Lakes, Dog Lane, Horsford (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of public	Support	<p>Comments in support of site being unreasonable:</p> <p>Whilst Dog Lane is able to cope with the vehicular traffic it sees now, I do not believe there is scope for larger developments including commercial. This would be to the detriment of a small and winding lane. Bramley Lakes is situated at the far end of Dog lane, so all other properties would need to be passed in order to reach the destination. Moreover, the junction with the B1149 really should not be seeing any further traffic given the through traffic the B1149 currently carries and will carry in the future.</p>		<p>Comments noted.</p> <p>No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.</p>	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0151 Pronto Joinery, Dog Lane, Horsford (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of public	Support	<p>Comments in support of site being unreasonable:</p> <p>Dog lane cannot support any further housing due to the constraints of the lane itself and the junction with the B1149. Dog Lane has to be carefully negotiated as it is. It is single track traffic only in some places. Give and take is a must on this lane. Whilst the traffic it carries now is within reason, any further developments along Dog Lane would certainly be to the detriment of the existing residents, not to mention add congestion at the small junction with the B1149. The B1149 has seen a vast increase in traffic already</p>		<p>Comments noted.</p> <p>No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.</p>	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0153 Pronto Joinery, Dog Lane, Horsford (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of public	Support	<p>Comments in support of site being unreasonable:</p> <p>Dog lane cannot support any further housing due to the constraints of the lane itself and the junction with the B1149. Dog Lane has to be carefully negotiated as it is. It is single track traffic only in some places. Give and take is a must on this lane. Whilst the traffic it carries now is within reason, any further developments along Dog Lane would certainly be to the detriment of the existing residents, not to mention add congestion at the small junction with the B1149. The B1149 has seen a vast increase in traffic already.</p>		<p>Comments noted.</p> <p>No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.</p>	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0192 Arable Land, Dog Lane, Horsford (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of public	Support	<p>Comments in support of site being unreasonable:</p> <p>This land is also far from ideal for a residential development. My previous comments on Dog Lane stand on this proposal too. Dog Lane is not in a position to carry further traffic. It is a small lane and vehicles would have to pass a large number of the properties on Dog lane to reach this development. It just isn't feasible. There is also no safe walking route on Dog lane itself. It could pose a danger to pedestrians. The junction with the B1149 is not sufficient for this development.</p>		<p>Comments noted.</p> <p>No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.</p>	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0283 Land off Holt Road, Horsford (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of public	Support	<p>Comments in support of site being unreasonable:</p> <p>Serious concerns on vehicular access to this proposed development. The roundabout at the B1149/Brewery Lane junction carries most of the through traffic to the NDR. Further development in this area will add to an already heavily used route. With the implementation of the NDR, the through traffic that the B1149 carries was grossly underestimated resulting in regular tail backs through Horsford. Where once there were 3 exits at the south end of the village, there is now only 1. Additional housing here will only exacerbate the problem.</p>		Comments noted	None
MDPC Town Planning on	Object	Comments objecting to the site being considered unreasonable	Representation recommends review of	A revised site for GNLP0283 was	None

<p>behalf of Carl Palmer &amp; Wellington</p>		<p>This representation submits includes a comprehensive comparison with other sites in Horsford, to demonstrate how this site should be considered as a preferred allocation.</p> <p>GNLP0283 can offer wider community benefits, higher level of affordable home provision, better transport links, better and less restrictive access options and lower accident records in the vicinity of the site when compared to other sites in Horsford.</p> <p>The representation cites a key advantage site GNLP0283 has over the majority of the sites listed for comparison in the representation's 'Connectivity Assessment' is that the site has good connectivity for various modes of travel, with good vehicle links to the Northern Broadway, which would not involve vehicle travel through the village to connect to the strategic road network; whereas the other sites involve travel through the village before connecting with the strategic road network.</p> <p>The promotion of this site through the application process is well documented and the outcome through negotiation has arrived at a scheme which in overall terms complies with all policy</p>	<p>this site in comparison to other sites in Horsford based on supporting evidence submitted.</p> <p>Horsford is the 9<sup>th</sup> largest settlement in the plan area – as such should be regarded as a Key Service Centre &amp; facilitate a higher level of growth than currently proposed.</p>	<p>submitted through the Reg 18C consultation and further discussions have taken place regarding this site. The conclusions being that it is not a particularly well located site, distant from services and facilities in the village. Planning permission (20181408) for 47 dwellings has been refused and an appeal lodged.</p> <p>Discussions regarding Horsford identification as a village cluster will be dealt with under Policy 7.4 – Village Clusters</p>	
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		<p>requirements. However the site remains outside of the settlement boundary.</p> <p>It is considered that Horsford should be identified as a Key Service Centre (or at the very least a Service Village as at present) to secure a sensible level of growth reflecting the realistic status of the village and therefore a contributor towards an effective local plan capable of delivering housing and achieving relevant strategic objectives.</p> <p>For the reasons set out in this consultation response and demonstrated through the planning application that has been submitted, the reasons for considering the site to be unreasonable are not justified and do not provide a sound basis for rejecting the site for allocation.</p>			
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0332R Reepham Road/ Cromer Road, Horsford (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 2 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Norwich City Community Sports Foundation	Object	<p>Norwich City Sports Community Foundation and The Nest have developed a brand-new state-of-the-art community hub at Horsford (The NEST) directly adjacent to the proposed sites for development (GNLP0332R and GNLP0334R).</p> <p>We firmly believe in the need for local services, facilities and infrastructure projects to be built alongside housing developments to support communities. The Nest Community Hub has gained investment of over £6.2million to build new community facilities that includes residential bunk boxes, high quality grass football pitches, 3G artificial pitch, multi-use classrooms / fitness spaces, IT suite, café, changing rooms and a disability changing places. The Foundation also</p>	The assessment of the site as 'unreasonable for allocation' is considered to negatively impact the brand new community hub at Horsford.	<p>Further discussions have taken place regarding this site following comments raised through the Reg 18C consultation.</p> <p>The view on the potential of the site has not changed. Development in this location would increase the urban sprawl of Hellesdon further into open countryside with subsequent</p>	

		<p>continues to investigate further opportunities to encourage the local community to participate in health and wellbeing activities for all age groups and abilities addressing local issues and need.</p> <p>The Foundation has been in discussions with the adjacent landowners with a view to working in partnership to expand and enhance the recreational community open space facilities on adjacent land. Development of these sites would enable the Nest to provide more activities, link with local schools and increase access to the Nest for the residents of Hellesdon and other areas. The Nest are keen to see improved footpaths and cycleway links provided to the Community Hub alongside working with local agencies to provide other essential services.</p> <p>We are therefore disappointed to note that the draft local plan Regulation 18 Stage C has identified the sites as 'unreasonable'. In our view, the Local Plan should be modified to include sites GNLP0332R and GNLP0334R as preferred allocations for development.</p>		<p>landscape impacts. There continue to be noise and safety concerns regarding proximity to the airport and the location of the site under the flight path. Significant highway improvements would also be necessary.</p> <p>The level of facilities provided by The Nest Community Hub is recognised but that does not necessarily mean that the adjacent site automatically becomes suitable for housing development, all factors need to be taken into consideration when assessing the suitability of the site.</p>	
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<p>CODE Development Planners Ltd</p>	<p>Object</p>	<p>The representation sets out the landowner's response to what they consider to be an inadequate assessment of the suitability of the sites for development and the conclusion that the sites are 'unreasonable' for development.</p> <p>"We do not believe that the sites have been robustly assessed or indeed assessed on the same basis as other sites. The conclusions of the draft plan to allocate certain sites and not the proposed sites 0332R and 0334R have not been justified as required by the NPPF.</p> <p>As a consequence, we believe there is a significant danger that the Plan will be considered to be not sound. In addition, in the case of some of the Reasonable Alternative sites identified in the draft plan there is less than convincing evidence to confirm that these sites are justified or deliverable within the plan period. As such the Partnership's strategy is likely to be not effective, placing further doubt on the plan as a whole being sound. (Detailed explanation is provided within rep to support this position)</p>	<p>Site assessment process is not in accordance with NPPF &amp; PPG, is not based in appropriate evidence, is inconsistent and is therefore unsound.</p> <p>Comprehensive evidence submitted in support review of site assessment, consideration that this should be regarded as a preferred allocation.</p> <p>It is recommended that without evidence to support the allocation of 11.08 hectares of land for recreational open space on land at Reepham Road without additional residential development, the proposal to simply carry forward the allocation of HEL4 is deleted.</p>	<p>Further discussions have taken place regarding this site following comments raised through the Reg 18C consultation.</p> <p>The original assessment of the site is set out in the Horsford assessment booklet and the view on the potential of the site has not changed. Development in this location would increase the urban sprawl of Hellesdon further into open countryside with subsequent landscape impacts. There continue to be noise and safety concerns regarding proximity to the</p>	<p>None</p>
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		<p>The landowner invites further discussion of the issues raised in their representation and review of the proposals (including removal/reduction in employment area if necessary).</p> <p>Support Policy 1's general strategy which seeks to distribute housing growth in line with a settlement hierarchy placing the Norwich urban area including urban extensions in the Norwich fringe parishes at the highest level.</p> <p>Object to the allocation of at least 1400 homes on site GNLP0337 (Taverham), identification of sites GNLP0581 and GNLP2043 at Costessey as reasonable alternatives to be brought forward should this prove to be required due to low delivery of allocated sites and identification of sites GNLP332R and GNLP334R as 'unreasonable'. In our view these conclusions have not been justified as required by paragraph 35 of the NNPF. Sites GNLP0581 and GNLP2043 cannot be categorised as being reasonably deliverable. Given the scale of proposed allocations involved, being a large proportion of the new allocations to meet housing requirements in the plan area, the issues raised are fundamental to the plan's function and objective. As such the approach and</p>		<p>airport and the location of the site under the flight path.</p> <p>Significant highway improvements would also be needed if sites GNLP0332R and 0334R were to be developed, and a Transport Assessment would be required. There is no safe walking/cycling route to the existing catchment primary school and it is not clear if a new school is to be provided on site.</p> <p>Both sites GNLP0332R and 0334R have been subject to the same process of assessment as all the other sites promoted,</p>	
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		<p>conclusions fail to demonstrate that the plan as a whole is justified and effective.</p> <p>Note the importance of identifying sufficient contingency sites given the specific issues related to the delivery of particularly complex sites in the East Norwich Strategic Regeneration Area. Policy7 confirms the concentration of a further large proportion of the plan's new allocations (1,220) on three complex sites in the East Norwich Strategic Regeneration Area in addition to an existing as yet undelivered commitment (780).</p> <p>Object to the allocation of 11.08 hectares of land at Reepham Road for recreational open space. The allocation has not been justified by evidence.</p> <p><b>RECOMMENDED MODIFICATIONS TO POLICY</b></p> <p>It is recommended that a robust and consistent assessment with appropriately proportionate evidence is undertaken to assess the suitability of sites GNLP0332R and GNLP0334R. Given the assessments already prepared by the landowner's team and appended to these representations the evidence to allocate both sites is compelling.</p>			
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		<p>The submitted illustrative development framework plan suggests a possible form of development involving c600-700 dwellings on GNL0332R and c250-300 dwellings on GNL0334R both together with substantial additional recreational open space and green infrastructure. Further liaison with the Partnership would develop more detail associated with site expectations to be included in a policy which allocates the sites.</p> <p>It is recommended that without evidence to support the allocation of 11.08 hectares of land for recreational open space on land at Reephram Road without additional residential development, the proposal to simply carry forward the allocation of HEL4 is deleted.</p>			
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0334R Reepham Road/ Cromer Road, Horsford (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 2 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Norwich City Community Sports Foundation	Object	Norwich City Sports Community Foundation and The Nest have developed a brand-new state-of-the-art community hub at Horsford (The NEST) directly adjacent to the proposed sites for development (GNLP0332R and GNLP0334R). We firmly believe in the need for local services, facilities and infrastructure projects to be built alongside housing developments to support communities. The Nest Community Hub has gained investment of over £6.2million to build new community facilities that includes residential bunk boxes, high quality grass football pitches, 3G artificial pitch, multi-use classrooms / fitness spaces, IT suite, café, changing rooms and a disability changing places. The Foundation also continues to investigate further	The assessment of the site as 'unreasonable for allocation' is considered to negatively impact the brand new community hub at Horsford.	Further discussions have taken place regarding this site following comments raised through the Reg 18C consultation.  The view on the potential of the site has not changed. Development in this location would increase the urban sprawl of Hellesdon further into open countryside with subsequent	

		<p>opportunities to encourage the local community to participate in health and wellbeing activities for all age groups and abilities addressing local issues and need.</p> <p>The Foundation has been in discussions with the adjacent landowners with a view to working in partnership to expand and enhance the recreational community open space facilities on adjacent land. Development of these sites would enable the Nest to provide more activities, link with local schools and increase access to the Nest for the residents of Hellesdon and other areas. The Nest are keen to see improved footpaths and cycleway links provided to the Community Hub alongside working with local agencies to provide other essential services.</p> <p>We are therefore disappointed to note that the draft local plan Regulation 18 Stage C has identified the sites as 'unreasonable'. In our view, the Local Plan should be modified to include sites GNLP0332R and GNLP0334R as preferred allocations for development.</p>		<p>landscape impacts. There continue to be noise and safety concerns regarding proximity to the airport and the location of the site under the flight path. Significant highway improvements would also be necessary.</p> <p>The level of facilities provided by The Nest Community Hub is recognised but that does not necessarily mean that the adjacent site automatically becomes suitable for housing development, all factors need to be taken into consideration when assessing the suitability of the site.</p>	
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<p>CODE Development Planners Ltd</p>	<p>Object</p>	<p>The representation sets out the landowner's response to what they consider to be an inadequate assessment of the suitability of the sites for development and the conclusion that the sites are 'unreasonable' for development.</p> <p>"We do not believe that the sites have been robustly assessed or indeed assessed on the same basis as other sites. The conclusions of the draft plan to allocate certain sites and not the proposed sites 0332R and 0334R have not been justified as required by the NPPF.</p> <p>As a consequence, we believe there is a significant danger that the Plan will be considered to be not sound. In addition, in the case of some of the Reasonable Alternative sites identified in the draft plan there is less than convincing evidence to confirm that these sites are justified or deliverable within the plan period. As such the Partnership's strategy is likely to be not effective, placing further doubt on the plan as a whole being sound. (Detailed explanation is provided within rep to support this position)</p> <p>The landowner invites further discussion of the issues raised in their</p>	<p>Site assessment process is not in accordance with NPPF &amp; PPG, is not based in appropriate evidence, is inconsistent and is therefore unsound.</p> <p>Comprehensive evidence submitted in support review of site assessment, consideration that this should be regarded as a preferred allocation.</p> <p>It is recommended that without evidence to support the allocation of 11.08 hectares of land for recreational open space on land at Reepham Road without additional residential development, the proposal to simply carry forward the allocation of HEL4 is deleted.</p>	<p>Further discussions have taken place regarding this site following comments raised through the Reg 18C consultation.</p> <p>The original assessment of the site is set out in the Horsford assessment booklet and the view on the potential of the site has not changed. Development in this location would increase the urban sprawl of Hellesdon further into open countryside with subsequent landscape impacts. There continue to be noise and safety concerns regarding proximity to the</p>	<p>None</p>
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		<p>representation and review of the proposals (including removal/reduction in employment area if necessary).</p> <p>Support Policy 1's general strategy which seeks to distribute housing growth in line with a settlement hierarchy placing the Norwich urban area including urban extensions in the Norwich fringe parishes at the highest level.</p> <p>Object to the allocation of at least 1400 homes on site GNLP0337 (Taverham), identification of sites GNLP0581 and GNLP2043 at Costessey as reasonable alternatives to be brought forward should this prove to be required due to low delivery of allocated sites and identification of sites GNLP332R and GNLP334R as 'unreasonable'. In our view these conclusions have not been justified as required by paragraph 35 of the NPPF. Sites GNLP0581 and GNLP2043 cannot be categorised as being reasonably deliverable. Given the scale of proposed allocations involved, being a large proportion of the new allocations to meet housing requirements in the plan area, the issues raised are fundamental to the plan's function and objective. As such the approach and conclusions fail to demonstrate that the plan as a whole is justified and effective.</p>		<p>airport and the location of the site under the flight path.</p> <p>Significant highway improvements would also be needed if sites GNLP0332R and 0334R were to be developed, and a Transport Assessment would be required. There is no safe walking/cycling route to the existing catchment primary school and it is not clear if a new school is to be provided on site.</p> <p>Both sites GNLP0332R and 0334R have been subject to the same process of assessment as all the other sites promoted,</p>	
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	<p>Note the importance of identifying sufficient contingency sites given the specific issues related to the delivery of particularly complex sites in the East Norwich Strategic Regeneration Area. Policy7 confirms the concentration of a further large proportion of the plan's new allocations (1,220) on three complex sites in the East Norwich Strategic Regeneration Area in addition to an existing as yet undelivered commitment (780).</p> <p>Object to the allocation of 11.08 hectares of land at Reepham Road for recreational open space. The allocation has not been justified by evidence.</p> <p><b>RECOMMENDED MODIFICATIONS TO POLICY</b></p> <p>It is recommended that a robust and consistent assessment with appropriately proportionate evidence is undertaken to assess the suitability of sites GNLP0332R and GNLP0334R. Given the assessments already prepared by the landowner's team and appended to these representations the evidence to allocate both sites is compelling.</p> <p>The submitted illustrative development framework plan suggests a possible form of development involving c600-</p>			
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	<p>700 dwellings on GNL0332R and c250-300 dwellings on GNL0334R both together with substantial additional recreational open space and green infrastructure. Further liaison with the Partnership would develop more detail associated with site expectations to be included in a policy which allocates the sites.</p> <p>It is recommended that without evidence to support the allocation of 11.08 hectares of land for recreational open space on land at Reephram Road without additional residential development, the proposal to simply carry forward the allocation of HEL4 is deleted.</p>			
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0419 Land at Holly Lane/ Reepham Road, Horsford (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of public	Support	<p>Comments in support of site being unreasonable:</p> <p>This site is completely unreasonable for a development of this scale. It would have a huge impact on the countryside and landscape. This is not acceptable in my eyes. Countryside is vanishing at a vast rate to the detriment of wildlife. It is not either part of Hellesdon or Horsford and is therefore a standalone proposal with no safe walking passage to anywhere. An implementation of a development of this size is completely ludicrous. I further believe NDR traffic needs slowing down as it is a dangerous carriageway. This site runs parallel with it.</p>		<p>Comments noted.</p> <p>No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.</p>	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0422 Land at Lodge Farm, Horsford (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of public	Support	<p>Comments in support of site being unreasonable:</p> <p>This land is behind the Church Rooms/new bungalow development. The only access near to this is opposite the Co-op food store. There is no other access along that stretch of the B1149. This location is completely unsuitable for development. The B1149 is pushed to its maximum now. Should there be an alternative proposed access, this too would be completely unsuitable. I note that the former garage is now vacant? Would this be a proposed entrance? Either way, this proposal is unsuitable for Horsford.</p>	Access issues related to the site – existing access is insufficient, new access would be inappropriate.	Comments noted	None

<p>Bidwells for Mrs Rachel Foley</p>	<p>Object</p>	<p>Comments objecting to the site being unreasonable:</p> <p>Given the suitability of the village cluster, it is surprising that only one site for 30-40 dwellings has been identified, despite the commentary confirming that approximately 20-50 new homes are appropriate for the cluster. Therefore, allocating GNLP0422 will help achieve the GNLP's target of 9% of total housing growth being within village clusters (480 dwellings in Broadland).</p> <p>it is sought to amend the red line boundary, alongside reducing the site area and quantum of development proposed on the site. More specifically, the village cluster assessment booklet confirms that only one preferred allocation has been identified in the village for 30 - 40 dwellings, despite development of 20 – 50 dwellings being appropriate for the cluster. Accordingly, this leaves a surplus of between 10 – 20 dwellings capacity for allocation in the village cluster.</p> <p>On this basis, it is sought to reduce the quantum of development proposed on the site to 10 – 20 dwellings, in order to accommodate this surplus. In reducing the quantum of development proposed to 10 – 20 dwellings, it is sought to both</p>	<p>Proposed revision of quantum of homes to address shortfall in Horsford's allocation potential. (reduction in proposed site allocation area)</p> <p>Evidence supporting how access issues can be overcome.</p> <p>Evidence supporting deliverability within the first 5 years of the plan.</p>	<p>A revised site proposal has been submitted through the Reg 18C consultation to reduce the site area to accommodate in the region of 10-20 dwellings, that could potentially make up the shortfall in the requirement for the cluster.</p> <p>The original site was considered to be unreasonable on access grounds so highway comments have been sought on the revised proposal. The local highway authority have stated that the access proposals for the revised site still present some concerns in terms of achieving adequate visibility.</p>	<p>None</p>
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		<p>amend the red line boundary and reduce the site area to 0.86 ha.</p> <p>One of the reasons for the site being identified as being unreasonable was due to the convoluted access route into the site. As a result, the red line of the site has been amended, to include land to the north and west of the access route. In parallel, this helps to create a logical extension to Horsford whilst addressing concerns over convoluted access route. (See site plan submitted with rep). An Indicative Access Road General Arrangement Plan has been submitted to support overcoming highways access issues.</p> <p>A deliverability programme estimates that the site could deliver 20 homes by 2024 – within the first 5 years of the plan.</p>		<p>The site may be acceptable if limited to 25 dwellings and serviced via a shared surface with dropped kerb access at Holt Road. Visibility needs to be in accordance with observed speed and drawn on topographical survey, not an OS base map.</p> <p>Densities have been recalculated across the village clusters as a whole to make sure they are in line with the indicative minimum of 25dph in Policy 2. Upon re calculation the preferred site GNLP0264 can accommodate approximately 45 dwellings at 25dph so there is</p>	
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				considered to be no need to allocate any further sites for housing in the Horsford cluster.	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0423 Land at Mill Lane, Horsford (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the public	Comment	I am slightly confused at the current/proposed allocation. Already committed to 8 dwellings, which is too much for a lane as small as this given the development it has already seen. Not to mention the school that is located at Mill Lane. I would have thought that any further proposed dwellings ( I don't know it its 10 on top of the 8 already allocated, or make it up to 10 by adding 2 more?) Regardless, this lane is not designed to carry any further traffic than it already does. Historically there have been major issues with school traffic.		This site was not considered to be reasonable for allocation at the Reg 18C consultation as it is unlikely to meet the minimum 12-15 dwellings requirement for allocation and it is already committed for development of 8 dwellings under planning application reference 20170707. This view has not changed.	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNL0479 Land east of Holt Road, Horsford (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>DRAFT GNL0 RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of public	Support	<p>Comments in support of site being unreasonable:</p> <p>There is already substantial development at this location, and, you have quite rightly deemed this site as unreasonable for more. My fear is that this will be overridden at some point for this extra housing which will all feed onto Crown Hill, thus causing further congestion to the B1149. The neighbourhood plan in Horsford has not exactly been adhered to so far with "extra" housing allowance.</p>		<p>Comments noted.</p> <p>No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.</p>	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0519 Land to the east of Holt Road, Horsford (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Savills	Comment	<p>In summary, in your assessment of sites, the site that you refer to as GNLP0519, is stated as being 'promoted for' 266 dws. Planning permission ref. 20161770 – the permission referenced in your assessment, that has now been implemented, permitted 259 dws. However, the site is now subject to a subsequent resolution to grant planning permission ref. 20191999 for 304 dws (subject to completion of the S106 Agreement).</p> <p>Your assessment states that the site is “not considered suitable for allocation as despite being a reasonable location for development it already had planning permission at the base date of the plan in 2018 and is currently under construction”.</p>	Requested revision to numbers proposed on site from 266 to 304	Change in numbers on site noted. This site is not proposed to be allocated so this matter does not affect the Regulation 19 version of the plan.	None

		<p>Your reply advises that you have stated 266 dwellings as that is the number we included in our original site submission to the GNLP “back in 2016”, and that you haven’t updated the number of dwellings as we haven’t requested any change.</p> <p>To avoid any further confusion, on behalf of our client – , I should be grateful if you would amend the figure of 266 dwellings to 304 dwellings to align with the most-recent resolution to grant permission.</p>			
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0578 Hilltop Farm, Church Street, Horsford (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the public	Support	<p>Comments in support of site being unreasonable:</p> <p>This land is situated on Church Street, which, as a small country lane is not designed for access onto a residential housing site. The A140 would be the obvious choice for access, however, the traffic carried on this road has increased dramatically, moreover the junction with it at Church Street is unsafe as it stands now. Both the B1149 and the A140 are already heavily congested at peak times resulting in unacceptable tail backs. B1149 traffic tails back through Horsford which is frustrating at best for village residents. Not to mention idle engine pollution.</p>		<p>Comments noted.</p> <p>No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.</p>	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP1008 Home Farm, Holt Road, Horsford (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the public	Support	<p>Comments in support of site being unreasonable:</p> <p>This land sits between the A140 Cromer road and the B1149 Holt Road. Developing an "unknown" number of houses at this site would result in the loss of more precious countryside and potentially add to an already heavily congested A140. Similarly, the B1149 would see an increase in traffic should access to this site lead from it. The through traffic that the B1149 carries was, I believe grossly underestimated when implementing the NDR. The feeder roads onto the NDR (from all directions) are not able to cope effectively as it stands now.</p>		<p>Comments noted.</p> <p>No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.</p>	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2009 Swanington Lane, Felthorpe (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the public	Support	<p>I support the draft plan's conclusion, however reasons extend beyond lack of access to Horsford Primary School.</p> <p>Felthorpe has poor access to services with shops, schools and doctors over two miles away. It has limited employment, poor connectivity, poor infrastructure (no gas, street lights, narrow pavements and sewage capacity problems) so the village is unsuitable for development.</p> <p>The site itself is likely unviable, suffering from poor site access and links to the main village. It may also impact on nearby SSSI, local archaeology and suffer from surface water flooding.</p>		<p>Comments noted.</p> <p>No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.</p>	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2012 Brand's Lane, Felthorpe (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the public	Support	<p>I support the draft plan's conclusion, however reasons extend beyond lack of access to Horsford Primary School.</p> <p>Felthorpe has poor access to services with shops, schools and doctors over two miles away. It has limited employment, poor connectivity, poor infrastructure (no gas, street lights, narrow pavements and sewage capacity problems) so the village is unsuitable for development.</p> <p>The site itself is likely unviable, suffering from poor site access and links to the main village.</p>		<p>Comments noted.</p> <p>No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.</p>	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2133 Glebe Farm North, Horsford (Unreasonable Non-residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the public	Support	<p>Comment in support of site being unreasonable:</p> <p>This piece of land is far too big to support any employment led development given the current roads surrounding it. The feeder roads onto the NDR struggle now. This would increase that tenfold.</p>		<p>Comments noted.</p> <p>No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.</p>	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2160 Green Lane, Horsford (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Savills for Barratt David Wilson Homes	Object	<p>Representations submitted to previous consultations have addressed areas which require mitigation as flagged up in the HELAA (additional evidence supporting this has been submitted with the rep).</p> <p>The HELAA states that it will need to be reviewed periodically, however – no review has been undertaken.</p> <p>The assessment regarding access has been inaccurately produced &amp; requires review in accordance with evidence submitted in rep.</p> <p>No evidence has been provided by GNLP to provide clarification of the</p>	<p>HELAA has not been appropriately reviewed and updated.</p> <p>Previous submissions have addressed items that require mitigation in the HELAA</p> <p>Access issues can be addressed.</p> <p>GNLP review of alternative site areas is not sufficiently evidenced &amp; is contrary to the findings of Savills.</p>	<p>Further discussions have taken place regarding this site in relation to this representation. The view continues to be that this site is too large for the needs of the Horsford cluster. It is recognised that a smaller part of the site could be considered but even then this is not thought to be</p>	None

		<p>alternative site sizes that have been considered as part of the assessment exercise (despite developer's previously stating that they would be willing to meet to discuss the site).</p> <p>Barratt David Wilson has a good track record of delivery, this site could commence within the first five years of the plan and deliver into the second five years of the plan at an estimated rate of 100 homes per year.</p>	<p>Site can be commenced in first five years of plan, and is deliverable in second 5 years of plan.</p>	<p>the right place for more housing development in Horsford. The preferred site is more centrally located and has the benefit of being a brownfield site.</p> <p>The local highway authority have confirmed that further development would require additional access to the B1149 and cannot be serviced via phase 2 and the existing roundabout. The proposed access strategy services the whole development via the existing roundabout which is not acceptable. Vehicular access could be considered via Green lane and</p>	
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				Mill Lane with appropriate improvements	
Savills for Barratt David Wilson Homes	Comment	Please note that we have previously promoted the site as having the capacity to accommodate 500 new homes, not the 600 that has been recorded and is referenced in the Sites Assessment Booklet. However, following further technical work, the site is now being promoted for c. 350 new homes, together with additional recreation facilities, as outlined in the Vision Document that accompanies these representations.	Update required to the proposed quantum of housing on site. This should be revised to 350 homes.	Noted	None

## HORSHAM AND NEWTON ST FAITH CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	HORSHAM AND NEWTON ST FAITH OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	82
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	45 Support, 22 Object, 15 Comment

The Horsham and Newton St Faith Cluster has 3 c/f allocations (HNF1, HNF2/0466R, HNF3), 1 preferred site (0125), 0 reasonable alternatives and 10 sites which are judged to be unreasonable.

### Main issues:

- Preferred Site GNLP0125. Historic England suggest the need for a detailed heritage impact assessment and the consideration of the Conservation Area in the policy wording
- Carried Forward Allocation HNF1. Historic England suggest further investigation of heritage impacts and rewording of policy to take nearby listed buildings into account
- Carried Forward Allocation HNF3. Revised boundary to be considered, Norfolk Wildlife Trust suggest rewording policy to take account of nearby County Wildlife Site. Historic England suggest reviewing the site in terms of historic environment, particularly proximity to St Faith Priory.
- Unreasonable Site GNLP0482 – revisit HELAA, consider Utilities Statement and Landscape Assessment which have been submitted.
- Unreasonable Site GNLP1054 – revisit HELAA, consider reduced number of dwellings
- Unreasonable Sites GNLP2021, 3027 and 3028 – additional land to be considered

Sites not commented on through the consultation:

Unreasonable Residential Sites

- GNLP0085
- GNLP0246
- GNLP0471

## Horsham and Newton St Faith Cluster – Preferred Site

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

		<p>detailed Heritage Impact Assessment be undertaken to assess the impact of the proposed development upon the significance of these heritage assets, to establish the suitability or otherwise of the site and to establish appropriate mitigation and enhancement should the site be found suitable. If the site is found suitable, the findings of the HIA should then inform the policy wording.</p> <p>The policy wording should also reference the conservation area.</p>		including a Heritage Impact Assessment	the significance of the grade I listed Church of St Mary and St Andrew, the scheduled monument St Faith Priory and the conservation area, including any contribution made to that significance by setting. This includes but is not limited to a sensitive design and layout. Due to the sensitivities of this site a Heritage Impact Assessment will be required'.
Members of the public - various	Object	<p>Issues Including:</p> <ul style="list-style-type: none"> <li>• Local amenities/infrastructure already stretched</li> <li>• Traffic already challenging</li> </ul>	Further investigation of heritage, landscape and conservation impacts	Comments noted. Further discussions have taken place regarding the site and comments	None

		<ul style="list-style-type: none"> <li>• Joining up with the HNF2 area – losing semi-rural feel of area</li> <li>• Unsuitable access – dangerous for existing junction, visibility issues with existing tree belt</li> <li>• The culvert in West land needs to be kept open for flood risk</li> <li>• School Capacity</li> <li>• Sewage and drainage concerns</li> <li>• Grade II listed building opposite the church, near site. Church is also a listed building</li> <li>• Site would remove rural buffer between village, an A road and employment development to the south.</li> <li>• Landscape Issues</li> <li>• Lack of biodiversity benefits</li> <li>• Detailed assessment of site should be made upon a reduced area</li> </ul>		submitted during the Reg 18C consultation and it is still supported as the most appropriate site in the cluster for development.	
Member of the Public	Comment	<ul style="list-style-type: none"> <li>• Concerns regarding conservation area – very close to site entrance, suggests using land as a children’s play area</li> </ul>	Further investigation of conservation impacts	Comments noted. Further discussions have taken place regarding the site and comments	None

				submitted during the Reg 18C consultation and it is still supported as the most appropriate site in the cluster for development although it is recognised that the design and layout of the site is very important to minimise adverse impact on nearby heritage assets.	
Bidwells (Site Promoter)	Support	<p>Sustainable location for growth, benefitting from a range of services and amenities, including a primary school, village hall, local shop and public transport provision.</p> <p>The site is suitable, available, achievable and viable, and is deliverable within the first five years of the plan period. There are no constraints which would affect the suitability of the site for residential development. We have demonstrated the suitability</p>	Consider revised policy wording	A revised site proposal was submitted through the Reg 18C consultation to increase the size of site slightly to accommodate up to 50 dwellings. Further consideration has been given to this proposal and it is considered to be acceptable as there is capacity in the cluster and the proximity of	Amend the site boundary as submitted to increase allocation to 50 dwellings

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

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

				than originally proposed in the period up to 2038.	
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## Horsham and Newton St Faith Cluster – Carried Forward Allocations

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy HNF1 Land east of Manor Road, Newton St Faith (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 3 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Historic England	Object	Whilst there are no designated heritage assets within the site boundary, the grade II listed Middle Farmhouse and Granary lie to the east of the site. Any development of the site has the potential to impact upon the setting of these listed buildings. There is currently no mention of the listed building in the policy or supporting text. Landscaping along the eastern edge of the site would help to mitigate the	Further investigation of heritage impacts  Revisit policy to take in consideration listed building	It is accepted that the policy should acknowledge the potential for harm to the heritage assets and the requirement for measures to address this.	Add a policy requirement to read: 'Any development must conserve and enhance the significance of the grade II listed Middle Farmhouse and Granary to the east of the site, including any contribution made to that

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

				undeliverable so it is carried forward unchanged into the GNLP for 60 dwellings.	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy HNF2/Site GNLP0466R Land east of the A140 and north of Norwich International Airport, Horsham St Faith (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	5
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the Public	Object	<p>Issues raised:</p> <ul style="list-style-type: none"> <li>• Traffic impacts at NDR junction and traffic congestion.</li> <li>• Vehicles use HSF as a bypass to NDR</li> <li>• Loss of Semi-Rural feel</li> </ul>	Consider traffic impacts on surrounding area	The principle of the HNF2 allocation has already been agreed through the Broadland Local Plan. No evidence has been submitted to suggest it is undeliverable so it is carried forward unchanged into the GNLP for employment use. The policy does include the need for highway	

				improvements to deal with the traffic generated by the development.	
Member of the Public – 2 people	Comment	<p>Issues raised:</p> <ul style="list-style-type: none"> <li>• Existing tree belt along boundary has been cut, diminishing the landscape</li> <li>• Any development should enhance landscape with a tree belt to act as wildlife corridor, sound and pollution barrier</li> <li>• Loss of village surroundings</li> <li>• Concerns regarding access improvements</li> </ul>	Consider landscape and conservation impacts	The principle of the HNF2 allocation has already been agreed through the Broadland Local Plan. No evidence has been submitted to suggest it is undeliverable so it is carried forward unchanged into the GNLP for employment use. The policy does include the need for landscaping and highway improvements to address the impacts of the development..	
GP Planning Ltd (site promoter)	Support	<p>Supports retention of HNF2 and the change of wording in policy to reflect benefits of proximity to airport.</p> <p>Strongly suggest amendments to the policy wording to reflect the</p>	Consider policy wording to reflect Civil Aviation Authority Guidance	Add appropriate wording to the policy to reflect Civil Aviation Authority Guidance.	Add additional words to policy requirement about landscaping to read: 'Civil Aviation Authority

		<p>primacy of the CAA guidance to assist in minimising aviation hazards posed by wildlife.</p> <p>Notes accompanying the policy refer to the site being promoted with a larger boundary. This was done to reflect extant policy Guidelines for Development that accepts a slightly larger area for development incorporating land that was safeguarded for Broadland Northway. To avoid future confusion, the landowners and promoters would strongly suggest that the allocation boundary is extended to reflect the full extent of anticipated development.</p>	<p>Consider boundary change to reflect full extent anticipated</p>	<p>No amendments to the boundary of the carried forward allocation are proposed</p>	<p>guidance should be followed to ensure aviation hazards posed by wildlife are minimised.</p>
Anglian Water	Comment	<p>No reference to water efficiency forming part of the design unlike other allocation policies. See comments on Policy 2</p>	<p>Consistent policy approach to water efficiency needed</p>	<p>This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy</p>	<p>None</p>

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy HNF3 Land at Abbey Farm Commercial, Horsham St Faith (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	6
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 Object, 5 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the public	Comment	Would like to see full impact assessment on traffic, archaeology, and confirmation that existing property at Abbey Farm is fully occupied and active, before extension into new development		The principle of the HNF3 allocation has already been agreed through the Broadland Local Plan. No evidence has been submitted to suggest it is undeliverable so it is carried forward unchanged into the GNLP for employment use.	None
Lawson Planning Partnership (Site Promoter) and	Support	<ul style="list-style-type: none"> <li>Allocation contains significant planning merits when considered against NPPF</li> </ul>	Consideration of revised boundary	The principle of the HNF3 allocation has already been agreed through the	Amend the allocation boundary to

<p>Horsham Properties Ltd</p>		<ul style="list-style-type: none"> <li>• Would provide further expansion opportunities for existing businesses</li> <li>• Request: existing central bund is included within the employment allocation HNF3</li> <li>• Revised Plan included</li> <li>• It is considered that the allocation of further land (approx. 0.9 hectares) to the north of the Commercial Park for employment use would also be compliant with the NPPF and the spatial approach for employment land set out in the GNLP. It is envisaged that the site's allocation would provide one additional building to the north of the Commercial Park, together with structural landscaping and forms a logical final extension to the Commercial Park. This additional allocation of land would provide for a small but important extension to the Commercial Park, which could be achieved within the limits of the site's</li> </ul>	<p>Consideration of additional studies undertaken</p>	<p>Broadland Local Plan. No evidence has been submitted to suggest it is undeliverable so it is carried forward unchanged into the GNLP for employment use.</p> <p>The additional area of land suggested for inclusion to the north of the commercial park (GNLP 4061) has also been considered and it is proposed to also include this for allocation considering it is small in scale, adjacent to the well established Commercial Park.</p>	<p>include site GNLP4061</p>
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		<p>future infrastructure capacity during the Plan period to 2040.</p> <ul style="list-style-type: none"> <li>• Sustainability Assessment Carried Out</li> </ul>			
Anglian Water	Comment	No reference to water efficiency forming part of the design unlike other allocation policies. See comments on Policy 2	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None
Norfolk Wildlife Trust	Comment	In addition to the protection provided in Policy 2, we recommend that specific wording is included in the allocation policies to ensure they are properly addressed at the planning application stage. Any applications in proximity to known wildlife sites (as set out in Table 4), as well as irreplaceable habitats such as ancient woodland, and priority habitats (as set out in the NERC Act 2016) should be accompanied by an ecological appraisal, with provision of biodiversity net gain and sufficient buffering and safeguarding space secured between the	<p>Consider policy wording to address proximity of wildlife sites</p> <p>Consider impacts on local hydrology and drainage effecting adjacent CWS</p>	It is accepted that the policy should acknowledge the potential for harm to nearby county wildlife sites and the requirement for measures to address this.	Add additional policy requirement to read: ‘The site is adjacent to Horsham Meadows County Wildlife Site. Potential impacts of development on the local hydrology and changes in drainage must be addressed through any planning application’.

		<p>development and the wildlife site in perpetuity (potentially also delivering contributions to green infrastructure).</p> <p>HNF3 - this site is adjacent to Horsham Meadows CWS, a pingo site. Impacts on the local hydrology and changes in drainage may have a significant effect on the adjacent CWS and so would need to be addressed by any application.</p>			
Historic England	Comment	<p>Site is separated from Horsham St Faith and its conservation area and listed building by existing industrial estate however the site is of archaeological sensitivity given the proximity to the scheduled St Faith Priory.</p> <p>Concerns regarding insufficient evidence in relation to the historic environment in terms of site allocations. Site Allocation should be reviewed in terms of Historic Environment. Referred to: HE Good Practice Advice in Planning</p>	<p>Consider proximity to scheduled St Faith Priory</p> <p>Consider Site Review in terms of Historic Environment</p> <p>Consider use of number rather than bullet points in site policies</p>	<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>	<p>Add wording to existing policy requirement to read: ‘Any development must also consider the archaeological sensitivity of proximity to the scheduled St Faith Priory, including any contribution made to that sensitivity by setting’.</p>

		<p>1 and He Advice Note 3 – site allocations in local plans.</p> <p>Suggestion: Use numbers rather than bullet point in the policies to make referencing easier.</p>			
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## Horsham and Newton St Faith Cluster – Unreasonable Sites

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

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

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

		<p>Should be considered against existing built form and character of village. HNF1 is subject to extant planning application (20182043 Full application) for the demolition of a dwelling and the erection of 69 Dwellings and Associated Infrastructure and landscaping at Land off Manor Road, Newton St Faiths, NR10 3LG. The Lovells scheme is also committed to providing a footpath to the south to St Faith's Primary School and the landowners of site GNLP1054 have stated in a recent planning appeal and via a current application that they are committed to extending the pedestrian link on Manor Road.</p> <p>Suggest flood risk comments are incorrect.</p> <p>Access has been confirmed as acceptable by Highways.</p>		<p>and it is still considered to be unreasonable for allocation.</p> <p>The local highway authority has highlighted concerns about creating a suitable access the site and it is not acceptable as a standalone site with direct vehicular access onto Manor Road. Other constraints include sections at risk of surface water flooding, particularly to the eastern boundary and nearby listed buildings.</p> <p>The site was subject to appeal on a planning application 20181525, the appeal was dismissed and permission refused in December 2019</p>	
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		<p>It is accepted that the eastern part of the site is less suitable for development and the most easterly fields should be removed from any assessment. As a result the capacity of the site is circa 25-30 dwellings. The reduced density and site area will still allow surface water drainage to be attenuated on site.</p> <p>In reviewing all of the documents relating to the allocation of development sites in Horsham and Newton St Faiths it is apparent that there are inconsistencies in the commentary relating to the rejection of this site when compared with the HELAA comparison table. This table confirms that the site is not at risk of flooding and whilst the Historic Environment is detailed as amber, if the most easterly field is deleted then the score should be green.</p>		<p>due to the effect of the proposed development on the character and appearance of the area with specific regard to the setting of listed buildings, the effect of the proposed development on the living conditions of neighbouring occupiers with specific regard to noise disturbance and whether the site is in an appropriate location for development having regard to scale, access to services, sustainable patterns of development and the Councils supply of housing sites.</p>	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2021 Oak Tree Farm, Horsham and Newton St Faith (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the Public	Support	There is now sufficient development at Newton St Faith there is no need ruin the village with more and more estates.		Comments noted	None
Brown & Co	Support	Whilst the overall strategy for village clusters contained in Policy 7.4 is supported, we believe that GNLP2021 and the additional land identified should be included as part of the delivery of growth in this part of Greater Norwich. The sites would offer an opportunity to deliver additional housing	Consider assessment of agricultural land  Consider additional land	This site was considered to be unreasonable for allocation as it is separated from the existing form and character of the village with resulting townscape and landscape implication with no	None

		<p>growth in a highly sustainable area. In particular the land between Meadow Farm Lane and Coltishall Lane is well related to the built form of the village and would form a logical extension to the built form.</p> <p>The contention in the general comments of the Horsham St Faith Assessment Booklet that 'prime agricultural land would be sacrificed' is incorrect as the latest Agricultural Land Classification map of Eastern England places these sites within Grade 3- Good to Moderate agricultural land.</p> <p>Additional Land Submitted</p>		<p>safe walking route to St Faiths Primary School. This situation has not changed so the site continues to be unreasonable for allocation.</p>	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2030 The Warren, Horsham and Newton St Faith (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the public	Support	The Warren had recently had a small development a lot of the area surrounding the Warren is waterlogged and marshy. The infrastructure will have difficulty maintaining further development.	Consider waterlogged and marsh comments in assessment	Comments noted.  No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.	None
Member of the public	Object	Concerns raised over flooding. Circle housing developed part of this site in 2012 installing additional drainage and have left provision for access for the rest of this site for additional housing in the	Consider drainage comments and potential access	Comments noted.  No evidence submitted through Regulation 18C consultation to justify changing the classification of the	None

		future. They had the pick of the original site and we asked that they build near the school. We cannot understand why the additional land is unsuitable for development given the contours of the site are exactly the same. Mature trees to be retained.		site so it remains unreasonable for allocation.	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2141 Manor Rd/A140 Cromer Road, Horsham and Newton St Faith (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	3 Support, 0 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Members of the public - various	Support	Support unreasonable site on the basis: <ul style="list-style-type: none"> <li>• Ruin landscape of village</li> <li>• Lack of facilities to support development</li> <li>• Lack of employment opportunities in village</li> <li>• Increase in air pollution</li> <li>• Highway issues and increased traffic</li> <li>• Loss of conservation wildlife site</li> </ul>		Comments noted.  No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.	None

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

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

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP3028 North of Meadow Farm Lane, Horsham and Newton St Faith (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	8
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	7 Support, 0 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Trustee of M.A Medler	Comment	Additional land submitted	Consider additional land	A revised site proposal was submitted through the Reg 18C consultation. The original site was considered to be unreasonable for allocation because vehicular access would be from narrow roads and there is no safe walking route to St Faiths Primary School. No additional	None

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

## LINGWOOD AND BURLINGHAM, STRUMPSHAW AND BEIGHTON CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	LINGWOOD AND BURLINGHAM, STRUMPSHAW AND BEIGHTON OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	276
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	140 Support, 100 Object, 36 comment

The Lingwood and Burlingham, Strumpshaw and Beighton Cluster has 0 c/f allocations, 1 preferred site (0379), 2 reasonable alternatives (0296 and 0380) and 7 sites which are judged to be unreasonable.

### Main issues:

- Should Old School site be included in the figures for Lingwood
- High level of local opposition to preferred site GNLP0379
- Mixture of support and opposition to reasonable alternative sites
- Historic England suggest a more detailed Heritage Impact Assessment should be undertaken for preferred site GNLP0379
- New site (GNLP4051) to be assessed

### Sites not commented on through the consultation:

- None

## Lingwood and Burlingham, Beighton and Strumpshaw Cluster – General Comments

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Lingwood No Carried Forward Sites (General Comments)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 2 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the public	Comment	No objection to plan. However, the access roads to Lingwood are poor especially the road to Blofield and the roads to the A47. These roads need to be widened and improved in the interests of safety given that this development will increase the number of vehicles using the access roads considerably.		Comments noted	None
Member of the public - various	Object	<ul style="list-style-type: none"> <li>• All local roads need improving</li> <li>• Church Road to be closed in A47 dualling plans, this means more traffic on Blofield Road which is already dangerous</li> <li>• Flooding is an issue in the locality</li> <li>• We need a doctors surgery not more houses</li> </ul>		Comments noted	None

		<ul style="list-style-type: none"><li>• Existing houses will be impacted by new housing. Newcomers rarely mix with locals</li><li>• Danger for children using the local park</li><li>• Destruction to local wildlife</li></ul>			
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## Lingwood and Burlingham, Beighton and Strumpshaw Cluster – Preferred Site

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0379 Land north of Post Office Road, Lingwood (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	87
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 77 Object, 8 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
NPS Property Consultants Ltd	Support	Norfolk County Council own the land and are committed to bringing it forward for a high quality, well designed development to deliver housing growth in Lingwood identified in the GNLP. Land currently farmed by a County Farms tenant and is let under a Business Farm Tenancy. The land would be available for NCC to take back once planning permission is granted. Site would likely be developed in a 2-3 year period after grant of detailed permission. NCC's development company, Repton Property Developments Ltd., will develop the site.	Further work needed to look at preferred and reasonable alternative sites in the light of consultation comments submitted	Further discussion has taken place regarding sites in Lingwood and it has been decided to delete site GNLP0379 as an allocation based on comments received through the Regulation 18C consultation and replace it with two allocations of 30 dwellings; one on reasonable	Delete site GNLP0379 as an allocation and replace with two allocations of 30 dwellings on sites GNLP0380 and 4016.

		<p>Site is relatively flat and topography would not offer any constraints to development. The site has clearly defined boundaries on 3 sides. Current use is agricultural. No evidence of any unstable ground or contamination. Site is within flood zone 1 with no identified risk or evidence of surface water flooding.</p> <p>Adjacent uses to the site are mainly residential and there would be no conflict between the proposed housing and existing properties subject to normal design and layout considerations.</p> <p>Access to the site would not prejudice access to the agricultural land to the north of the allocation. In order to achieve adequate visibility it would seem appropriate to position the access in the central portion of the Post Office Road frontage. Widening Post Office Road to 5.5 metres with a new footway on the north side would require removal of existing hedge and trees. Maybe scope for a new footpath link through to Church Road to the north.</p> <p>Infrastructure and services exist on Post Office Road and will be extended into the site. Site would accommodate about 60 dwellings with a policy compliant level of affordable housing. Substantial new</p>		<p>alternative site GNLP0380 and one on new site GNLP4016</p>	
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		planting would be needed on the northern boundary to protect the setting of the church. Initial layout plan submitted.			
Lingwood and Burlingham Parish Council	Object	<p>This is not the preferred site. Views of the medieval church will be compromised if the whole width of the site is used. This is grade 1 agricultural land so it would be preferable to use a smaller area to the right for building as per the original plan and parkland to the left of the site. The widening of Post Office Road would take away the current natural traffic calming. Traffic calming measures not possible as we are a dark village. Drains and sewers in the area are already an issue. The 50-60 figure could be reduced by using the brownfield site at the Old School Site on Chapel Road which is not currently included in the GNLP figures. We would expect no new building in the village until after the Chapel Road site is developed.</p> <p>The Parish Council preferred site is GNLP0380.</p> <p>Following from NPS representations if GNLP0379 is developed it is essential the view of the church is kept open to the village for all time. The Church is already divorced from the village spiritually and allow building to obstruct the view from Millennium Green would further isolate</p>	<p>Further work needed to look at preferred and reasonable alternative sites in the light of consultation comments submitted</p> <p>Should the site at the Old School be included in the figures for Lingwood?</p>	<p>Further discussion has taken place regarding sites in Lingwood and it has been decided to delete site GNLP0379 as an allocation based on comments received through the Regulation 18C consultation and replace it with two allocations of 30 dwellings; one on reasonable alternative site GNLP0380 and one on new site GNLP4016.</p> <p>The old school site will be counted as windfall in the GNLP consistent with the approach across the whole plan area</p>	<p>Delete site GNLP0379 as an allocation and replace with two allocations of 30 dwellings on sites GNLP0380 and 4016.</p>

		the community from its spiritual heart. The development should allow for an avenue of trees from the Millennium Green on Post Office Road to the Church and an area of parkland to protect the church not just a block of land at the front or back.			
Anglian Water Services Ltd	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design.</p> <p>Also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None
Historic England	Object	<p>No designated heritage assets within the site boundary but grade listed Church lies to the north as well as some other listed buildings in the vicinity. Any development of the site has the potential to impact upon the setting of these listed buildings.</p> <p>Note that the policy and supporting text refer to the church and a possible linear parkland but no mention is made of other heritage assets. This is a sensitive site in terms of potential impact on multiple heritage assets and therefore there are concerns about the allocation.</p> <p>Suggest a more detailed Heritage Impact Assessment is undertaken to assess the impact of development on these heritage assets, to establish the suitability or</p>	Further consideration of heritage comments needed. Consider undertaking Heritage Impact Assessment and the use of a concept diagram as suggested	Further discussion has taken place regarding sites in Lingwood and it has been decided to delete site GNLP0379 as an allocation based on comments received through the Regulation 18C consultation and replace it with two allocations of 30 dwellings; one on reasonable alternative site GNLP0380 and one on new site GNLP4016.	None

		<p>otherwise of the site and to establish appropriate mitigation and enhancement should the site be found suitable. If the site is found suitable the findings of the HIA should inform the policy wording.</p> <p>It might also be helpful to illustrate the proposed mitigation in the form of a concept diagram showing where open space and landscaping would be located.</p>			
Amber Slater, Brown & Co on behalf of client	Object	<p>Agree with the overall strategy for village clusters but object to site GNLP0379 suggesting instead that the site at Buckenham Road offer a good opportunity with minimal constraints and impact on the character of the village. Site GNLP0379 is in a sensitive area with rural character and development would be at odds with this. Concerns raised regarding traffic, excess provision of open space and surface water flood risk.</p>	<p>Further work needed to look at preferred and reasonable alternative sites in the light of consultation comments submitted</p>	<p>Further discussion has taken place regarding sites in Lingwood and it has been decided to delete site GNLP0379 as an allocation based on comments received through the Regulation 18C consultation and replace it with two allocations of 30 dwellings; one on reasonable alternative site GNLP0380 and one on new site GNLP4016.</p>	<p>Delete site GNLP0379 as an allocation and replace with two allocations of 30 dwellings on sites GNLP0380 and 4016.</p>
Member of the public	Support in part	<p>Object but to meet housing targets could support a partial development of the site. Enlarged proposal is incorrect. Would suggest a development to the eastern</p>		<p>Further discussion has taken place regarding sites in Lingwood and it</p>	<p>Delete site GNLP0379 as an allocation and replace with two</p>

		end of the site, larger than the previous submission but smaller than the current one but subject to Post Office road not being widened, retaining mature trees and western end of site left open to preserve view to the church from Post Office Road.		has been decided to delete site GNLP0379 as an allocation based on comments received through the Regulation 18C consultation and replace it with two allocations of 30 dwellings; one on reasonable alternative site GNLP0380 and one on new site GNLP4016.	allocations of 30 dwellings on sites GNLP0380 and 4016.
Members of the public – various	Object	<p><b>Roads/Traffic</b></p> <ul style="list-style-type: none"> <li>• Road network in and around Lingwood not suitable for increased level of traffic. Many accidents and recent fatality</li> <li>• Concern about road closure following dualling of A47 leading to increased traffic levels in the village</li> <li>• Post Office Road is narrow which currently has natural effect of reducing traffic speeds</li> <li>• Widening road would increase traffic speeds and safety concerns.</li> <li>• Loss of mature trees and hedgerows</li> <li>• Concern about proximity of site to Millennium Green children's play park.</li> <li>• What about current footpath on site?</li> </ul>	<p>Detailed consideration and understanding of 'grounds for objection' and 'schematic diagram' and other documents submitted through the consultation needed as part of ongoing site assessment</p> <p>Further work needed to look at preferred and reasonable alternative sites in the light of consultation comments submitted</p>	Further discussion has taken place regarding sites in Lingwood and it has been decided to delete site GNLP0379 as an allocation based on comments received through the Regulation 18C consultation and replace it with two allocations of 30 dwellings; one on reasonable alternative site GNLP0380 and	Delete site GNLP0379 as an allocation and replace with two allocations of 30 dwellings on sites GNLP0380 and 4016.

		<ul style="list-style-type: none"> <li>• Traffic calming measure not possible as village has no street lights</li> <li>• How and where will 2 metre footway be constructed?</li> </ul> <p><b>Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Concern about ability of infrastructure to cope with additional development</li> <li>• Lack of doctors surgery and surgeries in neighbouring settlements overwhelmed</li> <li>• Oversubscribed school, concerns that capacity of the school has been incorrectly evaluated and should be reviewed</li> <li>• Lack of parental choice for secondary education</li> <li>• Small village shop</li> <li>• No dentist and nearby practises not taking new patients</li> <li>• Public transport needs improving</li> <li>• Surface drainage will need considerable modifications and may not be able to cope.</li> <li>• Electricity and drinking water supply will need uprating and this will bring disruption.</li> </ul> <p><b>Flooding</b></p> <ul style="list-style-type: none"> <li>• Concern about current flooding issues at Post Office Road – field has a gradient which encourages surface water runoff</li> </ul>		<p>one on new site GNLP4016.</p>	
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		<ul style="list-style-type: none"> <li>• Post Office Road is lower than land proposed for development. It would be more logical to build on high, well drained ground to the north of the site allowing the area to the south to act as natural drainage.</li> <li>• Concern that removal of ditch on southern boundary would exacerbate flooding issue</li> <li>• Concern about drainage and sewerage systems ability to cope with new development</li> </ul> <p><b>Landscape/Heritage</b></p> <ul style="list-style-type: none"> <li>• Concern about loss of view of Grade I Listed medieval church and impact on setting – recognised in Broadland Landscape Character Assessment. Would amount to significant heritage harm</li> <li>• Concern about loss of strategic gap</li> <li>• Concern about loss of highest quality Grade 1 agricultural land</li> <li>• Loss of habitat for wildlife and biodiversity</li> </ul> <p><b>Submitted Plans</b></p> <ul style="list-style-type: none"> <li>• Plans for development are ambiguous. No detail of access points, size or location of houses, traffic mitigation measures etc.</li> <li>• NPS plan does not show promised avenue of open space protecting</li> </ul>			
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		<p>view of church, the existing footpath from Post Office Road to Church Road has vanished, no detail of pedestrian improvement at the Post Office Road/Close junction. The proposed landscaping strip will hide views of the church</p> <ul style="list-style-type: none"> <li>• Late submission of design layout by NPS is unacceptable and indicates a lack of transparency in process. It should have been on GNLP website throughout the consultation period and available at roadshows</li> <li>• There is a conflict of interests as NPS represents NCC in the promotion of land owned by NCC. NCC are also a partner in the GNLP</li> <li>• This is New Evidence not a comment, and as such requires full consultation with Residents and Parish Council members alike. If extra time is not to be given to allow comments, then it should be withdrawn.</li> </ul> <p><b>Better sites</b></p> <ul style="list-style-type: none"> <li>• GNLP0380 would be a better site, easier access to A47, closer to facilities, less traffic through village. Lower agricultural grade</li> <li>• GNLP0296 would be a better option</li> <li>• Development should be on brownfield sites</li> <li>• Why hasn't the Old School Site been included in the plan?</li> </ul>			
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		<ul style="list-style-type: none"> <li>• Reasonable alternatives should be re considered as preferred sites</li> </ul> <p><b>Other Issues</b></p> <ul style="list-style-type: none"> <li>• Why does the majority of development have to be on one site?</li> <li>• Area and number of houses have increased since original submission</li> <li>• The Sustainability Appraisal/ Strategic Environmental Assessment evidence base is flawed</li> <li>• Outside existing settlement boundary</li> <li>• Impact on privacy of nearby properties</li> <li>• Developments should not be considered in isolation, need to take account of what is happening in nearby settlements</li> <li>• Fears of subsidence if building work was to take place or there were changes in drainage</li> <li>• Failures in process and application of policy including inconsistencies, no change control and incorrect/out of date data. Nonadherence to procedures stated within the methodology for site assessment</li> <li>• Discordant with National and Local Planning guidelines</li> <li>• No overall assessment of Lingwoods ability to sustain 60+ houses. The policy of increasing school capacity is arbitrary and does not consider local constraints</li> </ul>			
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		<ul style="list-style-type: none"><li>• During construction there will be noise, dust, air pollution and additional traffic hazards to be considered</li></ul>			
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**Lingwood and Burlingham, Beighton and Strumpshaw Cluster – Reasonable Alternative Sites**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0296 Land east of Buckenham Lane and west of Buckenham Road, Lingwood (Reasonable Alternative Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	11
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 8 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Lingwood and Burlingham Parish Council	Object	<p>Site is too large, 110 homes would be too much for the village, infrastructure is not sufficient. The land is to the south of village so traffic would have to go through the village to get to it. The site is off two very narrow lanes with little chance of widening from the junctions off Norwich Road.</p> <p>The figure of 50-60 for Lingwood can be reduced if the brownfield site at the Old School on Chapel Road is used. Not currently included in the GNLP figures. The Parish Council were given the nursery building in original application to try and encourage a doctors surgery which has now been taken away.</p>	<p>Further work needed to look at preferred and reasonable alternative sites in the light of consultation comments submitted</p> <p>Further discussion with NCC Highways regarding access.</p> <p>Should the site at the Old School be included in the figures for Lingwood?</p>	<p>Further discussion has taken place regarding sites in Lingwood and it has been decided to delete site GNLP0379 as an allocation based on comments received through the Regulation 18C consultation and replace it with two allocations of 30 dwellings; one on reasonable alternative site</p>	None

				<p>GNLP0380 and one on new site GNLP4016.</p> <p>As a reasonable alternative site GNLP0296 was considered in the discussions but was not ultimately considered to be as favourable for allocation as the other two sites due to highway challenges with delivering an adequate width carriageway, mitigation required for heavy flood constraints and where to draw the boundary for 30 dwellings on a much larger site.</p>	
Amber Slater Brown & Co on behalf of client	Object	Agree with overall strategy for village clusters in Policy 7.4 but object to site GNLP0379 as the preferred site in Lingwood. This site is not the best option to deliver the amount of housing. Site GNLP0296 at Buckenham Road should be preferred as it has minimal constraints	Further work needed to look at preferred and reasonable alternative sites in the light of consultation comments submitted	Further discussion has taken place regarding sites in Lingwood and it has been decided to delete site GNLP0379 as an allocation based	None

		<p>and impact on the character of the village.</p> <p>Site GNLP0296 could provide a linear park and walks to the south of the village rather than focusing all open space to the north of the village as development of site GNLP0379 would. It also have a lower risk of surface water flooding.</p>	<p>Investigate the potential for site GNLP0296 to provide linear park</p>	<p>on comments received through the Regulation 18C consultation and replace it with two allocations of 30 dwellings; one on reasonable alternative site GNLP0380 and one on new site GNLP4016.</p> <p>As a reasonable alternative site GNLP0296 was considered in the discussions but was not ultimately considered to be as favourable for allocation as the other two sites due to highway challenges with delivering an adequate width carriageway, mitigation required for heavy flood constraints and where to draw the boundary for 30</p>	
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				dwellings on a much larger site.	
Members of the public – various	Object	<p>Comments objecting to the site being a reasonable alternative include:</p> <ul style="list-style-type: none"> <li>• Site is wrong side of the village. Traffic accessing the A47 would have to pass through the village. Additional traffic would be a hazard especially for children walking to school</li> <li>• Buckenham Road and Buckenham Lane are single track and cannot accommodate extra volume of cars, widening would be difficult. Already difficult to get out onto Norwich Road</li> <li>• Lingwood has limited facilities. No GP or library, only a small shop and strained sewerage system</li> <li>• Site close to Buckenham woods, potential wildlife impact</li> <li>• Development would spoil rural nature of the village and impact on residential amenity of surrounding properties due to disruption, noise, loss of privacy and visual amenity.</li> <li>• Land is grade 1 agricultural land and is also a flood risk area.</li> </ul>	<p>Further work needed to look at preferred and reasonable alternative sites in the light of consultation comments submitted</p> <p>Further discussion with NCC Highways regarding access.</p>	<p>Comments noted. Further discussions have taken place regarding sites for allocation in Lingwood and this site is not proposed for allocation.</p>	None
Members of the public - various	Comment	<p>If Lingwood has to provide additional housing, a development on this site would have less impact on the village as a whole. It has more access routes - via Brundall/Strumpshaw; from A47 at the White House turnoff; from A47 via Blofield Rd (at present), which would</p>	<p>Further work needed to look at preferred and reasonable alternative sites in the light of consultation comments submitted</p>	<p>Comments noted. Further discussions have taken place regarding sites for allocation in Lingwood and this</p>	

		<p>spread the traffic flow through the village rather than channeling it all along Post Office Rd. There is an existing footpath to the school and the site is no further from the school than the Post Office Rd proposed site.</p> <p>Whilst we do not want further development in Lingwood, site GNLP0296 being the largest of the proposed sites in Lingwood, has the greatest potential to meet future housing targets for many years to come as long as it is developed in phases as opposed to being developed in one go.</p> <p>Figures for Lingwood should be revised to take account of the Old School site.</p>	<p>Should the site at the Old School be included in the figures for Lingwood?</p>	<p>site is not proposed for allocation.</p> <p>As a reasonable alternative site GNLP0296 was considered in the discussions but was not ultimately considered to be as favourable for allocation as the other two sites due to highway challenges with delivering an adequate width carriageway, mitigation required for heavy flood constraints and where to draw the boundary for 30 dwellings on a much larger site.</p> <p>The old school site will be counted as windfall in the GNLP consistent with the approach across the whole plan area</p>	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0380 Land west of Blofield Road (Reasonable Alternative Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	20
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	8 Support, 12 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Lingwood and Burlingham Parish Council	Support	GNLP0380 is the preferred site of Lingwood and Burlingham Parish Council. The site would meet the allocation of 50-60 dwellings in combination with the brownfield site on Chapel Road which is not currently included in the GNLP figures Traffic impact will be less than other sites. Any development in Lingwood would require the widening of Blofield Road. An additional 50-60 houses on top of the current 44 committed will be too much for the school to take.	Further work needed to look at preferred and reasonable alternative sites in the light of consultation comments submitted	Further discussion has taken place regarding sites in Lingwood and it has been decided to delete site GNLP0379 as an allocation based on comments received through the Regulation 18C consultation and replace it with two allocations of 30 dwellings; one on reasonable alternative site GNLP0380 and	Add site GNLP0380 as an allocation.

				<p>one on new site GNLP4016.</p> <p>Site GNLP0380 was preferred for allocation over the other reasonable alternative site GNLP0296 as it received more support through the consultation, is the Parish Councils favoured site and development would act as a gateway site into the village creating a sense of place.</p> <p>The old school site will be counted as windfall in the GNLP consistent with the approach across the whole plan area</p>	
Members of the public – various	Support	<p>Comments supporting the site being a reasonable alternative include:</p> <ul style="list-style-type: none"> <li>• More suitable site access onto the main highway leading to the A47 thus reducing traffic travelling through the village.</li> </ul>	Further work needed to look at preferred and reasonable alternative sites in the light of consultation comments submitted	Further discussion has taken place regarding sites in Lingwood and it has been decided to delete site	Add site GNLP0380 as an allocation

		<ul style="list-style-type: none"> <li>• Less impact on the visual rural setting of the church</li> <li>• Lesser environmental impact, lesser impact on infrastructure and lesser landscape impact. Not in close proximity to any Grade 1 Listed Buildings and has negligible impact on Grade 2 Listed Buildings</li> <li>• Site could be expanded at a later if needed</li> <li>• Less safety issues as not near children's play area</li> </ul>		<p>GNLP0379 as an allocation based on comments received through the Regulation 18C consultation and replace it with two allocations of 30 dwellings; one on reasonable alternative site GNLP0380 and one on new site GNLP4016.</p> <p>Site GNLP0380 was preferred for allocation over the other reasonable alternative site GNLP0296 as it received more support through the consultation, is the Parish Councils favoured site and development would act as a gateway site into the village creating a sense of place.</p>	
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Members of the public – various	Object	<p>Comments objecting to the site being a reasonable alternative include:</p> <ul style="list-style-type: none"> <li>• Currently Buckenham Road has no pavements and at points is single lane only</li> <li>• Road is already very busy and more housing would bring more traffic, people do not abide by the 30mph limit</li> <li>• Site entrance is on a bad bend where a fatality recently occurred</li> <li>• Children walk to school down this road.</li> <li>• Traffic in the village will increase following the dualling of the A47</li> <li>• Building here would take away the charm of the village and views of open countryside</li> <li>• Further housing is not needed and will put a strain on resources. The village does not have enough facilities to cope with more people e.g. one shop, no doctors/dentist/inadequate bus service</li> <li>• Light and noise pollution from more properties in a dark village. Poorer air quality and bigger carbon footprint in rural area</li> <li>• The area floods already and this would increase flood risk. Water pump is not adequate, problems with raw sewerage flooding gardens</li> <li>• Impact on wildlife e.g. bats</li> <li>• Loss of mature oak trees</li> <li>• Grade 1 agricultural land</li> </ul>	Further work needed to look at preferred and reasonable alternative sites in the light of consultation comments submitted	<p>Further discussion has taken place regarding sites in Lingwood and it has been decided to delete site GNLP0379 as an allocation based on comments received through the Regulation 18C consultation and replace it with two allocations of 30 dwellings; one on reasonable alternative site GNLP0380 and one on new site GNLP4016.</p> <p>Site GNLP0380 was preferred for allocation over the other reasonable alternative site GNLP0296 as it received more support through the consultation, is the Parish Councils favoured site and development</p>	Add site GNLP0380 as an allocation.
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		<ul style="list-style-type: none"><li>• Devalue properties and spoil enjoyment of living in the village.</li><li>• Should not be supported just because it does not obstruct views of the church, what about the view from Church Road?</li><li>• Other sites have greater capacity to meet the housing targets placed upon the cluster</li></ul>		would act as a gateway site into the village creating a sense of place.	
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**Lingwood and Burlingham, Beighton and Strumpshaw Cluster – Unreasonable Sites**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	GNLP0067 Land at Lodge Road, Lingwood (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Lingwood and Burlingham Parish Council	Support	Support categorisation of the site as unreasonable. The original application was not approved by Lingwood & Burlingham Parish Council or residents but was given on appeal to the Secretary of State. To extend the area with more Live Work Units would not be acceptable.		Comments noted	None
MDPC Town Planning on behalf of client	Object	Object to categorisation of the site as unreasonable. Northern 3rd of overall field has the benefit of planning permission for Live/Work and B1 development through an allowed appeal. This development has commenced. Seeking allocation of undeveloped part of site for Live/work units. Settlement boundary extension would be welcome	New site to be assessed	Submission recorded as new Site GNLP4051. This site is not considered to be reasonable for allocation as access into the village would be	None

				<p>along a relatively busy road without footways, therefore there is no safe walking route to Lingwood Primary School. There is currently no evidence for the need to provide further live:work units in that location. If a high level of demand were to arise then this could be considered through a new planning application.</p>	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNL0090 23 Norwich Road, Strumpshaw (Lingwood) (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	36
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	31 Support, 0 Object, 5 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>DRAFT GNL0 RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Upton with Fishley Parish Council	Support	Strumpshaw Parish Council support the description of the site as being 'unreasonable'. Strumpshaw Neighbourhood Plan aims to resist the development of housing outside the settlement limit. The village has no shop, no school and limited public transport.		Comments noted.  No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.	None
Members of the public – various	Support/ comment	Comments in support of the site being unreasonable include: <ul style="list-style-type: none"> <li>• Roads are narrow and inappropriate for increased construction and residential traffic that would be created.</li> </ul>		Comments noted.  No evidence submitted through Regulation 18C consultation to	None

		<ul style="list-style-type: none"> <li>• Roads will become busier following proposed A47 changes</li> <li>• Access has limited visibility</li> <li>• There are few services or amenities. Inconsistent with plans to reduce reliance on the private car and become carbon neutral by 2050.</li> <li>• Public transport is poor</li> <li>• Lower levels of this land are prone to flooding and issues with sewerage capacity</li> <li>• Site contributes to landscape character and openness of area</li> <li>• No continuous footpath to local facilities</li> <li>• No street lighting</li> <li>• No common areas for children to play</li> <li>• In close proximity to a landfill site, risk of contamination</li> <li>• Harm to biodiversity</li> <li>• Contrary to Neighbourhood Plan which should be respected. Site is identified as a key green feature</li> <li>• Would create a ribbon of development between Lingwood and Strumpshaw</li> <li>• Not in keeping with small village rural character, already compromised by the Oaklands and Mill Meadow. Village has reached its capacity for new development</li> <li>• The site would impact an area that is rural and open, with excellent countryside views.</li> </ul>		<p>justify changing the classification of the site so it remains unreasonable for allocation.</p>	
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		<ul style="list-style-type: none"><li>• The negative impact on amenity for properties and community through noise, disturbance, nuisance, loss of privacy and overlooking.</li><li>• Why do small villages have to be developed when there is better quality land in larger places with plenty of roads, services and amenities.</li><li>• No reason to develop outside settlement boundary as Council has a 5 year land supply</li></ul>			
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0215 Land North of Long Lane, Strumpshaw (Lingwood) (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	39
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	33 Support, 0 Object, 6 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Upton with Fishley Parish Council	Support	Strumpshaw Parish Council support the description of the site as being 'unreasonable'. Strumpshaw Neighbourhood Plan aims to resist the development of housing outside the settlement limit. The village has no shop, no school and limited public transport.		Comments noted.  No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.	None
Members of the public – various	Support/ Comment	Comments in support of the site being unreasonable include: <ul style="list-style-type: none"> <li>• Neighbourhood Plan should be respected and not overruled</li> <li>• Lack of local services and facilities, would increase reliance on the private</li> </ul>		Comments noted.  No evidence submitted through Regulation 18C consultation to	None

		<p>car inconsistent with aim to be carbon neutral by 2050</p> <ul style="list-style-type: none"> <li>• Localised surface water in the area close to the Huntsman pub.</li> <li>• Issue with sewerage capacity and flooding</li> <li>• In close proximity to a landfill with risk of contamination</li> <li>• Narrow unsuitable roads that would not cope with construction and residential traffic generated</li> <li>• Lack of pavements for safe walking</li> <li>• No street lighting</li> <li>• Poor public transport</li> <li>• Removal of hedgerows and trees for access. Ancient hedgerow would be lost if road were widened</li> <li>• Accessing A47 is already busy and slow, will be made busier by proposed A47 changes</li> <li>• Site provides a contribution to the rural landscape character and openness of the area.</li> <li>• Includes existing footpath frequently used by walkers</li> <li>• Valuable agricultural land</li> <li>• Close to conservation and wildlife area e.g. Strumpshaw nature reserve</li> <li>• Would create ribbon development between Brundall and Strumpshaw, not conducive to keeping the two settlements separate</li> </ul>		<p>justify changing the classification of the site so it remains unreasonable for allocation.</p>	
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		<ul style="list-style-type: none"><li>• Part of this site was considered by the Strumpshaw Neighbourhood Plan for 10 dwellings and a community hall and was rejected due to concerns about access on the Long Lane bend</li><li>• Rural character already compromised by the Oaklands and mill meadow developments, no need for further housing as Council already has 5 year land supply</li><li>• Why develop in small villages when there is better quality land in larger places with plenty of roads, services and amenities</li><li>• Negative impact on amenity for properties and community through noise, disturbance, nuisance, loss of privacy and overlooking</li></ul>			
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0449 Land at Southwood Road/ Hantons Loke, Beighton (Lingwood) (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	5
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	4 Support, 0 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Lingwood and Burlingham Parish Council	Support	The Parish Council object to this site as it is too far outside the Parish boundary		Comments noted.  No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.	None
Members of the public – various	Support/ Comment	Comments supporting the site being unreasonable include: <ul style="list-style-type: none"> <li>Lack of local amenities to support development leading to an increase in car journeys. Conflict with</li> </ul>		Comments noted.  No evidence submitted through Regulation 18C consultation to	None

		<p>ambition to be carbon neutral by 2050.</p> <ul style="list-style-type: none"> <li>• Building would not be in keeping with rural character of the village</li> <li>• Key western arrival to the village</li> <li>• Roads are narrow, prone to surface water and a lack of pavements. Would not be able to cope with the increase in construction and residential traffic that would be created.</li> <li>• No street lights</li> <li>• Main sewer is undersized and overflows from manholes in heavy rain</li> <li>• Takes a long time to safely access the A47 with current traffic volumes</li> <li>• Contrary to the Neighbourhood Plan</li> </ul>		<p>justify changing the classification of the site so it remains unreasonable for allocation.</p>	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0499 Land north of Lodge Lane, Lingwood (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the public	Comment	A safe walking route to the school could be creating along the existing verges. This site is no further from the school than other sites. Once the A47 is dualled, Lodge Road will be the main route in/out of Lingwood and development here will reduce traffic impact on the rest of the village. Development could improve access into the village by straightening out the dangerous S bends.		No evidence has been provided to demonstrate how a safe walking route could be provided to Lingwood Primary School. In addition the site is divorced from the existing settlement and would appear as a separate enclave is developed contrary to the form and character of the village.	None

				Therefore the site remains unreasonable for allocation.	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0521 Mill Lane (South of Norwich Road, North of Buckenham Road), Strumpshaw (Lingwood) (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	34
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	28 Support, 0 Object, 6 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Upton with Fishley Parish Council	Support	The Parish Council support the site being unreasonable. The site is outside the settlement limit and the Strumpshaw Neighbourhood Plan aims to resist development outside present areas of housing. The village has no shop, no school and limited public transport.		Comments noted.  No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.	None
Members of the public – various	Support/ Comment	Comments supporting the site being unreasonable include: <ul style="list-style-type: none"> <li>• Site provides a high contribution towards the landscape character and openness of the area</li> </ul>		Comments noted.  No evidence submitted through Regulation 18C consultation to	None

		<ul style="list-style-type: none"> <li>• Roads surrounding the site are narrow and inappropriate. Creation of access and road widening would destroy ancient hedgerows with loss of wildlife.</li> <li>• Access would have limited visibility and endanger highway safety</li> <li>• No continuous footpath to local amenities. Safety issue of children walking to school in winter months</li> <li>• Strumpshaw has no facilities like shops, schools, dentist, doctors, public transport etc so residents would be totally reliant on the private car, not consistent with law to become carbon neutral by 2050.</li> <li>• Issues with sewerage capacity and flooding</li> <li>• Close proximity to landfill site, risk of contamination</li> <li>• Loss of prime agricultural land</li> <li>• The village has experienced recent growth so more preferable locations for development should be considered.</li> <li>• No need for growth, the Council has a 5-year land supply</li> <li>• Neighbourhood Plan should be respected. Part of this site was considered by the Strumpshaw Neighbourhood Plan for 10 dwellings and a community hall but was rejected because the site is isolated from the remainder of the settlement.</li> </ul>		<p>justify changing the classification of the site so it remains unreasonable for allocation.</p>	
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		<ul style="list-style-type: none"><li>• No communal areas for residents to meet and play</li><li>• Negative impact on amenity for properties and community through noise, disturbance, nuisance, loss of privacy and overlooking</li><li>• Strumpshaw within the immediate catchment and buffer (1 mile) of the Broads National Park – environmental footprint inappropriate in terms of noise and light pollution</li></ul>			
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2017 Mill Road, Strumpshaw (Lingwood) (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	38
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	33 Support, 0 Object, 5 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Members of the public – various	Support/ Comment	<p>Comments supporting the site being unreasonable include:</p> <ul style="list-style-type: none"> <li>• Site provides high contribution towards landscape character and openness of area</li> <li>• Strumpshaw does not have services and facilities to deal with further increase in residential dwellings</li> <li>• Issue with sewerage capacity and flooding</li> <li>• Development would increase reliance on private car, inconsistent with plans to become carbon neutral by 2050.</li> <li>• Roads serving the site are narrow. Creation of adequate access and visibility splay would require removal of ancient hedgerow. Widening the road</li> </ul>		<p>Comments noted.</p> <p>No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.</p>	None

		<p>would significantly change rural character of area.</p> <ul style="list-style-type: none"> <li>• Speed limit continually abused</li> <li>• Access to A47 is busy and difficult</li> <li>• Impact on public footpaths and healthy lifestyles</li> <li>• The village has already experienced a lot of growth in recent years, there are more preferable locations for development to take place. Broadland Council already have a 5 year land supply</li> <li>• Norfolk Heritage Records show there are Ancient Monument and archaeology special considerations in relation to the site e.g. remains of a World War Two searchlight battery and site of a windmill</li> <li>• Site is in SSSI risk zone for Yare Broads and Marshes and Broadland Ramsar site</li> <li>• Site is within 100m of ex landfill site. Questions about contamination and safety.</li> <li>• Out of keeping with the Neighbourhood Plan</li> <li>• Unsafe for children to walk to school as there is no continuous footpath to Lingwood and no street lighting.</li> <li>• No communal areas for residents to meet and play</li> <li>• Negative impact on amenity for properties and community through</li> </ul>			
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		<p>noise, disturbance, nuisance, loss of privacy and overlooking</p> <ul style="list-style-type: none"> <li>• Land immediately to the north of this plot is only recently developed plans to extend this development undermine the trust and process of limiting this original development to 10 houses and new community hall</li> <li>• Strumpshaw is within the immediate buffer (1 mile) of the Broads National Park and is inappropriate for urban development. There will be an effect on environmental footprint in terms of noise and light pollution</li> <li>• Loss of prime agricultural land</li> </ul>			
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## MARSHAM CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	MARSHAM OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	14
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 10 Object, 3 Comments

The Marsham Cluster has 0 c/f allocations, 1 preferred site (2143), 0 reasonable alternatives and 5 sites which are judged to be unreasonable.

### Main issues:

- General point – ensure densities across all sites are in line with Policy 2
- Preferred Site 2143 :
  - Need highway view on access appraisal
  - Consideration of water capacity in liaison with Environment Agency and Anglian Water
  - Historic England suggest undertaking more detailed Heritage Impact Assessment with concept diagram to show mitigation
  - Investigate the importance and implications of World War 1 landing strip
- Re-evaluate Site GNLP3035 in light of consultation comments received

Sites not commented on through the consultation:

### Unreasonable Residential Sites

- GNLP0171
- GNLP0219

- GNLP0229
- GNLP0572

## Marsham Cluster – Preferred Site

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2143 Land South of Le Neve Road, Marsham (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	12
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 8 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Bidwells on behalf of client	Support	<p>Support preferred allocation of GNLP2143. Land is in single ownership and available immediately. Further land is available if required.</p> <p>Upper limit of density for 25-35 dwellings is lower than the min. 25dph suggested in Policy 2 so site could accommodate at least 35 dwellings.</p> <p>Masterplan shows how land immediately adjacent to the existing cemetery could be used as an extension to the cemetery designed to mitigate visual impact on nearby heritage assets. Development has been designed around existing public right of way and a landscape strategy would be submitted with any planning application.</p>	Ensure densities across all sites are in line with Policy 2	Support for site noted. Densities have been re-looked at across the plan as a whole to ensure they are in line with the minimum requirements of Policy 2. It is proposed to allocate the site for 35 dwellings, which reflects its sensitive location and need for careful design and adequate	Remove reference to a range and allocate site for 35 dwellings

		An access appraisal has been prepared and submitted with the representation showing safe access from Le Neve Road and safeguarding the public right of way from the south east corner of the site. A new junction with Croft Lane (private road) will be required.	Get highway view on access appraisal	landscaping to minimise visual impact on the setting of the church to the east. The policy does state that more homes may be accommodate subject to an acceptable design and layout.  The highway authority have looked at the access appraisal submitted and are happy subject to access via Le Neve Road, a walking to school assessment and implementation of any agreed measures.	
Carter Jonas on behalf of Noble Foods Ltd	Object	Questioning/comparing HELAA assessment of site suggesting that site GNLP3035 is more preferable for allocation. Question why GNLP2143 was considered to be unreasonable in HELAA yet preferred for allocation.	Relook at site assessment for both sites GNLP2143 and GNLP3035 (including HELAA) in the context of this submission	Site GNLP2143 was only considered to be unreasonable in the HELAA to avoid double counting because it overlapped with	None

		<p>Sustainability Appraisal identified site as having minor negative impact on landscape and major negative impact on heritage</p> <p>Further work needed to look at impact on heritage assets and landscape, particularly setting of Grade 1 Listed Church of All Saints and wider setting of the village.</p> <p>Why develop a greenfield site when there are brownfield sites available in the village?</p>	<p>Further SA work will be undertaken</p> <p>Consider further investigation of landscape and heritage impacts</p>	<p>site GNLP0229 which had already been assessed as suitable. The conclusion for GNLP2143 states that in principle the site is considered to be suitable.</p> <p>The Sustainability Appraisal did identify GNLP02143 as having a minor negative impact on landscape and major negative impact on heritage, however after careful consideration and site assessment GNLP2143 was considered to be the best site for allocation in the village and the selection process is clearly set out in the Marsham assessment booklet.</p>	
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				It is considered that the potential heritage impacts can be mitigated through a well designed development and landscaping to the east of the site. The policy will also recognise that a Heritage Impact Assessment will be required.	
Anglian Water Services Ltd	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design.  Also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None
Sue Catchpole, District Councillor for Aylsham	Comment	Support Marsham Parish Council view that there is no need to build outside originally designated area, especially after fire on old Chicken Farm, this site should be developed first. Green space is important and should be included within any development.	Relook at Old Chicken Farm (Site GNLP3035) in the light of consultation comments received.	Comments noted	None
Environment Agency – Eastern Region	Comment	There is not enough capacity in current permit at Aylsham WRC to accommodate this development and there are no plans for capacity upgrades in terms of flow in PR19. There are only plans to increase storage at	Further consideration of water capacity, in liaison with Environment Agency and Anglian Water	Noted	Add policy requirement and supporting text to reference that development will

		intermittent CSOs. Development at this site will require phasing in line with upgrades to WRC and we will expect to see evidence of liaison with Anglian Water Services regarding this.			need phasing in line with upgrades to the Aylsham Water Recycling Centre with evidence of liaison with Anglian Water.
Historic England	Object	<p>Sensitive site in terms of the potential impact upon multiple heritage assets, some of which are highly graded. We therefore have some concerns about the allocation of this site. Whilst there are no designated heritage assets within the site boundary, there are a number of listed buildings to the east of the site including the grade I listed Church of All Saints and the grade II listed Old Rectory, Colenso Cottage and Marsham War Memorial.</p> <p>Suggest a more detailed Heritage Impact Assessment be undertaken to assess the impact of the proposed development upon the significance of these heritage assets, to establish the suitability or otherwise of the site and to establish appropriate mitigation and enhancement should the site be found suitable. If the site is found suitable, the findings of the HIA should then inform the policy wording.</p> <p>It might also be helpful to illustrate proposed mitigation in the form of a concept diagram</p>	Consider need for more detailed Heritage Impact Assessment with concept diagram showing proposed mitigation.	It is accepted that the policy should acknowledge the potential for harm to the heritage assets and the requirement for measures to address this including a Heritage Impact Assessment	Amend existing policy requirement to read: ‘Any development must conserve and enhance the significance of the grade I listed Church of All Saints, the grade II listed Old Rectory, Colenso Cottage and the Marsham War Memorial to the east of the site, including any contribution made to that significance by setting. This includes but is not limited to landscaping to the east of the site and a concept diagram showing

		for the site e.g. showing where open space and landscaping would be located.			where open space and landscaping would be located. Due to the sensitivities of this site a Heritage Impact Assessment will be required.
Members of the public – various	Object	<p>Various concerns raised including:</p> <p><b>Traffic/accessibility</b></p> <ul style="list-style-type: none"> <li>• Highway access insufficient for contractors and residents. Current residents on Le Neve Road will experience a significant period of disruption.</li> <li>• The junction with The Street and the A140 is difficult and dangerous.</li> <li>• Le Neve Road and Wathen Way are narrow residential roads with parking on both sides and increased volume of traffic would be dangerous for pedestrians using these roads.</li> </ul> <p><b>Heritage/landscape</b></p> <ul style="list-style-type: none"> <li>• Site would represent a clear breakout into open countryside outside development boundary. Other smaller sites would integrate more successfully with existing form (such as GNL0171).</li> <li>• Impact/harm to the setting of Grade I Parish Church. New landscaping will not mitigate this in the short or medium term. Church will be enshrouded by a modern housing estate</li> </ul>	<p>Promoters have submitted an access appraisal which will need to be considered by NCC highways</p> <p>Consider need for more detailed Heritage Impact Assessment with concept diagram showing proposed mitigation.</p>	<p>The highway authority have looked at the access appraisal submitted and are happy subject to access via Le Neve Road, a walking to school assessment and implementation of any agreed measures.</p> <p>The heritage sensitivities of the site are recognised and amendments are recommended to the policy based on comments from Historic England</p>	Amend policy in line with recommendations from Historic England

		<ul style="list-style-type: none"> <li>• The site is a recognised historic Word War 1 landing strip which would be lost forever if the site is built on.</li> <li>• Site of archaeological interest</li> <li>• Important for wildlife. Hares, farmland birds, smooth snake and hedgerow bird species</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Village has few facilities other than the school. Modest infill development may be appropriate but a large allocation would harm the character and setting of the village.</li> <li>• Allocation suggests 25-35 homes but accepts more could be accommodated. Fear that up to 60 dwellings could come forward. Site forms part of a much larger site and promoter could push for further growth.</li> <li>• Extension to cemetery being used as an incentive for the landowner to release the land. If extension is required this should be pursued as an allocation in isolation.</li> <li>• Use of Grade 1 agricultural land over brownfield sites within the village like Fengate Farm. Recommend compulsory purchase of brownfield sites</li> <li>• Creating less efficient agricultural use of land and increasing carbon footprint</li> <li>• Flood risk to existing properties, field run off seen regularly</li> <li>• Farming activities in close proximity to living space, nuisance to farmland</li> </ul>	<p>Investigate historic importance and implications of Word War 1 landing strip</p>	<p>including the need to undertake a Heritage Impact Assessment</p>	
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		animals. Dust clouds and insects in abundance from the field			
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**Marsham Cluster – Unreasonable Site**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP3035 Fengate Farm, Fengate, Marsham
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 2 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Carter Jonas LLP on behalf of Noble Foods Ltd	Object	<p>The findings of the site assessments for some of the preferred allocations and reasonable alternative are not robust or credible, including those in Marsham. We have reassessed the findings for sites in Marsham, attached to our representations.</p> <p>Site GNLP3035 contains vacant and unused buildings and areas of hardstanding associated with former poultry farm. Buildings recently damaged by fire and are due to be demolished. Site not likely to be reused for agricultural purposes.</p> <p>Main access to development would be from Old Norwich Road and the access</p>	<p>Relook at site assessment for both sites GNLP3035 and GNLP2143 (including HELAA) in the context of this submission</p> <p>Need further information from NCC</p>	The previously developed nature of the site is recognised but concerns still remain about vehicular access to the site and pedestrian connectivity to the school. Fengate Lane is not of a sufficient standard to accommodate development traffic and the junction with the A140 poses a	None

		<p>from Fengate would be used as a secondary/emergency access.</p> <p>Planning application for 36 dwellings submitted in 2013 was refused and dismissed at appeal. As number of dwellings exceed limit for service villages at the time. Some concern raised about proposed design and layout but no concerns about a vehicular access off Old Norwich Road. A contamination assessment would be needed because of previous uses on the site. Existing trees and hedgerows would be retained and a substantial landscape buffer provided. There would be a mix of housing including affordable.</p> <p>It is considered that the findings of the Sustainability Appraisal for landscape and heritage are incorrect and should be revised.</p> <p>Request that the site should be allocated for residential development of 35 dwellings in the GNLP.</p>	<p>Highways regarding suitability of site access. Look at highway comments made to refused planning application on this site</p> <p>Further SA work will be undertaken</p>	<p>safety concern regarding the intensification of traffic accessing onto a corridor of movement.</p> <p>A Transport Statement dated July has been provided. Further discussions have taken place with the highway authority who have commented that the 2013 planning application was subject to a highway holding objection that was not resolved. A subsequent application in 2015 was refused partly due to lack of highway information.</p>	
Member of the public	Object	<p>Object to the site being unreasonable for the following reasons:</p> <ul style="list-style-type: none"> <li>Two points of access to the site from Fengate and the Old Norwich Road will naturally split traffic rather than forcing all traffic onto one road as</li> </ul>		See above	None

		<p>would be the case with the preferred site.</p> <ul style="list-style-type: none"><li>• Access from Old Norwich Road should be able to support construction traffic without using Fengate.</li><li>• Site is brownfield and therefore will not destroy more greenfield sites as would be the case with the preferred site.</li><li>• Owner of site has already applied for planning permission so reasonable to assume they would like it to be built on</li><li>• Site should be big enough for 35 houses so would satisfy the requirement for housing without increasing the footprint of the village.</li></ul>			
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## REEDHAM CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	REEDHAM OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	104
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 92 Object, 10 Comment

The Reedham Cluster has 0 c/f allocations, 2 preferred site (1001 and 3003), 0 reasonable alternatives and 0 unreasonable sites.

Main issues:

- High levels of local opposition to both preferred sites as contrary to policy and site assessment principles

Sites not commented on through the consultation:

- None

## Reedham Cluster – General Comments

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Reedham – No carried forward sites (General Comments)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 3 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Members of the public - various	Object	<p>Reedham cannot support any further housing because:</p> <p><b>Roads and transport</b></p> <ul style="list-style-type: none"> <li>• Village is at the end of a single, narrow 7-mile road which passes through several other villages</li> <li>• Roads are narrow and in an appalling state, without proper passing places</li> <li>• Poor, infrequent and expensive public transport increases reliance on private car</li> <li>• Parking changes at the station leading to increased on-road parking</li> </ul> <p><b>Services and facilities</b></p>	<p>Further discussion with NCC highways to confirm local road network is suitable</p>	<p>The concerns regarding additional development in Reedham are recognised but these need to be balanced with the need to find additional housing across the plan area. After further consideration both sites continue to be considered suitable for allocation</p>	None



		<ul style="list-style-type: none"><li>• Give permission for smaller infill sites better suited to the village</li><li>• Covering farmland with houses means being left with inaccessible, unusable pieces of land and the need to fly in produce from around the world.</li></ul>			
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**Reedham Cluster – Preferred Sites**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP1001 Land to the east of Station Road (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	41
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 36 Object, 4 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Savills on behalf of client	Support	<p>Support for the draft allocation of GNLP1001 in the emerging Greater Norwich Local Plan.</p> <p>The site is located to the east of Broadland Local Plan allocation RED1 which has been built. No obvious constraints identified to prevent further development.</p> <p>The site has a single landowner and Badger Building who delivered the RED1 allocation have expressed an interest. It is envisaged the site will deliver policy compliant 33% affordable housing.</p>		Support for site noted	None

		<p>Access to the site will be through Barn Owl Close. Any application will be supported by relevant technical documents, including a Transport Assessment.</p> <p>Sewerage system capacity is not envisaged to be a constraint to development as Anglian Water have a responsibility to expand capacity to accommodate new development.</p> <p>Together sites GNLP1001 and 3003 could provide up to 60 dwellings in the plan period to 2038. There are 550 dwellings in Reedham so this would represent growth of 0.5% per annum which is considered to be sustainable.</p> <p>It is acknowledged that Reedham are progressing a Neighbourhood Plan which is still at early stages.</p>			
Reedham Parish Council	Object	<p>Outside the development boundary for the village.</p> <p>Contrary to GNLP Policy 2 as the site cannot provide “safe, convenient and sustainable access to on-site and local services and facilities including schools, healthcare, shops, leisure/community/faith facilities and libraries” without the use of a car.</p>	Further consideration of preferred sites in the context of GNLP Policy 2 and Policy 7.4	Concerns regarding the allocation of this site are noted. There are some services and facilities in Reedham including a primary school, village hall, pub	None

		<p>Contrary to GNLP Policy 7.4 as there is no safe walking route to school. Discussion states “Sites which do not have a safe walking route to school, or where one cannot be created, will not be considered suitable for allocation”. Highways have confirmed it is not feasible to provide an off-carriageway pedestrian facility to enable safe journeys to school.</p> <p>The sewerage system for the village is at or nearing capacity. Waste is removed on a near daily basis, more in peak summer season. Without additional capacity further housing is unreasonable and a hazard to health and the environment</p> <p>Road infrastructure to and around Reedham is not suitable for additional traffic. Most roads in the village are less than 4 metres wide with no pavements</p> <p>Public transport is poor, this increases reliance on the private car. Further development in Reedham is contrary to the GNLP Climate Change Statement. There are no policies in place to fulfil the GNLP ambitions of working from home or greener transport.</p>	<p>Further discussion with NCC Highways regarding safe walking route to Primary School</p> <p>Further consideration of sewerage capacity issues in conjunction with Anglian Water</p> <p>Further discussion with NCC highways to confirm local road network is suitable</p> <p>Plan-wide consideration of location of allocations in relation to carbon reduction requirements</p>	<p>and train station and therefore it is considered to meet the criteria under Policy 2. The Sustainability Appraisal considers the site to have a major positive impact by encouraging vibrant and interactive communities</p> <p>It is accepted that it is not possible to provide an off-carriageway pedestrian footway for the whole route to school however the local highway authority have accepted that vehicular access is achievable via adjacent Broadland Local Plan allocation RED1 and footpath connections can</p>	
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				<p>be provided via connection with Public Rights of Way at the north and east boundaries of the site.</p> <p>The concerns regarding the development of the site need to be balanced with the need to find additional housing across the plan area and after further consideration this site is considered to be suitable for allocation.</p>	
Anglian Water Services Ltd	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document</p>	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None

Broads Authority	Comment	<p>The site is on higher ground close to Broads Authority boundary and potential visual receptors: Wherrymans Way, the river, Ferry Road and Reedham Drainage Mill. Site might also be visible from the opposite valley side against backdrop of existing settlement</p> <p>New housing could have adverse impacts on the setting of the Broads if not sensitively handled.</p> <p>Landscape effects could be mitigated by low ridge heights, reduced scale/massing and screen planting.</p>	Talk to the Broads Authority about any changes needed to the policy wording to mitigate the effects of development	Concerns about the impact that new housing in this location could have on the Broads are recognised and mitigations should be built into the policy	Amend the policy to make reference to the need for sensitive design such as low ridge heights, reduce scale/massing and screen planting to mitigate the potential impact of the development on the Broads Authority Executive Area.
Members of the public – various	Object/ Comment	<p>Comments objecting to the site being preferred include:</p> <p><b>Roads and transport</b></p> <ul style="list-style-type: none"> <li>• Single lane, narrow roads in a poor state without proper passing places.</li> <li>• Contrary to GNLP Policy 2 as cannot provide safe access to facilities without the use of a car. Often more than one car is needed due to remote nature of Reedham</li> <li>• Contrary to plans to become carbon neutral</li> <li>• Conflict with HGV's and farm machinery</li> <li>• Poor, infrequent public transport both bus and train</li> </ul>	<p>Further discussion with NCC highways to confirm local road network is suitable and regarding safe walking route to Primary School</p> <p>Further consideration of preferred sites in the context of GNLP Policy 2 and Policy 7.4</p>	The concerns regarding additional development in Reedham are recognised but these need to be balanced with the need to find additional housing across the plan area. After further consideration this site continues to be considered suitable for allocation	None

		<ul style="list-style-type: none"> <li>• Increased traffic more dangerous for pedestrians and cyclists</li> <li>• On-road parking issues outside the school and at the station (since parking fees were introduced)</li> <li>• Contrary to GNLP Policy 7.4 as there is no safe walking route to school</li> <li>• A report from NCC Highways assessing the suitability of the preferred sites is needed</li> </ul> <p><b>Services and facilities</b></p> <ul style="list-style-type: none"> <li>• Local infrastructure insufficient to accommodate further development. Village has experienced 30% growth in the last 10 years with no infrastructure improvements</li> <li>• New housing without infrastructure improvements would overwhelm the village</li> <li>• Overloaded sewerage system, regularly trucked out. Frequent effluent flooding into properties. Smell in village. Reedham not on mains system, water pressure is low and supply is inadequate</li> <li>• Concern about surface water run-off from site</li> <li>• One small village shop</li> <li>• No free cash point, some distance to nearest banking facilities</li> <li>• Part time post office and GP surgery</li> </ul>	<p>Further consideration of sewerage capacity issues in conjunction with Anglian Water</p>	<p>More general strategic issues to be taken account of on a plan wide basis</p> <p>Wording to be added to the policy to mitigate the impact of the development on the Broads Authority Area (see above).</p> <p>The Sandersons Boat yard application will not be counted in the GNLP housing figures if it is a planning application in the Broads Authority area</p>	
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		<ul style="list-style-type: none"> <li>• No police presence</li> <li>• Telephone and internet stretched, minimal mobile phone signal</li> <li>• Electricity often fails</li> <li>• Nothing for young people to do. Money from developments should be used on projects to help young, elderly and families</li> <li>• Understanding that the field at the top of the Barn Owl Close development was to be used for recreation purposes. Land should remain as a green space buffer between Barn Owl Close and the agricultural land in the centre of the village</li> <li>• No employment opportunities available in the village</li> </ul> <p><b>Primary School capacity</b></p> <ul style="list-style-type: none"> <li>• The allocation of up to 60 homes based entirely on the fact that the school has vacancies is poor decision making</li> <li>• How can Reedham be a 'cluster' of one village. The school currently has pupils from Freethorpe, Cantley and Brundall.</li> <li>• Reasons why school has empty places should be explored. Parents elect to send their children to other schools. Would like to clarify that figures are correct</li> </ul>	<p>Further discussion with NCC Children's Service re: school capacity</p>		
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		<ul style="list-style-type: none"> <li>• Building more houses will not necessarily fill school places as evidenced by recent developments</li> <li>• The only way to make Reedham school better attended by resident children would be to extend/move it.</li> <li>• School currently thriving so if trend continues it will be up to capacity before additional houses are built</li> <li>• References to available places at the school is not supported by evidence from school management, governing board or local authority</li> </ul> <p><b>Landscape/wildlife</b></p> <ul style="list-style-type: none"> <li>• Part of the Broads National Park and should be kept as it is to preserve the natural beauty of the village</li> <li>• The views of the village from the Broads will be further degraded by the complete lack of architectural merit in new builds and the lack of planting and landscaping</li> <li>• Concerns about light pollution and loss of wildlife</li> </ul> <p><b>General comments</b></p> <ul style="list-style-type: none"> <li>• Village has already had substantial new developments in recent years, many new houses are still for sale.</li> <li>• Village should not be expected to over develop to compensate for other villages.</li> </ul>	<p>Talk to the Broads Authority about any changes needed to the policy wording to mitigate the effects of development</p>		
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		<ul style="list-style-type: none"> <li>• The GNLP does not contain sufficient evidence of current or future housing demand with respect to Reedham 60+ new homes is excessive and would result in over supply.</li> <li>• Figures do not take account of new housing at Sanderson Boatyard approved by the Broads Authority in December 2019</li> <li>• Infill development or use of empty homes would provide a more organic growth solution</li> <li>• New housing should be closer to the NDR or on brownfield sites instead</li> <li>• Site outside development boundary</li> <li>• No housing should be allocated until the Neighbourhood Plan has been adopted</li> <li>• With projected sea level rises it is irresponsible to build more housing in Reedham. Large parts of the village could be under water by 2050</li> <li>• Affordable housing is still too expensive for local people to buy or rent. No proper evidence on affordable housing the site assessment booklet</li> <li>• Needs to be a law to stop people buying properties for holiday rentals</li> <li>• GNLP is deeply flawed. Appears to pursue a political agenda and flouts national policy on climate change mitigation</li> </ul>	<p>Revisit housing figures in Reedham. Look at planning permission at Sanderson Boatyard and whether this should be counted towards current commitment, recognising that it is in the Broads Authority area</p> <p>Strategic issues such as affordable housing and climate change to be dealt with through Part 1 of the Plan</p>		
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		<ul style="list-style-type: none"><li>• Concern at change in focus regarding rural development between the JCS and GNLP. The JCS protected rural areas by keeping housebuilding near to Norwich.</li><li>• GNLP should use 2016 National Household projections rather than 2014.</li><li>• GNLP priority should be getting young people off the streets of Norwich and rehousing people who are living in poor rented conditions</li></ul>			
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP3003 Mill Road, Reedham (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	60
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 53 Object, 6 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Magnus Magnusson, Parker Planning on behalf of client	Support	Support the identification of the site as a preferred option. The site is under the control of a single landowner who is actively promoting it for development. The wider site area is available for development if required. There are considered to be no overriding constraints that would prevent development and promoter has undertaken their own RAG assessment to support their representation.		Support for site noted	None
Reedham Parish Council	Object	Outside the development boundary. Loss of valuable agricultural land.  Contrary to GNLP Policy 7.4 as there is no safe walking route to the school. Highways have confirmed there is no scope to provide a footway within the	Further discussion with NCC Highways regarding safe walking route to Primary	It is accepted that it is not possible to provide an off-carriageway pedestrian footway to the school but the site was	None

		<p>highway. Highways also confirm it is not feasible to provide safe access to the site. No evidence to support the statement that Mill Road is 'relatively lightly trafficked'.</p> <p>The sewerage system for the village is at or nearing capacity. Waste is removed on a near daily basis, more in peak summer season. Without additional capacity further housing is unreasonable and a hazard to health and the environment</p> <p>The road infrastructure to and around Reedham is not suited to additional traffic. Roads are narrow with no pavements. Public transport (both train and bus) are infrequent and unreliable. Reliance on private car contrary to GNLP Climate Change Statement.</p>	<p>School and to confirm adequate access can be provided</p> <p>Further consideration of sewerage capacity issues in conjunction with Anglian Water</p> <p>Plan-wide consideration of location of allocations in relation to carbon reduction requirements</p>	<p>considered to be suitable for allocation due to its close proximity to the school.</p> <p>The concerns regarding the development of the site need to be balanced with the need to find additional housing across the plan area and after further consideration this site is considered to be suitable for allocation.</p>	
Anglian Water Services Ltd	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None
Historic England	Comment	We welcome the reference to the non-designated heritage asset.		Noted	None
Members of the public – various	Object/ Comment	Comments objecting to the site being preferred include:		The concerns regarding additional	None

		<p><b>Roads and transport</b></p> <ul style="list-style-type: none"> <li>• Reedham is not a ‘through’ village. Traffic goes in and out the same way and poor road infrastructure needs to be addressed..</li> <li>• Contrary to GNLP Policy 2 as cannot provide safe access to facilities without the use of a car.</li> <li>• Poor, infrequent public transport both bus and train</li> <li>• On-road parking issues outside the school and at the station (since parking fees were introduced)</li> <li>• No pavements or street lights</li> <li>• Contrary to GNLP Policy 7.4 as there is no safe walking route to school. Highways have confirmed it is not feasible to provide a footway.</li> <li>• Vehicular access to the site is not adequate at either Mill Road or Holly Farm Road. Highways have confirmed there is no scope to widen to accommodate 2 way traffic. Need for 3<sup>rd</sup> party land. Refused permission in the past on access grounds</li> <li>• Main vehicular access would be over railway bridge on Mill Road, only wide enough for 1.5 car width and poor visibility on approach from both sides. Accident blackspot not able to cope with volume of traffic increase.</li> </ul>	<p>Further discussion with NCC highways to confirm local road network is suitable and clarification regarding vehicular access and safe walking route to Primary School</p> <p>Further consideration of preferred sites in the context of GNLP Policy 2 and Policy 7.4</p>	<p>development in Reedham are recognised but these need to be balanced with the need to find additional housing across the plan area. After further consideration this site continues to be considered suitable for allocation</p> <p>More general strategic issues to be taken account of on a plan wide basis</p> <p>Wording to be added to the policy to mitigate the impact of the development on the Broads Authority Area (see above).</p> <p>The Sandersons Boat yard application will not be counted in the</p>	
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		<ul style="list-style-type: none"> <li>• Mill Road used daily by heavy agricultural machinery, large delivery vans and lorries</li> <li>• Concern about proposed public footpath running from the site immediately next to existing properties causing loss of privacy, disturbance and safety issues.</li> <li>• A report from NCC Highways assessing the suitability of the preferred sites is needed</li> </ul> <p><b>Services and facilities</b></p> <ul style="list-style-type: none"> <li>• If Reedham is to be expanded then the infrastructure needs to be improved first</li> <li>• Developer fees of just over £23k have been provided to the parish council to improve facilities over the last 3 years. If development is to go ahead then contributions towards the village should be sought e.g. a larger amount of parking spaces and a green area for children</li> <li>• Sewerage treatment and disposal is at breaking point</li> <li>• Mains water pressure is already low in the village</li> <li>• Site has a potential flood amber from HELAA table</li> <li>• One small village shop</li> <li>• No free cash point, some distance to nearest banking facilities</li> </ul>	<p>Further consideration of sewerage capacity issues in conjunction with Anglian Water</p>	<p>GNLP housing figures if it is a planning application in the Broads Authority area</p>	
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		<ul style="list-style-type: none"> <li>• Building more houses will not necessarily fill school places as evidenced by recent developments</li> <li>• References to available places at the school is not supported by evidence from school management, governing board or local authority</li> <li>• Suggest a land swap with the school playing field. This would make the school playing field opposite the school with a safer walk for children</li> <li>• Utilise the central site beside this for a new purpose built Primary School to support all villagers including rooms for multi-purpose village hall. Build on current Village Hall site.</li> </ul> <p><b>Landscape/wildlife</b></p> <ul style="list-style-type: none"> <li>• Part of the Broads National Park and should be kept as it is to preserve the natural beauty of the village</li> <li>• Site is within 3000m buffer zone of Halvergate Marshes, designated a conservation area by the Broads Authority, SSSI, SPA and RAMSAR site of international importance.</li> <li>• Dark skies, wildlife and farming will be impacted by this proposal</li> <li>• Environmental and nature impact survey needed</li> </ul> <p><b>General comments</b></p>	<p>Further investigation of land swap idea with NCC Children's Services.</p> <p>Talk to the Broads Authority about any changes needed to the policy wording to mitigate the effects of development</p>		
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		<ul style="list-style-type: none"> <li>• Village has already had substantial new developments in recent years, many new houses are still for sale.</li> <li>• The GNLP does not contain sufficient evidence of current or future housing demand with respect to Reedham 60+ new homes is excessive and would result in over supply. The number of houses recently built plus any further a-hoc housing going forward should be deducted from total.</li> <li>• Figures do not take account of new housing at Sanderson Boatyard approved by the Broads Authority in December 2019</li> <li>• New housing should be closer to the NDR or on brownfield sites instead</li> <li>• Site outside development boundary</li> <li>• With projected sea level rises it is irresponsible to build more housing in Reedham. Large parts of the village could be under water by 2050</li> <li>• The Reedham assessment booklet has not properly addressed affordable and social housing demand in the village</li> <li>• GNLP is deeply flawed. Appears to pursue a political agenda and flouts national policy on climate change mitigation. There is nothing in the plan regarding the proposed housing being carbon neutral</li> <li>• Concern at change in focus regarding rural development between the JCS</li> </ul>	<p>Revisit housing figures in Reedham. Look at planning permission at Sanderson Boatyard and whether this should be counted towards current commitment, recognising that it is in the Broads Authority area</p> <p>Strategic issues such as affordable housing and climate change to be dealt with through Part 1 of the Plan</p>		
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		<p>and GNLP. The JCS protected rural areas by keeping housebuilding near to Norwich.</p> <ul style="list-style-type: none"> <li>• GNLP should use 2016 National Household projections rather than 2014.</li> <li>• GNLP priority should be getting young people off the streets of Norwich and rehousing people who are living in poor rented conditions</li> <li>• Have any unbiased views on the site been sought or is allocation based on information put forward by the site promoter?</li> <li>• Number of houses on site is far too optimistic. Five or less would be a better number</li> <li>• 30-50 homes would be a massive intrusion to privacy as the majority of houses along this site are bungalows and would be overlooked by the new development</li> <li>• The site is bounded by a railway line and cutting to the east. This potentially constrains development on the site by reason of noise and stability of the banks</li> <li>• The area is attractive for tourism which will be lost if we 'commercialise' the area with 100 unsightly new homes.</li> </ul>	<p>Further clarification of safety/stability issues of proximity to railway line.</p>		
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## SALHOUSE, WOODBASTWICK AND RANWORTH CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	SALHOUSE, WOODBASTWICK AND RANWORTH OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	9
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 5 Object, 2 Comment

The Salhouse, Woodbastwick and Ranworth Cluster has 0 c/f allocations, 1 preferred site (0188), 1 reasonable alternative (0157 – Non-residential) and 10 sites which are judged to be unreasonable.

Main issues:

- Unreasonable site GNLP0175 – further discussions needed with Highways and Development Management in light of consultation comments
- Unreasonable site GNLP0487 – reassess in the context of new type of development being proposed
- New site (GNLP4024) to be assessed.

Sites not commented on through the consultation:

### Unreasonable Residential Sites

- Site GNLP0110
- Site GNLP0160
- Site GNLP0161

- Site GNLP0163
- Site GNLP0164
- Site GNLP0493

**Salhouse, Woodbastwick and Ranworth Cluster – Preferred Site**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0188 Land adjoining Norwich Road, Salhouse (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 0 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
One Planning	Support	<p>Our client has an exclusive option agreement with the landowner and they are no physical or legal impediments. The site is deliverable and developable. A policy compliant level of affordable housing will be provided, including a mix of sizes, types and tenures.</p> <p>Pedestrian and vehicular access can be addressed via Norwich Road without requirement for third party land. The road at the frontage to the site is relatively straight and flat. Removal of specimen trees is unlikely to be required to provided visibility, although there would be a need for some existing hedgerow to be removed. Any lost</p>		Support for site noted	None

		<p>hedgerow will be replaced with mixed native species.</p> <p>The site is single plot depth, the proposed scheme would provide frontage development which will fit in well and maintain a similar pattern to existing built form opposite and bordering the site to the west.</p> <p>As set out in the allocation, the scheme would provide a footway along Norwich Road between the existing development to the west and Honeycombe Road. Further, it is proposed to provide roundabout improvements to facilitate a pedestrian crossing in its vicinity. These provisions would connect the site to the village and provide safe and easy pedestrian access site to the Primary School along its entire route.</p> <p>The site is visually contained and more distant views of the site are set against the backdrop of existing residential development. The land represents a logical site for development.</p>			
Anglian Water Services Ltd	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

Salhouse Parish Council	Support	<p>Support site but with concerns;</p> <ul style="list-style-type: none"> <li>• Development should be low rise to protect skyline and views, higher dwellings should be downslope.</li> <li>• Access should be off Honeycombe Road as far from other roundabouts as possible, access from Norwich road, close to the roundabout, would be too dangerous.</li> <li>• The walk to school route will need to cross two busy roads regardless of where access is.</li> <li>• Footpaths/footways should extend along Honeycombe Road, preferably servicing other properties along this road as an added benefit to local residents.</li> <li>• 40mph speed limit should be extended along Honeycombe Road.</li> </ul>		<p>Comments noted.</p> <p>Policy does state that development will need to be sensitively designed to reflect the location and that properties will need to be of a modest scale. The exact design will be negotiated through any planning application on the site.</p> <p>The highway authority have advised on the necessary improvements to make the development acceptable and these have been written into the policy requirements</p>	None
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**Salhouse, Woodbastwick and Ranworth Cluster – Reasonable Alternative (Non-residential) Site**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0157 Land to north of Salhouse Road, Salhouse (Reasonable Alternative, Non-Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Environment Agency (Eastern Region)	Comment	<p>It is not clear what is being proposed at Salhouse Broad (Tourism GNLP0157) near Woodbastwick, if there are to be any changes then a WFD compliance assessment must be undertaken to assess the impacts on ecological elements.</p> <p>The east of the site adjacent to the river is Flood Zone 3 and Flood Zone 2. Part of Flood Zone 3 is also shown to be Flood Zone 3b on our modelling. Ideally all new built development should be sequentially sited to be located within the large area of Flood Zone 1 on the site. However if the tourism uses were classed as 'water compatible' then this</p>		No further information has been provided through the Reg 18C consultation regarding the need for the proposal or exactly what is planned for the site. Therefore there is considered to be no justification for allocating the site for tourism use.	None

		would be an acceptable land use within the flood zones, including Flood Zone 3b, providing that it is designed to: 'remain operational and safe for users in times of flood; result in no net loss of floodplain storage; and not impede water flows and not increase flood risk elsewhere'.			
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**Salhouse, Woodbastwick and Ranworth Cluster – Unreasonable Sites**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0175 Site off Bell Lane, Salhouse (Unreasonable Residential 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
One Planning	Object	<p>Comments objecting to the site being unreasonable:</p> <p>Site GNLP0175 is suitable for residential development and would bring forward additional housing to meet the identified need within the Salhouse cluster. With preferred site GNLP0188 there is a potential shortfall of at least 35 dwellings in the cluster. Client has exclusive option agreement with landowner and there are no physical or legal impediments. The site is deliverable and developable. A policy compliant level of affordable housing will be provided with a mix of sizes, types and tenures. In addition a substantial part of the site can be offered for public open space or any alternative community use.</p>	<p>Consideration of footway proposals with NCC Highways.</p> <p>Further discussion of landscape and heritage concerns with Development Management Officers</p> <p>New site to be assessed</p>	<p>Further discussion has taken place regarding this site with Development Management colleagues and the local highway authority based on the comments in this representation.</p> <p>Development Management colleague maintain their significant landscape and</p>	

		<p>Access can be provided via an existing agricultural access from Bell Lane which would be designed to meet the requirements of Norfolk County Highways. Some existing landscaping may need to be removed to allow for visibility splays, although any lost hedgerow would be replaced to ensure landscape impacts are minimised. It is considered that improvements could be undertaken to provide an additional small section of footway to link up with service and facilities in the village centre including the primary school</p> <p>The proposal fits in with the built surroundings in term of scale and form, it is well related to the existing settlement pattern and represents a logical extension to the settlement boundary.</p> <p>Landscape and heritage concerns of Development Management Officers are noted and regard will be paid to these constraints through the design of development with suitable and effective mitigation put in place to significantly reduce any potential harm. The site is contained by established hedgerows along the western boundary and more distant views of the site are set against the backdrop of existing residential development</p> <p>An additional site has been submitted for consideration which lies immediately to the east of this site, currently used as an equestrian facility. The two sites could come forward as</p>		<p>heritage concerns and are not keen on the development of this site extending northwards towards the church.</p> <p>The local highway authority have stated that it is not clear whether the missing section of footway can be provided within highway land and that this would need to be confirmed if the site were considered suitable for allocation. They have commented that the site may be suitable subject to footway improvements and satisfactory access, which may require tree removal.</p>	
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		<p>one larger development proposal with linkages across. The vehicular access for site GNLP0175 could be taken via the new site.</p>		<p>The site is not considered reasonable for allocation due to the significant landscape and heritage concerns raised.</p> <p>The additional site submitted to the east has been given the reference GNLP4024. It has been assessed for its suitability for allocation and it not considered to be reasonable on access and surface water flood risk grounds.</p>	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP 0189 Site off Lower Street, Salhouse (Unreasonable Residential 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
One Planning	Object	<p>Comments objecting to the site being considered unreasonable:</p> <p>Site GNLP0189 is a suitable site for residential development to bring forward additional housing to meet the identified need within the Salhouse cluster. With preferred site GNLP0188 there is a potential shortfall of at least 35 dwellings. Client has exclusive option agreement with the landowner and there are no physical or legal impediments to development. The site is deliverable and developable. A policy compliant level of affordable housing will be provided with a mix of sizes, types and tenures. The client is also keen to offer a substantial part of the site for public open space or any alternative community use.</p>		Further discussion has taken place regarding this site based on the comments in this representation. The site is still considered to be unreasonable for allocation due to the level changes on site and the fact that development in this location is getting remote from the village.	None

		<p>Access can be provided via Lower Street and would be designed to meet requirements of Norfolk County Highways. Access can be achieved without the need for third party land. Some existing landscaping would need to be removed to allow for access but any lost hedgerow would be replaced with mixed native species to ensure any potential landscape impacts are minimised.</p> <p>The whole of the site is included within the Salhouse Conservation area, there is a listed building to the north and the site is near to the Broads Authority area and Broads Special Area of Conservation. These constraints and sensitivities of the site are recognised and mitigation would be provided to significantly reduce any harm resulting from the scheme. The landscape and heritage concerns of Development Management officers are also noted.</p> <p>Site GNLP0189 connects well to the existing village centre and therefore represents a sustainable location in respect of access to services and facilities. The site also relates well to the existing settlement boundary and the built form of the village thereby representing a logical extension to the existing boundary. The site is contained due to established hedgerows which reduces and mitigates its visual impact when viewed in the wider landscape context.</p>			
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		It is considered that other constraints such as biodiversity/geodiversity and surface water flood risk can be dealt with through any future planning application.			
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0226 Manor Farm, Land to west of Wroxham Road (A1151), Salhouse (Unreasonable Residential 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
GP Planning Ltd	Object	<p>The landowner of this site OBJECTS to it being considered unreasonable given its potential for a long-term extension to the GT16 allocation. The site and land area offer the opportunity for the provision of approximately 1,000 residential units and certainty of delivery through the masterplan for GT16. There is no clear justification for its exclusion.</p> <p>Furthermore, the spine road into North Rackheath, as shown on the endorsed Masterplan, provides a roundabout that fronts the GNLP 0226 site, allow safe access and a reasonable extension</p>		This site is promoted as a long term extension to the large scale Growth Triangle AAP allocation at Rackheath and the GNLP maintain the view that it is not needed for development at the current time. Development of this site without completion of the AAP allocation would lead to an	None

				isolated and disconnected form of development in the countryside. There is no safe walking route to Salhouse Primary School.	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0487 Land to the north of Norwich Road, Salhouse (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 2 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Grand Vision Developments Ltd via Jon Jennings (Cheffins Planning)	Object	<p>Comments objecting to site being considered unreasonable:</p> <p>This site is subject to a current application for residential development. The application has not been determined but conversations with Development Control show that there is potential conflict with the Salhouse Neighbourhood Plan. The Neighbourhood Plan discourages unrestricted open market housing but has a specific policy relating to development meeting the needs of elderly residents. The committed and proposed developments in Rackheath and Salhouse do not cater for this.</p> <p>As a consequence the decision has been made to change the form of development</p>	Re-evaluate the site in the context of change in development proposed	For the purposes of the GNLP the proposal for a care home and over 55's accommodation would be assessed against the same criteria as open market housing so it is still considered to be contrary to form and character and disconnected from the existing edge of the village with an absence of footpaths.	None

		<p>proposed on this site with 1.2ha now proposed for a 60 bed care home with the remainder of the site providing circa 60 dwellings aimed at over 55's accommodation. A significant number of these will comprise bungalows. 33-50% of the units will be affordable i.e. shared equity and rented accommodation.</p> <p>The site will still provide 5.09ha of green infrastructure, which will help to reinforce the gap between Salhouse and the development at Rackheath. The proposal will also allow for the extension of the Salhouse Country park which will result in a significant community benefit</p> <p>Development in this location relates more closely to the existing and proposed facilities within Rackheath. As a consequence, Grand Vision Developments Ltd will work with Network Rail to upgrade the existing level crossing, to provide a safe means of pedestrian access to Rackheath. Similar pedestrian upgrades can also be made to Salhouse. Due to the nature of the proposed development the issue of a safe walking route to Salhouse Primary School is less relevant.</p> <p>In reviewing the documentation relating to this site it is interesting to note that Salhouse Parish Council are of the view</p>		<p>Proposals for the provision of older peoples/extra care housing have been considered on a settlement hierarchy basis to ensure sustainable development. Salhouse is a village where limited development is proposed. At a strategic level there is not considered to be an overriding need for extra care housing in Salhouse leading to the conclusion that more sustainable locations should be favoured.</p> <p>The policy in the Salhouse Neighbourhood Plan relating to the provision of sheltered housing within the village is</p>	
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		<p>that “The scheme is highly sustainable and will deliver net environmental gains”. The Parish Council have also commented on the high pressure gas main which crosses the site. It can be confirmed that the position of this pipeline and its easement has been taken into account in identifying the developable areas.</p> <p>The assumptions made in the HELAA comparison table are questioned as many issues have been mitigated or resolved through the current planning application. It is requested that the site be reassessed and allocated for a care home and over 55s housing development to meet the needs of Salhouse and the wider area and to accord with the Salhouse Neighbourhood Plan.</p>		<p>noted. The policy states new sheltered housing developments will be permitted where they are compatible with the local surrounding area and of an appropriate size, respecting the amenities of neighbouring uses. It is considered that this proposal may be better to come forward as a planning application so that it can be considered against the requirements of the Neighbourhood Plan policy.</p> <p>On this basis the site is not considered to be reasonable for allocation in the GNLP.</p>	
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GP Planning Ltd	Object	Landowner objects to site being unreasonable, the site is immediately adjacent to village and could be designed to provide safe access and footpath links		Comments noted but no evidence submitted with the representation to demonstrate how the site could be developed to overcome form and character concerns or how a safe walking route could be provided to Salhouse Primary School therefore the site is still considered to be unreasonable for allocation.	None
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## SOUTH WALSHAM AND UPTON WITH FISHLEY CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	SOUTH WALSHAM AND UPTON WITH FISHLEY OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 Object, 0 Comment

The South Walsham and Upton with Fishley Cluster has 1 c/f allocation (SWA1), 1 preferred site (0382, 0 reasonable alternatives and no unreasonable sites.

Main issues:

- Preferred Site GNLP0382 - Consider slightly reduced site size and submitted masterplan layout

Sites not commented on through the consultation:

- None

### South Walsham and Upton with Fishley Cluster – Preferred Site

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0382 Land north of Chamery Hall, South Walsham (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Norfolk County Council via NPS Property Consultants Ltd	Support	<p>Norfolk County Council own the land and work has been ongoing to confirm the site can deliver a sustainable, policy compliant housing scheme. Site is currently farmed by a County Farms tenant, let under a Business Farm Tenancy. The land would be available following grant of planning permission. Site would be developed in a two year period following completion of SWA1 allocation. Anticipated to commence within 5 years.</p> <p>Site slopes gently from north to south but the topography does not offer any significant constraint to development. The site is open to the west, limited boundary planting to east and south. Land to the north is allocated (SWA1).</p>	Consider slightly reduced site size and submitted masterplan layout	Comments noted. Further discussions have taken place with NPS and a slightly revised site boundary has been agreed to level off site GNLP0382 with adjacent carried forward allocation SWA1	Make minor amendments to site boundary

		<p>Site is within flood zone 1 with no history of flooding. Adjacent uses to the site are residential so there would be no conflict. Infrastructure and services are in place.</p> <p>Work has been undertaken to identify the most suitable means of access to the site and it is proposed that vehicular access will be via the SWA1 allocation. No vehicular access is proposed from Chamery Hall Lane. Footway improvements are required as part of the outline permission on SWA1.</p> <p>NOTE: The representation shows a slightly smaller red line boundary than the preferred allocation.</p>			
Anglian Water	Comment	<p>No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2</p>	<p>Consistent policy approach to water efficiency needed</p>	<p>This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy</p>	<p>None</p>

### South Walsham and Upton with Fishley Cluster – Carried Forward Allocation

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy SWA1 Land to rear of Burlingham Road/St Marys Close, South Walsham (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 1 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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of the public	Object	<ul style="list-style-type: none"> <li>• School and pre-school are oversubscribed, people who move to the new houses will likely need to travel to other villages to school their children.</li> <li>• Increased traffic, noise and air pollution doesn't appear to have been factored in.</li> <li>• Impact on over stretched local services (e.g. GPs) can only worsen with this.</li> <li>• Vehicular access via Burlingham Road could be problematic due to speed on the road creating danger.</li> <li>• Detrimental to wildlife that thrives in area along field boundary</li> </ul>		The principle of the SWA1 allocation has already been agreed through the Broadland Local Plan so it is carried forward unchanged into the GNLP for 20 dwellings.	None
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	None

				to include it in the allocation policy	
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## SPIXWORTH AND CROSTWICK CLUSTER

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	SPIXWORTH AND CROSTWICK OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 0 Comment

The Spixworth and Crostwick Cluster has 0 c/f allocations, 0 preferred sites, 0 reasonable alternatives and 1 site which is judged to be unreasonable.

Main issues:

- Reassess revised proposal on unreasonable site GNLP0467

Sites not commented on through the consultation:

- None

### Spixworth and Crostwick Cluster – Unreasonable Site

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0467 Land off North Walsham Road, Crostwick (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>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Brown and Co representing landowner	Object	<p>Comments objecting to the site being unreasonable:</p> <ul style="list-style-type: none"> <li>• Site has been revised to bring benefits to local community by providing significant mature open space (27.69 acre Area of Spixworth Marsh) delivering substantial net biodiversity gain.</li> <li>• This land will be transferred to the Parish providing increase in open space and ability to offset carbon footprint. Provides ability to deliver forest school or similar to improve school capacity and education benefits.</li> <li>• Revision seeks to address disconnect issue identified previously</li> </ul>	Revised site proposal to be assessed	The site boundary has been revised through the Reg 18C consultation, however the area proposed for residential development remains the same. The change to the boundary reflects the fact that a large area of open space has now been proposed (bringing in questions over	None

		<p>by linking development around north and eastern side of settlement, access will still be necessary from B1150.</p> <ul style="list-style-type: none"> <li>• Site will now provide up to 100 dwellings with benefits deemed to outweigh drawbacks.</li> </ul>		<p>management) with the aim of delivering a substantial biodiversity net gain from the development and addressing the disconnection issue with the original site. However vehicular access from the B1150 remains necessary and there is still unlikely to be a safe walking route to the primary school. For these reasons the site is still considered to be unreasonable for allocation.</p>	
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