

Settlement Name:	Horsford , Felthorpe and Haveringland
Settlement Hierarchy:	<p>Horsford, Felthorpe and Haveringland form a village cluster in the emerging Greater Norwich Local Plan, although no sites have been promoted in Haveringland. The Towards a Strategy document identifies that around 2,000 dwellings in total should be provided between all the village clusters. Horsford has a range of services and facilities including a primary school, shop, doctors surgery, village hall, library and public house. Most development in recent decades has been in the north of the village and this pattern will be reinforced by current commitments.</p> <p>Horsford has a made neighbourhood plan which covers the same area as that of the parish boundary. The Plan was made in July 2018 and covers the period to 2038. It contains a series of policies that look to shape development within the neighbourhood area. There are policies within the plan that will be of relevance to development and any applications that are submitted for development within the parish should have due regard to those policies.</p> <p>The current capacity at Horsford Church of England VA Primary School is rated as 'amber', consequently it is considered that the Horsford cluster could accommodate development in the region of 20-50 dwellings. Without expansion school capacity could be a possible constraint on further development.</p> <p>At the base date of the plan there are no carried forward residential allocations but there is a total of 394 additional dwellings with planning permission on a variety of sites. Former allocations (HOR1 and HOR2) have recently been built out at Pinelands for 53 homes and employment and north of Mill Lane for 125 homes. There is also a planning permission for 259 homes further north of Mill Lane (site GNLP0519 and permission 20161770).</p>

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

STAGE 1 – COMPLETE LIST OF SITES PROMOTED IN THE SETTLEMENT

LIST OF SITES TO BE CONSIDERED FOR RESIDENTIAL ALLOCATION (0.5 HECTARES OR LARGER)

Address	Site Reference	Area (ha)	Proposal
Horsford			
Bramley Lakes, Dog Lane	GNLP0059	3.33	Range of uses (industrial, residential, commercial, recreation, leisure & tourism)
Pronto Joinery, Dog Lane	GNLP0151	2.34	Residential (unspecified number)
Pronto Joinery, Dog Lane	GNLP0153	0.85	Mixed use (unspecified number)
Arable Land, Dog Lane	GNLP0192	2.66	Residential (unspecified number)
Land to East of Brand's Lane (Partly in Drayton)	GNLP0222	11.05	Light industrial and office uses, market and affordable housing including starter homes, live work and Public Open Space
Land at 33 St Helena Way	GNLP0251	1.44	15-20 dwellings
Dog Lane	GNLP0264	1.76	35-46 dwellings
Land Off Holt Road	GNLP0283	3.43	105 dwellings
Land off Reepham Road	GNLP0302	7.34	150-200 dwellings
Reepham Road / Cromer Road (Partly in Hellesdon)	GNLP0332R	64.00	600-700 dwellings
Reepham Road / Holt Road	GNLP0333	36.60	Residential (unspecified number), improved cricket field, employment, roadside services and retail)
West of Reepham Road	GNLP0334R	11.70	250-300 dwellings
Land adjacent Drayton Lane	GNLP0359R	8.10	Up to 150 dwellings
Land at Holly Lane / Reepham Road	GNLP0419	40.65	Approx. 750 dwellings with associated access and open space

Land at Lodge Farm	GNLP0422	1.65	Approx. 40 dwellings
Land at Mill Lane	GNLP0423	0.95	Approx. 10 dwellings with improved access off Mill Lane
Land off St Helena Way,	GNLP0469	2.64	Approx. 10-15 dwellings with remaining land available as open space
Land east of Holt Road	GNLP0479	4.38	Approx. 80 dwellings with open space, play equipment and GI
Land to the east of Holt Road	GNLP0519	15.59	Approx. 266 dwellings
Hilltop Farm, Church Street	GNLP0578	6.67	Residential (unspecified number)
Home Farm, Holt Road	GNLP1008	20.25	Residential (unspecified number)
Dog Lane	GNLP1043	7.21	Residential (unspecified number)
Green Lane	GNLP2160	29.70	600 dwellings plus open space and community woodland
North of Reepham Road	GNLP3005	2.25	Residential (unspecified number)
Felthorpe			
Swanington Lane	GNLP2009	2.00	15-20 dwellings
Brand's Lane	GNLP2012	0.63	5 dwellings
North of Church Lane	GNLP3004	1.24	16 dwellings
Total area of land		290.41	

LIST OF SITES TO BE CONSIDERED AS SETTLEMENT BOUNDARY EXTENSIONS (SETTLEMENT BOUNDARY PROPOSALS AND SITES LESS THAN 0.5 HECTARES)

Address	Site Reference	Area (ha)	Proposal
Horsford			
North Farm, Green Lane	GNLP3021	0.48	9 dwellings

(Sites of less than 0.5ha are not considered suitable for allocation and therefore have not been assessed in this booklet. These sites will be considered as part of a reappraisal of settlement boundaries to be published with the Regulation 19 Submission version of the Plan).

LIST OF SITES SUBMITTED FOR OTHER USES

Address	Site Reference	Area (ha)	Proposal
Horsford			
Glebe Farm North	GNLP2133	26.23	Employment led mixed use development
South of Drayton Lane	GNLP2154	2.30	Commercial , retail/car parking

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

STAGE 2 – HELAA COMPARISON TABLE

RESIDENTIAL/MIXED USE

	Categories													
	Site access	Access to services	Utilities Capacity	Utilities Infrastructure	Contamination/ground stability	Flood Risk	Market attractiveness	Significant landscapes	Sensitive townscapes	Biodiversity & Geodiversity	Historic environment	Open Space and GI	Transport & Roads	Compatibility with neighbouring uses
Site Reference														
Horsford														
GNLP0059	Red	Amber	Amber	Green	Green	Amber	Green	Amber	Amber	Amber	Green	Green	Green	Green
GNLP0151	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber
GNLP0153	Amber	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber
GNLP0192	Red	Green	Amber	Green	Green	Green	Green	Amber	Green	Green	Green	Green	Amber	Green
GNLP0222	Amber	Amber	Amber	Green	Green	Green	Amber	Green	Green	Amber	Green	Green	Amber	Amber
GNLP0251	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green	Green
GNLP0264	Amber	Green	Amber	Green	Amber	Amber	Green	Green	Green	Green	Green	Green	Green	Green
GNLP0283	Amber	Green	Amber	Green	Green	Green	Green	Green	Amber	Green	Amber	Green	Amber	Green
GNLP0302	Amber	Amber	Amber	Green	Green	Green	Green	Amber	Amber	Amber	Green	Green	Amber	Green
GNLP0332R	Amber	Amber	Amber	Green	Green	Green	Green	Amber	Amber	Amber	Green	Amber	Amber	Red
GNLP0333	Amber	Amber	Amber	Green	Green	Green	Green	Green	Amber	Amber	Green	Green	Amber	Red
GNLP0334R	Amber	Amber	Amber	Green	Green	Green	Green	Amber	Amber	Amber	Green	Green	Amber	Amber
GNLP0359R	Amber	Green	Amber	Green	Green	Green	Green	Green	Amber	Green	Green	Green	Amber	Amber
GNLP0419	Amber	Amber	Amber	Green	Green	Green	Green	Green	Amber	Amber	Green	Green	Amber	Green

GNLP0422	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green	Green	Green
GNLP0423	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Green
GNLP0469	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green	Green
GNLP0479	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green	Amber	Green
GNLP0519	Green	Green	Amber	Green	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Amber	Green
GNLP0578	Green	Amber	Amber	Green	Green	Green	Green	Amber	Amber	Green	Amber	Green	Amber	Amber	Amber
GNLP1008	Amber	Green	Amber	Green	Green	Green	Green	Green	Amber	Green	Amber	Green	Amber	Amber	Green
GNLP1043	Red	Amber	Amber	Green	Green	Green	Green	Green	Amber	Amber	Green	Green	Amber	Amber	Amber
GNLP2160	Amber	Green	Amber	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber	Green	Amber	Amber	Green
GNLP3005	Amber	Amber	Amber	Green	Green	Green	Green	Amber	Amber	Amber	Green	Green	Amber	Amber	Green
Felthorpe															
GNLP2009	Amber	Amber	Amber	Green	Green	Amber	Amber	Green	Green	Amber	Green	Green	Amber	Amber	Green
GNLP2012	Amber	Red	Amber	Green	Green	Green	Amber	Green	Green	Amber	Green	Green	Amber	Amber	Green
GNLP3004	Amber	Amber	Amber	Green	Amber	Green	Amber	Green	Green	Amber	Green	Green	Amber	Amber	Green

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

Site Reference	Comments
Horsford	
GNLP0059	No comments submitted
GNLP0151	No comments submitted
GNLP0153	No comments submitted
GNLP0192	No comments submitted
GNLP0222	<p>General comments Brands Lane has become a dangerous road and has had multiple accidents which I have reported to the council. Extra housing would only make this problem worse. The woodland is an important habitat for animals so other sites towards the city centre and still following NDR would make more sense. The site is remote and outside of settlement limits, so the location is unsustainable. It would prejudice a 'no development' policy along the NDR.</p> <p>The site is adjacent to woods and by the NNDR. It is likely that an industrial area would increase the volume of traffic on Brands Lane. The site is on a very narrow track. There are two brownfield sites in Felthorpe and on Fir Covert Road so why build on Greenfield. There would be no facilities/public transport for this site which is also close to wildlife sites at Drayton Drewray.</p> <p>Felthorpe Parish Council comments Felthorpe Parish Council objects to the proposal for the following reasons: the development would cause extra traffic down Brands Lane which is a narrow country lane and already unsuitable for the amount of traffic using it; the location would be removed from the main parish and so parishioners would find it difficult to integrate into the community; there would be no facilities or buses for the new properties; the site are close to Drayton Drewray and would affect these vital wildlife sites.</p> <p>Drayton Parish Council comments This site is outside the settlement limit and is remote from either Felthorpe, Horsford or Drayton and is unstainable and would rely on private means of transport. Any development would result in a loss of rural character of the lane.</p>
GNLP0251	<p>Norfolk Wildlife Trust comments 0469 and 0251 should be recognised as County Wildlife Sites and there should be no development.</p>

GNLP0264	No comments submitted
GNLP0283	<p>General comments This site would prejudice a 'no development' policy near the NDR of which the aim was to free traffic on the radial roads. Also ribbon development.</p> <p>Comments submitted in support of site. The site is considered suitable for development as investigation, surveys and reporting has been undertaken in relation to the site to justify its suitability.</p>
GNLP0302	<p>General comments The local amenities are already overstretched, and the site is isolated from Horsford and the surrounding villages. There are no footpaths or public transport, so the development would be unsustainable. It will join the villages of Horsford and Hellesdon and so both communities will lose their character. The green buffer will be lost, and future generations will lose out on the fields that children play in today. Loss of wildlife. Reephams Road is already congested at peak times and Middleton's Lane will also be adversely affected. The site will impact on Hellesdon and Drayton services without any cost benefits. Development goes against the Neighbourhood Plan.</p> <p>Would prejudice a 'no development' policy along the NDR. Noise pollution from NDR.</p> <p>Drayton Parish Council comments This site is extremely remote from village of Horsford and is contrary to the neighbourhood plan which supports new dwellings close to the village centre. This is outside of any settlement limit and is unsustainable and would rely on use of private transport</p> <p>Hellesdon Parish Council comments Large site close to Hellesdon Parish boundary which will remove more of the green buffer between Horsford and Hellesdon. It is remote from the village of Horsford which is contrary to the draft Horsford Neighbourhood plan and will put yet more pressure on the infrastructure and amenities of Hellesdon.</p>
GNLP0332R	<p>General comments Objections raised concerns regarding local infrastructure & community impacts, drainage, flood risk, traffic congestion, loss of green space, lack of suitable services (or stretched to capacity), parking, public transport, impact on form/character and site is directly under the flight path to Norwich Airport. It has been expressed Hellesdon is already overcrowded.</p>

	<p>Norfolk FA comments Norfolk County FA would be interested to understand the green infrastructure being offered by this proposal, and where football within Hellesdon may benefit, whether that be via the development of new football facilities or supporting the enhancement of existing football facilities within Hellesdon.</p> <p>Drayton Parish Council comments The site although in the parish of Horsford is on the boundary of the parish of Hellesdon. The Parish Council have concerns about the site being in or adjacent to the airport safety zone. The cumulative detrimental effect of the submitted developments off Reephram Rd on Drayton and Hellesdon is unacceptable.</p>
GNLP0333	<p>General comments Increased car pressure is a big concern as the infrastructure cannot cope with today's traffic. The development will question the validity of traffic flows for the AADT as part of the NDR. It would prejudice a 'no development' policy near the NDR. Drainage issues as observed by the lagoons. Wildlife will be destroyed and it's in the Airport safety zone.</p> <p>Drayton Parish Council comments This site is outside of the settlement limit and remote from the services of Horsford, contrary to their neighbourhood plan. This is also within the Norwich Airport Public Safety Zone. It will call in question the validity of all traffic flows for the AADT which part of the requirement for the DCO for the NDR was. These sites were not under consideration when the NDR was approved. This location has serious drainage issues as observed by the lagoons on the Reephram Rd/ Drayton Lane roundabout.</p> <p>Hellesdon Parish Council comments Another large site close to Hellesdon and remote from Horsford. The site will suffer noise and pollution from its proximity to the Airport. Will again add to the pressure on the infrastructure and amenities of Hellesdon and add further to the already considerable traffic congestion in the area,</p>
GNLP0334R	<p>General comments Objections raised concerns regarding local infrastructure & lack of already overstretched services, loss of green space, changing the character of Hellesdon, traffic congestion, increased pollution, parking, field proposed in on the flight path to Norwich airport. It has been suggested Hellesdon has already had enough development.</p> <p>One comment in support of site. The site promoter is undertaking further work to assess the impact and mitigation</p>

	<p>opportunities based on the assessment findings and is working closely with stakeholders and decision makers with requirements being met where justified for later submission. The site located east of Reepham Road (0332R) could be allocated on its own or together with the site west of Reepham Road (0334R) if the Greater Norwich Development Partnership (GNDP) so wished.</p> <p>Drayton Parish Council comments The site is in the parish of Horsford but remote from the village centre and is adjacent to the parish of Hellesdon. The cumulative detrimental impact of the submitted developments off Reepham Rd on both Drayton and Hellesdon is unacceptable.</p> <p>Norfolk Wildlife Trust comments We note the proximity of this site to Drayton Wood CWS and are concerned at the potential ecological impacts of housing in this location. Should this site be progressed to the next consultation stage, then we would expect it to be accompanied by further details demonstrating how it would be deliverable without resulting in damage to adjoining areas of ecological value, for example through providing sufficient stand-off between development and priority habitats, and where proportional the provision of green infrastructure to ensure that the site has a net benefit for biodiversity.</p>
GNLP0359R	<p>General comments Objections raised concerns regarding road infrastructure already stretched, traffic congestion and additional pressure on local services.</p> <p>Horsford Parish Council comments The Council objects to this site as the road network in that area is already very congested and there would be a lack of connection with the main part of the village.</p>
GNLP0419	<p>General comments The site is isolated from Horsford and surrounding villages. Local amenities are already overstretched and there are no footpaths, public transport and the site goes against the Drayton Neighbourhood Plan. Loss of green space.</p> <p>The development would prejudice a 'no development' policy near the NDR. It would invalidate traffic modelling used to approve the NDR. Other issues include unsustainable location, contrary to Horsford Neighbourhood Plan, in the airport safety zone and the site is adjacent to a critical drainage area.</p> <p>The site is remote from Horsford and contrary to their neighbourhood plan draft and so money will go towards Horsford</p>

	<p>instead of Hellesdon. The site will have a negative impact on the environment. Access is onto a 50mph road which is inherently dangerous. It would make more sense to build north of the NDR as it wouldn't disrupt the flow of traffic out of the city. It is in the safety zone of Norwich Airport which will cause high noise levels.</p> <p>The site should be used for mixed use development as this site is suitable, achievable, viable and deliverable. It represents a sustainable location and evidence suggests there are no constraints.</p> <p>Drayton Parish Council comments The site is outside of the settlement and is extremely remote from the centre of Horsford which is contrary to their neighbourhood plan. The site is with the Norwich Airport Public Safety Zone. This land is at risk of surface water flooding and has drainage issues as clearly seen by the non-draining lagoons on the Drayton Lane/ Reepham Road roundabout. Approval which bring into question the validity of the DCO for the NDR. reference point A77 reflects an increase of over 23% by 2032 which was based on known developments up to that time consent was approved.</p> <p>Hellesdon Parish Council comments Another large site remote from Horsford contrary to their draft neighbourhood plan which will have an adverse impact on the environment access to / from the site is onto a 50-mph road with its inherent danger and will again have an adverse effect on the infrastructure and amenities of Hellesdon and increase traffic congestion.</p>
GNLP0422	<p>General comments The site should be used for residential development and retail, residential and leisure uses. The site is suitable, achievable and therefore deliverable. The location is sustainable, and evidence demonstrates that there are no constraints to delivery.</p>
GNLP0423	No comments submitted
GNLP0469	<p>Norfolk Wildlife Trust comments There should be no development on CWS. 0469 and 0251 should be recognised as having CWS constraint.</p>
GNLP0479	<p>General comments The site would prejudice a 'no development' policy near the NDR. The NDR should free traffic on radial roads.</p>
GNLP0519	General comments

	The site would prejudice a 'no development' policy near the NDR. The NDR should free traffic on radial roads.
GNLP0578	No comments submitted
GNLP1008	General comments The site is remote enough not to impact other areas negatively and large enough for some services to be supplied so the community could be self-contained.
GNLP1043	General comments The site would prejudice a 'no development' policy near the NDR. The NDR should free traffic on radial roads.
GNLP2160	<p>General comments</p> <p>Objections raised concerns regarding scale of development, services will need to be built, effect on the environment & wildlife and the strain on infrastructure.</p> <p>This development is of strategic interest to Norfolk FA, especially given the proposal associated to the development of open space.</p> <p>One comment in support of site. Agent submitted highways capacity assessment & public transport provision review for phase 3 development, ecological report, utilities & drainage review, vision document, education report and an archaeological statement.</p> <p>Norfolk Wildlife Trust comments</p> <p>We note the proximity of this site to Horsford Woods and Horsford Rifle Range County Wildlife Sites and are concerned at the potential ecological impacts of housing in this location. Should this site be progressed to the next consultation stage, then we would expect it to be accompanied by further details demonstrating how it would be deliverable without resulting in damage to adjoining areas of ecological value, for example through providing sufficient stand-off between development and priority habitats, and where proportional the provision of green infrastructure to ensure that the site has a net benefit for biodiversity.</p> <p>Horsford Parish Council comments</p> <p>The Council objects strongly to this proposal. It would represent complete over-development of Horsford. The existing highway infrastructure would be completely inadequate. The pleasant vistas highlighted in the Neighbourhood Plan would be lost and it would effectively create a second village disconnected from existing main settlements and with no village centre.</p>
GNLP3005	No comments as site received during stage B consultation

Felthorpe	
GNLP2009	<p>General comments Objections raised concerns regarding traffic congestion, road safety, NDR has already increase traffic, lack of footpaths, no safety parking, views destroyed, poor infrastructure, limited employment with only two buses running to Norwich, surface water flood risks, environmental risks and Felthorpe has no shops, school or doctors, just a pub.</p> <p>Felthorpe Parish Council comments While the council agrees with most of the suitability assessment for the Swannington Lane site, we believe that the Market Attractiveness criteria should be rated as red. It seems unlikely that a site with so few facilities would attract the required 10% premium for rural fringe sites. Mitigation for the other six amber criteria, including site access, local road network, waste water infrastructure and surface water flooding would be costly, rendering this site economically unviable. We therefore request that this site is not progressed further and is excluded from the Greater Norwich Plan.</p>
GNLP2012	<p>General comments Objections raised concerns regarding damage to the local landscape, loss of open green space, damage to wildlife habitat and further intrusion into and despoliation of the countryside in and around the existing settlement. Felthorpe has no shops, school or doctors, just a pub. It has an inadequate bus service,</p> <p>Felthorpe Parish Council comments The council agrees with the suitability assessment that the Brands Lane site is unsuitable for development due to its lack of access to facilities. We request that this site is not progressed further and is excluded from the Greater Norwich Plan.</p>
GNLP3004	No comments as site received during stage B consultation

STAGE 4 – DISCUSSION OF SUBMITTED SITES

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

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

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

Land totalling 279 ha is promoted for residential use in the Horsford, Felthorpe and Haveringland cluster. Most notably, large areas of land are promoted to the south of Horsford village, near the Broadland Northway A1270. Of the sites promoted for residential use, two of them are in effect urban extensions to Hellesdon (GNLP0332R and GNLP0334R) and are considered to be reasonable alternatives. GNLP0332R and GNLP0334R benefit from the more extensive range of services in Hellesdon and as a Norwich urban fringe parish Hellesdon has better access to services in Norwich than Horsford. Sites GNLP0222 and 0333 are not considered to be reasonable alternatives as they are separated from Horsford but are not as well related to the urban fringe as GNLP0332R and 0334R.

As another alternative, to give the option for strategic-scale growth in Horsford village itself, GNLP2160 is also considered to be a reasonable alternative. GNLP2160 is better located to the services in the village (and most particularly the school) when compared to the other large-scale sites in Horsford. A series of other smaller sites are also shortlisted as reasonable in order to give further alternatives and to fulfil the NPPF requirement (paragraph 68) for sites of 1 ha or less. Sites GNLP0153, 0251, 0422 and 0423 are considered to be reasonable alternatives due to their proximity to the existing built edge of the village, although vehicular access

and areas at surface flood risk are amongst the constraints that might reduce the net developable areas.

In comparison other sites are much larger than 1 ha or more constrained; and, on this basis GNLP0151 and 0469 are not considered to be reasonable alternatives for further consideration. For sites GNLP0059, 0192 and 1043 access is via an unadopted part of Dog Lane and for this reason they are not reasonable alternatives. For sites along Dog Lane, another limiting factor is the capacity of the junction with the Holt Road, hence the rationale for favouring only a small development site (GNLP0153). For other sites their separation in form and character from the existing village makes them less preferable, especially when set against the strategic requirement for 500-800 dwellings in the North/North West sector. Less preferred sites are GNLP0283, 0302, 0359R, 0419, 0479, 0519, 0578, 1008 and 3005. These sites are not considered to be reasonable alternatives for a combination of reasons. These reasons are: the land is not an accessible walking distance to facilities; the site is separated from the existing built edge of the village, and the size of site far exceeds the strategic requirement for housing and in the case of sites 0479 and 0519 these sites already had planning permission at the base date of the plan in 2018 and are currently under construction..

Site GNLP0264 is considered to be a reasonable alternative for further consideration as it is a brownfield site within the existing settlement limit.

For sites in Felthorpe the lack of facilities within walking distance makes them less attractive for further consideration. Sites GNLP2009, 2012, and 3004 when compared to sites in Horsford are disadvantaged by not having good access to core services like a primary school or local food shop and are therefore not considered to be reasonable alternatives. No sites were promoted in Haveringland.

STAGE 5 – SHORTLIST OF REASONABLE ALTERNATIVE SITES FOR FURTHER ASSESSMENT

Based on the assessment undertaken at stage 4 above the following sites are considered to be reasonable alternatives.

Address	Site Reference	Area (ha)	Proposal
Horsford			
Pronto Joinery, Dog Lane	GNLP0153	0.85	Mixed Use (unspecified number)
Land at 33 St Helena Way	GNLP0251	1.44	15-20 dwellings
Dog Lane	GNLP0264	1.76	35-46 dwellings
Reephram Road / Cromer Road	GNLP0332R	64.00	600-700 dwellings
West of Reephram Road	GNLP0334R	11.70	250-300 dwellings
Land at Lodge Farm	GNLP0422	1.65	40 dwellings
Land at Mill Lane	GNLP0423	0.95	10 dwellings
Green Lane	GNLP2160	29.70	600 dwellings
Total area of land		112.05	

STAGE 6 – DETAILED SITE ASSESSMENTS OF REASONABLE ALTERNATIVE SITES

Site Reference:	GNLP0153
Address:	Pronto Joinery, Dog Lane
Proposal:	Mixed Use (unspecified number)

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Manufacturing workshops and associated storage	Brownfield

CONSTRAINTS IDENTIFIED IN THE HELAA
Amber Constraints in HELAA Access, Utilities Capacity, Compatibility with Neighbouring Uses
HELAA Conclusion This is a 0.85 ha site, only accessible from Dog Lane. Constraints include the access and concern about the local road network’s suitability. Otherwise, the site appears relatively unconstrained and abuts the existing built edge of the Village. Whilst noting the access constraints, the site is concluded as suitable for the land availability assessment.

FURTHER COMMENTS
Highways No comments
Development Management Further development has traditionally been resisted down Dog Lane due to highway concerns - would loss of employment traffic be taken in to account? The development would also result in the loss of existing commercial operations - would these need to be relocated at cost and impact viability?
Minerals & Waste Underlain or partially underlain by sand and gravel, any future policy matters should include CS16 if site area increased over 1ha; if allocated
Lead Local Flood Authority Few or no Constraints. Standard information required at a planning stage. RoSFW mapping indicates that the site is not at risk from surface water flooding. There is a watercourse shown on mapping within 200m of the site but there are no connection to it shown on mapping. Given the location of the site at the very edge of an existing residential area there may not be sewerage connections available. therefore surface water drainage may be reliant on the results of infiltration testing.

PLANNING HISTORY:

No relevant history

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

Site Reference:	GNLP0251
Address:	Land at 33 St Helena Way
Proposal:	15-20 dwellings

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Detached residential dwelling and curtilage	Part brownfield, part greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
Amber Constraints in HELAA Access, Biodiversity and Geodiversity
HELAA Conclusion This is a 1.4 ha site on the western side of the Village centre that appears to rely on a narrow access between two existing properties on St Helena Way. The other main constraint is that the western portion of the site intersects with the Pyehurn Lane Woodland County Wildlife Site. It is probable that the narrow access and the overlap with the Pyehurn Lane Woodland will reduce the net developable area but the site is concluded as suitable for the land availability assessment.

FURTHER COMMENTS
Highways No comments
Development Management Site raises a number of landscape/ecology/arboricultural related issues and other sites are likely to be sequentially preferable.
Minerals & Waste No safeguarded mineral resources.
Lead Local Flood Authority Mitigation required for heavy constraints. Significant information required at a planning stage. A flow path, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps, flows through the eastern section of the site. Access and egress may be an issue. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible).

PLANNING HISTORY:
No applications found

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

Site Reference:	GNLP0264
Address:	Dog Lane
Proposal:	35-46 dwellings

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Paddock, employment use, children's play/education/adventure centre	Brownfield

CONSTRAINTS IDENTIFIED IN THE HELAA
Amber Constraints in HELAA Access, Utilities Capacity, Contamination and Ground Stability, Flood Risk
HELAA Conclusion This is a 1.7ha site that is most likely to be accessed from Dog Lane, subject to highways mitigations that will likely be required. As a former brick works decontamination is a matter that will need consideration and it is also noted that a narrow strip of the site is at surface water flood risk. Otherwise, the site appears relatively unconstrained and abuts the existing built edge of the Village. The site is concluded as suitable for the land availability assessment.

FURTHER COMMENTS
Highways Dog Lane is not of a standard that would be suitable for intensification of use – has been considered many times. The site could only be acceptable if accessed via Horsebeck Way. Segregation of road users would need to be brought forward as part of any application. Access to the site from B1149/ Horsebeck Way would be acceptable, as would walking route to school. Need to provide enhanced pedestrian crossing facility and the access would need to be modified to enhance pedestrian facilities and walk to school routes.
Development Management Agreed
Minerals & Waste No comments
Lead Local Flood Authority Few or no constraints. Standard information required at planning stage. The site has superficial deposits of Clay, Silt and Sand potentially limiting surface water infiltration drainage. The site benefits from on-site watercourses which could be looked at as an alternative to soakaway drainage.

PLANNING HISTORY:
Not known

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

Site Reference:	GNLP0332R
Address:	Reepham Road/Cromer Road
Proposal:	600-700 dwellings

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agricultural (Arable)	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
<p>Amber Constraints in HELAA Access, Accessibility to Services, Utilities Capacity, Significant Landscapes, Townscapes, Biodiversity and Geodiversity, Open Space and GI, Transport and Roads</p> <p>Red Constraints in HELAA Compatibility with Neighbouring Uses</p>
<p>HELAA Conclusion This is a major 64 hectare site that is bounded by the Reepham Road and Cromer Road, on the edge of Hellesdon but largely in the parish of Horsford. The revised site boundary combines what was originally promoted as the 49 ha GNLP0332 and the 36.8 ha GNLP0333. The main difference being that approximately 21.8 ha adjacent to the Reepham Road, which was part of GNLP0333, is no longer promoted. The scheme comprises residential development of 600-700 homes south of the Airport Safety Zone, a commercial scheme to the north-east facing the Broadland Northway (A1270), and green infrastructure over the remaining land. Development is presented as a single masterplan, by the same promoter, with land to the west of Reepham Road (GNLP0334R). Subject to mitigations suitable access points are likely to be achievable. An extremely important constraint across part of the site is the Airport Safety Zone that will reduce the net developable area. Noise from the Airport and its associated industries could be a factor on the site's eastern side as well. If developed, the site would extend Hellesdon northwards, raising landscape considerations about the urban edge inside the route of the Broadland Northway. With the caveat about the net developable area being markedly reduced by proximity to the Airport, this site is concluded as suitable for the land availability assessment. However, because the site was previously assessed for the original HELAA it will not contribute any additional capacity to this HELAA addendum and has therefore been marked as unsuitable.</p>

FURTHER COMMENTS
<p>Highways No comments</p> <p>Development Management The site raises potentially significant landscape issues given scale of development and setting between existing built edge and NDR. Critical would be how it relates to existing settlement so that it is an integrated urban extension and not an 'add on'. Character of Reepham Road feels different to character of A140 due to</p>

proximity of airport and NDR junctions. Noise and safety concerns with airport also critical. Airport would not permit surface water suds in this proximity to airport due to risk of birdstrike. South-west of the site allocated as recreational open space under HEL4.

Minerals & Waste

The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority..

Lead Local Flood Authority

Few or no Constraints. Standard information required at a planning stage. RoSFW mapping indicates that the site is generally not at risk from surface water flooding. There are minor isolated areas of ponding across the site. There is no nearby watercourse shown on mapping. Given the location of the site there may be sewerage connections available. If not surface water drainage will be reliant on the results of infiltration testing.

PLANNING HISTORY:

No known history

OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:

Development Management comments

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

- Position Statement

Site Reference:	GNLP0334R
Address:	West of Reepham Road
Proposal:	250-300 dwellings

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agricultural (Arable)	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
<p>Amber Constraints in HELAA Access, Accessibility to Services, Utilities Capacity, Significant Landscapes, Townscapes, Biodiversity and Geodiversity, Transport and Roads, Compatibility with Neighbouring Uses</p>
<p>HELAA Conclusion This 11.7 ha site promoted for 250-300 homes is immediately north-west of Hellesdon’s existing built edge, although the site is in the parish of Horsford. Since its original submission, the boundary of the site has been increased northwards along the Reepham Road from 6.4 ha to 11.7 ha. Development is presented as a single masterplan, by the same promoter, with site GNLP0332R (land between Reepham Road and Cromer Road). In terms of constraints, some consideration will be needed to the landscape, biodiversity and townscape implications, as the site abuts Drayton Woods (which is a County wildlife Site). A further constraint of the site could be its access but mitigations are thought achievable. The site is concluded as suitable for the land availability assessment but the area of land already considered through the original HELAA assessment must not be double-counted in this addendum</p>

FURTHER COMMENTS
<p>Highways No comments</p> <p>Development Management Site would be a significant expansion into the countryside and impact character of Reepham Road. Critical would be how roadside trees are dealt with to provide access as these provide attractive feature. Also critical how site relates to existing built form and services so that it is an integrated urban extension. Noise and airport safety issues. CWS to west which may need buffer.</p> <p>Minerals & Waste The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - ‘safeguarding’ (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.</p>

Lead Local Flood Authority

Few or no Constraints. Standard information required at a planning stage. The northern third of the site falls within a critical drainage catchment. RoSWF mapping indicates that the site is not at risk of flooding in the 3.33% or 1% rainfall events. In the 0.1% event a flow path is shown to develop in the very southwest corner of the site and flow west towards the River Wensum. Any planning application should be supported by information to demonstrate that risk off site will not be increased as a result of development. There are no watercourses shown on mapping near the site. The location on the edge of an established urban area suggests that sewerage connections are likely to be available. IF not, drainage will be reliant on the results of infiltration testing.

PLANNING HISTORY:

No relevant history

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

- Position Statement

Site Reference:	GNLP0422
Address:	Land at Lodge Farm
Proposal:	40 dwellings

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

CONSTRAINTS IDENTIFIED IN THE HELAA
Amber Constraints in HELAA Access, Townscapes
HELAA Conclusion This is a 1.6 ha site that has a long private access road from the Holt Road. Based on current evidence, there are significant constraints to creating a suitable access and achieving an adequate visibility splay onto the Holt Road. The other constraints identified relate to townscape and historic environment factors, namely affecting undeveloped views of the Grade II listed parish church to the south. The issue about the access is important and will require further examination, but at this stage not considered an absolute constraint, and so the site is concluded as suitable for the land availability assessment.

FURTHER COMMENTS
Highways No. Not clear how site can be accessed from highway
Development Management Site has convoluted access and could not accommodate the scale of development proposed. Also harm to undesignated heritage asset. Other sites considered more preferable. Further advice from Highway Authority suggested.
Minerals & Waste Underlain or partially by sand and gravel, any future policy matters should include CS16 if allocated.
Lead Local Flood Authority Few or no Constraints. Standard information required at a planning stage. RoSFW mapping indicates that the site is not at risk from surface water flooding. There is a watercourse shown on mapping but there is no connection to it shown on mapping. Given the location of the site at the very edge of an existing residential area there may not be sewerage connections available. If not surface water drainage may be reliant on the results of infiltration testing.

PLANNING HISTORY:

No relevant history

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION
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- | |
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| <ul style="list-style-type: none">• Access Appraisal |
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Site Reference:	GNLP0423
Address:	Land at Mill Lane
Proposal:	10 dwellings

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

CONSTRAINTS IDENTIFIED IN THE HELAA
Amber Constraints in HELAA Open Space and GI
HELAA Conclusion This is a 0.9 ha site on the eastern side of the Village, opposite the primary school, on Mill Lane. As a small site, well-related to the built area of the Village, there are not thought to be any constraints to the principle of development. Some consideration may be needed to the form of development given the depth of the site relative to its frontage, but the site is concluded as suitable for the land availability assessment.

FURTHER COMMENTS
Highways Yes. Possible requirement for carriageway widening and footway (10 dwellings)
Development Management Site committed for 8 dwellings under 20170707. 10 dwellings as proposed likely acceptable in principle but is this too small to allocate (being less than 15)?
Minerals & Waste The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. As the site is under 2 hectares it is exempt from the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 – ‘safeguarding’, in relation to mineral resources. If the site area is amended in the future to make the area over 2 hectares CS16 (or any successor policy) will apply..
Lead Local Flood Authority Few or no Constraints. Standard information required at a planning stage. RoSFW mapping indicates that the site is not at risk from surface water flooding. There are no watercourse shown on mapping. Given the location of the site at the very edge of an existing residential area there may not be sewerage connections available. Therefore surface water drainage is likely to be reliant on the results of infiltration testing.

PLANNING HISTORY:

Not known

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION
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| <ul style="list-style-type: none">• Proposed Layout Plan |
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Site Reference:	GNLP2160
Address:	Green Lane
Proposal:	600 dwellings

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agriculture and section of small holding farm	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
<p>Amber Constraints in HELAA Access, Utilities Capacity, Utilities Infrastructure, Flood Risk, Significant Landscapes, Townscapes, Biodiversity and Geodiversity, Historic Environment, Transport and Roads</p>
<p>HELAA Conclusion This is 29.7 ha site on the eastern side of the Village along Mill Lane promoted for up to 600 dwellings with public open space and a community woodland. Adjacent to the site is the primary school, a recently completed residential development, as well as an 11 ha site that is the subject of a full planning approval for 259 homes (ref. 20161770). Possible access points are Mill Lane and Green Lane but significant highways investment would likely be necessary. In terms of the land availability assessment criteria, there are not considered to be any absolute constraints relating to landscape, biodiversity, townscape, and flood risk. Such a major site will require infrastructure utilities improvements, as will ecology and heritage impacts need consideration. To the north is Horsford Woods County Wildlife site, in which there are two round barrows that are designated Scheduled Ancient Monuments. Subject to finding acceptable mitigations, the site is considered suitable for the land availability assessment.</p>

FURTHER COMMENTS
<p>Highways No. Unlikely to be able to develop an acceptable access strategy for this level of development. Ongoing concern with new B1149 roundabout (600 dwellings)</p>
<p>Development Management Site close to significant amount of committed development and concerns that further development could result in imbalance in settlement grain and pattern. A smaller allocation could be considered however school capacity will require consideration if a larger site is needed to provide school upgrades. Area north of Green Lane considered unacceptable.</p>
<p>Minerals & Waste</p>

The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority..

Lead Local Flood Authority

No comments

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

- Highway Capacity assessment and public transport provision
- Ecological Desk Study
- Utilities and Drainage Review
- Archaeological Assessment
- Vision Document
- Education Report

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

Eight reasonable alternative sites have been identified in the Horsford, Felthorpe and Haveringland cluster at stage 5. These sites were considered to be worthy of further investigation to look at their potential for allocation as the initial assessment did not flag up any major constraints that would preclude allocation. These sites have been subject to further discussion with Development Management, Highways, Flood Authority and Children’s Services in order to identify preferred sites for allocation and their comments are recorded under stage six above. As part of this further discussion it was decided that Site GNLP0264 was the most appropriate site to allocate for 30-40 dwellings due to its brownfield nature within the existing built-up area of the village. None of the other reasonable alternative sites were considered to be suitable for allocation, some on highway grounds, some of landscape and airport safety grounds, one on ecological grounds and one because it was deemed to be too small to accommodate the minimum size of allocation.

In conclusion one site is identified as a preferred option, providing for between 30-40 new homes in the cluster. There are no carried forward residential allocations but there is a total of 394 additional dwellings with planning permission on a variety of sites. This gives a total deliverable housing commitment for the cluster of between 424 -434 homes between 2018-2038.

Preferred Sites:

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
Horsford, Felthorpe and Haveringland				
Dog Lane, Horsford	GNLP0264	1.76	30 – 40 dwellings	This proposal is for the redevelopment of a soft play centre and other commercial premises. It is preferred for allocation as it is well related to the form and character of Horsford although the proximity to remaining industrial uses will need to be considered. The site is only acceptable for development if access is taken from Horsbeck Way as Dog Lane and it’s junction with the Holt Road are not suitable for additional traffic.

Reasonable Alternative Sites:

Address	Site Reference	Area (ha)	Promoted for	Comments
Horsford, Felthorpe and Haveringland				
NO REASONABLE ALTERNATIVE SITES				

Unreasonable Sites:

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
Horsford, Felthorpe and Haveringland				
Bramley lakes, Dog Lane, Horsford	GNLP0059	3.33	Range of uses (industrial, residential, commercial, recreation, leisure and tourism)	This site is not considered to be reasonable for allocation as access would be via an unadopted part of Dog Lane. An additional limiting factor is the capacity of the junction with Holt Road. There is no safe walking route to Horsford Primary School.
Pronto Joinery, Dog Lane, Horsford	GNLP0151	2.34	Residential (unspecified number)	This site is considered to be unreasonable due to highway constraints along Dog Lane. An additional limiting factor is the capacity of the junction with Holt Road.
Pronto Joinery, Dog Lane, Horsford	GNLP0153	0.85	Mixed Use (unspecified number)	This site was considered worthy of further investigation due to its proximity to the existing built edge of the village, brownfield nature and the fact that it would fulfil the NPPF requirement for sites of 1ha or less. However, the site is considered to be unreasonable for allocation due to highway constraints along Dog Lane, the capacity of the junction with Holt Road and potential loss of

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				existing commercial operations.
Arable Land, Dog Lane, Horsford	GNLP0192	2.66	Residential (unspecified number)	This site is not considered to be reasonable for allocation as access would be via an unadopted part of Dog Lane. An additional limiting factor is the capacity of the junction with Holt Road. There is no safe route to Horsford Primary School.
Land to east of Brands Lane, Horsford, (partly in Drayton)	GNLP0222	11.05	Light industrial and office uses, market and affordable housing including starter homes, live work and public open space	This site is considered to be unreasonable for allocation as it is some distance from the built-up area of Horsford. It is closer to Thorpe Marriot but still separated from the built-up area by the Broadland Northway. Development here, of either a residential or commercial nature, would be remote and quite prominent in the landscape. There is no safe walking route to catchment schools in Horsford. Non catchment schools in Taverham or Drayton are closer but again with no safe walking route.
Land at 33 St Helena Way, Horsford	GNLP0251	1.44	15-20 dwellings	This site is not considered to be reasonable for allocation due to landscape/ecology and arboricultural issues. Trees to the southern boundary are likely to be a significant constraint and the woods to the north and west are a County Wildlife Site. Norfolk Wildlife Trust

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				suggest that this site should also be designated as a County Wildlife Site highlighting the potential ecological significance.
Land off Holt Road, Horsford	GNLP0283	3.43	105 dwellings	This site is not considered to be reasonable for allocation as it is separate from the built edge of the village and development here would be quite remote from the services and facilities in the main part of the village. There is no safe walking route to Horsford Primary School.
Land off Reepham Road, Horsford	GNLP0302	7.34	150-200 dwellings	This site is considered to be unreasonable for allocation as it some distance from the built-up area of Horsford, separated by the Broadland Northway. It is closer to Thorpe Marriot but still separated from the built-up area. Development here would be remote and potentially quite prominent in the landscape. There is no safe walking route to catchment schools in Horsford. Non catchment schools Taverham or Drayton are closer but again with no safe walking route.
Reepham Road/ Cromer Road, Horsford	GNLP0332R	64.00	600-700 dwellings	This site was considered worthy of further investigation due to its location as an urban extension to Hellesdon. Development here would benefit from proximity to the extensive range of

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				<p>services and facilities in Hellesdon. However, the site raises potentially significant landscape issues given the scale of development and setting between the existing built edge and the Broadland Northway and it is therefore not considered to be reasonable for allocation. Noise and safety concerns with the airport are also critical. Surface water suds are unlikely to be allowed due to the potential to attract birds.</p>
Reepham Road/Holt Road	GNLP0333	36.60	Residential (unspecified number), improved cricket field, employment, roadside services and retail	<p>This site is considered to be unreasonable for allocation as it is some distance from the built-up area of Horsford, separated by the Broadland Northway. It is closer to Hellesdon or Drayton but still separated from the built-up area. Development here would be remote and have potential significant landscape impacts. There is no safe walking route to catchment schools in Horsford. Non-catchment schools in Hellesdon or Drayton may be closer but again with no safe walking route.</p>
West of Reepham Road, Horsford	GNLP0334R	11.70	250-300 dwellings	<p>This site was considered worthy of further investigation due to its location as an urban extension to Hellesdon. Development here would benefit from proximity to</p>

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				<p>the extensive range of services and facilities in Hellesdon. However, the site is not considered to be reasonable for allocation as it would represent a significant expansion into the countryside and would impact on the character of Reepham Road. Noise and safety concerns linked with the airport are also critical. Surface water suds are unlikely to be allowed due to the potential to attract birds. Roadside trees may impact on achieving suitable access.</p>
Land adjacent Drayton Lane, Horsford	GNLP0359R	8.10	Up to 150 dwellings	<p>This site is not considered to be reasonable for allocation as it is separate from the built edge of the village and development here would be quite remote from the services and facilities in the main part of the village. There is no safe walking route to Horsford Primary School.</p>
Land at Holly Lane/ Reepham Road, Horsford	GNLP0419	40.65	Approx. 750 dwellings with associated access and open space	<p>This site is considered to be unreasonable for allocation as it is some distance from the built-up area of Horsford, separated by the Broadland Northway. It is closer to Hellesdon or Drayton but still separated from the built-up area. Development here would be remote and have potential significant landscape impacts. There is no</p>

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				safe walking route to catchment schools in Horsford. Non catchment schools in Hellesdon or Drayton may be closer but again with no safe walking route.
Land at Lodge Farm, Horsford	GNLP0422	1.65	40 dwellings	This site is not considered to be reasonable for allocation as it has convoluted access and it is not clear how the site would be accessed from the highway. The site could not accommodate the scale of development proposed.
Land at Mill Lane, Horsford	GNLP0423	0.95	10 dwellings	This site is considered to be unreasonable as it is unlikely to meet the minimum 12-15 dwelling requirement for allocation and is already committed for development of 8 dwellings under planning application reference 20170707.
Land off St Helena Way, Horsford	GNLP0469	2.64	Approx. 10-15 dwellings with remaining land available as open space	This site is considered to be unreasonable due to landscape/ecology and arboricultural issues. Trees to the southern boundary are likely to be a significant constraint and the woods to the north and west are a County Wildlife Site. Norfolk Wildlife Trust suggest that this site should also be designated as a County Wildlife Site highlighting the potential ecological significance.

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
Land east of Holt Road, Horsford	GNLP0479	4.38	Approx. 80 dwellings with open space, play equipment and GI	This site is not considered to be 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.
Land to the east of Holt Road, Horsford	GNLP0519	15.59	Approx. 266 dwellings	This site is not considered to be 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.
Hilltop Farm, Church Street, Horsford	GNLP0578	6.67	Residential (unspecified number)	This site is not considered to be reasonable for allocation as it is separate from the built edge of the village and development here would be quite remote from the services and facilities in the main part of the village.
Home Farm, Holt Road, Horsford	GNLP1008	20.25	Residential (unspecified number)	This site is not considered to be reasonable for allocation as it is separate from the built edge of the village and development here would be quite remote from the services and facilities in the main part of the village. There is no safe walking route to Horsford Primary School. The site as proposed is too large for the capacity of the cluster.
Dog Lane, Horsford	GNLP1043	7.21	Residential (unspecified number)	This site is not considered to be reasonable for allocation

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				as access would be via an unadopted part of Dog Lane. An additional limiting factor is the capacity of the junction with Holt Road. There is no safe route to Horsford Primary School.
Green Lane, Horsford	GNLP2160	29.70	600 dwellings	This site is not considered to be reasonable for allocation as the scale of the proposal is a concern with a lack of safe walking/cycling route to the catchment high school. Development would require highway improvements and it is unlikely that a satisfactory access strategy would be able to be developed for the entire level of development. There are also ongoing concerns with the new B1149 roundabout. Smaller areas of the larger site were considered but dismissed as unsuitable due to the standard of Mill Lane and Green Lane.
North of Reepham Road, Horsford	GNLP3005	2.25	Residential (unspecified number)	This site is considered to be unreasonable for allocation as it some distance from the built-up area of Horsford, separated by the Broadland Northway. It is closer to Thorpe Marriot but still separated from the built-up area. Development here would be remote and potentially quite prominent in the landscape. There is no

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				safe walking route to catchment schools in Horsford. Non catchment schools Taverham or Drayton are closer but again with no safe walking route.
Swanington Lane, Felthorpe	GNLP2009	2.00	15-20 dwellings	This site is not considered to be reasonable for allocation as it has poor access to core services and facilities in Horsford some distance away. In particular there is no safe walking route to Horsford Primary School which is over 3km away.
Brand's Lane, Felthorpe	GNLP2012	0.63	5 dwellings	This site is not considered to be reasonable for allocation as it has poor access to core services and facilities in Horsford some distance away. In particular there is no safe walking route to Horsford Primary School which is over 3km away.
North of Church Lane, Felthorpe	GNLP3004	1.24	16 dwellings	This site is not considered to be reasonable for allocation as it has poor access to core services and facilities in Horsford some distance away. In particular there is no safe walking route to Horsford Primary School which is over 3km away.

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

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

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
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</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</p>	None

		from the current industrial use, flood risk, restrictions on acceptable vehicle access 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.		allocation. A revision to site 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	Requires WFD compliance assessment	Noted, add additional requirement to policy	Add policy requirement to read 'The site intersects with a water course. A WFD

		gardens and secure opportunities for riparian habitat restoration.			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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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0059 Bramley Lakes, Dog Lane, Horsford (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
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

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0151 Pronto Joinery, Dog Lane, Horsford (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
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

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0153 Pronto Joinery, Dog Lane, Horsford (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
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

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0192 Arable Land, Dog Lane, Horsford (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
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</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

		junction with the B1149 is not sufficient for this development.			
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0283 Land off Holt Road, Horsford (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 1 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Member of 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

<p>MDPC Town Planning on behalf of Carl Palmer & Wellington</p>	<p>Object</p>	<p>Comments objecting to the site being considered unreasonable</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>Representation recommends review of this site in comparison to other sites in Horsford based on supporting evidence submitted.</p> <p>Horsford is the 9th largest settlement in the plan area – as such should be regarded as a Key Service Centre & facilitate a higher level of growth than currently proposed.</p>	<p>A revised site for GNLP0283 was 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>	<p>None</p>
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		<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 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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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0332R Reepham Road/ Cromer Road, Horsford (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 2 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
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,</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</p>	

		<p>café, changing rooms and a disability changing places. The Foundation also 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>countryside with subsequent 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</p>	
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				consideration when assessing the suitability of the site.	
CODE Development Planners Ltd	Object	<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,</p>	<p>Site assessment process is not in accordance with NPPF & 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</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</p>	None

		<p>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 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</p>	<p>carry forward the allocation of HEL4 is deleted.</p>	<p>impacts. There continue to be noise and safety concerns regarding proximity to the 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>	
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		<p>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>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>RECOMMENDED MODIFICATIONS TO POLICY</p> <p>It is recommended that a robust and consistent assessment with appropriately proportionate evidence</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>is undertaken to assess the suitability of sites GNL0332R and GNL0334R. 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 c600-700 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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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0334R Reepham Road/ Cromer Road, Horsford (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 2 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
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	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	

		<p>changing places. The Foundation also 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>countryside with subsequent 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</p>	
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				consideration when assessing the suitability of the site.	
CODE Development Planners Ltd	Object	<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</p>	<p>Site assessment process is not in accordance with NPPF & 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</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</p>	None

		<p>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 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,</p>	<p>carry forward the allocation of HEL4 is deleted.</p>	<p>impacts. There continue to be noise and safety concerns regarding proximity to the 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>	
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		<p>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>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>RECOMMENDED MODIFICATIONS TO POLICY</p> <p>It is recommended that a robust and consistent assessment with appropriately proportionate evidence</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>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 c600-700 dwellings on GNLP0332R and c250-300 dwellings on GNLP0334R 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 Reepham Road without additional residential development, the proposal to simply carry forward the allocation of HEL4 is deleted.</p>			
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0419 Land at Holly Lane/ Reepham Road, Horsford (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
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</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

		carriageway. This site runs parallel with it.			
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0422 Land at Lodge Farm, Horsford (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 1 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Member of 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?</p>	Access issues related to the site – existing access is insufficient, new access would be inappropriate.	Comments noted	None

		Either way, this proposal is unsuitable for Horsford.			
Bidwells for Mrs Rachel Foley	Object	<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</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</p>	None

		<p>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 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>still present some concerns in terms of achieving adequate visibility. 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</p>	
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				preferred site GNLP0264 can accommodate approximately 45 dwellings at 25dph so there is considered to be no need to allocate any further sites for housing in the Horsford cluster.	
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNL0423 Land at Mill Lane, Horsford (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNL0 RESPONSE	PROPOSED CHANGE TO PLAN
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 if 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	None

				view has not changed.	
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0479 Land east of Holt Road, Horsford (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
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

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0519 Land to the east of Holt Road, Horsford (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
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</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>in 2018 and is currently under construction”.</p> <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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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0578 Hilltop Farm, Church Street, Horsford (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
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</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

		residents. Not to mention idle engine pollution.			
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP1008 Home Farm, Holt Road, Horsford (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
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)</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

		are not able to cope effectively as it stands now.			
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2009 Swanington Lane, Felthorpe (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
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

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2012 Brand's Lane, Felthorpe (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
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

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2160 Green Lane, Horsford (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
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 & requires review in accordance with evidence submitted in rep.</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 & is</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</p>	None

		<p>No evidence has been provided by GNLP to provide clarification of the 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>contrary to the findings of Savills.</p> <p>Site can be commenced in first five years of plan, and is deliverable in second 5 years of plan.</p>	<p>not thought to be 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</p>	
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				could be considered via Green lane and 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

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

STAGE 1 – LIST OF NEW &REVISED SITES PROMOTED IN THE SETTLEMENT

LIST OF SITES TO BE CONSIDERED FOR RESIDENTIAL/MIXED USE ALLOCATION (0.5 HECTARES OR LARGER)

Address	Site Reference	Area (ha)	Proposal	Status at Reg 18C
Horsford, Felthorpe and Haveringland				
Land off Holt Road	GNLP0283R	3.66	Housing	Unreasonable
Land at Lodge Farm	GNLP0422R	1.04	Housing	Unreasonable
Rookery Nook	GNLP4006	0.58	3 dwellings, retain existing	New site
East of Mill Lane, Felthorpe	GNLP4041	0.85	20 dwellings	New site
TOTAL		6.13		

STAGE 2 – HELAA COMPARISON TABLE

Site reference	Site access	Access to services	Utilities capacity	Utilities infrastructure	Contamination / ground stability	Flood risk	Market attractiveness	Significant landscapes	Sensitive townscapes	Biodiversity & Geodiversity	Historic environment	Open space & GI	Transport & roads	Compatibility with neighbouring
Horsford, Felthorpe and Haveringland														
GNLP0283R	Amber	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Amber	Green	Green	Green
GNLP0422R	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
GNLP4006	Amber	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Amber	Green	Amber	Green
GNLP4041	Amber	Amber	Amber	Amber	Green	Green	Green	Green	Amber	Green	Amber	Green	Amber	Green

STAGE 3 – SUMMARY OF COMMENTS FROM THE REGULATION 18 STAGE C CONSULTATION

See Part 2 above

STAGE 4 – DISCUSSION OF NEW & REVISED SITES

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

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

Conclusions in regard to a sites performance against the relevant factors have also been informed by the outcomes of the HELAA, consultation responses received and other relevant evidence

Horsford, Felthorpe and Haveringland

GNLP0283R, Land off Holt Road, Horsford, 3.66ha, housing

This greenfield site to the south of Horsford has been revised from 3.4ha to 3.66ha to reflect a new access point via Church Lane. Initial highway evidence suggests that access could be suitable, subject to acceptable access to Holt Road and provision of 2.0m footway for the full frontage, extending northwards to the B1149 junction with Church Street where improvements will be required to enable safe pedestrian crossing to access village facilities. They suggest no vehicular access to Church Street. This site was not originally shortlisted at Stage 5 in the site assessment booklets as it was considered not be accessible or within walking distance of facilities in the village, separate from the built edge of the settlement and too large for the strategic requirement. However the site is now subject to a planning application (20181408) with numbers reduced from 105 to 47 and with additional information submitted regarding connectivity and proposals for a 25m stretch of footway/cycleway to link to the village. The site is now considered to be reasonable to shortlist to allow for further discussion to take place regarding the additional;

evidence submitted. If developed the site would extend Horsford significantly southwards so landscape character would need to be considered

GNL0422R, Land at Lodge Farm, 1.04ha, housing

This is a revised greenfield site to the north of the previous site and reduced from 1.6ha to 1.04ha, the quantum of development proposed on site has also been reduced. The revised site is adjacent to the existing settlement boundary and in close proximity to services and facilities in Horsford, however initial highway evidence indicates that there are significant constraints to creating a safe access and achieving an adequate visibility splay is limited by adjacent third party land at Holt Road. The original site was shortlisted at Stage 5 of the Horsford site assessment booklet but was ultimately deemed as unreasonable for allocation due to access concerns. Additional highway evidence has been submitted with the revised site and an access plan has been prepared. For this reason the site is considered to be reasonable to shortlist for further consideration to allow full assessment of the new access proposals to take place.

GNL0406, Rookery Nook, 0.58ha, 3 dwellings and retain existing

This is 0.58ha of amenity land within a large residence to the west off Drayton Lane proposed for 3 dwellings. There is a disused barn opposite and agricultural land to the west with some housing along Drayton Lane approx. 54 m away from the settlement boundary to the west, therefore development here is unlikely to detract from the character of the village. In addition, diagonal to the site is a new access point for a large residential development currently under construction, although there are mature trees and hedging on the borders of the site access is likely to be possible via Drayton Lane. Initial Highways advice confirms the site to be suitable subject to provision of acceptable access. There is a bus stop 170m from the site, Horsford primary school is a little over 1km and Horsford surgery is 1.5km. Though there is no footpath on Drayton Lane, the rest of the village is well catered for pedestrian movement and it may be possible to achieve a continuous pedestrian route via the new development or the new development may contribute some footway improvements. Alternatively pedestrian access may be possible onto the B1149 Holt Road. There is the Grade II listed The Lindens across Drayton Lane approx. 23 m away and further listed buildings to the east such as the Grade I church of all saints 250m away, which will require consideration. Overall the site is considered to be reasonable to shortlist for further consideration subject to further comments from internal consultees.

GNLP4041, East of Mill Lane, Felthorpe, 0.85ha, 20 dwellings

This is a brownfield site of 0.85ha proposed for 20 dwellings east of Mill Lane on a former builders yard. This site is considered to be unreasonable for allocation as there is no safe walking route to primary school in Horsford and Felthorpe currently does not have a settlement boundary. The site is located approx. 200m from the built up area and would be disconnected from the rest of the village and unsympathetic to the character of the area. Initial highway advice highlights that although the site has vehicular access it is unlikely that acceptable visibility will be achieved and Mill Lane is not sufficiently wide for development traffic and there is a visibility constraint at Mill Lane junction with The Street.

STAGE 5 – SHORTLIST OF REASONABLE ALTERNATIVE NEW & REVISED SITES FOR FURTHER ASSESSMENT

Based on the assessment undertaken at stage 4 above the following sites are considered to be reasonable alternatives.

Address	Site Reference	Area (ha)	Proposal
Horsford, Felthorpe and Haveringland			
Land off Holt Road	GNLP0283R	3.66	Housing
Land at Lodge Farm	GNLP0422R	1.04	Housing
Rookery Nook	GNLP4006	0.58	3 dwellings, retain existing
TOTAL		5.28	

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

Site Reference:	GNLP0283R
Address:	Land off Holt Road, Horsford
Proposal:	Housing

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agriculture	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
Amber Constraints in HELAA Access, Sensitive Townscapes, Historic Environment
HELAA Conclusion This revised greenfield site from 3.4 to 3.66 ha reflects a new access point via Church Lane located to the south of Horsford, east of the Holt Road. Initial highways evidence advises access could be suitable, subject to acceptable access to Holt Road and provision of 2.0m footway for full frontage, extending northwards to the B1149 junction with Church Street where improvements will be required to enable safe pedestrian crossing to access village facilities. Will require removal of frontage hedge. No vehicular access to Church Street. If developed, the site would extend Horsford significantly southwards, raising considerations about the landscape character of the village. In addition, from a heritage perspective, the site is 200 metres from the Grade II listed All Saints Church. The issues identified are important but not absolute constraints and so the site is concluded as suitable for the land availability assessment. Much of the site has already been counted and should not be counted again but as the site has increased in size an additional 0.26ha can be added to the HELAA bank.

FURTHER COMMENTS
Highways Subject to acceptable access, frontage footway/cycleway with connection northwards to Church Street. Vehicular access via Holt Road only.
Development Management Planning permission 20181408 for 47 dwellings refused and appeal lodged. Not a particularly well located site, distant from services and facilities in the village.
Lead Local Flood Authority GREEN – surface water flood risk on site but not sever enough to prevent development, few or no constraints, standard information required at a planning stage. No internal & external flooding on site or within 500m. No watercourses on site or within 100m. No surface water sewer systems on site or within 100m. In Source Protection Zone 3. The site predominantly has superficial deposits of sand

and gravel. Comment on infiltration potential are dependent on a complete geotechnical investigation.

PLANNING HISTORY:

20181408 (47 dwellings) – planning permission refused – appeal lodged.

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

Original submission:

- Preliminary Ecological Overview
- Green Infrastructure Strategy
- Site access plan
- (Site submission form and boundary plan)

Revised Site:

- (Boundary change plan)

Site Reference:	GNLP0422R
Address:	Land at Lodge Farm, Horsford
Proposal:	Housing

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agriculture	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
Amber Constraints in HELAA
Access
HELAA Conclusion
This is a revised greenfield site to the north of previous site and reduced 1.6 ha to 1.04 ha that has a long private access road from the Holt Road. The revised site is adjacent to the settlement limit and in close proximity to services however, initial highways evidence indicates there are significant constraints to creating a safe access and achieving an adequate visibility limited by adjacent third party land Holt Road. There are no concerns over potential flood risk, loss of high-quality agricultural land, ecology, contamination or ground stability. The issue about the access is important and will require further consideration, but at this stage not considered an absolute constraint, and so the site is concluded as suitable for the land availability assessment. However as the site has already been assessed for the purposes of the HELAA it will not contribute any additional capacity without double counting and has therefore been marked as unsuitable.

FURTHER COMMENTS
Highways
The access proposals present some concern in terms of achievable visibility. 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.
Development Management
No Development Management comments sought as issue with revised site is highway related e.g. access. Development Management comments to the original site mentioned that site has convoluted access and could not accommodate the scale of development proposed. Also harm to an undesignated heritage asset.
Lead Local Flood Authority
GREEN – surface water flood risk on site but not severe enough to prevent development, standard information required at a planning stage. No internal & external flooding on site but external flooding within 500m. No watercourses on site or within 100m. No surface water sewer system on site but within 100m obstructed by housing. In Source Protection Zone 3. The site predominantly has superficial deposits of sand and gravel. Comments on infiltration potential are dependent on a complete geotechnical investigation.

The site is affected by a very minor extension of a flow path in the 0.1% AEP events. This must be considered in the site review. A large percentage of the site is unaffected by flood risk.

PLANNING HISTORY:

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

Original submission:

- Access Appraisal
- (Site submission form and boundary plan)

Revised Site:

- Access arrangements
- (Representation and boundary amendment)

Site Reference:	GNLP4006
Address:	Rookery Nook, Horsford
Proposal:	3 dwellings, retain existing

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Amenity land associated with existing dwelling	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
Amber Constraints in HELAA
Access, Sensitive Townscapes, Historic Environment, Transport and Roads
HELAA Conclusion
<p>This is 0.58ha amenity land within a large residence to the west off Drayton Lane proposed for 3 dwellings. There is a disused barn opposite and agricultural land to the west with some housing along Drayton Lane approx. 54 m away from the settlement boundary to the west, therefore development here is unlikely to detract from the character of the village. In addition, diagonal to the site is a new access for a new large residential development under construction, though there are mature trees and hedging on the borders of the site access is likely to be possible via Drayton Lane. Initial Highways advice confirms the site to be suitable subject to provision of acceptable access. There is a bus stop 170m from the site, Horsford primary school is a little over 1km and Horsford surgery is 1.5km. Though there is no footpath on Drayton Lane, the rest of the village is well catered for pedestrian movement. Sewerage infrastructure upgrades are likely to be needed, including enhancement to the water recycling centre There are no concerns over loss of protected open space or high-quality agricultural land as it is grade 3, or flood risk. However, development of the site may have an impact on protected species Barbastelle bats colony at ROAR Dinosaur Park (10km away) , but the impact could be reasonably mitigated or compensated. There is the Grade II listed The Lindens across Drayton Lane approx. 23 m away and further listed buildings to the east such as the Grade I church of all saints 250m away, which will require consideration. Despite some minor constraints, the site is considered suitable for the land availability assessment.</p>

FURTHER COMMENTS
Highways
Whilst access might be achievable, safe walking/cycling route is not – site unsuitable for allocation
Development Management
No Development Management comments sought, concerns relate primarily to highways and whether an acceptable access and continuous pedestrian route can be provided
Lead Local Flood Authority

GREEN -no surface water flood risk on site, few or no constraints, standard information required at a planning stage. No internal & external flooding on site or within 500m. No watercourse on site or within 100m. No surface water sewer systems on site or within 100m. In Source Protection Zone 3. The site predominantly has superficial deposits of sand and gravel. Comments on infiltration potential are dependent on a complete geotechnical investigation.

PLANNING HISTORY:

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

- None (site submission form and boundary plan)

STAGE 7 – INITIAL CONCLUSIONS ON THE SUITABILITY OF NEW AND REVISED SITES FOR ALLOCATION

The new and revised sites shortlisted at Stage 4 have been subject to further consideration with Development Management, the Local Highway Authority and Lead Local Flood Authority and their comments are recorded under Stage 6 above. Based on their views the following initial conclusions regarding the suitability of the sites for allocation have been drawn.

New and revised sites to be considered for allocation:

None

New and revised sites considered to be unreasonable for allocation:

Address	Site Reference	Area (ha)	Promoted for	Reason for rejection
Horsford, Felthorpe and Haveringland				
Land off Holt Road, Horsford	GNLP0283	3.43	105 dwellings	This site is not considered to be reasonable for allocation as it is separate from the built edge of the village and development here would be quite remote from the services and facilities in the main part of the village. There is no safe walking route to Horsford Primary School. Planning permission 20181408 for 47 dwellings has recently been refused and an appeal lodged.
	GNLP0283R	3.66	Housing	
Land at Lodge Farm, Horsford	GNLP0422	1.65	40 dwellings	This site as originally submitted was not considered to be reasonable for allocation as it has convoluted access and it is not clear how the site would be accessed from the highway. It was considered that the site could not accommodate the scale of development proposed and the access proposals presented some concern in terms of achieving acceptable visibility. A revised site proposal was submitted through the Regulation 18C consultation but the local highway authority are still of the view that the proposal presents some concerns in terms of achieving adequate visibility.
	GNLP0422R	1.04	Housing	

Address	Site Reference	Area (ha)	Promoted for	Reason for rejection
Rookery Nook, Horsford	GNLP4006	0.58	3 dwellings, retain existing	This site is not considered to be suitable for allocation as a safe walking and cycling route cannot be achieved.
East of Mill Lane, Felthorpe	GNLP4041	0.85	20 dwellings	This site is considered to be unreasonable for allocation as there no safe walking route to primary school in Horsford and Felthorpe currently does not have a settlement boundary. The site is disconnected from the rest of the village and development here would be unsympathetic to the character of the area. There are also highway concerns regarding visibility and the width of Mill Lane

FINAL CONCLUSIONS FOR THE REGULATION 19 VERSION OF THE PLAN

Site assessments prior to the Regulation 18C consultation

Up to the Regulation 18 C consultation there were 27 sites promoted for residential/mixed use totalling around 290 hectares of land. The outcome of initial site assessment work (which is detailed in part 1 of this booklet) was to prefer site GNLP0264 for 30-40 dwellings. This preferred site was favoured over the other sites promoted in the cluster because of its brownfield nature and the fact it is well related to the form and character of Horsford. It is acknowledged that the proximity to remaining industrial uses will need to be considered and this has been written into the supporting text which accompanies the policy. This site was consulted on during the Regulation 18C draft plan consultation. The other sites in the cluster were rejected for a variety of reasons (see part 1) including highways, landscape ecology, airport safety and remoteness.

Summary of comments from the Regulation 18C draft plan consultation

Through the Regulation 18C consultation a number of comments were received regarding sites in the Horsford cluster (detailed in part 2 above). The main issues raised were regarding Horsford's classification as a village cluster in the settlement hierarchy and the suitability of alternative sites for allocation. These comments have been considered but have not resulted in any changes to the selection of site preferred for allocation.

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

A total of 2 new sites and 2 revised sites were submitted through the Regulation 18C consultation totalling around 6 hectares of land. All the new and revised sites were subject to the same process of assessment as the earlier sites (detailed in part 3 of this booklet). The conclusion of this work was that none of the sites were considered suitable for allocation in addition to, or instead of GNLP0264. The 2 revised sites were rejected as one is considered to be remote from services and facilities and planning permission has recently been refused and the other has access concerns. The 2 new sites were rejected as neither have a safe walking and cycling route to the primary school.

Sustainability Appraisal

The sustainability performance of each reasonable alternative sites has been considered in the selection of sites. The Sustainability Appraisal includes a scoring and assessment narrative on the sustainability performance of each reasonable

alternative and recommendations for mitigation measures which have been incorporated in policy requirements as appropriate. The Sustainability Appraisal (insert link) highlighted a number of negative and positive impacts for the sites in the Horsford cluster but showed broadly how all sites promoted scored similarly. Sites GNLP0251 and GNLP0423 scored marginally better than other sites in the SA but were not chosen for allocation as GNLP0251 has significant landscape/ecology and arboricultural issues with Norfolk Wildlife Trust suggested that it should be designated as a County Wildlife site and GNLP0423 is unlikely to meet the minimum allocation threshold for the plan and has planning permission for 8 dwellings.

The preferred site for allocation, GNLP0264 did score negatively in the SA for health, education and economy however has still been considered favourably for allocation as the loss of economic uses on the site needs to be weighed up against the benefits of developing a brownfield site for housing over greenfield land.

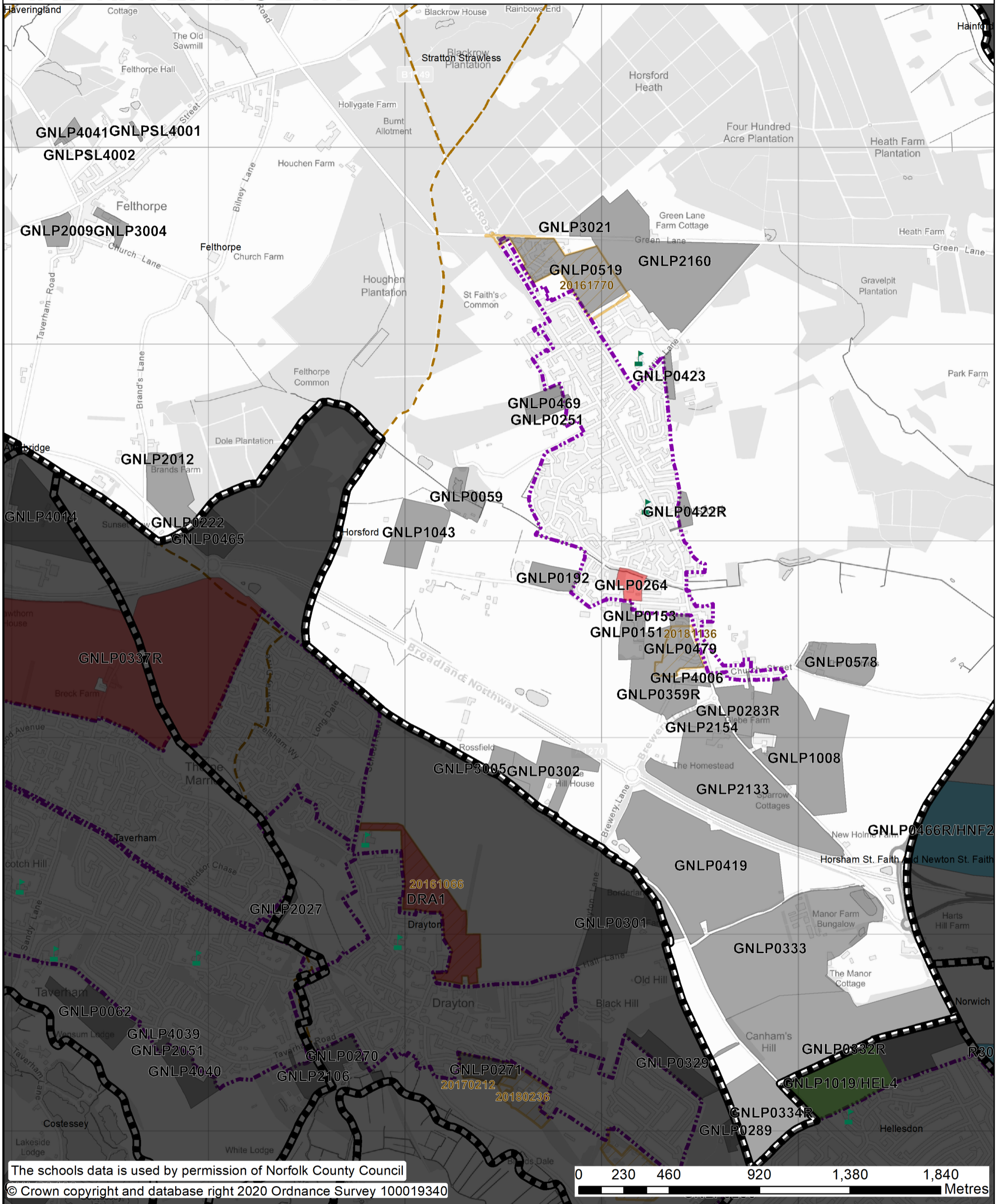
Final conclusion on sites for allocation in the Regulation 19 Plan

Based on all the information contained within this booklet the final conclusion of the site assessment process for the Horsford cluster is to allocate site GNLP0246 for 45 dwellings (the range of dwellings in villages was dropped after the Regulation 18C consultation). Other sites are rejected for allocation due to a variety of reasons including highways, landscape ecology, airport safety and remoteness.

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

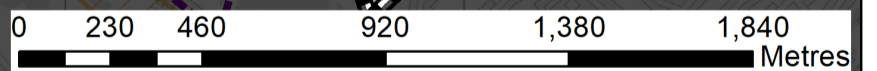
HORSFORD, FELTHORPE AND HAVERINGLAND

GREATER NORWICH LOCAL PLAN PROMOTED SITES BY SCHOOL CATCHMENT AREAS



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- Primary School
- Employment Allocation
- Not Allocated
- Parish Boundary
- Primary School Catchment (2018-19)
- Open Space/Leisure Amenity Allocation
- Settlement Boundary
- Housing Allocation
- Commitment*

*new and extant permissions at 1st April 2020 (10 or more dwellings)

N
 1:17,684
 at A3
 Date: 03/12/2020