

Settlement Name:	Reedham
Settlement Hierarchy:	<p>Reedham forms a cluster in its own right in the emerging Greater Norwich Local Plan. The Towards a Strategy document identifies that 2,000 dwellings in total should be provided between all the village clusters. Services in Reedham include a primary school, village hall, food shop, pub and train station.</p> <p>Reedham has a neighbourhood area designated and the parish council is working on an emerging neighbourhood plan (at time of writing). Any applications that are submitted for development within the parish should take into account the emerging neighbourhood Plan for the area, in line with paragraph 48 of the National Planning Policy Framework).</p> <p>The current capacity at Reedham Primary school is classified as green, and it is recorded as needing more children. Therefore, a development of around 50-60 dwellings would be considered suitable depending on the quality of sites put forward and other service/facilities in the settlement.</p> <p>At the base date of the plan there are no carried forward residential allocations but there is a total of 28 additional dwellings with planning permission on small sites.</p>

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

STAGE 1 – LIST OF SITES PROMOTED IN THE SETTLEMENT

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

Address	Site Reference	Area (ha)	Proposal
Reedham			
Land to East of Station Road	GNLP1001	1.10	18 dwellings
Mill Road	GNLP3003	2.27	Approx. 50 dwellings
Total area of land		3.37	

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
Reedham			
North of Church Road	GNLP2151	0.36	6 dwellings
East of Witton Green	GNLP2175	0.20	5-6 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
None			

(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														
	Reedham													
GNLP1001	Amber	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green
GNLP3003	Amber	Green	Amber	Green	Green	Amber	Green	Green	Green	Amber	Green	Green	Amber	Green

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

Site Reference	Comments
Reedham	
GNLP1001	Parish Council comments The parish council wants to see new developments to include affordable housing, bungalows, staffed housing, an upgrade to the sewerage system and other infrastructure systems.
GNLP3003	No comments as site submitted 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

The main part of the village is next to the River Yare, with the properties fronting the river being within the Broads Authority area. The second major part of the village is located around the railway station. In environmental terms, any development here will be within 3,000 metres of the SAC, SPA, and Ramsar designations found in the Broads. There is one existing allocation (reference RED1 / 20151061) for 24 dwellings off Station Road that is under construction.

GNLP1001 is east of allocation RED1 and could be accessed via the existing permission 20151061. A Public Right of Way (PROW) goes southwards of the site to the Hills. Alternatively, the primary school could be reached via Station Road. The distance to the school is approximately 900 metres via Station Road and Riverside. Whilst concerns exist over access to the primary school the site is considered to be a reasonable alternative for further assessment.

The most recently submitted site GNLP3003 is less than 100 metres from the primary school on Mill Road. Difficulties of the site relate mainly to the narrow approximately 10 metre wide access onto Mill Road. A further factor is the narrowness of Mill Road itself and the absence of a footpath. The site is shortlisted as a reasonable alternative subject to further Highways Authority advice.

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
Reedham			
Land to East of Station Road	GNLP1001	1.10	18 dwellings
Mill Road	GNLP3003	2.27	50 dwellings
Total area of land		3.37	

STAGE 6 – DETAILED SITE ASSESSMENTS OF REASONABLE ALTERNATIVE SITES

Site Reference:	GNLP1001
Address:	Land to the east of Station Road
Proposal:	18 dwellings

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agriculture	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
Amber Constraints in HELAA Site access, Utilities capacity, Transport & Roads
HELAA Conclusion The site is adjacent to existing allocation RED1, where access (vehicular and pedestrian) will be off Yare View Close and/or Station Road. Initial highway evidence has indicated that there are potential access constraints on the site, but these could be overcome through development. Also, that the local road network is considered to have significant constraints. The Broads Authority is in close proximity and therefore, landscaping screening may be required. However, there are no concerns on flood risk, heritage or ecological impacts. Subject to identifying suitable mitigation for the constraints, the site is concluded as suitable for the land availability assessment.

FURTHER COMMENTS
Highways Not feasible to provide an off-carriageway pedestrian facility to enable safe journeys to school.
Development Management Further consideration of access to school required. The lack of complete pedestrian footpaths is unlikely to be resolved but this has been accepted previously for adjacent 20151061 where enhancements to rights of way and permissive paths were deemed sufficient. Site also too small to deliver scale of development envisaged.
Minerals & Waste No safeguarded mineral resources
Lead Local Flood Authority No comments

PLANNING HISTORY:

No history on site

20151061 relevant which granted permission for 24 dwellings on adjacent site (allocation RED1) in SA DPD 2016. Access through this development would need to be secured to provide access to proposed site.

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

Site Reference:	GNLP3003
Address:	Mill Road
Proposal:	Approx. 50 dwellings

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agriculture	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
<p>Amber Constraints in HELAA Site access, utilities capacity, flood risk, biodiversity, transport and roads</p>
<p>HELAA Conclusion This is a 2.27 ha site promoted for around 50 dwellings, accessed directly from Mill Road to the east of Reedham. There appears to be a single point of access that is relatively narrow at less than 10 metres so further guidance from the Highway Authority is likely to be required. Whilst development could be acceptable, mitigations may be required, and the overall scale of development could be limited. The site is next to the existing edge of the village and is bounded by the Wherry Railway Line to the east. Although there is no footpath Mill Road is relatively lightly trafficked and the site is just 120 metres from Reedham Primary School. Whilst not an absolute constraint to development, the site is adjacent to the Broads Authority administrative area and within the 3,000 metre buffer distance to a SAC, SPA (Special Protection Area), SSSI, Ramsar and National Nature Reserve designations. In conclusion, the site is considered suitable for the land availability assessment.</p>

FURTHER COMMENTS
<p>Highways Not feasible to provide a safe access, carriageway narrower than required for 2-way traffic & no footway to enable safe journeys to school. No scope for improvements within highway.</p>
<p>Development Management Consideration of access arrangements to be undertaken as the ability to achieve a safe access would appear compromised given limited site frontage to highway. This could prove to be a decisive constraint unless 3rd party land acquired. Consideration of setting of non-designated heritage asset.</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. No risk of surface water flooding. Internal flooding within proximity to site. No watercourses on or near site. Not in a source protection zone. The site has superficial deposits of Diamicton.

PLANNING HISTORY:

No history

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

No additional documents submitted to support this proposal.

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

Only two sites were promoted in the Reedham cluster, both of which are considered to be reasonable alternatives at stage five. 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 agreed that both sites are appropriate for allocation to meet the capacity identified in the cluster, albeit that both sites have highway issues that may need further investigation.

In conclusion, two sites are identified as preferred options, providing for between 40-60 new homes in the cluster. There are no carried forward residential allocations but there is a total of 28 additional dwellings with planning permission on small sites. This gives a total deliverable housing commitment for the cluster of between 68-88 homes between 2018 – 2038.

Preferred Sites:

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
Reedham				
Land to East of Station Road	GNLP1001	1.10	20 - 30 dwellings	This site is preferred for allocation as it has minimal constraints. However, it is accepted that it is not possible to provide an off-carriageway pedestrian footway for the whole route to Reedham Primary School. The site can be allocated subject to vehicular access via adjacent existing Broadland Local Plan site allocation RED1 and footpath connection with Public Rights of Way at the north and east boundaries of the site.
Mill Road	GNLP3003 (part of a larger site)	1.30	20 - 30 dwellings	Part of this site is preferred for allocation due to its immediate proximity to Reedham Primary School and minimal other constraints, however, it is accepted that it is not possible to provide an off-carriageway pedestrian footway to the school.

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
				The site can be allocated subject to vehicular access via Mill Road and pedestrian only access at Holly Farm Road. The vehicular access point at Mill Road will require visibility over the frontage of 'The Brambles' to the north which may require 3 rd party land.

Reasonable Alternative Sites:

Address	Site Reference	Area (ha)	Promoted for	Comments
Reedham				
NO REASONABLE ALTERNATIVE SITES				

Unreasonable Sites:

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
Reedham				
NO UNREASONABLE SITES				

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

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

		<p>Access to the site will be through Barn Owl Close. Any application will be supported by relevant technical documents, including a Transport Assessment.</p> <p>Sewerage system capacity is not envisaged to be a constraint to development as Anglian Water have a responsibility to expand capacity to accommodate new development.</p> <p>Together sites GNLP1001 and 3003 could provide up to 60 dwellings in the plan period to 2038. There are 550 dwellings in Reedham so this would represent growth of 0.5% per annum which is considered to be sustainable.</p> <p>It is acknowledged that Reedham are progressing a Neighbourhood Plan which is still at early stages.</p>			
Reedham Parish Council	Object	<p>Outside the development boundary for the village.</p> <p>Contrary to GNLP Policy 2 as the site cannot provide “safe, convenient and sustainable access to on-site and local services and facilities including schools, healthcare, shops,</p>	Further consideration of preferred sites in the context of GNLP Policy 2 and Policy 7.4	Concerns regarding the allocation of this site are noted. There are some services and facilities in Reedham	None

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

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

		<ul style="list-style-type: none"> • Conflict with HGV's and farm machinery • Poor, infrequent public transport both bus and train • Increased traffic more dangerous for pedestrians and cyclists • On-road parking issues outside the school and at the station (since parking fees were introduced) • Contrary to GNLP Policy 7.4 as there is no safe walking route to school • A report from NCC Highways assessing the suitability of the preferred sites is needed <p>Services and facilities</p> <ul style="list-style-type: none"> • Local infrastructure insufficient to accommodate further development. Village has experienced 30% growth in the last 10 years with no infrastructure improvements • New housing without infrastructure improvements would overwhelm the village • Overloaded sewerage system, regularly trucked out. Frequent effluent flooding into properties. Smell in village. Reedham not on mains system, water pressure is low and supply is inadequate 	<p>the context of GNLP Policy 2 and Policy 7.4</p> <p>Further consideration of sewerage capacity issues in conjunction with Anglian Water</p>	<p>be considered suitable for allocation</p> <p>More general strategic issues to be taken account of on a plan wide basis</p> <p>Wording to be added to the policy to mitigate the impact of the development on the Broads Authority Area (see above).</p> <p>The Sandersons Boat yard application will not be counted in the GNLP housing figures if it is a planning application in the Broads Authority area</p>	
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		<ul style="list-style-type: none"> • Concern about surface water run-off from site • One small village shop • No free cash point, some distance to nearest banking facilities • Part time post office and GP surgery • No police presence • Telephone and internet stretched, minimal mobile phone signal • Electricity often fails • Nothing for young people to do. Money from developments should be used on projects to help young, elderly and families • Understanding that the field at the top of the Barn Owl Close development was to be used for recreation purposes. Land should remain as a green space buffer between Barn Owl Close and the agricultural land in the centre of the village • No employment opportunities available in the village <p>Primary School capacity</p> <ul style="list-style-type: none"> • The allocation of up to 60 homes based entirely on the fact that the school has vacancies is poor decision making 	<p>Further discussion with NCC Children's Service re: school capacity</p>		
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		<ul style="list-style-type: none"> • How can Reedham be a 'cluster' of one village. The school currently has pupils from Freethorpe, Cantley and Brundall. • Reasons why school has empty places should be explored. Parents elect to send their children to other schools. Would like to clarify that figures are correct • Building more houses will not necessarily fill school places as evidenced by recent developments • The only way to make Reedham school better attended by resident children would be to extend/move it. • School currently thriving so if trend continues it will be up to capacity before additional houses are built • References to available places at the school is not supported by evidence from school management, governing board or local authority <p>Landscape/wildlife</p> <ul style="list-style-type: none"> • Part of the Broads National Park and should be kept as it is to preserve the natural beauty of the village • The views of the village from the Broads will be further degraded by the complete lack of architectural merit in new builds and the lack of planting and landscaping 	<p>Talk to the Broads Authority about any changes needed to the policy wording to mitigate the effects of development</p>		
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		<ul style="list-style-type: none"> • Concerns about light pollution and loss of wildlife <p>General comments</p> <ul style="list-style-type: none"> • Village has already had substantial new developments in recent years, many new houses are still for sale. • Village should not be expected to over develop to compensate for other villages. • The GNLP does not contain sufficient evidence of current or future housing demand with respect to Reedham 60+ new homes is excessive and would result in over supply. • Figures do not take account of new housing at Sanderson Boatyard approved by the Broads Authority in December 2019 • Infill development or use of empty homes would provide a more organic growth solution • New housing should be closer to the NDR or on brownfield sites instead • Site outside development boundary • No housing should be allocated until the Neighbourhood Plan has been adopted • With projected sea level rises it is irresponsible to build more housing in Reedham. Large parts of the village could be under water by 2050 	<p>Revisit housing figures in Reedham. Look at planning permission at Sanderson Boatyard and whether this should be counted towards current commitment, recognising that it is in the Broads Authority area</p>		
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		<ul style="list-style-type: none"> • Affordable housing is still too expensive for local people to buy or rent. No proper evidence on affordable housing the site assessment booklet • Needs to be a law to stop people buying properties for holiday rentals • GNLP is deeply flawed. Appears to pursue a political agenda and flouts national policy on climate change mitigation • Concern at change in focus regarding rural development between the JCS and GNLP. The JCS protected rural areas by keeping housebuilding near to Norwich. • GNLP should use 2016 National Household projections rather than 2014. • GNLP priority should be getting young people off the streets of Norwich and rehousing people who are living in poor rented conditions 	<p>Strategic issues such as affordable housing and climate change to be dealt with through Part 1 of the Plan</p>		
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP3003 Mill Road, Reedham (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	60
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 53 Object, 6 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Magnus Magnusson, Parker Planning on behalf of client	Support	Support the identification of the site as a preferred option. The site is under the control of a single landowner who is actively promoting it for development. The wider site area is available for development if required. There are considered to be no overriding constraints that would prevent development and promoter has undertaken their own RAG assessment to support their representation.		Support for site noted	None
Reedham Parish Council	Object	Outside the development boundary. Loss of valuable agricultural land. Contrary to GNLP Policy 7.4 as there is no safe walking route to the school. Highways have confirmed there is no	Further discussion with NCC Highways regarding safe walking	It is accepted that it is not possible to provide an off-carriageway pedestrian footway to the school but	None

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

Members of the public – various	Object/ Comment	<p>Comments objecting to the site being preferred include:</p> <p>Roads and transport</p> <ul style="list-style-type: none"> • Reedham is not a ‘through’ village. Traffic goes in and out the same way and poor road infrastructure needs to be addressed.. • Contrary to GNLP Policy 2 as cannot provide safe access to facilities without the use of a car. • Poor, infrequent public transport both bus and train • On-road parking issues outside the school and at the station (since parking fees were introduced) • No pavements or street lights • Contrary to GNLP Policy 7.4 as there is no safe walking route to school. Highways have confirmed it is not feasible to provide a footway. • Vehicular access to the site is not adequate at either Mill Road or Holly Farm Road. Highways have confirmed there is no scope to widen to accommodate 2 way traffic. Need for 3rd party land. Refused permission in the past on access grounds • Main vehicular access would be over railway bridge on Mill Road, only wide enough for 1.5 car width and poor visibility on approach from both sides. 	<p>Further discussion with NCC highways to confirm local road network is suitable and clarification regarding vehicular access and safe walking route to Primary School</p> <p>Further consideration of preferred sites in the context of GNLP Policy 2 and Policy 7.4</p>	<p>The concerns regarding additional development in Reedham are recognised but these need to be balanced with the need to find additional housing across the plan area. After further consideration this site continues to be considered suitable for allocation</p> <p>More general strategic issues to be taken account of on a plan wide basis</p> <p>Wording to be added to the policy to mitigate the impact of the development on the Broads Authority Area (see above).</p>	None
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		<p>Accident blackspot not able to cope with volume of traffic increase.</p> <ul style="list-style-type: none"> • Mill Road used daily by heavy agricultural machinery, large delivery vans and lorries • Concern about proposed public footpath running from the site immediately next to existing properties causing loss of privacy, disturbance and safety issues. • A report from NCC Highways assessing the suitability of the preferred sites is needed <p>Services and facilities</p> <ul style="list-style-type: none"> • If Reedham is to be expanded then the infrastructure needs to be improved first • Developer fees of just over £23k have been provided to the parish council to improve facilities over the last 3 years. If development is to go ahead then contributions towards the village should be sought e.g. a larger amount of parking spaces and a green area for children • Sewerage treatment and disposal is at breaking point • Mains water pressure is already low in the village • Site has a potential flood amber from HELAA table 	<p>Further consideration of sewerage capacity</p>	<p>The Sandersons Boat yard application will not be counted in the GNLP housing figures if it is a planning application in the Broads Authority area</p>	
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		<ul style="list-style-type: none"> • One small village shop • No free cash point, some distance to nearest banking facilities • Part time post office and GP surgery • No police presence • Telephone and internet stretched, minimal mobile phone signal • Electricity often fails • No employment opportunities available in the village • Site is close to the railway line which is likely to become busier due to proposed rail upgrades. Children and railways do not mix • The Site carries an HGV overhead cable running east to west which will need to be diverted should the site be developed. <p>Primary School capacity</p> <ul style="list-style-type: none"> • Small scale organic development of infill and small developments with architectural merit and careful consideration of the local environment should be the drivers for planning not notional 'spare' school capacity • How can Reedham be a 'cluster' of one village. The school currently has pupils from Freethorpe, Cantley and Brundall. 	<p>issues in conjunction with Anglian Water</p> <p>Further clarification of safety/stability issues of proximity to railway line.</p>		
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		<ul style="list-style-type: none"> • Reasons why school has empty places should be explored. Many parents elect to send their children to other schools. • Building more houses will not necessarily fill school places as evidenced by recent developments • References to available places at the school is not supported by evidence from school management, governing board or local authority • Suggest a land swap with the school playing field. This would make the school playing field opposite the school with a safer walk for children • Utilise the central site beside this for a new purpose built Primary School to support all villagers including rooms for multi-purpose village hall. Build on current Village Hall site. <p>Landscape/wildlife</p> <ul style="list-style-type: none"> • Part of the Broads National Park and should be kept as it is to preserve the natural beauty of the village • Site is within 3000m buffer zone of Halvergate Marshes, designated a conservation area by the Broads Authority, SSSI, SPA and RAMSAR site of international importance. • Dark skies, wildlife and farming will be impacted by this proposal 	<p>Further discussion with NCC Children's Service re: school capacity</p> <p>Further investigation of land swap idea with NCC Children's Services.</p> <p>Talk to the Broads Authority about any changes needed to the policy wording to</p>		
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		<p>mitigation. There is nothing in the plan regarding the proposed housing being carbon neutral</p> <ul style="list-style-type: none"> • Concern at change in focus regarding rural development between the JCS and GNLP. The JCS protected rural areas by keeping housebuilding near to Norwich. • GNLP should use 2016 National Household projections rather than 2014. • GNLP priority should be getting young people off the streets of Norwich and rehousing people who are living in poor rented conditions • Have any unbiased views on the site been sought or is allocation based on information put forward by the site promoter? • Number of houses on site is far too optimistic. Five or less would be a better number • 30-50 homes would be a massive intrusion to privacy as the majority of houses along this site are bungalows and would be overlooked by the new development • The site is bounded by a railway line and cutting to the east. This potentially constrains development on the site by reason of noise and stability of the banks 	<p>Strategic issues such as affordable housing and climate change to be dealt with through Part 1 of the Plan</p> <p>Further clarification of safety/stability issues of proximity to railway line.</p>		
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		<ul style="list-style-type: none">• The area is attractive for tourism which will be lost if we 'commercialise' the area with 100 unsightly new homes.			
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**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
Reedham				
North of Church Road	GMLP4025	0.95	12 dwellings	New site
TOTAL		0.95		

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
Reedham														
GNLP4025	Amber	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Green	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

Reedham

GNLP4025, North of Church Road, 0.95ha, 12 dwellings

This is a 0.95 ha greenfield site that could lend itself to frontage development along Church Road. Access from Church Road would likely require highways alterations to be acceptable, but this could probably be overcome through development however the Highways Authority also raises concern about the surrounding road network. In terms of access to services there is a bus service, shop and GP surgery within a reasonable distance although there is no footpath along Church Road so there is no safe route to primary school. The Broads Authority area is nearby but there are minimal other landscape or townscape constraints. The Grade II listed Witton Farmhouse lies opposite the site but this appears to be well screened by trees so impact on the setting would be limited. As there is no safe walking route to primary school the site is considered to be unreasonable for allocation.

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.

None

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

None

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
Reedham				
North of Church Road	GMLP4025	0.95	12 dwellings	This site is considered to be unreasonable for allocation as there is no safe walking route to Reedham Primary School which is some distance away and the surrounding highway network is poor with limited scope for improvement.

FINAL CONCLUSIONS FOR THE REGULATION 19 VERSION OF THE PLAN

Site assessments prior to the Regulation 18C consultation

Up to the Regulation 18C consultation there were two sites promoted for residential/mixed use in the Reedham cluster totalling around 68 dwellings and 3 hectares of land. The outcome of initial site assessment work (which is detailed in part 1 of this booklet) was to prefer both sites (GNLP1001 and GNLP3003) for 20-30 dwellings each and these sites were consulted on during the Regulation 18 C consultation. Both sites have some issue with providing a pedestrian route to primary school but on balance were considered suitable as GNLP1001 is an extension to a previous Broadland Local Plan allocation and some off road pedestrian routes are available using public rights of way at the north and east boundaries of the site and GNLP3003 is immediately opposite the school.

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 Reedham cluster. The main issues raised were high levels of local opposition to both preferred sites as contrary to policy and site assessment principles (detailed in part 2 above). These comments have been carefully considered but did not result in any changes to the selection of the sites preferred for allocation due to the need to make allocations to provide for the housing needs identified in the plan and the fact that the sites scored positively through the SA process.

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

A total of one new site was submitted through the Regulation 18C consultation totalling 12 dwellings and 0.95 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 the site is not suitable for allocation as it is some distance from services and facilities with no safe walking route to Reedham Primary School. In addition the surrounding highway network is poor with limited scope for improvement.

Sustainability Appraisal

The sustainability performance of each reasonable alternative site has been considered in the selection of sites. The Sustainability Appraisal includes a scoring and assessment narrative on the sustainability performance of each reasonable alternative and recommendations for mitigation measures 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 Reedham but showed how broadly all sites promoted scored similarly. Both preferred sites score well through the SA with double positives for population and communities.

Final conclusion on sites for allocation in the Regulation 19 Plan

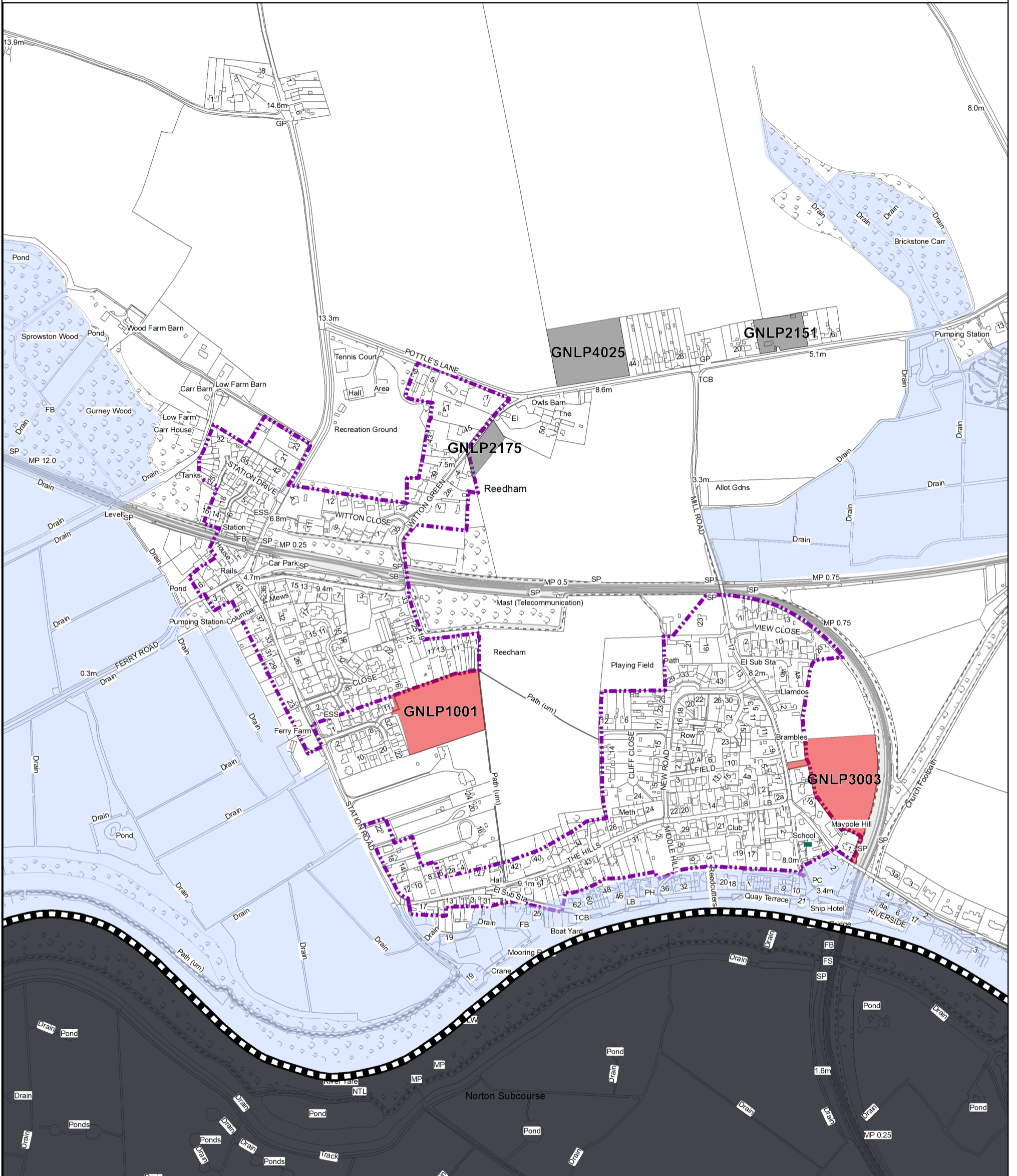
Based on all the information contained within this booklet the final conclusion of the site assessment process for Reedham is to allocate sites GNLP1001 and GNLP3003 for 30 dwellings each (the range of dwellings in villages was dropped after the Regulation 18C consultation). Other sites are rejected for allocation due to the absence of a safe pedestrian route to primary school and other services and facilities and poor highway network.

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.








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REEDHAM

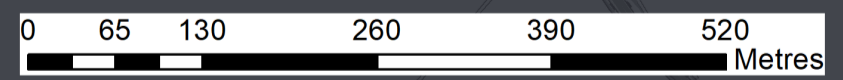
GREATER NORWICH LOCAL PLAN PROMOTED SITES BY SCHOOL CATCHMENT AREAS




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-  Primary School
-  Primary School Catchment (2018-19)
-  Housing Allocation
-  Not Allocated
-  Broads Authority Area
-  Settlement Boundary
-  Parish Boundary

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




 N
 1:5,251
 at A3
 Date: 03/12/2020