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| Settlement Name: | Loddon & Chedgrave |
| Settlement Hierarchy: | <p>The combined settlement of Loddon and Chedgrave is identified as a Key Service Centre in the Greater Norwich Local Plan. There is a range of services including shops, infant, junior and high schools, medical centre, library, public houses and industrial estate. The settlement is well served by buses linking to Norwich, Beccles and Lowestoft, and a development of 200 homes north of George Lane, Loddon is currently being progressed.</p> <p>At the base date of the plan there are no carried forward residential allocations in Loddon or Chedgrave and 200 dwellings with planning permission.</p> <p>Early work in the 'Towards a Strategy' document identifies that 400-600 dwellings in total should be provided between all the Key Service Centres up to 2038. This site assessment booklet looks in detail at the sites promoted in Loddon and Chedgrave to determine which are the most suitable to contribute towards the overall allocation figure for the Key Service Centres.</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/MIXED USE ALLOCATION (0.5 HECTARES OR LARGER)

| Address | Site Reference | Area (ha) | Proposal |
|---------------------------------------|-----------------------|------------------|--|
| Chedgrave | | | |
| Land off Langley Road | GNLP0463R | 5.58 | 70 dwellings with open space to the north as necessary |
| Land on the west side of Norwich Road | GNLP1014 | 1.60 | Residential (unspecified number) |
| Big Back Lane | GNLP2055 | 3.45 | Residential (unspecified number) |
| Loddon | | | |
| Wood Farm, Bungay Road | GNLP0008 | 2.01 | Up to 15 dwellings including access roads |
| Land to the east of Beccles Road | GNLP0312 | 7.70 | Up to 228 dwellings |

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| Land to east of High Street | GNLP0313 | 1.62 | Approx. 68 dwellings |
| Land off Low Bungay Road | GNLP0314 | 0.74 | Approx. 19 dwellings |
| Land to the east of High Bungay Road | GNLP0372 | 3.14 | Approx. 130 dwellings plus a Scout Hut and public open space. (An initial phase of 60 starter homes could be promoted on the southern section of the site) |
| South of Beccles Road | GNLP2032 | 0.52 | Residential (unspecified number) |
| Total area of land | | 29.36 | |

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 |
|---|----------------|-----------|------------------|
| Chedgrave | | | |
| Pebblers, Norwich Road | GNLPSL0015 | 0.21 | Settlement Limit |
| Land Bordering Hardley Road and Pits Lane | GNLP0541 | 0.49 | 5-8 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 |
|---------------------------|----------------|-----------|--|
| Loddon | | | |
| Land to the south of A146 | GNLP0347 | 3.41 | Commercial development of storage and distribution hub |

(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 | | | | | | | | | | | | | | |
| Chedgrave | | | | | | | | | | | | | | |
| GNLP0463R | Amber | Amber | Amber | Green | Green | Amber | Green | Green | Amber | Green | Green | Green | Amber | Green |
| GNLP1014 | Green | Amber | Green | Green | Green | Green | Green | Green | Amber | Amber | Amber | Green | Green | Amber |
| GNLP2055 | Amber | Amber | Amber | Green | Green | Green | Green | Green | Amber | Green | Amber | Green | Amber | Green |
| Loddon | | | | | | | | | | | | | | |
| GNLP0008 | Amber | Red | Green | Green | Green | Green | Green | Green | Green | Amber | Green | Green | Amber | Green |
| GNLP0312 | Amber | Green | Green | Green | Green | Amber | Green | Green | Green | Green | Green | Green | Amber | Amber |
| GNLP0313 | Amber | Green | Green | Green | Green | Green | Green | Amber | Amber | Amber | Amber | Green | Amber | Green |
| GNLP0314 | Amber | Green | Green | Green | Green | Amber | Green | Amber | Amber | Amber | Amber | Green | Amber | Green |
| GNLP0372 | Amber | Green | Green | Green | Green | Amber | Green | Green | Green | Green | Green | Green | Amber | Green |
| GNLP2032 | Amber | Green | Amber | Green | Amber | Amber | Green | Green | Amber | Amber | Amber | Green | Green | Green |

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

| Site Reference | Comments |
|------------------|---|
| Chedgrave | |
| GNLP0463R | <p>General comments Objections raised to the original site boundary, concerns regarding lack of infrastructure, services and capacity of services. Concerns the site will remove valuable farmland and the community and the description of Chedgrave as a village. Better access to A146 is required before any more development. Other issues include drainage, scale of development</p> <p>One comment submitted in support of site, see full submission regarding initial site plan, changed boundary, aerial plan and information in relation to the landscape.</p> <p>Chedgrave Parish Council comments Chedgrave PC Considered this matter 1st March 2018. Cllrs referred to feedback from residents during the parish plan consultation which is broadly in favour of small scale development as long as: Houses are not all together, there are mixed types of property, there is mixed tenure for rental, there is mixed ownership, housing density is as per the village at the moment - it was noted that this site would not accommodate 70 houses. Parishioners showed some interest in retail development.</p> |
| GNLP1014 | <p>General comments Objections raised concerns regarding overdevelopment, removal of open spaces, busy unsuitable roads, road safety and the site is outside the development boundary.</p> <p>Comments made. It has no impact on the two conservation areas in the village and, unlike the other two sites, has ready access to the A146 without having to use any of the narrow village roads. However, at least two sites in Loddon appear more suitable as they offer good access to the A146 and are closer to the schools and other shared community facilities.</p> <p>Comment submitted in support of site. This would seem to be a sensible place to have new development in the village as it is adjacent to the current development boundary, has good road access and is opposite existing development. A mix of housing would be preferable with some smaller starter homes included.</p> <p>Parish Council comments Chedgrave PC considered this matter 1st March 2018. Cllrs referred to feedback from residents during the parish plan consultation which is broadly in favour of small scale development</p> |

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| | <p>as long as: houses are not all together, there are mixed types of property, there is mixed tenure for rental, there is mixed ownership, housing density is as per the village at the moment - density numbers are not stated in the consultation paper and this needs to be clarified. Parishioners showed some interest in retail development.</p> <p>Norfolk Wildlife Trust comments There may be biodiversity constraints with regard to adjacent stream habitats</p> |
| GNLP2055 | <p>South Norfolk Council comments No foul sewer available</p> <p>Chedgrave Parish Council comments Chedgrave PC considered this matter 6th December 2018. Cllrs referred to feedback from residents during the parish plan consultation (and previous responses to the GNLP consultation) which is broadly in favour of small scale development as long as: houses are not all together, there are mixed types of property, there is mixed tenure for rental, there is mixed ownership, housing density is as per the village at the moment - density numbers are not stated in the consultation paper and this needs to be clarified. Parishioners showed some interest in retail development.</p> |
| Loddon | |
| GNLP0008 | <p>General comments One objection raised concerns regarding overdevelopment.</p> |
| GNLP0312 | <p>General comments Objections raised concerns regarding removal of prime agricultural land, conservation area and the site is outside the development boundary. Other concerns include loss of wildlife, lack of stretched facilities, would create a dangerous junction, site would dominate area due to topography, invasion of privacy,</p> <p>One comment. Norfolk County Council have in the past made outline plans for relocating the Fire Station to an NCC-owned site on the A146 junction with George Lane, adjoining the school. The scheme would facilitate a sympathetic residential development which would improve the Conservation Area. The Fire Service supported the relocation operationally, but the scheme did not progress; land values of this small site in isolation did not justify the outlay. It may be worth reconsidering this as part of a larger scheme, since it would enable resolution of the current access constraint on site 0313</p> <p>One comment submitted in support of site. The site lies in a wholly sustainable location, adjacent to the main employment area of Loddon, whilst benefits from an existing frontage footway to</p> |

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| | <p>Beccles Road, which enables direct pedestrian linkages into the centre of Loddon. Public transport also passes directly along the site frontage, enabling connections to Norwich, Beccles and other larger centres beyond. In view of the above sustainability credentials, Hopkins Homes considers that this site should be Allocated for residential development within the forthcoming Draft Local Plan. See full report.</p> |
| GNLP0313 | <p>General comments Objections raised concerns regarding traffic congestion, impact on listed building & conservation area, overdevelopment, access, road safety and the area already had two major developments.</p> <p>Broads Authority comments GNLP0313 - 68 dwellings This is near the Broads border. Would welcome early discussions on this. Would be extending the built up area in a way that could affect the Broads. More limited potential for visual impact.</p> <p>Loddon & District Business Association comments This is a town centre site and we feel that greater and more flexible consideration should be given to the development of this site and uses in connection with town centres should be incorporated. The Association in general welcomes further residential development in Loddon but is also mindful of the needs in relation to additional commercial/social uses.</p> |
| GNLP0314 | <p>General comments Objections raised concerns regarding flood area/zone, overdevelopment, traffic congestion, road safety and loss of livestock.</p> |
| GNLP0372 | <p>General comments Objections raised concerns regarding flood risk, overdevelopment, access, road safety and traffic congestion.</p> |
| GNLP2032 | <p>General comments Objections raised concerns regarding site has been turned down previously by the parish and district council and twice by the national planning inspectorate.</p> <p>One comment submitted in support of site. In summary, no statutory protected habitats were identified on the site, or within close proximity. Whilst development of the site would result in the loss of some poor semi-improved grassland and herb vegetation, the introduction of new landscaping within any new development would provide the potential for ecological enhancements of the site through the introduction of gardens and landscaping across the site. The report recommends a number of mitigation measures to ensure that impacts during the construction phase are minimised</p> |

as well as a range of biodiversity enhancements to be incorporated within any proposed development. See full report.

The Suitability Assessment published at page 315 of the HELAA capacity assessment identifies a number of potential constraints to the development of the site. The landowner has commissioned the technical assessments necessary to establish that the site is suitable for development. A summary of the findings in relation to access, ecology and biodiversity, flood risk and trees is provided - see full submission.

South Norfolk Council Parish Council comments

Eastern and southern areas of the site in flood zones 2 & 3 and at risk of flooding from surface water.

Low risk of surface water flooding affecting much of the site with depths generally below 300mm but some ponding above 300mm

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.

Loddon, together with Chedgrave, fulfils the role of a key service centre with a range of shops and facilities serving the nearby settlements. Nine sites have been promoted for residential development on sites 0.5ha or larger (3 in Chedgrave and 6 in Loddon) totalling 29.36 ha.

Loddon

In Loddon itself sites, GNLP0312, GNLP0313, GNLP0314, GNLP0372, and GNLP2032 are reasonably well located in relation to the settlement, though GNLP2032 may be affected by flood-risk on part of the site which may make a suitable layout of development problematic, and there may be some surface water flooding issues to be considered on a number of the sites. Access to GNLP0313 may be difficult to achieve unless adjoining land at the fire station is included. GNLP0314 also has inadequate access and this is off Low Bungay Road which does not have pedestrian footways. Site GNLP0008 is located in open countryside a considerable distance from any settlement, with no pedestrian access to any services. Consequently, sites GNLP0312, GNLP0313, GNLP0372 and GNLP2032 are regarded as reasonable alternatives for more detailed assessment, but sites GNLP0008 and GNLP0314 are not due to the reasons given above.

Chedgrave

In Chedgrave, site GNLP0463R off Langley Road is directly adjacent to the settlement limit, and relates well to the form of the settlement. It is on the northern edge of the settlement and is approx. 1 – 1.5 km from the main facilities that are located in Loddon, but it has access to the main road through the village, including pedestrian footways. Consequently, GNLP0463R is regarded as a reasonable alternative for more detailed assessment.

To the west of Chedgrave, site GNLP2055 is divorced from the settlement and development here would appear as a separate enclave. Also, access to the site is via the single width Big Back Lane which does not have footways. Whilst road improvements including footway provision here might be feasible for the scale of the development, there is also the issue of lack of footways along Norwich Road. Therefore, there would not be safe pedestrian access to the facilities of Loddon & Chedgrave. Consequently, site GNLP0314 is not regarded as a reasonable alternative for more detailed assessment.

Site GNLP1014 is close to the settlement of Chedgrave, but still divorced from it, other than for some low density ribbon development located to the north. As such, it does not relate well to the form of the settlement and would appear as a separate enclave of development, though there is a narrow pedestrian footway along the Norwich Road into Loddon & Chedgrave. Site GNLP1014 is not regarded as reasonable alternatives for more detailed assessment.

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 |
|--|-----------------------|------------------|--|
| Loddon | | | |
| Land to the east of Beccles Road, Loddon | GNLP0312 | 7.70 | Up to 228 dwellings |
| Land to east of High Street, Loddon | GNLP0313 | 1.62 | Approx. 68 dwellings |
| Land to the east of High Bungay Road, Loddon | GNLP0372 | 3.14 | Approx. 130 dwellings plus a Scout Hut and public open space. (An initial phase of 60 starter homes could be promoted on the southern section of the site) |
| South of Beccles Road, Loddon | GNLP2032 | 0.52 | Residential (unspecified number) |
| Chedgrave | | | |
| Land off Langley Road Chedgrave | GNLP0463R | 5.58 | 70 dwellings with open space to the north as necessary |
| Total area of land | | 18.56 | |

STAGE 6 – DETAILED SITE ASSESSMENTS OF REASONABLE ALTERNATIVE SITES

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| Site Reference: | GNLP0312 |
| Address: | Land to east of Beccles Road, Loddon |
| Proposal: | Up to 228 dwellings |

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| CURRENT USE OF SITE: | BROWNFIELD/GREENFIELD: |
| Agricultural | Greenfield |

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| CONSTRAINTS IDENTIFIED IN THE HELAA |
| Amber Constraints in HELAA Access, Flood Risk, Transport and Roads, Compatibility with Neighbouring Uses |
| HELAA Conclusion This site is located on the edge of the built up area of Loddon, opposite the industrial estate with good accessibility to services. Initial highway evidence has highlighted concerns that there are potential access constraints which could be overcome by development. Subject to suitable footpath provision any potential impact on the functioning of local roads could reasonably be mitigated. The site is at low risk of flooding although the edge of the site facing Beccles Road has a small area at risk of surface water flooding. Enhancement to the water recycling centre and sewerage infrastructure upgrades may be required. There are no significant landscape, historic environment, townscape or biodiversity concerns on the site, although it is adjacent to conservation area with listed buildings to the north. There are a number of constraints that have been identified, but based on the current evidence, the site is considered suitable for the land availability study. |

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| FURTHER COMMENTS |
| Highways Yes. 228 dwellings – subject to two points of access. |
| Development Management Development Management officers recommend that sites GNLP0463 and GNLP0312 are the most appropriate for development. Both sites are prominent within the landscape, especially the Chedgrave site, and it is therefore considered appropriate for a more prescriptive approach to the allocations (particularly in relation to the Chedgrave site which would benefit from the production of a Design Brief). |
| 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

No comments

PLANNING HISTORY:

No planning history

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

- Site layout

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| Site Reference: | GNLP0313 |
| Address: | Land to east of High Street, Loddon |
| Proposal: | Approx. 68 dwellings |

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| CURRENT USE OF SITE: | BROWNFIELD/GREENFIELD: |
| Amenity land | Greenfield |

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| CONSTRAINTS IDENTIFIED IN THE HELAA |
| <p>Amber Constraints in HELAA Access, Significant Landscapes, Townscapes, Biodiversity and Geodiversity, Historic Environment, Transport and Roads</p> |
| <p>HELAA Conclusion This site is accessed off the High Street in the centre of Loddon with good accessibility to key services. Initial highway evidence has highlighted concerns that the possibility of creating suitable access to the site is severely constrained. Development in this location would increase traffic along the High Street but subject to suitable footpath provision any potential impact on the functioning of the local roads could be reasonably mitigated. The site is at low risk of flooding and Anglian Water are still to confirm utilities capacity. The site is adjacent to the conservation area and concentrations of grade II listed buildings and also within 1000m of the Broads Special Conservation Area and a SSSI/Ramsar site so mitigations are likely to be required. A number of constraints are identified but subject to being able to overcome these the site is considered suitable for the land availability study.</p> |

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| FURTHER COMMENTS |
| <p>Highways No. (Earlier comment – No- Access)</p> |
| <p>Development Management This site has been assessed a number of times and is not considered to be suitable for development due to its constraints and very sensitive location</p> |
| <p>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.</p> |
| <p>Lead Local Flood Authority No comments</p> |

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| PLANNING HISTORY: |
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| Historic refusals for small scale residential development (1980s); |
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| BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION |
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| None submitted |
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| Site Reference: | GNLP0372 |
| Address: | Land to the east of High Bungay Road, Loddon |
| Proposal: | Approx. 130 dwellings plus a scout hut and public open space (an initial phase of 60 starter homes could be promoted on the southern section of the site). |

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| CURRENT USE OF SITE: | BROWNFIELD/GREENFIELD: |
| Vacant agricultural land | Greenfield |

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| CONSTRAINTS IDENTIFIED IN THE HELAA |
| Amber Constraints in HELAA Access, Flood Risk, Transport and Roads |
| HELAA Conclusion This site is well related to the existing built up area of Loddon with good accessibility to services. Access would be from High Bungay Road, one potential access point is narrow and the other is close to the junction with the A146. Initial highway evidence has highlighted concerns that there is no possibility of creating a suitable access to the site. Development may lead to additional traffic on High Bungay Road and the A146 but subject to suitable footpath provision any potential impact on the functioning of local roads could be reasonably mitigated. The site has a low risk of flooding but adjacent areas have a risk of surface water flooding. Enhancement to the water recycling centre and sewerage infrastructure upgrades may be required. There are no significant landscape, historic environment, townscape or biodiversity concerns on the site. There are a number of constraints that have been identified, but based on the current evidence, the site is considered suitable for the land availability study. |

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| FURTHER COMMENTS |
| Highways No. (Earlier comment – No- Access) |
| Development Management Site previously considered as a preferred option for an employment land allocation (A0018/971) but there were issues raised about viability for employment use only. The site was not considered suitable for residential use principally due to flood risk and access constraints |
| 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

No comments

PLANNING HISTORY:**2017/0864**

REFUSAL - 79 starter homes; a number of issues including impact on form and character of the area and the local landscape.

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

- Transport Statement
- Ecological Scoping Survey
- Assessment of Impact of Road Traffic
- Flood Risk Assessment
- Masterplan

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|------------------------|----------------------------------|
| Site Reference: | GNLP2032 |
| Address: | South of Beccles Road, Loddon |
| Proposal: | Residential (unspecified number) |

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| CURRENT USE OF SITE: | BROWNFIELD/GREENFIELD: |
| Vacant land and storage of building materials | Greenfield |

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| CONSTRAINTS IDENTIFIED IN THE HELAA |
| Amber Constraints in HELAA Access, Utilities Capacity, Contamination and Ground Stability, Flood Risk, Townscapes, Biodiversity and Geodiversity, Historic Environment |
| HELAA Conclusion This is a 0.54 ha site promoted for residential development in Loddon with a frontage onto the southern side of the Beccles Road. Initial Highway Authority advice has not raised concern, subject to improvements to form a suitable access. The site is adjacent to the Loddon Conservation Area, and there are Grade II listed buildings along Beccles Road, so consideration to townscape matters will be needed. Fluvial and surface water flood risk are crucial matters that will likely reduce the net developable area. The eastern side of the site is in Flood Zone 3. Ecological constraints also relate to the site's proximity to habitats in the Broads. The site is 400 metres from the Broads Authority administrative area and within the 3,000 metre buffer distance to SAC (Special Area of Conservation), SPA (Special Protection Area), SSSI (Sites of Special Scientific Importance), Ramsar and National Nature Reserve designations. Whilst particularly the flood risk could constrain the developable area, the site is concluded as suitable for the land availability assessment. |

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| FURTHER COMMENTS |
| Highways No. Access acceptable for single dwelling only. |
| Development Management comments Previously promoted as 742. The site was considered to have good accessibility to services but concerns about the flood risk, wildlife concerns and an English Heritage conservation area objection was noted |
| Minerals & Waste No safeguarded mineral resources |
| Lead Local Flood Authority No comments |

PLANNING HISTORY:

Various refusals on the site - this site has been tested a number of times by applications and appeals and has consistently been found to be unsuitable for development

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

- Flood modelling assessment
- Flood Risk Assessment
- Arboricultural Impact Assessment
- Tree Survey

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| Site Reference: | GNLP0463R |
| Address: | Land off Langley Road, Chedgrave |
| Proposal: | 70 dwellings with open space to the north if necessary |

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| CURRENT USE OF SITE: | BROWNFIELD/GREENFIELD: |
| Agricultural | Greenfield |

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| CONSTRAINTS IDENTIFIED IN THE HELAA |
| Amber Constraints in HELAA Access, Significant Landscapes, Townscapes, Biodiversity and Geodiversity, Historic Environment, Transport and Roads |
| HELAA Conclusion This is a large greenfield site off Langley Road and Snow's Lane and adjacent to the development boundary. It is not particularly well related to services as mostly located to the south in Loddon. Initial highway evidence has indicated that there are potential access constraints on the site, but these could be overcome through development. Also, subject to suitable footpath provision, any potential impact on the functioning of local roads could be reasonably mitigated. There are no concerns over potential contamination, ground stability, loss of high quality agricultural land, nor loss of open space. However, other constraints include the proximity to Langley Historic Park (opposite) and potential impact on the wider setting of grade 1 listed building. Other environmental sensitivities at this location include the Broads (within the 1,000 m buffer) special area of conservation and SSSI , (within 3,000 m buffer), risk of surface water flooding. There are number of constraints but as these may be possible to mitigate the site is concluded as suitable for the land availability assessment |

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| FURTHER COMMENTS |
| Highways Yes. Subject to visibility improvement and frontage development at Langley Rd to north. 2.0m footway required at site frontage to link with existing facilities. If access is via Snow's Lane, it will need to be widened to 5.5m with 2.0m footway. |
| Development Management comments If the site is considered for allocation it would be appropriate to prepare a design brief for the site. This would need to address the sensitivities of the site within the landscape due to the site topography and should set the design parameters for development in this location. |
| 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
No comments

PLANNING HISTORY:

Historic refusals for residential development on the site (1970's)

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

- Site layout
- Landscape summary

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

Five reasonable alternative sites have been identified in Loddon and Chedgrave at stage 5 of this booklet. 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 development. 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 6 above.

Loddon and Chedgrave together are a key service centre and the 'Towards a Strategy' document identifies a requirement for 400-600 dwellings across this sector of the hierarchy. Through further discussion two sites were identified as being suitable to allocate.

GNLP0312 is preferred for 180 dwellings. This site is well related to the form and character of the settlement and is less constrained than other sites promoted, which raise access or townscape and heritage concerns. Highways support subject to two points of access.

GNLP0463R is preferred for 20 dwellings. It is not considered appropriate for the 70 homes originally suggested. Although this site is elevated and would be quite prominent it is considered suitable subject to a good layout to work with its setting in the landscape. A design brief would be needed. The site's allocation is subject to visibility improvements and frontage development at Langley Road to the north. A 2m footway will be required at the site frontage to link with existing facilities. If access is to be via Snows Lane then it will need to be widened and a footway provided.

No sites have been identified as reasonable alternatives.

Other sites have been dismissed primarily due to flood and/or access concerns. A number of these sites have already been tested numerous times through the planning application and appeal process.

In conclusion, two sites are identified as preferred options providing for at least 200 new homes in the key service centre (one for 180 homes, one for 20 homes). There are no carried forward residential allocations and a total of 200 additional dwellings with planning permission. This gives a total deliverable housing commitment for Loddon and Chedgrave of 400 homes between 2018 – 2038.

Preferred Sites:

| Address | Site Reference | Area (Ha) | Proposal | Reason for allocating |
|--|----------------|-----------|---------------|---|
| Loddon and Chedgrave | | | | |
| Land to the east of Beccles Road, Loddon | GMLP0312 | 7.70 | 180 dwellings | This site is preferred for allocation as it is well related to the form and character of the settlement and is less constrained than other sites promoted, which raise access or townscape and heritage concerns. The allocation is subject to two points of access. The site rises to the north so development on this site would be significantly more visible in the landscape than the dwellings and units opposite, and the design of the development would need to address the issues with the topography of the site. |
| Land off Langley Road, Chedgrave | GMLP0463 | 3.07 | 20 dwellings | Although this site is elevated and would be quite prominent it is preferred for allocation subject to a good layout to work with its setting in the landscape. A design brief would be needed. It is not considered appropriate for the 70 homes originally suggested. The allocation is subject to visibility improvements and frontage development at Langley Road to the north. A 2m footway will be required at the site frontage to link with existing facilities. If access is to be via Snows Lane then it will need to be widened and a footway provided. |

Reasonable Alternative Sites:

| Address | Site Reference | Area (ha) | Promoted for | Reason for not allocating |
|---------------------------------|----------------|-----------|--------------|---------------------------|
| Loddon and Chedgrave | | | | |
| NO REASONABLE ALTERNATIVE SITES | | | | |

Unreasonable Sites:

| Address | Site Reference | Area (ha) | Promoted for | Reason considered to be unreasonable |
|--|----------------|-----------|---|---|
| Loddon and Chedgrave | | | | |
| Land on the west side of Norwich Road, Chedgrave | GNLP1014 | 1.60 | Residential (unspecified number) | This site is not considered to be suitable for allocation as it does not relate well to the form of the settlement and would appear as a separate enclave of development. |
| Big Back Lane, Chedgrave | GNLP0314 | 3.45 | Residential (unspecified number) | This site is not considered to be suitable for allocation as it does not relate well to the form of the settlement and would appear as a separate enclave of development. |
| Wood Farm, Bungay Road, Loddon | GNLP0008 | 2.01 | Up to 15 dwellings including access roads | This site is not considered to be suitable for allocation as it is located in open countryside, a considerable distance from any settlement, with no pedestrian access to any services. |
| Land to east of High Street, Loddon | GNLP0313 | 1.62 | Approx. 68 dwellings | This site is not considered to be suitable for allocation. Significant heritage concerns would be compounded by landscape impacts if trees had to be removed from the site. Crucially, there is no suitable vehicular access unless adjoining land at the fire station is included. |
| Land off Low Bungay Road, Loddon | GNLP0314 | 0.74 | Approx. 19 dwellings | This site is not considered to be suitable for allocation as it has inadequate vehicular access and no pedestrian footway to Loddon Infant and Junior Schools. |
| Land to the east of High Bungay Road, Loddon | GNLP0372 | 3.14 | Approx. 130 dwellings plus a Scout Hut and public open space (an initial phase of 60 starter homes could be | Although well-located in relation to the settlement, the site is not considered to be suitable for allocation as there are concerns regarding vehicular access onto High Bungay Road in close proximity to the A146. |

| Address | Site Reference | Area (ha) | Promoted for | Reason considered to be unreasonable |
|-------------------------------|----------------|-----------|---|---|
| | | | promoted on the southern section of the site) | |
| South of Beccles Road, Loddon | GNLP2032 | 0.52 | Residential (unspecified number) | This site is not considered to be suitable for allocation. There is flood risk on part of the site which may affect the developable area. There are concerns regarding vehicular access; access would be suitable for a single dwelling only. There have also been a number of dismissed appeals on the site. |

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

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|---|---|
| STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE: | Site GNLP0312 Land to the east of Beccles Road, Loddon (Preferred Site) |
| TOTAL NUMBER OF REPRESENTATIONS: | 12 |
| SUPPORT/ OBJECT/ COMMENT BREAKDOWN: | 1 Support, 7 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 |
|---|---|---|--|---|--|
| Lanpro/Hopkins Homes | Support | Propose amended policy wording to remove requirement for two site access points | <ul style="list-style-type: none"> • Can site access be reduced to one primary and one emergency vehicle? | The Highway Authority view is that a development of this scale requires two vehicular accesses. | None |
| Members of the public | Object | Impact on residential amenity including loss of view; construction noise; traffic; light pollution Better to use it as employment land | <ul style="list-style-type: none"> • Revisit assessment criteria | These issues have been reconsidered and the impact on views has been addressed in policy. The | Reference to the Broads to be inserted regarding development's |

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| | | Landscape impacts Distance from services | | Highway Authority considers that the impact of development and future resident traffic can be mitigated. The allocation policy requires surrounding trees and hedgerows to be enhanced and site topography to be considered. | impact on views. |
| Larkfleet Homes | Object | Lack of professional assessment of site's impacts, alternative site performs better (HELAA), | <ul style="list-style-type: none"> • Comparison with site 0372 | The process of assessing a site is more complex than counting the number of amber scores in the HELAA assessment. The site assessment booklet for Loddon and Chedgrave explains the process of assessing sites, why 0312 has been allocated, and why 0372 has not. | None |

| | | | | | |
|-----------------------|---------|--|---|--|---|
| Historic England | Object | Impact on conservation area to north and west of site not mentioned in policy wording | <ul style="list-style-type: none"> Amend policy wording re built heritage, including setting | It is accepted that the policy should acknowledge the potential for harm to the heritage assets and the requirement for measure to address this. | Add to policy: "Any development must conserve and enhance the significance of listed buildings within the Loddon and Chedgrave Conservation Area to the north-west of the site, including any contribution made to that significance by setting." |
| Anglian Water | Comment | No reference to water efficiency | <ul style="list-style-type: none"> Water efficiency policy wording | This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy. | None |
| Members of the public | Comment | Need studies on surface water run-off, traffic risks, services capacity Support mixed use on the site | <ul style="list-style-type: none"> Traffic Surface water Service capacity | Loddon's services are considered appropriate for this level of growth. The Highway Authority considers the traffic | None |

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| | | | | impacts can be mitigated and the policy addresses surface water drainage. Additional studies will be required at planning application stage. | |
| Loddon Parish Council | Comment | Propose amendments to policy wording | <ul style="list-style-type: none"> • Density • Open space/landscaping • Community infrastructure • Highway safety | The additional highway elements and s106 contributions will be addressed at planning application stage. Elements such as density and open space are incorporated within design and layout. Infrastructure issues may be on- or off-site. | None |

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| STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE: | Site GNLP0463R Land off Langley Road, Chedgrave (Preferred Site) |
| TOTAL NUMBER OF REPRESENTATIONS: | 20 |
| SUPPORT/ OBJECT/ COMMENT BREAKDOWN: | 1 Support, 14 Object, 5 Comment |

| RESPONDENT (OR GROUP OF RESPONDENTS) | SUPPORT/ OBJECT/ COMMENT | BRIEF SUMMARY OF COMMENTS | MAIN ISSUES REQUIRING INVESTIGATION | DRAFT GNLP RESPONSE | PROPOSED CHANGE TO PLAN |
|---|---|--|---|---|---|
| Brown & Co/ESCO Developments | Support | Welcome preferred status, consider number of units should not be reduced from 70 to 20 but to 60. Poor choice of subdivided site due to ground levels. | <ul style="list-style-type: none"> • Size and location of site boundary • Rebalance numbers between two sites | The area indicated on the masterplan as open space addresses some amenity concerns raised by local residents. Although there will be landscape and heritage impacts, these can be mitigated if site boundary altered as proposed. | The site will now be allocated at 5.58ha for 60 dwellings |
| Members of the public | Object | Various concerns including: | <ul style="list-style-type: none"> • Would proposed revised site boundary | The Highway Authority considers | Change of site boundary to |

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|------------------|--------|---|---|---|---|
| | | <p>Impact on residential amenity</p> <p>Surface water flooding</p> <p>Services at capacity</p> <p>Traffic congestion/road safety</p> <p>Financial compensation</p> <p>Landscape and ecology impacts</p> <p>Air quality</p> <p>Ground contamination (foot and mouth)</p> | <p>address any of these issues?</p> <ul style="list-style-type: none"> Does revised site have surface flood areas? | <p>the traffic impacts can be mitigated, to be determined by a transport survey. The level of services in Loddon and Chedgrave is considered appropriate for this scale of allocation. Financial compensation is not awarded for impact of housing development. The revised site boundary may reduce the impact on residential amenity.</p> | <p>retain open space to south; add policy requirements to conduct ground contamination survey and mitigate surface water flooding</p> |
| Historic England | Object | No mention of Langley Park and impact on its setting | <ul style="list-style-type: none"> Amend policy wording to conserve and enhance heritage assets including setting | It is accepted that the policy should acknowledge the potential for harm to the heritage assets and the requirement for measure to address this. | Add to policy: "Any development must conserve and enhance the significance of Langley Park to the west of the site, including its associated listed buildings |

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| | | | | | and any contribution made to its significance by setting.” |
| Anglian Water | Comment | No reference to water efficiency in policy wording | <ul style="list-style-type: none"> Amend policy wording | This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy. | None |
| Members of the public | Comment | <p>Various concerns including: Parking and traffic congestion Services at capacity</p> <p>Disruption during construction</p> <p>Suggest alternative sites</p> <p>Suggest single storey dwellings</p> | <ul style="list-style-type: none"> Does revised site boundary address any of these issues? | The level of services in Loddon and Chedgrave is considered appropriate for this scale of allocation. The Highway Authority considers that traffic impacts can be mitigated. The revised site's masterplan addresses amenity issues. | Revision to site boundary. |

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| STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE: | Site GNLP0008 Wood Farm, Bungay Road, Loddon (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 |
|---|---|--------------------------------------|--|-----------------------------------|--|
| Members of the public | Comment | Traffic issues | <ul style="list-style-type: none"> None | Noted. The site is not allocated. | None |

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| STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE: | Site GNLP0313 Land to east of High Street, Loddon (Unreasonable Residential Site) |
| TOTAL NUMBER OF REPRESENTATIONS: | 2 |
| SUPPORT/ OBJECT/ COMMENT BREAKDOWN: | 0 Support, 0 Object, 2 Comment |

| RESPONDENT (OR GROUP OF RESPONDENTS) | SUPPORT/ OBJECT/ COMMENT | BRIEF SUMMARY OF COMMENTS | MAIN ISSUES REQUIRING INVESTIGATION | DRAFT GNLP RESPONSE | PROPOSED CHANGE TO PLAN |
|---|---|--|---|----------------------------------|--|
| Members of the public | Comment | Various concerns including: Heritage/conservation Safe highway access Traffic/parking/footpath Relocate fire station | <ul style="list-style-type: none"> As previous | Noted The site is not allocated. | None |

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| STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE: | Site GNLP0314 Land off Low Bungay Road, Loddon (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 |
|---|---|--|---|-----------------------------------|--|
| Members of the public | Comment | Safe highway access Traffic Service congestion | <ul style="list-style-type: none"> As previous | Noted. The site is not allocated. | None |

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| STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE: | Site GNLP0372 Land to the east of High Bungay Road, Loddon (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 |
|---|---|--|---|--|--|
| Members of the public | Object | Reduced site should be explored, as planning application which addresses landscape and highway constraints | <ul style="list-style-type: none"> Reduced site size | Noted. However there are concerns regarding vehicular access onto High Bungay Road. The site is not allocated. | None |
| Members of the public | Comment | Supports site, subject to highway solution | <ul style="list-style-type: none"> Support site | Noted However there are concerns regarding vehicular access onto High Bungay Road. The site is not allocated. | None |

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| STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE: | Site GNLP1014 Land on the west side of Norwich Road, Chedgrave (Unreasonable Residential Site) |
| TOTAL NUMBER OF REPRESENTATIONS: | 6 |
| SUPPORT/ OBJECT/ COMMENT BREAKDOWN: | 0 Support, 1 Object, 5 Comment |

| RESPONDENT (OR GROUP OF RESPONDENTS) | SUPPORT/ OBJECT/ COMMENT | BRIEF SUMMARY OF COMMENTS | MAIN ISSUES REQUIRING INVESTIGATION | DRAFT GNLP RESPONSE | PROPOSED CHANGE TO PLAN |
|---|---|--|--|---|--|
| Members of the public | Object | Planning permission renders unreasonable status invalid | <ul style="list-style-type: none"> Investigate permission | The site has been reconsidered in its reduced state, excluding the permitted land. The remaining site is considered unsuitable. | None |
| Site promoter | Comment | Various attachments in support of the site, including permission | <ul style="list-style-type: none"> Investigate permission | The site has been reconsidered in its reduced state, excluding the permitted land. The remaining site is | None |

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|-----------------------|---------|---|--|--|------|
| | | | | considered unsuitable. | |
| Members of the public | Comment | Permission for 5 dwellings on this site and some adjacent, should be included in settlement's total | <ul style="list-style-type: none"> Investigate permission | The permission will be included in calculations of commitment, which has been considered when distributing growth. | None |

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| STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE: | Site GNLP2032 South of Beccles Road, Loddon (Unreasonable Residential Site) |
| TOTAL NUMBER OF REPRESENTATIONS: | 3 |
| SUPPORT/ OBJECT/ COMMENT BREAKDOWN: | 0 Support, 0 Object, 3 Comment |

| RESPONDENT (OR GROUP OF RESPONDENTS) | SUPPORT/ OBJECT/ COMMENT | BRIEF SUMMARY OF COMMENTS | MAIN ISSUES REQUIRING INVESTIGATION | DRAFT GNLP RESPONSE | PROPOSED CHANGE TO PLAN |
|---|---|---|--|---|--|
| Site promoter | Comment | Flood and access constraints have been shown to be overcome. Also tree survey completed. Please reassess the site | <ul style="list-style-type: none"> • Flood constraint • Highway access • 2011/1174 permits access | 2013/1846 permits 7m access strip which has been implemented. Flood model report suggests no risk to proposed housing but some risk to access in climate change scenario. The minimum size for a housing allocation is 12 – 15 dwellings, and this is unlikely to be achievable on this | None |

| | | | | | |
|-----------------------|---------|---|---|--|------|
| | | | | site due to highway and drainage constraints. | |
| Members of the public | Comment | Site is between two new developments, is suitable for development | <ul style="list-style-type: none"> • Reconsider site | The minimum size for a housing allocation is 12 – 15 dwellings, and this is unlikely to be achievable on this site | None |
| Larkfleet Homes | Comment | Addresses constraints | <ul style="list-style-type: none"> • Reconsider site | The minimum size for a housing allocation is 12 – 15 dwellings, and this is unlikely to be achievable on this site | None |

| | |
|---|--|
| STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE: | Site GNLP2055 Big Back Lane, Chedgrave (Unreasonable Residential Site) |
| TOTAL NUMBER OF REPRESENTATIONS: | 3 |
| SUPPORT/ OBJECT/ COMMENT BREAKDOWN: | 0 Support, 0 Object, 3 Comment |

| RESPONDENT (OR GROUP OF RESPONDENTS) | SUPPORT/ OBJECT/ COMMENT | BRIEF SUMMARY OF COMMENTS | MAIN ISSUES REQUIRING INVESTIGATION | DRAFT GNLP RESPONSE | PROPOSED CHANGE TO PLAN |
|---|---|--|---|--|--|
| Members of the public | Comment | Permission for 5 dwellings on this site should be included in settlement's total Potential access to site indicated Traffic concerns | <ul style="list-style-type: none"> Investigate permission and access to site | This site is considered unsuitable as it does not relate well to Chedgrave's built form. | 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 consult. |
|--|-----------------------|------------------|-----------------------------|-----------------------------------|
| Loddon and Chedgrave | | | | |
| Langley Road, Chedgrave | GNLP0463R | 5.58 | 78 dwellings and open space | Preferred site |
| South of Norwich Road, Chedgrave | GNLP1014R | 1.61 | Housing | Unreasonable |
| North of Beccles Road, Loddon | GNLP4028 | 4.56 | 120 dwellings | New site submitted |
| North and South of Norton Road, Loddon | GNLP4029 | 6.03 | 125 dwellings | New site submitted |
| South east of Big Back Lane, Chedgrave | GNLP4058 | 6.58 | 80-90 dwellings | New site submitted |
| TOTAL | | 24.36 | | |

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 |
|-------------------------------|-------------|--------------------|--------------------|--------------------------|--------------------------------|------------|-----------------------|------------------------|----------------------|-----------------------------|----------------------|-----------------|-------------------|---------------------------------|
| Loddon & Chedgrave | | | | | | | | | | | | | | |
| GNLP0463R | Amber | Green | Green | Green | Green | Amber | Green | Amber | Amber | Amber | Amber | Green | Amber | Green |
| GNLP1014R | Amber | Green | Amber | Green | Green | Amber | Green | Green | Green | Amber | Green | Green | Amber | Green |
| GNLP4028 | Green | Green | Amber | Green | Green | Amber | Green | Green | Green | Amber | Green | Green | Amber | Green |
| GNLP4029 | Amber | Green | Amber | Green | Green | Amber | Green | Amber | Amber | Amber | Green | Green | Amber | Green |
| GNLP4058 | Green | Amber | Amber | Green | Green | Green | Green | Green | Amber | 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

Three new sites have been promoted for residential development in Loddon and Chedgrave on sites 0.5ha or larger. Additionally, the boundaries of two existing sites have been revised. We are therefore considering five sites totalling 24.36ha. Of these, site GNLP0463R was identified as a preferred site for the Regulation 18 consultation, and a revised site boundary is now being considered (since the draft plan was produced).

Loddon is bounded by the A146 to the west and south, and the Broads Authority area to the east. Chedgrave is constrained by the Broads Authority area to the south-east and Langley Park to the north. Loddon, together with Chedgrave, fulfils the role of a key service centre with a range of shops and facilities serving the nearby settlements. The housing allocation in the current local plan, to the west of the town centre, has been built out.

Taking account of the comments received through previous public consultations, existing commitment, achieving safe access to school, and the constraints set out in the HELAA including those highlighted below, the following sites are considered to be reasonable alternatives worthy of further investigation regarding their potential for allocation. This will be done through discussions with the Highways Authority, Lead

Local Flood Authority, and officers in Development Management with specialist knowledge about landscape, townscape, trees, etc. These comments will be sought through the Regulation 18D consultation and taken account of at Regulation 19:

GNLP0463R, Langley Road, Chedgrave, 5.58ha, 60 dwellings and open space

This site was a preferred site in the Reg.18C consultation, as defined in its original submission but with housing numbers reduced to 20. During Reg.18C, members of the public raised concerns about the impact on residential amenity, surface water flooding, service and road capacity of the site, and the site promoter identified an alternative site boundary which would address the topography of the site, and provided evidence supporting the site's allocation for 60 dwellings. There were further representations from Historic England and Anglian Water, which need to be addressed in the policy text. The HELAA continues to show several constraints, but the revision of the site boundary, additional housing numbers and additional evidence should be considered further, subject to the views of the Highways Authority, Development Management and Lead Local Flood Authority in particular.

GNLP1014R, South of Norwich Road, Chedgrave, 1.61, housing

The site was assessed as unreasonable for the Reg.18C draft plan, with concerns over its relationship to the form of the settlement. During Reg.18C members of the public queried the impact of a permission for 5 dwellings on the site, and the site promoter revised the boundary of the site to remove the permission. The revised HELAA shows several constraints which would require mitigation. Estate development at this location does not relate well to the form of the settlement. However, the permission on part of the original site will change the settlement form and may indicate that a footway could be provided to link the site to the village centre (the distance to services makes them accessible). Therefore the site is regarded as a reasonable alternative to consider further, subject to the views of the Highways Authority and Development Management in particular.

GNLP4028, North of Beccles Road, 4.56ha, 120 dwellings

This site to the east of Loddon on Beccles Road and is promoted for 120 dwellings, with potential employment use to be considered within a mixed use scheme. The adjacent site has been identified as a preferred site for housing, and there is an industrial estate on the opposite side of Beccles Road. There are areas within the site at risk of surface water flooding, which would need to be addressed. However, as the site is adjacent to the preferred site, it could potentially be part of a wider scheme and should be considered further, subject to the views of the Lead Local Flood Authority in particular.

GNLP4029, North and South of Norton Road, 6.03, 125 dwellings

This two-part site either side of Norton Road to the east of Loddon is promoted for up to 125 dwellings (there are also suggestions that community facilities may be provided but these have not been described). There are concerns that Norton Road is not suitable for development traffic but the south site may be accessed via the adjacent preferred site GNLP0312. There are some areas at risk of surface water flooding which would require mitigation. The site is well related to services, is adjacent to a site which has been preferred for housing allocation, and offers the

potential to increase permeability within this part of the town. Therefore it should be considered further, subject to the views of the Highways Authority and Lead Local Flood Authority in particular.

GNLP4058, South east of Big Back Lane, Chedgrave, 6.58ha, 80-90 dwellings

This site to the north-west of Chedgrave is promoted for 80-90 dwellings and open space, with primary site access from Proctor Road and Beauchamp Road. It is accessible to some facilities and is adjacent to existing open space. There may be some worth in expanding the local open space and the site should be considered further in that context, subject to the views of the Highways Authority in particular.

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 |
|--|-----------------------|------------------|-----------------------------|
| Loddon and Chedgrave | | | |
| Langley Road, Chedgrave | GNLP0463R | 5.58 | 60 dwellings and open space |
| South of Norwich Road, Chedgrave | GNLP1014R | 1.61 | Housing |
| North of Beccles Road | GNLP4028 | 4.56 | 120 dwellings |
| North and South of Norton Road | GNLP4029 | 6.03 | 125 dwellings |
| South east of Big Back Lane, Chedgrave | GNLP4058 | 6.58 | 80-90 dwellings |
| TOTAL | | 24.36 | |

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

| | |
|------------------------|-----------------------------|
| Site Reference: | GNLP0463R |
| Address: | Langley Road, Chedgrave |
| Proposal: | 78 dwellings and open space |

| | |
|-----------------------------|-------------------------------|
| CURRENT USE OF SITE: | BROWNFIELD/GREENFIELD: |
| Agricultural | Greenfield |

| |
|---|
| CONSTRAINTS IDENTIFIED IN THE HELAA: |
| <p>Amber Constraints in HELAA Access, Significant Landscapes, Townscapes, Biodiversity & Geodiversity, Historic Environment, Transport & Roads</p> |
| <p>HELAA Conclusion: This is a large greenfield site off Langley Road and Snow's Lane and adjacent to the development boundary. It is not particularly well related to services as mostly located to the south in Loddon. Initial highway evidence has indicated that there are potential access constraints on the site, but these could be overcome through development. Also, subject to suitable footpath provision, any potential impact on the functioning of local roads could be reasonably mitigated. There are no concerns over potential contamination, ground stability, loss of high quality agricultural land, nor loss of open space. However, other constraints include the proximity to Langley Historic Park (opposite) and potential impact on the wider setting of grade 1 listed building. Other environmental sensitivities at this location include the Broads (within the 1,000 m buffer) special area of conservation and SSSI, (within 3,000 m buffer), risk of surface water flooding. There are number of constraints but as these may be possible to mitigate the site is concluded as suitable for the land availability assessment.</p> |

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| FURTHER COMMENTS: |
| <p>Highways Authority Subject to acceptable access/visibility, submission of TS and implementation of any agreed measures. Carriageway widening may be required at Langley Lane, 2.0m wide footway required for full extent of site frontage, extending southwards to Hillside. Impact at Big Back Lane to be assessed and any agreed measures to be implemented.</p> |
| <p>Lead Local Flood Authority The revised site is at risk of surface water flooding, but this is not severe enough to prevent development of the site. Mitigation will be required, and standard information will be required at planning stage.</p> |

Development Management

The new layout of the site would create a gap in the built form, extend Chedgrave into the countryside and cause harm to the landscape setting of Langley School within Langley Park. The developers claim that the scheme is landscape-led, but we consider that there would be detrimental impact on the form and character of the settlement.

PLANNING HISTORY:

Historic refusals for residential development on the site (1970's)

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION:

- Site layout (pre-Reg18C)
- Landscape summary, ecology assessment (pre-Reg18C)
- Aerial plan, site context, site plan, landscape analysis

| | |
|------------------------|----------------------------------|
| Site Reference: | GNLP1014R |
| Address: | South of Norwich Road, Chedgrave |
| Proposal: | Housing |

| | |
|-----------------------------|-------------------------------|
| CURRENT USE OF SITE: | BROWNFIELD/GREENFIELD: |
| Agricultural | Greenfield |

| |
|---|
| CONSTRAINTS IDENTIFIED IN THE HELAA: |
| <p>Amber Constraints in HELAA Site Access, Utilities Capacity, Flood Risk, Biodiversity & Geodiversity, Transport & Roads</p> <p>HELAA Conclusion: This greenfield site to the west of Chedgrave has been altered to remove an area which now has planning permission, leaving 1.61ha which is still promoted for housing. Initial Highways Authority comments suggest the site is remote with concerns over site access and pedestrian access to services. There is a small area at the western and southern boundary at risk of surface water flooding (1 in 1000). The site is in Grade 4 agricultural land and also within a SSSI impact zone. The impact on listed buildings would result from the area which has been removed from the site. The site has already been counted within the HELAA land availability so is considered unsuitable to add again.</p> |

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| FURTHER COMMENTS: |
| <p>Highways Authority No - Revised site configuration defines access location and causes visibility concern to west, also requires sight lines over 3rd party land which is not acceptable. Footway required from site access to link with existing facility to east. Speed Limit would require review, visible development would assist with compliance. Access to local facilities acceptable.</p> <p>Development Management The permission on part of the original site maintains the character of strong frontage development at this location. Estate development at this location does not relate well to the form of the settlement.</p> <p>Lead Local Flood Authority There is a watercourse within 100m of the site boundary, in an IDB area. The revised site is at risk of surface water flooding, but this is not severe enough to prevent development of the site. Mitigation will be required, and standard information will be required at planning stage.</p> |

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| PLANNING HISTORY: |
| No comments |

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION:

Map of flood zones, land registry title, permission on adjacent site

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|------------------------|-------------------------------|
| Site Reference: | GNLP4028 |
| Address: | North of Beccles Road, Loddon |
| Proposal: | 120 dwellings |

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|-----------------------------|-------------------------------|
| CURRENT USE OF SITE: | BROWNFIELD/GREENFIELD: |
| Agricultural | Greenfield |

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| CONSTRAINTS IDENTIFIED IN THE HELAA: |
| Amber Constraints in HELAA Utilities Capacity, Flood Risk, Biodiversity & Geodiversity, Transport & Roads |
| HELAA Conclusion: This greenfield site to the east of Loddon is promoted for housing and employment use. The Highways Authority are likely to require a transport assessment and masterplan. There are some areas within site are at risk of surface water flooding (1 in 30, 1 in 100, 1 in 1000). The site is in Grade 3 agricultural land and within a SSSI impact zone. Although there are constraints, the site is considered suitable for the land availability assessment. |

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| FURTHER COMMENTS: |
| Highways Authority Subject to Transport Assessment and implementation of any agreed measures. Subject to detailed masterplan to integrate infrastructure with GNLP0312. |
| Lead Local Flood Authority There is a surface water sewer within 100m of the site boundary, which is obstructed by a road. The site is at risk of surface water flooding, but this is not severe enough to prevent development of the site. Mitigation will be required, and standard information will be required at planning stage. |
| Development Management The housing preferred on the adjacent site is of a suitable scale for the village. It may be more appropriate to consider this site once the adjacent site is delivered and the businesses on employment sites nearby have made any expansion plans. |

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| PLANNING HISTORY: |
| No comments |

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| BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION: |
| Constraints statement, location plan |

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|------------------------|--|
| Site Reference: | GMLP4029 |
| Address: | North and South of Norton Road, Loddon |
| Proposal: | 125 dwellings |

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|-----------------------------|-------------------------------|
| CURRENT USE OF SITE: | BROWNFIELD/GREENFIELD: |
| Agricultural | Greenfield |

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| CONSTRAINTS IDENTIFIED IN THE HELAA: |
| <p>Amber Constraints in HELAA Site Access, Utilities Capacity, Flood Risk, Significant Landscapes, Sensitive Townscapes, Biodiversity & Geodiversity, Transport & Roads</p> |
| <p>HELAA Conclusion: This two-part greenfield site to the east of Loddon is promoted for housing. Initial Highways Authority comments that Norton Road is not suitable for development traffic but the south site may be accessed via 0312. There is a small area at northern boundary and within site to the east at risk of surface water flooding (1 in 30, 1 in 100, 1 in 1000). The site is in Grade 3 agricultural land and the northern site is adjacent to the Broads Authority area, with potential impacts on the sensitive Broads landscape. Two listed buildings lie to the east of the site. The site is within a SSSI impact zone and a PRoW runs along the site's northern boundary. Although there are several constraints, the site is considered suitable in terms of contributing to the land availability study.</p> |

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| FURTHER COMMENTS: |
| <p>Highways Authority No - Network - Norton Road not suitable for development traffic, south site may be appropriate if brought forward with and accessed via GMLP0312 only. No vehicular access to Norton Road. [Could the north site be accessed simply by crossing Norton Road?] No - Neither Norton Rd, nor Pyes Mill Rd are suitable to support development traffic.</p> <p>Lead Local Flood Authority Complete geotechnical investigation needed to determine infiltration potential. The site is at risk of surface water flooding, but this is not severe enough to prevent development of the site. Mitigation will be required, and standard information will be required at planning stage.</p> <p>Development Management Development of this site would cause harm to the landscape and the rural setting of the Broads.</p> |

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| PLANNING HISTORY: |
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| No comments |
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| BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION: |
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| Location plan |
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| Site Reference: | GNLP4058 |
| Address: | South east of Big Back Lane, Chedgrave |
| Proposal: | 80-90 dwellings |

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|-----------------------------|-------------------------------|
| CURRENT USE OF SITE: | BROWNFIELD/GREENFIELD: |
| Agricultural | Greenfield |

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| CONSTRAINTS IDENTIFIED IN THE HELAA: |
| Amber Constraints in HELAA Access to Services, Sensitive Townscapes, Transport & Roads |
| HELAA Conclusion: This greenfield site to the north-west of the village is promoted for housing. Initial comments from the Highways Authority would require a transport assessment, access via Proctor Road and if possible via Beauchamp Road also (no vehicular access at Big Back Lane). The site is in Grade 3 agricultural land and within a SSSI impact zone. A band of TPO trees sits on the site's boundary with the road and the site is adjacent to open space on Mallard Close. Although the site has constraints, it is considered suitable for the purposes of the land availability assessment. |

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| FURTHER COMMENTS: |
| Highways Authority Subject to transport assessment, implementation of agreed measures, acceptable access via Proctor Road and if possible via Beauchamp Road also. No vehicular access at Big Back Lane. |
| Development Management If access was taken from Proctor Road, this site could be suitable for housing including affordable housing. |
| Lead Local Flood Authority The site is at risk of surface water flooding, but this is not severe enough to prevent development of the site. Mitigation will be required, and standard information will be required at planning stage. |

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| PLANNING HISTORY: |
| No comments |

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| BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION: |
| Location 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:

| Address | Site Reference | Area (Ha) | Proposal | Reason for allocating |
|-----------------------------|----------------|-----------|-----------------------------|--|
| Loddon and Chedgrave | | | | |
| Langley Road, Chedgrave | GNLP0463R | 5.58 | 60 dwellings and open space | Although this site is elevated and would be quite prominent it is allocated subject to a design brief and masterplan. This should indicate open space to the south to reduce leisure visits to the Broads, enhance the green infrastructure network, and acknowledge the site's setting adjacent to the historic park landscape. Highway and footpath improvements will be needed. |

New and revised sites considered to be unreasonable for allocation:

| Address | Site Reference | Area (ha) | Promoted for | Reason considered to be unreasonable |
|--|----------------|-----------|----------------------------------|---|
| Loddon and Chedgrave | | | | |
| Land on the west side of Norwich Road, Chedgrave | GNLP1014R | 1.61 | Residential (unspecified number) | This site is not considered to be suitable for allocation as it does not relate well to the form of the settlement and site access is constrained. |
| South east of Big Back Lane, Chedgrave | GNLP4058 | 6.58 | 80-90 dwellings | If this site was allocated in addition to the two other allocations in Loddon & Chedgrave, development of this site may overwhelm public services. It is therefore considered unsuitable. |
| North of Beccles Road, Loddon | GNLP4028 | 4.56 | 120 dwellings | If this site was allocated in addition to the two other allocations in Loddon & Chedgrave, development of this |

| Address | Site Reference | Area (ha) | Promoted for | Reason considered to be unreasonable |
|--|----------------|-----------|---------------|---|
| | | | | site may overwhelm public services. It is therefore considered unsuitable. |
| North and South of Norton Road, Loddon | GNLP4029 | 6.03 | 125 dwellings | If this site was allocated in addition to the two other allocations in Loddon & Chedgrave, development of this site may overwhelm public services. Furthermore, Norton Road and Pyes Mill Road are not suitable for development traffic. It is therefore considered unsuitable. |

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 9 sites promoted for residential/mixed use (6 in Loddon, 3 in Chedgrave) totalling just over 29 hectares of land. The outcome of initial site assessment work (which is detailed in part 1 of this booklet) was to prefer site GNLP0463 in Chedgrave for 20 dwellings and GNLP0312 in Loddon for 180 dwellings. These preferred sites were favoured because they provide pedestrian access to services and the impacts of development could reasonably be mitigated. This option was consulted on as part of the Regulation 18C draft plan consultation.

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 Loddon and Chedgrave KSC. The main issues raised were loss of residential amenity, traffic, landscape and heritage impacts (detailed in part 2 above). These comments have resulted in changes to policy wording where appropriate such as addressing residential amenity, the proximity to the Broads and local heritage assets but did not result in any changes to the selection of the sites preferred for allocation.

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

Three new and two revised sites were also submitted through the consultation totalling over 24 ha of land, including a proposed revision to the boundary of preferred site GNLP0463R to accommodate up to 70 dwellings. 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 new sites were unreasonable for allocation as in combination with the preferred sites they would be too large for the scale of development required in Loddon and Chedgrave. After consideration and engagement with Development Management and Lead Local Flood Authority colleagues and the Highway Authority the extension to preferred site GNLP0463R was considered to be appropriate because it would enable the southern part of the site to remain as open space, thus protecting residential amenity to some extent. The proposed 70 dwellings was reduced to 60.

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 Loddon and Chedgrave but showed how broadly all sites promoted scored similarly. One site (GNLP0313) scored slightly better than others, but from a site assessment perspective was unable to prove access to the site to the satisfaction of the Highway Authority.

The Sustainability Appraisal shows how GNLP0463R scored slightly worse for population and communities after it was revised, due to the measured distance to local services. Sites GNLP0312 and GNLP0463R score positively for housing and both score negatively for education and a double negative for health, due to distance to services (the SA uses a different metric to the site assessment process). Other more minor issues flagged up for both sites through the SA were related to historic environment, landscape and biodiversity impacts but it is considered that these can be addressed through policy.

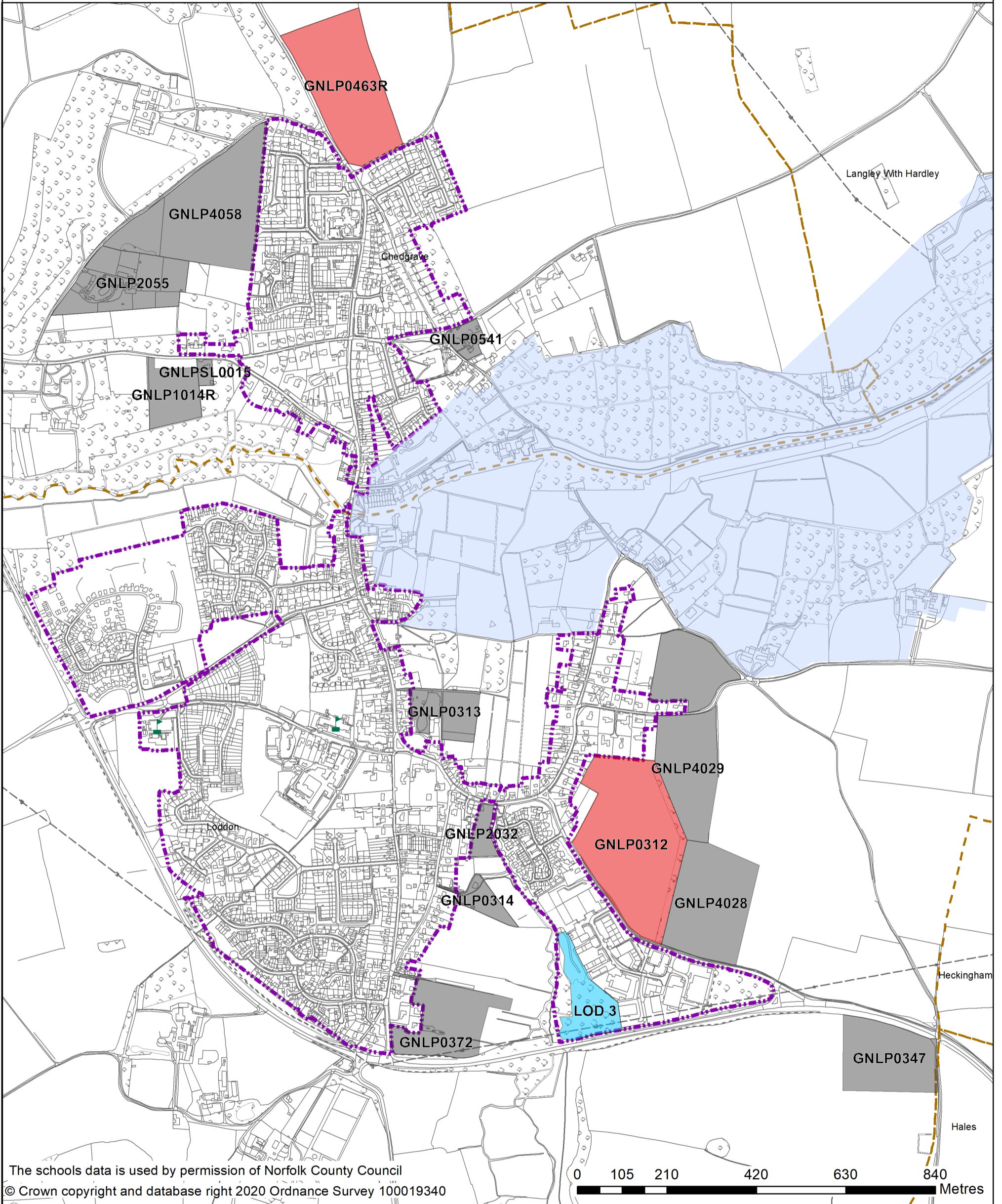
Final conclusion on sites for allocation in the Regulation 19 Plan









Based on all the information contained within this booklet the final conclusion of the site assessment process for Hingham is to allocate GNLP0312 in Loddon for 180 dwellings and GNLP0463R in Chedgrave for 60 dwellings on the revised boundary promoted through the Regulation 18C consultation.


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.

LODDON AND CHEDGRAVE

GREATER NORWICH LOCAL PLAN
PROMOTED SITES BY SCHOOL CATCHMENT AREAS



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


 N
 1:8,161
 at A3
 Date: 25/11/2020

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