



Broads Authority

Housing and Economic Land Availability

Assessment

September 2023

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1. Introduction

1.1. About this assessment

The purpose of this assessment is to provide information on the range and extent of land which could be considered for development to meet the objectively assessed needs identified for housing and economic development in the Broads across the period 2021-2041. The Housing and Economic Land Availability Assessment (HELAA) is a key evidence document which supports the preparation of Local Plans. Its purpose is to test whether there is sufficient land to meet objectively assessed need (OAN) and identifies where this land may be located. The HELAA represents just one part of wider evidence and should not be considered in isolation of other evidence.

The HELAA for the Broads Authority assesses sites which will be rolled forward to the Local Plan from the 2019 Local Plan as well as new regeneration sites and other sites put forward by landowners through the various Local Plan consultation stages. A call for sites has also been completed (at the end of 2022) and sites put forward as part of that are assessed in this HELAA.

Please note that the order of the sites is as follows: residential dwellings, then residential moorings and then other uses. Within those sections, the sites are then ordered in alphabetical order by Parish/Town.

The NPPF says at para 68 'Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment'.

The NPPG¹ says an assessment should:

- a) identify sites and broad locations with potential for development;
- b) assess their development potential; and
- c) assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

1.2. The HELAA Methodology²

This HELAA methodology has been agreed by each of the commissioning Local Planning Authorities (LPAs)³ in line with the Duty to Cooperate. A consistent methodology across the Norfolk area is considered beneficial and will ensure each LPA prepares its HELAA in a consistent way. This will ensure that each of the individual LPAs understand the level of growth that can be planned for and the areas of each District where the growth could be

¹ NPPG: <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

² HELAA methodology https://www.broads-authority.gov.uk/_data/assets/pdf_file/0025/253294/EB47-Norfolk-HELAA-Methodology.pdf

³ Commissioning Local Planning Authorities (LPAs) are: Breckland District Council, Broadland District Council, Broads Authority, Great Yarmouth Borough Council, Borough Council of King's Lynn and West Norfolk, North Norfolk District Council, Norwich City Council, and South Norfolk District Council.

accommodated. At a more detailed level it will also help the LPAs choose the best individual sites to allocate in Local Plans to meet the growth planned.

The HELAA methodology will apply to the local planning authority areas of:

- a) Breckland Council;
- b) Broadland District Council;
- c) Broads Authority⁴;
- d) Great Yarmouth Borough Council;
- e) Borough Council of King's Lynn and West Norfolk;
- f) North Norfolk District Council;
- g) Norwich City Council; and,
- h) South Norfolk Council.

The Consultation for the HELAA methodology was undertaken across the seven districts and the Broads Authority between 21 March and 3rd May 2016. The methodology was broadly supported with most comments seeking greater clarity and context.

Please note that the HELAA methodology has also been applied to residential mooring sites. Although the HELAA methodology was not produced with assessing sites for residential moorings in mind per se but has been used. There are some additional considerations for residential moorings, and these are also included in this document.

The Norfolk HELAA Methodology is based on the HELAA used in the preparation of the East Suffolk (Waveney) Local Plan and so there is still consistency between the part of the Broads in Norfolk and that in Suffolk.

1.3. NPPG requirements for the HELAA

The NPPG⁵ states some core outputs expected from a HELAA to ensure consistency, accessibility and transparency:

NPPG requirement	Place in this document
a list of all sites or broad locations considered, cross-referenced to their locations on maps	<ul style="list-style-type: none">• Contents page.• Also see section for each site.
an assessment of each site or broad location, including: <ul style="list-style-type: none">• where these have been discounted, evidence justifying reasons given;• where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build	<ul style="list-style-type: none">• See section for each site.

⁴ The Broads Authority area includes a small part of Suffolk, and this methodology is consistent with that used by East Suffolk District Council, formerly Waveney District Council, as they produced the Waveney Local Plan.

⁵ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

NPPG requirement	Place in this document
out rates, setting out how any barriers to delivery could be overcome and when;	
an indicative trajectory of anticipated development based on the evidence available.	This will follow in the Local Plan.

1.4. What the HELAA is and what the HELAA is not

It is important to note that the NPPG says ‘the assessment does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet the local authority’s (or, where relevant, elected Mayor or combined authority) requirements, but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements’. Paragraph: 001 Reference ID: 3-001-20190722.

Important: A Housing and Economic Land Availability Assessment does not allocate land for development. That is the role of the Local Plan. The assessment does not determine whether a site should be allocated or given planning permission for development. The inclusion of a site as ‘suitable’ in the assessment does not imply or guarantee that it will be allocated, nor that planning permission would be granted should an application be submitted for consideration.

Including a suitable site with identified development potential within a HELAA document does NOT confer any planning status on the site but means only that it will be considered as part of local plan production for potential development in the future and, where relevant, for potential inclusion on a statutory Brownfield Sites Register. No firm commitment to bring a site forward for development (either by the commissioning local planning authorities or other parties) is intended, or should be inferred, from its inclusion in a HELAA.

1.5. Colour coding used in table.

Turning to the colour coding used in the HELAA. Please refer to the HELAA Methodology⁶ for explanations for the colour used.

1.6. Next steps

Following assessment in the HELAA, these sites will be considered in the round as there could be other issues to consider when deciding to allocate or not these sites that are not considered in the HELAA. Another paper will be produced that summarises each site and proposes a way forward for each of them in terms of the Local Plan.

⁶ https://www.broads-authority.gov.uk/_data/assets/pdf_file/0025/253294/EB47-Norfolk-HELAA-Methodology.pdf

1.7. Nutrient enrichment and recreational impact issues

In some places in this document, there is reference to nutrient enrichment and recreational impact issues. More information can be found here for [GI RAMS](#) and [Nutrient Neutrality](#). But at the time of writing, in all of Norfolk and parts of Suffolk, a tariff system is in operation to mitigate the impacts of recreation as a result of development. And in terms of Nutrient Neutrality, which applies to parts of Norfolk, at the time of writing (summer 2023), there were no credit schemes in place, but these were being worked up and it is anticipated that by the time the Local Plan is towards the end of its production, mitigation schemes will be up and running. The HELAA refers to these as important considerations but does not consider these to be showstoppers.

1.8. 'Indicative Flood Zone 3b'

At the time of producing the Strategic Flood Risk Assessments, not all areas have been modelled for flood risk. In the absence of detailed hydraulic model information, a precautionary approach has been adopted with the assumption that the extent of Flood Zone 3b would be equal to Flood Zone 3a. In the SFRAs, this precautionary approach is represented as a separate layer and is termed 'indicative extent of Flood Zone 3b'. If a proposed development is shown to be in Flood Zone 3, further investigation should be undertaken as part of a detailed site-specific Flood Risk Assessment to define and confirm the extent of Flood Zone 3b. This may require detailed hydraulic modelling. Ordinarily, any development in flood zone 3b would not be considered further in the HELAA, but given the precautionary approach, it is noted if the site is in 3b and that is then a consideration later in the assessment tables; it is not seen as a 'showstopper' currently.

1.9. General comments from Norfolk County Council applicable to all Norfolk sites:

Norfolk County Council provided these generic comments for consideration:

Education

- a. Based on the volume and size of the sites proposed through the call for sites process, Norfolk County Council does not anticipate any issues or significant pressure being placed on local schools.

Landscape

- a. The Broads is a sensitive Landscape and therefore all development should be carefully considered to ensure that there are no adverse impacts visually to those enjoying the landscape for recreational uses, or adverse impacts on the landscape character itself.
- b. It will be important to ensure that Landscape and Visual Impact Assessments are submitted with any proposals and that these assessments are used to inform the layout, scale and appearance of any proposals. Due to the nature of the landscape and the location of the sites these LVIA's may require sequential viewpoints along lengths of footpath or indeed waterway where the view may be experienced for a period of time

whilst enjoying the route. The assessment of the impact on Landscape should take account of the Broads Landscape Character Assessment and Landscape Sensitivity Study and ensure that any proposals take note of and appreciate the unique set of characteristics and sense of place that form the context of their site.

- c. Scale and massing of any structures is a key consideration in what is broadly a flat, low-lying landscape recognised for its long-distance views. Any proposals which will have an element of visibility in the landscape should carefully consider colour and materials so as to be in keeping with the surrounding landscape. Proposals should, as mentioned above, be designed holistically with the assessment in mind and due to the Broads designation be designed with a landscape first approach.
- d. Broadly speaking we would suggest any proposals which require the removal of landscape features such as woodland, stand-alone trees, hedgerows to be unacceptable. There may be other landscape features such as meadow or grassland which are also important to retain. Where proposals would result in minor losses suitable mitigation should be proposed on site as part of the design and be chosen to reflect the contextual landscape.

Heritage

- a. None of the below sites should be excluded from future site allocation on the ground of below-ground archaeology and/or upstanding undesignated heritage assets.

2. Broadland Nurseries, Main Road, Ormesby St Michael - Campsite or 25 dwellings

2.1. Map of site



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2.2. Photos of site





2.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	<p>a) Some discussions about proposals over the last decade. Marketing of the site is a key consideration.</p> <p>b) In terms of a proposal for housing, the site is outside of a defined development boundary where the principle of new housing is not acceptable. Public transport is poor in this location and there are no facilities within walking distance such as a shop, school, GP surgery etc.</p> <p>c) Some of the site is within Flood Zone 3 and so a site-specific FRA would be required.</p> <p>d) Access into the site is good and so no highway concerns in that regard are anticipated.</p> <p>e) Contamination could be an issue given the previous uses and fertilisers etc.</p>
Broads Authority Design and Heritage	There are no particular heritage or design constraints.
Norfolk County Council Heritage	Based on currently available information we would recommend conditions for post-consent archaeological mitigation. This may be subject to change due to alterations in baseline information and policy.
Broads Authority Landscape Architect	<p>Holiday use</p> <p>Considering the potential use of the site for camping and caravanning, other than any alteration or construction of new buildings that might be required to support the use of the site for tourism, would represent a relatively low impact use in landscape terms. Associated infrastructure of access roads and car parking could be minimal and there would be an expectation that the site would be enhanced with planting to provide some privacy and character around individual pitches, this</p>

Stakeholder	Comments
	<p>would likely lead to some ecological and landscape gains to the site when compared to the current use.</p> <p>It is unlikely that a change of use to camping and caravanning would have a negative impact on the frontage or on publicly accessible views around the site, including the Broad itself.</p> <p>The use of the site for tourism could increase the level of activity and noise on the site, and some additional lighting, although it is considered that this could be controlled through the planning process.</p> <p>Overall, I do not think that the use of the site for camping and caravanning would lead to any negative effects on the visual and landscape qualities of the site and its surrounding context, and arguably could improve the current condition and quality of the landscape fabric itself if a tourism proposal were to include sufficient supplementary planting.</p> <p>Residential use</p> <p>The potential use of this site for residential would result in the introduction of a number of elements not currently characteristic with the edge of broad setting around Rollesby and Ormesby Broad. Considering the existing settlement pattern of Ormesby St Margret and along the A149 generally, it would be unusual and out of character for the settlement to intensify directly alongside the broads. With regard to potential number of dwellings suggested at 20-25, although this would not represent high density given the size of the site, when compared to the adjacent grouping of dwellings (accessed partly off Burgh Wood Road), this sits around 13-15, so the proposed use of the Broadland Nurseries site would result in a residential development of significant size by comparison.</p> <p>Any proposal for residential dwellings in this location would result in readily visible changes to the site frontage, whilst there are a number of access points already present on the A149/ Main Road, and it might be possible to utilise these with a layout set further within the site, this kind of development pattern is not characteristic of that within the Landscape Character Area. The site falls within LCA 26 (Muck Fleet Valley - The Trinity Broad) and the settlement pattern of development is specifically referred to within the LCA '<i>Residential settlement can be found to a limited extent within the character area tends to be linear in form along the A149 and A1064</i>' this linear settlement is traditionally one plot deep to the east of the Broad, with access directly off Main Road.</p> <p>The use of the site for residential could have some impacts on tranquillity and rurality around the broad, additional lighting would also need consideration. The introduction of numbers of residential dwellings in the region of 20-25 homes, would represent a significant increase in built form and have some urbanising effect, even if development was limited to single storey buildings. This would likely</p>

Stakeholder	Comments
	have a long term, permanent (i.e., not easily reversible) negative effect on the setting of the broad and the edge character of the village.
Norfolk County Council Highways	<p>a) The site is remote from local service provision, reliant on limited local service provision in adjacent tertiary villages/settlements but does have direct access onto the main highway network but reliant on the private motor vehicle as the primary mode of transport with limited scope for a modal shift.</p> <p>b) Having regard to the current permitted use a small-scale residential development with appropriate highway access is unlikely to give rise to any severe detrimental impact in highway terms.</p>
Norfolk County Council – Lead Local Flood Authority.	<p>a) Application form states that the site is not affected by flood risk. This is incorrect. The site is in Flood Zones 2 and 3 - LLFA recommend the EA are consulted.</p> <p>b) Safe access and egress must be considered</p>
Anglian Water Services	<p>Utilities Capacity: Advise developer to liaise with Anglian Water regarding infrastructure requirements and capacity of the vacuum sewer to accommodate the development. Caister Pump Lane WRC - currently capacity available.</p> <p>Utilities Infrastructure This is an area served by a vacuum sewer - specific guidance applies as only 4 properties can connect to a vacuum pot. No surface water connections. SuDS will be required. Two vacuum collection chambers and rising main located on the site.</p>
Great Yarmouth Borough Council	<p>a) Small village with limited range of village amenities (classed as a 'Secondary Village' in our existing Local Plan)</p> <p>b) Greater range of amenities, services at Ormesby St Margaret ('Primary Village') e.g., shops, infant/junior school, doctor surgery – however over 2.5km walking distance from site. Footpath connections between the two villages, but unlit. Reliance upon car would be likely to access these facilities than other more sustainable modes.</p> <p>c) Site falls within Ormesby (St Margaret) Infant and Junior school catchments. There are identified future capacity issues at both schools when current GY Local Plan growth is factored in. Particularly the junior school. Both schools do not have room for future expansion.</p> <p>d) There are highway capacity issues along the A149 through Ormesby St Michael. We received NCC comments as part of our submission SA on another site in St Michael, east of the waterworks (see screenshot below). NCC commented that the road network was unsuitable and couldn't accommodate additional development.</p>

Stakeholder	Comments
	<p>e) The Broadland Nurseries site is wholly within FRZ2, and partly FRZ3 (western half). Note that your CfS submission response says it is not in an area of Flood Risk. This is incorrect.</p> <p>f) There are known surface water capacity issues within the area – as highlighted to us via Anglian Water.</p>
Broads Authority Ecologist	<p>a) Very close to Rollesby Broad & the Trinity Broads SSSI/Broads SAC</p> <p>b) Direct impacts on site through increased residential proposal</p> <p>c) Ditches mentioned adjacent to site – hydrological connection likely</p>

2.4. Site assessment – residential dwellings:

Site address: Broadland Nurseries, Main Road, Ormesby St Michael		
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.		Suggested through call for site. History of discussions about potential for the site. Planning Application received for campsite but withdrawn due to some stakeholder objections.
Site Size (hectares)		1.33 hectares
Greenfield / Brownfield		Brownfield.
Ownership (if known) (private/public etc.)		Private
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar		No
National Nature Reserve		No
Ancient Woodland		No
Flood risk zone 3b		Indicative flood zone 3b.
Scheduled Ancient Monument		No
Statutory Allotments		No
Locally Designated Green Space		No
At risk from Coastal Erosion		No
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 25 dwellings.		
Density calculator		18.80 dwellings per hectare
Suitability Assessment		
Constraint	Score red/amber/green	Comments

Access to site		Vehicles currently access the site. No concerns raised during stakeholder consultation. Specific access requirements or improvements will be finalised as part of any planning application.
Accessibility to local services and facilities		Key services are 3km away. Footway on both sides of the road. There is a bus stop nearby, but it seems there is not a peak hour service in the morning to a higher order settlement.
Utilities Capacity		Generally acceptable although detail regarding sewerage disposal required. There are known surface water capacity issues within the area
Utilities Infrastructure		
Contamination and ground stability		The land has been used for horticulture and may therefore be contaminated from fertiliser for example.
Flood Risk		Land in flood zone 2 and indicative 3b.
Coastal Change		
Market Attractiveness		Other than limited services and facilities nearby, has potential to be attractive as a place to visit and live as it is an area in the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		Within the Broads. There are buildings around the site. The site is built up already, albeit glasshouses and storage. The potential use of this site for residential would result in the introduction of a number of elements not currently characteristic with the edge of broad setting around Rollesby and Ormesby Broad. This would likely have a long term, permanent (i.e., not easily reversible) negative effect on the setting of the broad and the edge character of the village.
Townscape		
Biodiversity and Geodiversity		SSSI and SAC next to the site. Would need to mitigate from recreation impacts. In terms of Nutrient Enrichment, the mains drainage flows to Caister Pump Lane Water Recycling Centre which is out of scope for Nutrient Neutrality. Scheme would need to mitigate for recreation impacts. Deciduous woodland borders site. Not on peat.
Historic Environment		
Open Space		

Transport and Roads		A small-scale residential development with appropriate highway access is unlikely to give rise to any severe detrimental impact in highway terms.
Compatibility with neighbouring / adjoining uses		
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	Part of the site was marketed as part of the marketing exercise. Not currently being marketed.	
When might the site be available for development (tick as appropriate)	Immediately	✓
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):	7 per year.	
Comments	Presumed it will take 3 or 4 years to complete the development.	
Achievability (including viability)		
Comments	Agent says 'There are interested developers - the viability of the site is a function of the selling price. I have no doubt that a negotiated purchase can be achieved at this site'.	
Overcoming Constraints		
Comments	Development not able to overcome access to services and facilities constraints or landscape/townscape character concerns. Site specific flood risk assessment a requirement which could include surface water concerns. Contamination investigation likely to be required with potential remediation work. Highways access a consideration. GI RAMS – payment likely.	
Trajectory of development		
Comments	Delivered within 5 years.	
Barriers to Delivery		
Comments	Potentially flood risk. Access to services.	

	Landscape impact.
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is not suitable for residential development.	

2.5. Site assessment – campsite:

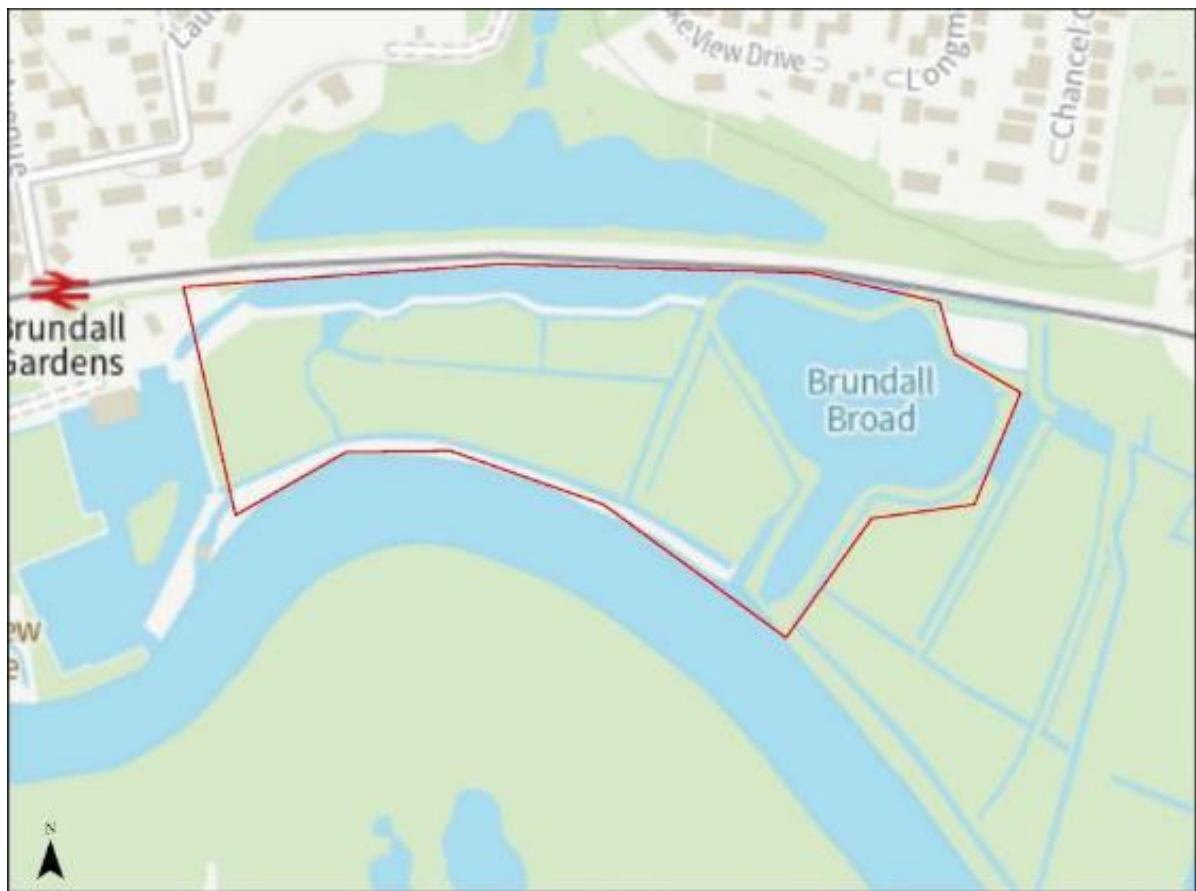
Site address: Broadland Nurseries, Main Road, Ormesby St Michael		
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.		Suggested through call for sites. History of discussions about potential for the site. Planning Application received for campsite but withdrawn due to some stakeholder objections.
Site Size (hectares)		1.33 hectares
Greenfield / Brownfield		Brownfield.
Ownership (if known) (private/public etc.)		Private
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar		No
National Nature Reserve		No
Ancient Woodland		No
Flood risk zone 3b		Indicative flood zone 3b.
Scheduled Ancient Monument		No
Statutory Allotments		No
Locally Designated Green Space		No
At risk from Coastal Erosion		No
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space):		
Campsite		
Density calculator		N/A
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Vehicles currently access the site. No concerns raised during stakeholder consultation. Specific access requirements or improvements will be finalised as part of any planning application.
Accessibility to local services and facilities		Key services are 3km away. Footway on both sides of the road. There is a bus stop nearby, but it seems there is not a peak hour service in the morning to a higher order settlement. As this is a tourism use, the Tourism

		Policy is also considered – this site is not within a development boundary and is not closely associated with an existing visitor attraction or tourism site, holiday dwelling, boatyard or sailing club.
Utilities Capacity		Generally acceptable although detail regarding sewerage disposal required. There are known surface water capacity issues within the area
Utilities Infrastructure		
Contamination and ground stability		The land has been used for horticulture and may therefore be contaminated from fertiliser for example.
Flood Risk		Land in flood zone 2 and indicative 3b.
Coastal Change		
Market Attractiveness		Other than limited services and facilities nearby, has potential to be attractive as a place to visit and live as it is an area in the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		Overall, do not think that the use of the site for camping and caravanning would lead to any negative effects on the visual and landscape qualities of the site and its surrounding context, and arguably could improve the current condition and quality of the landscape fabric itself if a tourism proposal were to include sufficient supplementary planting
Townscape		
Biodiversity and Geodiversity		SSSI and SCA next to the site. Would need to mitigate from recreation impacts. In terms of Nutrient Enrichment, the mains drainage flows to Caister Pump Lane Water Recycling Centre which is out of scope for Nutrient Neutrality. Scheme would need to mitigate for recreation impacts. Deciduous woodland on border. Not on peat.
Historic Environment		
Open Space		
Transport and Roads		With appropriate highway access, proposal is unlikely to give rise to any severe detrimental impact in highway terms.
Compatibility with neighbouring / adjoining uses		Some responses to the planning application raised concerns about the impact on neighbouring amenity.

Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	Part of the site was marketed as part of the marketing exercise. Not currently being marketed.	
When might the site be available for development (tick as appropriate)	Immediately	✓
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		7 per year.
Comments	Presumed it will take 3 or 4 years to complete the development.	
Achievability (including viability)		
Comments	Agent says 'There are interested developers - the viability of the site is a function of the selling price. I have no doubt that a negotiated purchase can be achieved at this site'.	
Overcoming Constraints		
Comments	Development not able to overcome location concerns. Site specific flood risk assessment a requirement which could include surface water concerns. Contamination investigation likely to be required with potential remediation work. Highways access a consideration. GI RAMS – payment likely. Landscape concerns could be addressed through an application.	
Trajectory of development		
Comments	Delivered within 5 years.	
Barriers to Delivery		
Comments	Potentially flood risk. Access to services.	
Conclusion (e.g., is included in the theoretical capacity)		
According to the HELAA assessment, the site is not suitable for camping and caravanning.		

3. Brundall Gardens Marina – Brundall Broad - 10 holiday homes.

3.1. Map of site



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3.2. Photos of site

Actual site not accessible – it is a closed Broad with no access to it. It is surrounded by wet woodland.

3.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	No comment
Broads Authority Design and Heritage	a) Heritage constraints: The site is in relatively close proximity to the grade II* listed Church of St Lawrence but due to the topography and trees between the two sites it is unlikely that there will be impact on the setting of the church.

Stakeholder	Comments
	<p>b) Design constraints: Development here and the loss of carr woodland has the potential for detrimental impact on the character of the wider landscape. Design will need to ensure impact on the landscape is mitigated, including design of buildings and infrastructure. I would have some concern regarding development here.</p>
Norfolk County Council Heritage	<p>Based on currently available information we would recommend conditions for post-consent archaeological mitigation. This may be subject to change due to alterations in baseline information and policy.</p>
Broads Authority Landscape Architect	<p>It seems likely that any development of this nature would result in some loss of the existing woodland (which is presumed to be wet woodland) and this would be negative in terms of existing landscape fabric and character.</p> <p>This area is more isolated in terms of potential views from public access points, however the changes put forward in the submission would potentially be far more readily visible from the river itself as this submission suggests residential moorings and possible extension of quay heading along the frontage to link to Brundall marina. I am also unsure from reading the submission as to how the site would be adequately accessed, golf buggies might be suitable for general access to holiday accommodation, but what about emergency access to any units? This would require more substantial infrastructure which would have a more significant impact on the existing character and landscape fabric that alluded to within the submission.</p>
Norfolk County Council Highways	<p>Notwithstanding the application relate to specific sites, clearly at this location the cumulative effect if all sites are allocated is a material consideration.</p> <p>The sites, whilst located close to Brundall and the local service provision that provides, are remote in terms of accessibility other than by the private motor vehicle. There are no public footpath non-motorised user/pedestrian facilitates provision and links within Brundall.</p> <p>The highway access to Postwick Lane, whilst altered in recent years has restricted visibility due to an adjacent tree and given the allocation proposed, there would be a material increase in traffic movements through the access and could give rise to conditions</p>

Stakeholder	Comments
	<p>detrimental to highway safety. Access improvements in terms of visibility and access width would need to be a consideration to taking development forward.</p> <p>Postwick Lane does allow for two vehicles to pass, but there is no non-motorised provision and clearly the cumulative scale of development proposed will not only increase residential traffic, but service traffic associated with that. Consideration would need to be given to appropriate highway mitigation and non-motorised provision.</p> <p>In terms of individual allocation:</p> <p>Above comments apply in relation to access and non-motorised use, but not considered to give rise to a serve detrimental impact.</p> <p>In terms of the use of the footbridge over the railway and the roads to the north of the railway line, I have no record of any Public Right of Way over the footbridge, and I consider it is a private right for users of the railway – a matter for Network Rail to advise. Likewise, I would advise that West End Avenue and Laurel Drive are private roads outside the jurisdiction of the highway authority and again my records show no Public Rights of Way. It would be for the landowner/owners to grant private rights of access. There could be permissive rights of way, or rights under covenant, but I would not have any record of that. As I understand, permissive access routes are not permanent and there might not be a formal agreement in place, likewise I believe they have to be closed at least once a year to prevent any possible future claim of continuous public access. Accordingly, if no such permissive rights or other documented legal rights of access can be demonstrated it cannot be assured that non-motorised use to the site can be established to address earlier comments provided in that respect, or even retained in perpetuity.</p>
Anglian Water Services	<p>Utilities Capacity</p> <p>Does not appear to be a mains water or sewer connection south of the railway line - although the neighbouring marina is within the Whitlingham Trowse WRC catchment so may have a connection to our network - further investigation needed. Capacity available at WRC.</p> <p>Utilities Infrastructure</p> <p>No constraints apparent on site</p>
Broads Authority Ecologist	a) Carr woodland is an important habitat.

Stakeholder	Comments
	<p>b) Impacts on surrounding carr woodland from development & disturbance.</p> <p>c) Likely to be on peat</p>
Norfolk County Council Ecologist	The site appears to support extensive areas of wet woodland, wetland habitats and broad (priority habitats). The site is likely to support associated protected and priority species such as otter, water vole, reptiles, amphibians, bats and breeding birds. This site is therefore not considered appropriate for development due to the potential for significant impacts on biodiversity. Development would likely result in a net loss in biodiversity.
Norfolk County Council – Lead Local Flood Authority.	<p>a) Small area of the site is in Flood Zones 2 and 3 - LLFA recommend the EA are consulted.</p> <p>b) Safe access and egress must be considered</p>
Broadland District Council	A number of different proposals have been put forward within this area, including within areas that appear to be extensively covered in woodland. BDC would draw your attention to the existence of Brundall Neighbourhood Plan 2016-2026 which is available on our website and may be subject to review in the near future.

3.4. Site assessment

Site address: Brundall Broad, Brundall gardens, Brundall	
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Submitted through 2022 call for sites.
Site Size (hectares)	7.07 hectares
Greenfield / Brownfield	Greenfield.
Ownership (if known) (private/public etc.)	Private
Absolute Constraints Check	
Is the site in a ...	
SPA, SAC, SSSI or Ramsar	No
National Nature Reserve	No
Ancient Woodland	No
Flood risk zone 3b	Indicative flood zone 3b.
Scheduled Ancient Monument	No

Statutory Allotments		No
Locally Designated Green Space		No
At risk from Coastal Erosion		No
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 10 dwellings (holiday)		
Density calculator		1.4 dwellings per hectare
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Access improvements in terms of visibility and access width would need to be a consideration to taking development forward. Proposal not considered to give rise to a serve detrimental impact. Highways raised concern regarding using the footbridge over the railway to then access roads into the centre of Brundall saying that the route is not public highway. The site promoter currently does not have proof of an agreement for use of the route but says it has been used for many years.
Accessibility to local services and facilities		Train station very close (Brundall Gardens with access to higher order settlements). Assuming a route through the wet woodland to use the footbridge over the railway, then towards the middle of Brundall, the Central Brundall Coop is 1.2km away.
Utilities Capacity		Does not appear to be a mains water or sewer connection south of the railway line - although the neighbouring marina is within the Whitlingham Trowse WRC catchment so may have a connection to our network - further investigation needed. Capacity available at WRC.
Utilities Infrastructure		
Contamination and ground stability		The land is wet woodland. Stability would need great consideration.
Flood Risk		Land in flood zone 3 and 2 – indicative flood zone 3b.
Coastal Change		
Market Attractiveness		Has potential to be attractive holiday accommodation option.
Impact	Score red/amber/green	Comments

Nationally and Locally Significant Landscapes		It seems likely that any development of this nature would result in some loss of the existing woodland (which is presumed to be wet woodland) and this would be negative in terms of existing landscape fabric and character.	
Townscape			
Biodiversity and Geodiversity		<p>Next to Local Nature Reserve and SPA/SAC and SSSI over the river. Also, a closed Broad and an area of wet woodland. Considered red as the scheme would result in the loss of wet woodland/carr (deciduous woodland – priority habitat). Site is on peat.</p> <p>Nutrient enrichment and recreational impacts will need to be mitigated (but these issues do not result in the scheme being rated red).</p>	
Historic Environment			
Open Space		Would result in the loss of green infrastructure.	
Transport and Roads		Access improvements in terms of visibility and access width would need to be a consideration to taking development forward. Proposal not considered to give rise to a severe detrimental impact.	
Compatibility with neighbouring / adjoining uses		Introducing dwellings near to a train line so noise may be a consideration.	
Local Plan Designations (add further lines as required)			
Designation	Policy reference	Comments	
None			
Availability Assessment (will require liaison with landowners)			
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No		
When might the site be available for development (tick as appropriate)	Immediately		
	Within 5 years		
	5-10 years	✓	
	10-15 years		
	15-20 years		
	Comments:		

Estimated annual build out rate (including justification):	Not known as a variety of water and land based residential facilities proposed.
Comments	Presumed it will take 5-8 years to complete the development.
Achievability (including viability)	
Comments	Agent says, 'The high demand for use of the adjacent facilities indicates there is an under provision of holiday lets and other residential and holiday moorings in the area'.
Overcoming Constraints	
Comments	It does not seem that the impacts of loss of carr/wet woodland can be overcome, especially given the need for access, potentially by emergency vehicles and the infrastructure that is likely to need. Land stability also a concern. Site specific flood risk assessment a requirement. Mains sewer and water connection needed. Amenity impacts from proximity to train line a consideration. Nutrient enrichment will need to be mitigated. GI RAMS – payment likely. Site is on peat.
Trajectory of development	
Comments	Potential start date is 5-10 years after allocation and build out could be 5-8 years after that.
Barriers to Delivery	
Comments	Loss of wet woodland. Peat. Flood risk. At the time of writing, Nutrient Enrichment.
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is not suitable for development.	

4. Brundall Gardens Marina off West Lane, east of main Marina - 12 holiday homes.

4.1. Map of site



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4.2. Photos of site



4.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	No comments
Broads Authority Design and Heritage	Although there are no particular heritage or design constraints, the loss of Carr woodland and the addition of new development in this area has the potential for detrimental impact on the character of the wider landscape.
Norfolk County Council Heritage	Based on currently available information we would recommend conditions for post-consent archaeological mitigation. This may be subject to change due to alterations in baseline information and policy.
Broads Authority Landscape Architect	<p>Considering the potential use of this area for 12 holiday homes and leisure facility/café, it seems likely that any development of this nature would result in some loss of the existing woodland (which is presumed to be wet woodland) and this would be negative in terms of existing landscape fabric and character.</p> <p>In terms of potential visual impact associated with such a development, public accessibility of the area surrounding Brundall Gardens is limited, with the nearest Prow Postwick FP3 to the west, so visibility the site and any potential changes that would occur would be limited to those from West Lane, the railway to the north and the river itself. Given the woodland present on site, the site would have some capacity to screen development and minimise its impact, this would be reliant on an approach to create an inward-looking development rather than one that was outward looking with a relationship with the river such as that at Yare View Holiday cottages.</p> <p>Introducing additional built form around Brundall Gardens would change the settlement pattern, this could be particularly harmful to the experiential qualities of this section of the river if those changes could be perceived from the river itself.</p>
Norfolk County Council Highways	Notwithstanding the application relate to specific sites, clearly at this location the cumulative effect if all sites are allocated is a material consideration.

Stakeholder	Comments
	<p>The sites, whilst located close to Brundall and the local service provision that provides, are emotive in terms of accessibility other than by the private motor vehicle. There are no public footpath non-motorised user/pedestrian facilities provision and links within Brundall.</p> <p>The highway access to Postwick Lane, whilst altered in recent years has restricted visibility due to an adjacent tree and given the allocation proposed, there would be a material increase in traffic movements through the access and could give rise to conditions detrimental to highway safety. Access improvements in terms of visibility and access width would need to be a consideration to taking development forward.</p> <p>Postwick Lane does allow for two vehicles to pass, but there is no non-motorised provision and clearly the cumulative scale of development proposed will not only increase residential traffic, but service traffic associated with that. Consideration would need to be given to appropriate highway mitigation and non-motorised provision.</p> <p>In terms of individual allocation:</p> <p>Above comments apply in relation to access and non-motorised use, but not considered to give rise to a serve detrimental impact.</p> <p>In terms of the use of the footbridge over the railway and the roads to the north of the railway line, I have no record of any Public Right of Way over the footbridge, and I consider it is a private right for users of the railway – a matter for Network Rail to advise. Likewise, I would advise that West End Avenue and Laurel Drive are private roads outside the jurisdiction of the highway authority and again my records show no Public Rights of Way. It would be for the landowner/owners to grant private rights of access. There could be permissive rights of way, or rights under covenant, but I would not have any record of that. As I understand, permissive access routes are not permanent and there might not be a formal agreement in place, likewise I believe they have to be closed at least once a year to prevent any possible future claim of continuous public access. Accordingly, if no such permissive rights or other documented legal rights of access can be demonstrated it cannot be assured that non-motorised use to the site can be established to address earlier comments provided in that respect, or even retained in perpetuity.</p>
Anglian Water Services	Utilities Capacity

Stakeholder	Comments
	<p>Does not appear to be a mains water or sewer connection south of the railway line - although the neighbouring marina is within the Whitlingham Trowse WRC catchment so may have a connection to our network - further investigation needed. Capacity available at WRC.</p> <p>Utilities Infrastructure</p> <p>No constraints apparent on site</p>
Broads Authority Ecologist	<p>a) Carr woodland is an important habitat – appears that 12 residences would occupy more than just the current ‘clearing’</p> <p>b) Impacts on surrounding carr woodland from development & disturbance.</p> <p>c) Likely on peat.</p> <p>d) Impacts on open water habitat</p>
Norfolk County Council Ecologist	<p>The site appears to support extensive areas of mature wet woodland (and potentially other) priority habitats. The site is likely to support associated protected and priority species such as otter, water vole, reptiles, amphibians, bats and breeding birds. This site is therefore not considered appropriate for development due to the potential for significant impacts on biodiversity. Development would likely result in a net loss in biodiversity.</p>
Norfolk County Council – Lead Local Flood Authority.	<p>a) Most of the site is in Flood Zones 2 and 3 - LLFA recommend the EA are consulted.</p> <p>b) Safe access and egress must be considered</p>
Broadland District Council	<p>A number of different proposals have been put forward within this area, including within areas that appear to be extensively covered in woodland. BDC would draw your attention to the existence of Brundall Neighbourhood Plan 2016-2026 which is available on our website and may be subject to review in the near future.</p>

4.4. Site assessment

Site address: Brundall Gardens Marina off West Lane, east of main Marina	
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Submitted through 2022 call for sites.
Site Size (hectares)	1.35 hectares
Greenfield / Brownfield	Greenfield

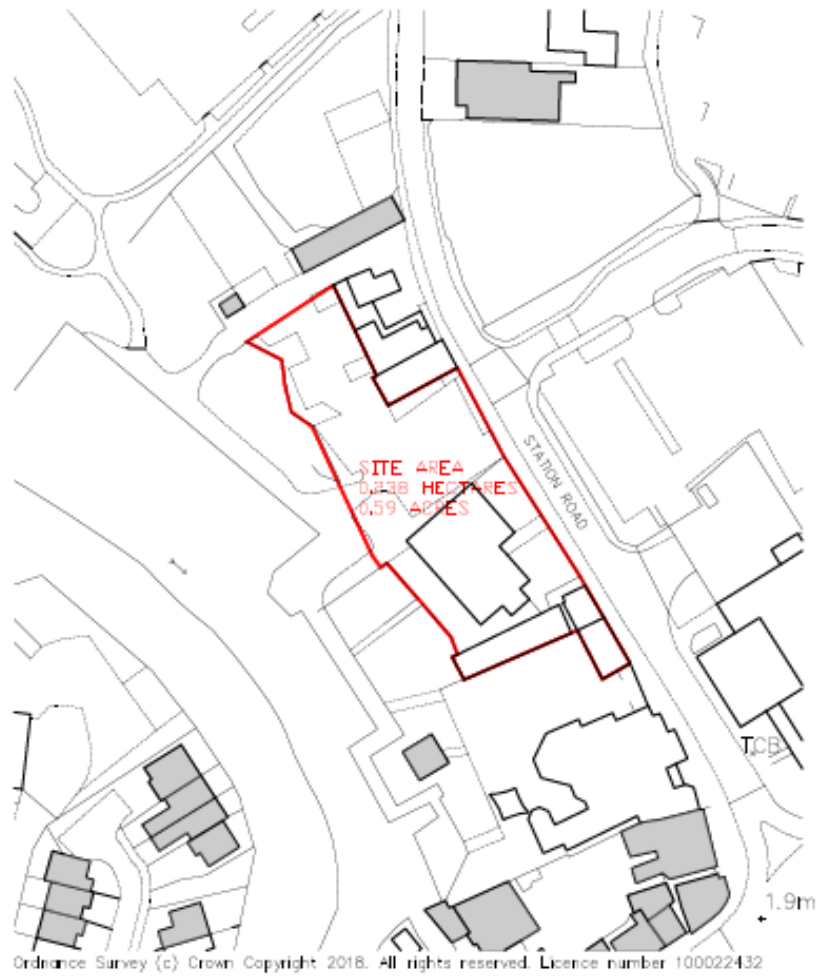
Ownership (if known) (private/public etc.)		Private
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar	No	
National Nature Reserve	No	
Ancient Woodland	No	
Flood risk zone 3b	Part of site indicative flood zone 3b	
Scheduled Ancient Monument	No	
Statutory Allotments	No	
Locally Designated Green Space	No	
At risk from Coastal Erosion	No	
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 12 holiday homes		
Density calculator	8.889 dwellings per hectare	
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Access improvements in terms of visibility and access width would need to be a consideration to taking development forward. Proposal not considered to give rise to a serve detrimental impact. Highways raised concern regarding using the footbridge over the railway to then access roads into the centre of Brundall saying that the route is not public highway. The site promoter currently does not have proof of an agreement for use of the route but says it has been used for many years.
Accessibility to local services and facilities		Train station very close (Brundall Gardens with access to higher order settlements). Assuming a route through the wet woodland to use the footbridge over the railway, then towards the middle of Brundall, the Central Brundall Coop is 1.2km away.
Utilities Capacity		Does not appear to be a mains water or sewer connection south of the railway line - although the neighbouring marina is within the Whitlingham Trowse WRC catchment so may have a connection to our network - further investigation needed. Capacity available at WRC.
Utilities Infrastructure		

Contamination and ground stability		The land is wet woodland and likely to be on deep peat. Stability would need great consideration.
Flood Risk		Land in flood zone 3 and 2 – indicative flood zone 3b.
Coastal Change		
Market Attractiveness		Has potential to be attractive holiday accommodation option.
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		It seems likely that any development of this nature would result in some loss of the existing woodland (which is presumed to be wet woodland) and this would be negative in terms of existing landscape fabric and character.
Townscape		
Biodiversity and Geodiversity		SPA/SAC and SSSI over the river. Also, a closed Broad and an area of wet woodland. Considered red as the scheme would result in the loss of wet woodland/carr (deciduous woodland – priority habitat). Also, lowland fen (priority habitat). Site is on peat. Nutrient enrichment and recreational impacts will need to be mitigated (but this would not make the assessment rate red).
Historic Environment		
Open Space		Would result in the loss of green infrastructure.
Transport and Roads		Access improvements in terms of visibility and access width would need to be a consideration to taking development forward. Proposal not considered to give rise to a severe detrimental impact.
Compatibility with neighbouring / adjoining uses		
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
Not allocated		
Availability Assessment (will require liaison with landowners)		

Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No	
When might the site be available for development (tick as appropriate)	Immediately	✓
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):	6 per year.	
Comments	Presumed it will take two years to complete the development.	
Achievability (including viability)		
Comments	The promoter says 'the success of the existing adjoining businesses operated by the site owners has provided year on year evidence that the proposed holiday lets will be viable even having regard to site specific constraints on construction of the proposed units where the owners have extensive previous experience'.	
Overcoming Constraints		
Comments	It does not seem that the impacts of loss of carr/wet woodland and lowland fen can be overcome, especially given the need for access, potentially by emergency vehicles and the infrastructure that is likely to need. Land stability also a concern. Site specific flood risk assessment a requirement. Mains sewer and water connection needed. Nutrient enrichment will need to be mitigated. GI RAMS – payment likely. On peat soils.	
Trajectory of development		
Comments	6 a year for two years	
Barriers to Delivery		
Comments	Loss of wet woodland and lowland fen. Peat. Flood risk. At the time of writing, Nutrient Enrichment.	
Conclusion (e.g., is included in the theoretical capacity)		
According to the HELAA assessment, the site is not suitable for development.		

5. Station Road, Hoveton – tourist accommodation

5.1. Map of site



5.2. Photos of site





5.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	Would consider the whole site being used for holiday accommodation perhaps overbearing for the site. A mix of uses might be more suitable.
Broads Authority Ecologist	No comments
Broads Authority Design and Heritage	<p>No objection to the demolition of the former Waterside Rooms but the old cottages fronting Station Road and the old outbuilding to the north of the existing pub car park would be considered locally identified heritage assets and should be retained and converted. The site is also within relatively close proximity to Wroxham bridge which is a scheduled monument and impact on the setting of this designated heritage asset will need to be considered.</p> <p>Design: No objection to the proposed use but the design will need to relate well to its context and should preferably seek to provide improved views and public access between Station Road and the river frontage.</p>
Norfolk County Council Heritage	Based on currently available information we would recommend conditions for post-consent archaeological mitigation. This may be subject to change due to alterations in baseline information and policy.
Broads Authority Landscape Architect	No landscape objection to this site being taken forward with some adjustments, the inclusion of the carpark area and consideration of mixed use being acceptable in landscape terms, providing that public access could be maintained/enhanced and that an element of residential is included to bring natural surveillance and activity to the site. The retention of the building adjacent to the pub is important in terms of streetscape and would be helpful in organising

Stakeholder	Comments
	any development going forward, I would not support the demolition of this building. Any trees on site should be retained and protected, parameters should be placed on any potential new building heights and positions to maintain good visual connection through, and a high-quality public realm should be encouraged as per the existing allocation.
Norfolk County Council Highways	<ul style="list-style-type: none"> a) Town centre location with good access to local service and public transport provision. b) Subject to access and parking/cycling provision in accordance with current guidance and scale of development proposed unlikely to give rise to any severe detrimental impact in highway terms.
Anglian Water Services	<p>Utilities Capacity: Mains water and sewerage available. Currently capacity available at Belaugh WRC. Hoveton is identified at risk of fluvial flooding and tidal locking along the River Bure in the 2017 Strategic Flood Risk Assessment (SFRA) for the Norfolk Authorities.</p> <p>Utilities Infrastructure: No constraints apparent on site.</p>
Norfolk County Council – Lead Local Flood Authority.	<ul style="list-style-type: none"> a) Significant proportion of the site is in Flood Zones 2 and 3 - LLFA recommend the EA are consulted. b) Low risk surface water flow path crosses part of the site c) Safe access and egress must be considered
North Norfolk District Council	<p>Hoveton is identified in the Settlement Hierarchy as a small growth town as part of NNDC's emerging Local Plan. The Plan identifies a housing target of 221 dwellings for the settlement to be delivered over the Plan period via a combination of small scale 'infill' developments, new allocations and existing commitments.</p> <p>The Plan allocates one site in Hoveton, HV01/B, Land East of Tunstead Road, for 120 dwellings, this allocation is a residential development only. If the applicant for this Call for Sites submission is suggesting a mixed-use development, NNDC would be open to a development that supports the town centre and its uses and retains the local character of the town centre. The eastern portion of the site that includes the public house and derelict residential dwellings is included within Hoveton's Town Centre Area and Primary Shopping Area and would fall under Policy E4 of the emerging Local Plan.</p>

Stakeholder	Comments
	<p>There are some flood risk concerns, the Council's SFRA (2017) identifies the functional flood plain (FZ3) of the Wroxham Broad runs to the south of Hoveton with the area immediately adjacent to the river Bure being at risk from flooding. The southern extent of the site is within Flood Zone 3 and majority of the site within Flood Zone 2.</p> <p>The site is within 500m of Wroxham Bridge, a Scheduled Ancient Monument.</p> <p>The site lies outside, though adjacent to Hoveton's Settlement Boundary, and is considered to be development in the countryside, however the site can be considered brownfield, the development of which is supported and is well located within Hoveton.</p> <p><i>Conclusion</i></p> <p>The southern portion of the site is constrained due to the flood risk, and solutions would need to be identified to mitigate this. The site is in a sustainable location within the settlement in regard to access to services and facilities, but development would need to consider the site's presence within the Town Centre Area and any development here would need to suitably consider Policy E4 of the emerging Local Plan.</p>

5.4. Site assessment

Site address: Station Road, Hoveton	
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Allocated in Local Plan 2019 for various suitable uses including residential.
Site Size (hectares)	0.238 hectares
Greenfield / Brownfield	Brownfield.
Ownership (if known) (private/public etc.)	Private
Absolute Constraints Check	
Is the site in a ...	
SPA, SAC, SSSI or Ramsar	No
National Nature Reserve	No
Ancient Woodland	No
Flood risk zone 3b	No – a small part of the site is, but this is not considered an absolute constraint as proposals can be designed accordingly.

Scheduled Ancient Monument	No	
Statutory Allotments	No	
Locally Designated Green Space	No	
At risk from Coastal Erosion	No	
If yes to any of the above, site will be excluded from further assessment.		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): Overnight accommodation linked to the pub		
Density calculator	N/A	
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Subject to access and parking/cycling provision in accordance with current guidance and scale of development proposed unlikely to give rise to any severe detrimental impact in highway terms.
Accessibility to local services and facilities		Town centre location with good access to local services and public transport provision.
Utilities Capacity		Mains water and sewerage available. Currently capacity available at Belaugh WRC.
Utilities Infrastructure		No constraints apparent.
Contamination and ground stability		The land is currently storage and former drinking establishment. No reason to consider the site is contaminated.
Flood Risk		Some land in flood zone 3a and 2 and potentially 3b but may be able to be designed to avoid high flood risk areas.
Coastal Change		
Market Attractiveness		Has potential to be attractive as a place to visit and stay as it is a town by the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		Whilst in the Broads, the development is in an already built-up area so no obvious negative impact on the landscape or townscape. Design is an important aspect of all development within the Broads. There is an opportunity to improve on the existing development here.
Townscape		

Biodiversity and Geodiversity		Whilst in a town centre, is by the river, near a park and the buildings have been there a while and could be used for nesting for example. Surveys likely required. Nutrient enrichment and recreational impacts will need to be mitigated. BGS layer indicates peat, but this is also brownfield land.
Historic Environment		The old outbuilding to the north of the existing pub car park and the cottages on Station Road would be considered locally identified heritage assets and should be retained and converted. The site is also within relatively close proximity to Wroxham bridge which is a scheduled monument and impact on the setting of this designated heritage asset will need to be considered.
Open Space		Near to open space, but not affecting it. Pub garden is to be retained.
Transport and Roads		Subject to access and parking/cycling provision in accordance with current guidance and scale of development proposed unlikely to give rise to any severe detrimental impact in highway terms.
Compatibility with neighbouring / adjoining uses		Whilst the pub and garden are busy in the summer, holiday accommodation could generally be compatible, but the impact would need to be a consideration in the design of the building. Further, the entire area being used for hotel accommodation could be overbearing in the area.

Local Plan Designations (add further lines as required)

Designation	Policy reference	Comments
Allocated for various uses.	HOV3	Local Plan 2019

Availability Assessment (will require liaison with landowners)

Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No.	
When might the site be available for development (tick as appropriate)	Immediately	✓
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	

	Comments:
Estimated annual build out rate (including justification):	Unknown.
Comments	-
Achievability (including viability)	
Comments	The development will likely be attractive to people to stay at. Detailed viability information will be calculated at Planning Application stage. A Viability Assessment will also accompany the Local Plan. There is no reason to consider this site not achievable.
Overcoming Constraints	
Comments	Site specific flood risk assessment. Surveys may be required relating to biodiversity and enhancements added. Would need to be designed to reflect the popularity of the pub and pub garden in the summer months. There is some debate about the suitability of using the existing older buildings near to the pub versus the need for demolition. Biodiversity surveys potentially. Nutrient enrichment will need to be mitigated. GI RAMS – payment likely. Depending on proposals, may need to consider peat. Potential for the site to be mixed use.
Trajectory of development	
Comments	-
Barriers to Delivery	
Comments	Older buildings – demolition versus conversion. At the time of writing, Nutrient Enrichment.
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is suitable for development.	

6. Land near Pyes Mill, Loddon - 10 residential dwellings

6.1. Map of site

Land near Pye's Mill for residential dwellings

Scale: 1:1,250



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6.2. Photos of site



6.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	The site is in the Conservation Area, so all trees are protected. There have been some recent applications for works to trees. There has been a refusal for a supermarket in the recent past.
Broads Authority Design and Heritage	<p>The site is just to the south of an attractive public area known as Pye's Mill, the site of a drainage mill that was lost in the late 20th century. The site is within the Loddon Conservation Area and from this open area views across the meadows and fields towards designated heritage assets such as the grade I church of Holy Trinity are gained. The setting of these designated heritage assets will therefore need to be considered in any development, particularly the wider setting of the church and the Loddon Conservation Area.</p> <p>The character of the site and this part of the conservation area is currently rural, and this natural character contributes greatly to the wider landscape value of this area and the setting of the town. Any additional housing in this area would have a detrimental impact on</p>

Stakeholder	Comments
	<p>this landscape value and the character and appearance of the conservation area. Likewise, any proposal for a link road from the site towards Loddon and the Marina is unlikely to be considered acceptable in townscape, landscape or heritage terms.</p>
<p>Broads Authority Landscape Architect</p>	<p>These comments relate to the suggestion of 10 residential dwellings only, and do not relate to other developments muted within the call for sites application, such as mixed commercial and public amenities, a supermarket or residential moorings. The impacts of which in landscape terms would need consideration in terms of significance and would likely need screening for EIA.</p> <p>Key considerations in landscape terms are the potential impact on landscape character, amenity and tranquillity. Visual impacts also need consideration due to the presence of PROW - Loddon FP3 to north of river, Loddon FP10 to west of Mill Lane existing residential dwellings in addition to visibility of the site from Pyes Mill Road (which includes an important view toward the Loddon church) and views from the river itself.</p> <p>The localised area represents a number of characteristics that are considered special within the relevant LCA (17 Chet Valley), the area of undeveloped land that is contained between the linear development to the east side of Bridge Street/Church Plain/High Street and that west of Mill Road/Pyes Mill Road contains a unique combination of vegetation and drainage ditches that contribute to its special field pattern and rural setting beyond the extent of the village. This area also represents a transition into the more remote isolated character that exists within the LCA beyond Loddon and Chedgrave.</p> <p>Expansion of development into grazing marsh around the river would have a negative impact on some of these key characteristics, and result in their permanent loss. On a more localised scale, development of the area adjacent to the Pyes Mill picnic area would result in negative impacts on the amenity value of this space, the experiential qualities of tranquillity and rurality for those using the river, the previously mentioned PROWs and the picnic area itself. Although the setting of Loddon Church is a heritage consideration rather than landscape, the development of the land contained between existing development would also likely impact</p>

Stakeholder	Comments
	<p>important views towards the church from Pyes Mill Road and the PROW network.</p> <p>The extent of the significance of any changes that could occur through potential development of this site would have to be fully explored through and LVIA to be understood further, and as already mentioned the possibility of significant effects would trigger the need for an EIA.</p> <p>In landscape terms I would not support the inclusion of this site for residential or any kind of development, as it would result in irreversible negative impacts on the key landscape characteristics, landscape fabric, amenity and visual qualities of the area. It would also lead to future development pressure on other areas of the upper river valley marshland around Loddon Marina, particularly if it required additional infrastructure, and would ultimately erode the positive landscape characteristics that make the area around Pyes Mill picnic area and the edge of the Loddon settlement special.</p>
Norfolk County Council Highways	<p>Site located to west of the northern end of Pyes Mill Road. Pyes Mill Road and immediate surrounding highway networks only suitable for single file traffic use and with no formal passing provision, non-motorised use provision or street lighting. The unclassified road serving the site is considered to be inadequate to serve the development proposed, by reason of its restricted width / lack of passing provision / restricted visibility at adjacent road junctions /lack of non-motorised user provision and as such, would be likely to give rise to conditions detrimental to highway safety.</p> <p>The proposal is remote from local service centre provision conflicting with the aims of sustainable development, the need to minimise travel, and the ability to encourage walking, cycling, use of public transport and reduce the reliance on the private car as represented in national and local policy. Contrary to the National Planning Policy Framework and Policy 5 of Norfolk's 3rd Local Transport Plan, entitled Connecting Norfolk.</p> <p>In terms of a new access road from Loddon Marina to this site, NCC said: Whilst such a proposal may go some way to address the LHA's comments, The LHA is unlikely to be supportive of such a proposal</p>

Stakeholder	Comments
	as it does not consider a private drive is the appropriate form of access for the scale of development proposed. In accepting the addition of the proposed residential moorings on the existing marina site and the access thereto, it is unlikely that the existing highway access could be appropriately upgraded to serve additional development.
Norfolk County Council Lead Local Flood Authority	<p>a) The supporting application form states that the site is “not in flood zone”. This is incorrect. It’s in Flood Zones 2 and 3 - LLFA recommend the EA are consulted.</p> <p>b) The site appears to be at low risk from surface water flooding.</p> <p>c) Safe access and egress must be considered</p>
Anglian Water Services	<p>Utilities Capacity Sisland WRC catchment - WRC has capacity available.</p> <p>Utilities Infrastructure We have a rising main (pumped sewer) that is likely to intersect with the proposed site boundary. The developer would need to ensure that this is not built over or located in private gardens – further information can be found here. The developer would also have to ensure that development maintains a 15m stand-off distance from the sewer pumping station located off the NE corner of the site, close to the car park. The site is also some distance from nearest sewer and water connection – the developer would need to consider whether it is viable to connect to our network. Our network assets can be identified on https://www.digdat.co.uk/asset-protection/digdat-connect</p>
Broads Authority Ecologist	<p>a) Removal of semi-natural habitat and proximity to river a concern.</p> <p>b) Would need ecological survey.</p>
South Norfolk Council	With regards to the proposed residential development on the Loddon Marina site we would have significant reservations about this proposal - most notably (but not limited to) the landscape impact of development in this location, highways access to the site and the sustainability of the site (with particular regard to the distance of the site from the defined Development Boundary of Loddon).

6.4. Site assessment

Site address: Land near Pyes Mill, Loddon		
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.		Submitted through 2022 call for sites.
Site Size (hectares)		0.2 hectares
Greenfield / Brownfield		Greenfield
Ownership (if known) (private/public etc.)		Private
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar		No
National Nature Reserve		No
Ancient Woodland		No
Flood risk zone 3b		Western part of site is indicative flood zone 3b.
Scheduled Ancient Monument		No
Statutory Allotments		No
Locally Designated Green Space		No
At risk from Coastal Erosion		No
If yes to any of the above, site will be excluded from further assessment.		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 10 dwellings.		
Density calculator		50 dwellings per hectare
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		<p>a) Pyes Mill Road and immediate surrounding highway networks only suitable for single file traffic use and with no formal passing provision, non-motorised use provision or street lighting. The unclassified road serving the site is considered to be inadequate to serve the development proposed, by reason of its restricted width / lack of passing provision / restricted visibility at adjacent road junctions /lack of non-motorised user provision and as such, would be likely to give rise to conditions detrimental to highway safety.</p> <p>b) The LHA is unlikely to be supportive of a link road as it does not consider a private drive is the</p>

		<p>appropriate form of access for the scale of development proposed.</p> <p>c) In accepting the addition of the proposed residential moorings on the existing marina site and the access thereto, it is unlikely that the existing highway access could be appropriately upgraded to serve additional development.</p>
Accessibility to local services and facilities		<p>a) If a link road was put in place, site could be within 800m of many key services. But link road not likely to be supported by LHA.</p> <p>b) If using existing roads, no footways, but using the footpath to the church, site could be within 800m of many key services. But footpath might not be attractive throughout the year – not surfaced for example.</p> <p>c) If using existing roads, no footways and not using footpath, would be around 1.3km. But without footways for the entire length, this might not be attractive throughout the year.</p>
Utilities Capacity		Sisland WRC catchment - WRC has capacity available.
Utilities Infrastructure		<p>Anglian Water have a rising main (pumped sewer) that is likely to intersect with the proposed site boundary. The developer would need to ensure that this is not built over or located in private gardens. The developer would also have to ensure that development maintains a 15m stand-off distance from the sewer pumping station located off the NE corner of the site, close to the car park. The site is also some distance from nearest sewer and water connection – the developer would need to consider whether it is viable to connect to our network.</p>
Contamination and ground stability		
Flood Risk		Western part of site is indicative flood zone 3b.
Coastal Change		
Market Attractiveness		Other than limited services and facilities nearby, has potential to be attractive as a place to visit and live as it is an area by the Broads.

Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		This development would result in irreversible negative impacts on the key landscape characteristics, landscape fabric, amenity and visual qualities of the area. It would ultimately erode the positive landscape characteristics that make the area around Pyes Mill picnic area and the edge of the Loddon settlement special
Townscape		
Biodiversity and Geodiversity		Removal of semi-natural habitat and proximity to river would have an irreversible negative impact. Would need ecological surveys. Recreation impacts will need to be mitigated (although this does not make the assessment rate amber). Peat nearby, but BGS mapping does not indicate on site. May benefit from augers to check.
Historic Environment		Any additional housing in this area would have a detrimental impact on this landscape value and the character and appearance of the conservation area. Likewise, any proposal for a link road from the site towards Loddon and the Marina is unlikely to be considered acceptable in townscape, landscape or heritage terms.
Open Space		Would result in loss of green infrastructure.
Transport and Roads		The unclassified road serving the site is considered to be inadequate to serve the development proposed, by reason of its restricted width / lack of passing provision / restricted visibility at adjacent road junctions /lack of non-motorised user provision and as such, would be likely to give rise to conditions detrimental to highway safety. Link Road idea not likely to be supported.
Compatibility with neighbouring / adjoining uses		
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		
Availability Assessment (will require liaison with landowners)		

Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No	
When might the site be available for development (tick as appropriate)	Immediately	✓
	Within 5 years	
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):	10 per year.	
Comments	Presumed one year to complete.	
Achievability (including viability)		
Comments	Despite the lack of services nearby the site, being a village by the Broads, the development will likely be attractive to people to live in. Detailed viability information will be calculated at Planning Application stage. A Viability Assessment will also accompany the Local Plan. There are queries regarding the link road idea given the type of land that will be crossed by the road and its cost and the impact on viability and therefore affordable housing requirements as well as other various policy requirements.	
Overcoming Constraints		
Comments	Development proposal cannot overcome impact of introducing development in this location with associated impacts on landscape, natural environment, conservation area. Query the viability of providing a link road, as discussed previously. The scheme would probably not provide footways for the entire length of other ways to get to Loddon without impact on viability, so query how people would travel to access key services, other than use the private car. GI RAMS – payment likely. May need augers to determine if on peat.	
Trajectory of development		
Comments	10 in one year.	
Barriers to Delivery		
Comments	Highways access.	

	<p>Link road.</p> <p>Access to services.</p> <p>Landscape impact.</p> <p>Impact on natural environment and landscape.</p> <p>Impact on conservation area.</p>
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is not suitable for development.	

7. Land off Mill Road, Stokesby - 2 self-build dwellings

7.1. Map of site

Mill Road, Stokesby



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7.2. Photos of site



7.3. Stakeholder comments

Please note that the site promoter amended and resubmitted the call for sites form including clarifying the area to be developed. This was sent to stakeholders who were asked if they wished to amend their comments. No stakeholder asked to amend their comments.

Stakeholder	Comments
Broads Authority Development Management Team	This site is outside of the development boundary where the principle of residential development is not acceptable. I believe a dwelling here has been refused previously (2006). The site is in Flood Zone 3 - highest risk of flooding.
Broads Authority Ecologist	Semi-natural habitat with potential to support range of species including reptiles and breeding birds. Mature hedgerow also likely used by foraging bats. Loss of existing habitat not supported.
Broads Authority Design and Heritage	I would have some concerns about development here in landscape and townscape terms. The site is on higher ground, and it falls away to the south-west. It currently fulfils an important function in allowing views out of the village, across open countryside and this contributes to the rural character of the village. Development here would restrict those views and change

Stakeholder	Comments
	<p>the character, as well as being set on higher ground that would make it more prominent in views towards the village from the south-west.</p> <p>There are listed buildings in relatively close proximity: Manor Farmhouse and its listed walled garden and barn to the north and Tretts Mill to the south-east. The setting of these buildings will need to be considered but they are unlikely to be a great constraint, given their distance from the site.</p> <p>However, in closer proximity to the site are a number of historic buildings that would be considered locally identified heritage assets. These include the thatched High House, Alma Cottages and other cottages opposite the site and the Homestead to the north. These cottages are predominantly diminutive in scale and make use of traditional and vernacular materials, for example, thatch, red brick, render, pantiles etc. Any new development in this site would be expected to be of an appropriate scale, form, design and layout to ensure that it relates well to this context.</p>
Broads Authority Landscape Architect	<p>The site falls within area 25 of the LCA (25 - Fleggburgh to Bure Loop Arable Marshlands), the importance of the River Bure is recognised within the area for its popularity for recreational boating and the good provision of footpaths routes around the river. The main part of Stokesby falls within the landscape type of settled broad, there are a number of pressures and forces for change which are relevant to the submission of this site, which should be considered, those are.</p> <ul style="list-style-type: none"> • Loss of traditional settlement patterns due to continuing pressures for both commercial and residential property; • Settlement expansion and the increased recreational pressures it causes; • Loss of buffering vegetation between properties or plots. <p>The site represents a natural/semi natural area located within the village and we must consider the role of this site within the settlement pattern of the village and the overall contribution to landscape character and experience.</p> <p>Key considerations in landscape terms are the potential impact on landscape character, and key views from Mill Road which help reinforce the understanding of where one is within the wider landscape. Potential impacts on views from the River Bure and</p>

Stakeholder	Comments
	<p>from the extensive network of footpaths that run both sides of the Bure and extend north connecting to Muck Fleet also need to be considered.</p> <p>The site provides a break in the settlement between the cottages and what is presumably a former farmstead at the north end of the village to the west side of Mill Road. There are clear views possible towards the wider landscape, as the site is relatively flat these are expansive. The site has clearly defined, partly vegetated boundaries and contributes a smaller scale field pattern than the wider arable landscape beyond the village extents.</p> <p>It is the combination of more formal green spaces such as the village green, small scale fine grain of settlement and the openness of undeveloped semi-natural sites comprising of this site and that adjacent to the Village Community Centre that give the village it's character. These two open sites, with clear views towards the wider landscape provide an understanding of the setting, of The Bure, The Broads and the wider arable landscape, and in combination this site and the one adjacent the Village Community Centre somewhat bookend the village.</p> <p>Development on this site would result in the loss of the basic landscape characteristics associated with the existing natural/semi natural environment in this location, would result in changes to the existing field pattern. The introduction of built form, boundary treatments and paraphernalia associated with domestic curtilage would have a harmful impact on the existing landscape character and visual amenity of the site, and its contribution to the village.</p> <p>In landscape terms I would not support the inclusion of this site for residential development, I consider that this site is important to the setting of the village and offers views and connection to the wider landscape which provides an opportunity to understand one's position within the wider setting of the Broads and the surrounding arable land. Any development of this site would also likely impact wider views and the visual experience from the footpath network along the River Bure and potentially from the Bure itself.</p>

Stakeholder	Comments
Norfolk County Council Highways	<p>a) Site is remote from local service provision and therefore reliant on the private motor vehicle as primary mode with no realistic opportunity for a modal shift to more sustainable modes.</p> <p>b) Site located adjacent to existing residential development on edge of village, subject to access and parking standards being achieved, proposed scale of development is unlikely to give rise to any severe detrimental impact in highway terms. Reservation in terms of any larger scale development.</p> <p>c) I would add there could be implications in terms of overhead power and BT apparatus, that may require relocation/diversion to facilitate safe and suitable access (and/or requirement of utility companies).</p>
Norfolk County Council Ecologist	The site appears to consist of a grassland meadow habitat with mature boundary hedgerows and trees and has the potential to support protected species such as reptiles, bats, badgers and breeding birds, therefore a Preliminary Ecological Appraisal should be carried out. Existing habitats should be retained and protected wherever possible. The loss of grassland habitats as a result of development would mean on site Biodiversity Net Gain does not appear achievable.
Norfolk County Council – Lead Local Flood Authority.	<p>a) The site is in Flood Zones 2 and 3 - LLFA recommend the EA are consulted.</p> <p>b) Safe access and egress must be considered.</p> <p>c) Currently would be classified as Minor Development</p>
Anglian Water Services	<p>Utilities Capacity</p> <p>Advise developer to liaise with Anglian Water regarding infrastructure requirements and capacity of the vacuum sewer to accommodate the development - although only a small site. Caister Pump Lane WRC - currently capacity available</p> <p>Utilities Infrastructure</p> <p>This is an area served by a vacuum sewer - specific guidance applies as only 4 properties can connect to a vacuum pot. No surface water connections. SuDS will be required. Two vacuum collection chambers and rising main located on the site.</p>
Great Yarmouth Borough Council	<p>a) Very small village, with very few services and facilities (classed as a 'Tertiary Village' in our existing Local Plan).</p> <p>b) There are additional facilities (shops, school, pub, medical facilities) spread across Filby and Fleggburgh (classed as</p>

Stakeholder	Comments
	<p>'Secondary Villages') but are over 5km away on roads with are mostly unlit, national speed limit and without footways. Bus services are infrequent in the area. Therefore, greater reliance upon the car over other more sustainable modes.</p> <p>c) Acle is closer, and as a large village has a greater range of facilities and amenities, but still remains over 3.5km away and on roads the same as above.</p> <p>d) Site falls within Filby primary school catchment. Latest pupil-roll forecasting from NCC indicates school will be over-capacity within next five-years taking into account project growth, with no room to expand on the site. (Noted that call for sites submission is for a couple of houses for older people, but no guarantees on future household composition if proposed homes are sold on in the future).</p> <p>e) Site is wholly within FRZ3. There are drainage ditches to the rear of the site, which drains into the Bure so potential for drainage pathways.</p>

7.4. Site assessment

Site address: Land off Mill Road, Stokesby	
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Submitted through 2022 call for sites.
Site Size (hectares)	0.18 hectares
Greenfield / Brownfield	Greenfield
Ownership (if known) (private/public etc.)	Private
Absolute Constraints Check	
Is the site in a ...	
SPA, SAC, SSSI or Ramsar	No
National Nature Reserve	No
Ancient Woodland	No
Flood risk zone 3b	Some of the site is indicative 3b
Scheduled Ancient Monument	No
Statutory Allotments	No
Locally Designated Green Space	No
At risk from Coastal Erosion	No
<i>If yes to any of the above, site will be excluded from further assessment.</i>	
Development Potential	

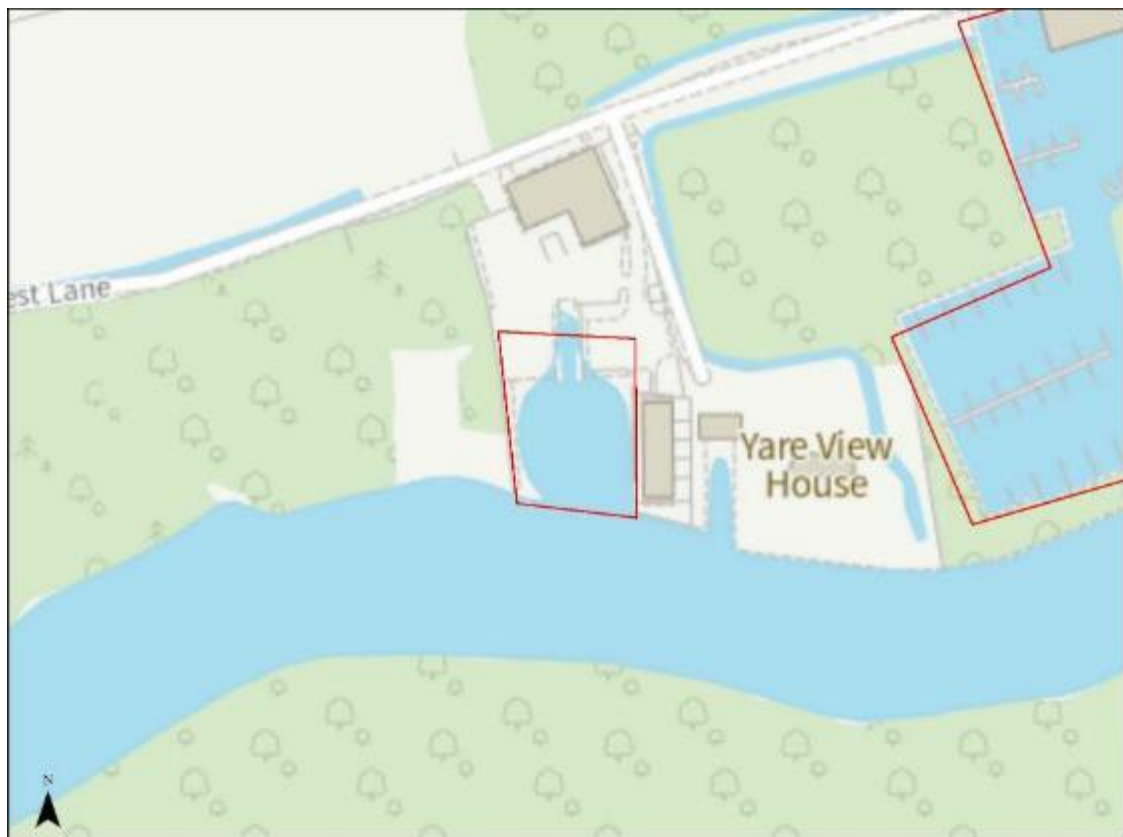
(number of dwellings, hectares of employment land or town centre use floor space):		
2 self-build homes		
Density calculator		11.1 dwellings per hectare
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Site located adjacent to existing residential development on edge of village, subject to access and parking standards being achieved, proposed scale of development is unlikely to give rise to any severe detrimental impact in highway terms. Reservation in terms of any larger scale development. There could be implications in terms of overhead power and BT apparatus, that may require relocation/diversion to facilitate safe and suitable access (and/or requirement of utility companies).
Accessibility to local services and facilities		<p>Bus stop around 250m from site, no footways. The 72A seems to travel from Stokesby at 7:30am and there is a return journey at 1705hrs. There is therefore one key service in Stokesby.</p> <p>There is a shop that is at the pub, but this was closed for all of January 2023 and half of February 2023 and is therefore not deemed as a key service due to the part time nature of its provision.</p> <p>Site falls within Filby primary school catchment. Latest pupil-roll forecasting from NCC indicates school will be over-capacity within next five-years taking into account project growth, with no room to expand on the site.</p>
Utilities Capacity		Advise developer to liaise with Anglian Water regarding infrastructure requirements and capacity of the vacuum sewer to accommodate the development - although only a small site. Caister Pump Lane WRC - currently capacity available
Utilities Infrastructure		<p>This is an area served by a vacuum sewer - specific guidance applies as only 4 properties can connect to a vacuum pot. No surface water connections. SuDS will be required. Two vacuum collection chambers and rising main located on the site.</p> <p>There could be implications in terms of overhead power and BT apparatus, that may require</p>

		relocation/diversion to facilitate safe and suitable access (and/or requirement of utility companies).
Contamination and ground stability		
Flood Risk		Land in flood zone 3a and 2 and indicative 3b.
Coastal Change		
Market Attractiveness		Other than limited services and facilities nearby, has potential to be attractive as a place to visit and live as it is a village by the Broads
Impact	Score: red/amber/green	Comments
Nationally and Locally Significant Landscapes		This site is important to the setting of the village and offers views and connection to the wider landscape which provides an opportunity to understand one's position within the wider setting of the broads and the surrounding arable land. Any development of this site would also likely impact wider views and the visual experience from the footpath network along the River Bure and potentially from the Bure itself.
Townscape		
Biodiversity and Geodiversity		Some designated sites nearby, but away from the proposal. Recreation impacts will need to be mitigated.
Historic Environment		Some listed buildings nearby, but away from the proposal.
Open Space		This would result in the loss of green infrastructure.
Transport and Roads		Site located adjacent to existing residential development on edge of village, subject to access and parking standards being achieved, proposed scale of development is unlikely to give rise to any severe detrimental impact in highway terms. Reservation in terms of any larger scale development.
Compatibility with neighbouring / adjoining uses		
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		
Availability Assessment (will require liaison with landowners)		

Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No	
When might the site be available for development (tick as appropriate)	Immediately	✓
	Within 5 years	
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):	2 per year.	
Comments	Presumed it will take one year to complete the development.	
Achievability (including viability)		
Comments	Despite the lack of services nearby, being a village by the Broads, the development will likely be attractive to people to live in. Detailed viability information will be calculated at Planning Application stage. A Viability Assessment will also accompany the Local Plan. There is no reason to consider this site not achievable.	
Overcoming Constraints		
Comments	School capacity a consideration. Only one key service nearby. Site specific flood risk assessment a requirement. Impact on landscape not likely to be able to be resolved. GI RAMS – payment likely.	
Trajectory of development		
Comments	2 in 1 year.	
Barriers to Delivery		
Comments	Flood risk potentially Access to services Landscape impact	
Conclusion (e.g., is included in the theoretical capacity)		
According to the HELAA assessment, the site is not suitable for development.		

8. Brundall Gardens Marina – small marina - 2 residential moorings

8.1. Map of site



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8.2. Photos of site



8.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Ranger Services (impact on navigation)	The inclusion of residential moorings would not impact on the navigation as the moorings would be within the marina.
Broads Authority Development Management Team	No comments
Broads Authority Design and Heritage	No particular heritage or design constraints.
Broads Authority Landscape Architect	I would have no objection to the inclusion of 2 residential moorings in the small basin near Yare View Holiday Cottages, it seems this would have minimal landscape and visual impact, this seems a sensible and proportionate extension to the existing offer around Brundall Gardens main marina.
Norfolk County Council Highways	<p>Notwithstanding the application relate to specific sites, clearly at this location the cumulative effect if all sites are allocated is a material consideration.</p> <p>The sites, whilst located close to Brundall and the local service provision that provides, are emotes in terms of accessibility other than by the private motor vehicle. There are no public footpath non-motorised user/pedestrian facilitates provision and links within Brundall.</p> <p>The highway access to Postwick Lane, whilst altered in recent years has restricted visibility due to an adjacent tree and given the allocation proposed, there would be a material increase in traffic movements through the access and could give rise to conditions detrimental to highway safety. Access improvements in terms of visibility and access width would need to be a consideration to taking development forward.</p> <p>Postwick Lane does allow for two vehicles to pass, but there is no non-motorised provision and clearly the cumulative scale of development proposed will not only increase residential traffic, but service traffic associated with that. Consideration would need to be given to appropriate highway mitigation and non-motorised provision.</p> <p>In terms of individual allocation: Limited change/traffic generation resulting from proposal, no concern able highway impact.</p>

Stakeholder	Comments
	<p>In terms of the use of the footbridge over the railway and the roads to the north of the railway line, I have no record of any Public Right of Way over the footbridge, and I consider it is a private right for users of the railway – a matter for Network Rail to advise. Likewise, I would advise that West End Avenue and Laurel Drive are private roads outside the jurisdiction of the highway authority and again my records show no Public Rights of Way. It would be for the landowner/owners to grant private rights of access. There could be permissive rights of way, or rights under covenant, but I would not have any record of that. As I understand, permissive access routes are not permanent and there might not be a formal agreement in place, likewise I believe they have to be closed at least once a year to prevent any possible future claim of continuous public access. Accordingly, if no such permissive rights or other documented legal rights of access can be demonstrated it cannot be assured that non-motorised use to the site can be established to address earlier comments provided in that respect, or even retained in perpetuity.</p>
Anglian Water Service	<p>Utilities Capacity</p> <p>Does not appear to be a mains water or sewer connection south of the railway line - although the neighbouring marina is within the Whitlingham Trowse WRC catchment so may have a connection to our network - further investigation needed. Capacity available at WRC.</p> <p>Utilities Infrastructure</p> <p>No constraints apparent on site</p>
Broads Authority Ecologist	No comment
Norfolk County Council – Lead Local Flood Authority.	<p>a) The site is in Flood Zones 2 and 3 - LLFA recommend the EA are consulted.</p> <p>b) Safe access and egress must be considered.</p> <p>c) Currently would be classified as Minor Development</p>
Broadland District Council	<p>A number of different proposals have been put forward within this area, including within areas that appear to be extensively covered in woodland. BDC would draw your attention to the existence of Brundall Neighbourhood Plan 2016-2026 which is available on our website and may be subject to review in the near future.</p>

8.4. Site assessment

Site address: Brundall Gardens Marina – small marina		
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Submitted through 2022 call for sites.	
Site Size (hectares)	0.24 hectares	
Greenfield / Brownfield	Marina - water	
Ownership (if known) (private/public etc.)	Private	
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar	No	
National Nature Reserve	No	
Ancient Woodland	No	
Flood risk zone 3b	Yes, but this is for residential moorings	
Scheduled Ancient Monument	No	
Statutory Allotments	No	
Locally Designated Green Space	No	
At risk from Coastal Erosion	No	
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space):		
2 residential moorings		
Density calculator	N/A	
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Access improvements in terms of visibility and access width would need to be a consideration to taking development forward. Proposal not considered to give rise to a serve detrimental impact. Highways raised concern regarding using the footbridge over the railway to then access roads into the centre of Brundall saying that the route is not public highway. The site promoter currently does not have proof of an agreement for use of the route but says it has been used for many years.
Accessibility to local services and facilities		Train station very close (Brundall Gardens with access to higher order settlements). Assuming use the footbridge over the railway, then towards the middle of Brundall, the Central Brundall Coop is 800m away.

Utilities Capacity		Does not appear to be a mains water or sewer connection south of the railway line - although the neighbouring marina is within the Whitlingham Trowse WRC catchment so may have a connection to our network - further investigation needed. Capacity available at WRC.
Utilities Infrastructure		
Contamination and ground stability		
Flood Risk		In flood zone 3b/body of water but is for residential moorings and residential moorings policy has provisions relating to flood risk.
Coastal Change		
Market Attractiveness		Has potential to be attractive as a place to visit and live as it is by the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		Boats are part of the character of the area.
Townscape		
Biodiversity and Geodiversity		Some designated sites nearby, but there are already boats in the marina. Nutrient enrichment and recreational impacts will need to be mitigated.
Historic Environment		
Open Space		
Transport and Roads		Access improvements in terms of visibility and access width would need to be a consideration to taking development forward. Limited change/traffic generation resulting from proposal, no concern able highway impact.
Compatibility with neighbouring / adjoining uses		Boats are typical of the area. The Residential Moorings policy (and guide) talk of the need for a management plan.
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments

None		
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No.	
When might the site be available for development (tick as appropriate)	Immediately	✓
	Within 5 years	
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):	All in 1 year.	
Comments	Immediate start and completed in a year.	
Achievability (including viability)		
Comments	Generally achievable with limited development.	
Overcoming Constraints		
Comments	Meeting the general policy requirements for residential moorings, including relating to flood risk. Water and sewer connection. Nutrient enrichment will need to be mitigated. GI RAMS – payment likely.	
Trajectory of development		
Comments	Immediate start and take one year to complete.	
Barriers to Delivery		
Comments	At the time of writing, Nutrient Enrichment.	
Conclusion (e.g., is included in the theoretical capacity)		
According to the HELAA assessment, the site is suitable for development.		

8.5. Additional considerations for residential moorings

Criteria	Assessment
1: How many residential moorings or what length of residential moorings is proposed?	2

Criteria	Assessment
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	See above
3: Are there moorings already? If so, what is the current use of the moorings (e.g., public, private, marina etc.)?	Yes – private
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	No – in a marina and boats there already
5: Is riverbank erosion an issue here? How would this be addressed?	Quay heading in place
6: What are the adjacent buildings or land used for	Marina
7: What is the character or appearance of the surrounding area?	Marina. Over the river, wildlife site.
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes
9: What car parking is there for people living on boats (e.g., car park or park on road)?	Car parking at marina
10: How can service and emergency vehicles access the area safely?	Down road to the site
11: How would waste and sewerage be disposed of?	Pump out at Marina
12: Is the area on mains sewerage?	See assessment
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	Not considered it would.
14: Who owns the site? If not, who does and have you told them about your proposal?	Site promoter
15: What is the current use of the site?	Marina

9. Brundall Gardens Marina – large marina - 6 residential moorings

9.1. Map of site



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9.2. Photos from site





9.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Ranger Services (impact on navigation)	The inclusion of residential moorings would not impact on the navigation as the moorings would be within the marina.
Broads Authority Development Management Team	No comments
Broads Authority Ecologist	No comments
Broads Authority Design and Heritage	No particular heritage or design constraints although there is a locally listed chalet to the east at Brundall Gardens Marina, the setting of which may need to be considered.
Broads Authority Landscape Architect	I have no objection to the existing allocation being carried forward.
Norfolk County Council Highways	<p>Notwithstanding the application relate to specific sites, clearly at this location the cumulative effect if all sites are allocated is a material consideration.</p> <p>The sites, whilst located close to Brundall and the local service provision that provides, are emotes in terms of accessibility other than by the private motor vehicle. There are no public footpath non-motorised user/pedestrian facilitates provision and links within Brundall.</p> <p>The highway access to Postwick Lane, whilst altered in recent years has restricted visibility due to an adjacent tree and given the allocation proposed, there would be a material increase in traffic movements through the access and could give rise to</p>

Stakeholder	Comments
	<p>conditions detrimental to highway safety. Access improvements in terms of visibility and access width would need to be a consideration to taking development forward. Postwick Lane does allow for two vehicles to pass, but there is no non-motorised provision and clearly the cumulative scale of development proposed will not only increase residential traffic, but service traffic associated with that. Consideration would need to be given to appropriate highway mitigation and non-motorised provision.</p> <p>In terms of individual allocation:</p> <p>Above comments apply in relation to access and non-motorised use, but not considered to give rise to a serve detrimental impact.</p> <p>In terms of the use of the footbridge over the railway and the roads to the north of the railway line, I have no record of any Public Right of Way over the footbridge, and I consider it is a private right for users of the railway – a matter for Network Rail to advise. Likewise, I would advise that West End Avenue and Laurel Drive are private roads outside the jurisdiction of the highway authority and again my records show no Public Rights of Way. It would be for the landowner/owners to grant private rights of access. There could be permissive rights of way, or rights under covenant, but I would not have any record of that. As I understand, permissive access routes are not permanent and there might not be a formal agreement in place, likewise I believe they have to be closed at least once a year to prevent any possible future claim of continuous public access. Accordingly, if no such permissive rights or other documented legal rights of access can be demonstrated it cannot be assured that non-motorised use to the site can be established to address earlier comments provided in that respect, or even retained in perpetuity.</p>
Norfolk County Council – Lead Local Flood Authority.	<p>a) The site is in Flood Zones 2 and 3 - LLFA recommend the EA are consulted.</p> <p>b) Safe access and egress must be considered.</p> <p>c) Currently would be classified as Minor Development</p>
Anglian Water Services	<p>Utilities Capacity</p> <p>Does not appear to be a mains water or sewer connection south of the railway line - although the neighbouring marina is within the Whitlingham Trowse WRC catchment so may have</p>

Stakeholder	Comments
	<p>a connection to our network - further investigation needed. Capacity available at WRC.</p> <p>Utilities Infrastructure</p> <p>No constraints apparent on site</p>
Broadland District Council	<p>A number of different proposals have been put forward within this area, including within areas that appear to be extensively covered in woodland. BDC would draw your attention to the existence of Brundall Neighbourhood Plan 2016-2026 which is available on our website and may be subject to review in the near future.</p>

9.4. Site assessment

Site address: Brundall Gardens Marina – large marina		
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.		Allocated in Local Plan 2019 for 6 residential moorings.
Site Size (hectares)		N/A
Greenfield / Brownfield		Marina – water
Ownership (if known) (private/public etc.)		Private
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar		No
National Nature Reserve		No
Ancient Woodland		No
Flood risk zone 3b		Yes, but this is for residential moorings.
Scheduled Ancient Monument		No
Statutory Allotments		No
Locally Designated Green Space		No
At risk from Coastal Erosion		No
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 6 residential moorings.		
Density calculator		N/A
Suitability Assessment		
Constraint	Score red/amber/green	Comments

Access to site		Access improvements in terms of visibility and access width would need to be a consideration to taking development forward. Proposal not considered to give rise to a serve detrimental impact. Highways raised concern regarding using the footbridge over the railway to then access roads into the centre of Brundall saying that the route is not public highway. The site promoter currently does not have proof of an agreement for use of the route but says it has been used for many years.
Accessibility to local services and facilities		Train station very close (Brundall Gardens with access to higher order settlements). Assuming use the footbridge over the railway, then towards the middle of Brundall, the Central Brundall Co-op is 700m away.
Utilities Capacity		Does not appear to be a mains water or sewer connection south of the railway line - although the neighbouring marina is within the Whitlingham Trowse WRC catchment so may have a connection to our network - further investigation needed. Considerable development planned in the WRC catchment and further investment required at WRC.
Utilities Infrastructure		
Contamination and ground stability		
Flood Risk		In flood zone 3b/body of water but is for residential moorings and residential moorings policy has provisions relating to flood risk.
Coastal Change		
Market Attractiveness		Has potential to be attractive as a place to visit and live as it is by the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		Boats are part of the character of the area.
Townscape		
Biodiversity and Geodiversity		Some designated sites nearby, but there are already boats in the marina. Nutrient enrichment and recreational impacts will need to be mitigated.
Historic Environment		
Open Space		

Transport and Roads		Access improvements in terms of visibility and access width would need to be a consideration to taking development forward. Proposal not considered to give rise to a severe detrimental impact.
Compatibility with neighbouring / adjoining uses		Boats are typical of the area. The Residential Moorings policy (and guide) talk of the need for a management plan.
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
Local Plan allocation	BRU6	5 residential moorings
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No.	
When might the site be available for development (tick as appropriate)	Immediately	✓
	Within 5 years	
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		All in 1 year.
Comments	Immediate start and completed in a year.	
Achievability (including viability)		
Comments	Generally achievable with limited development.	
Overcoming Constraints		
Comments	Meeting the general policy requirements for residential moorings, including relating to flood risk. Water and sewer connection. Nutrient enrichment will need to be mitigated. GI RAMS – payment likely.	
Trajectory of development		
Comments	Immediate start and take one year to complete.	
Barriers to Delivery		
Comments	At the time of writing, Nutrient Enrichment.	
Conclusion (e.g., is included in the theoretical capacity)		
According to the HELAA assessment, the site is suitable for development.		

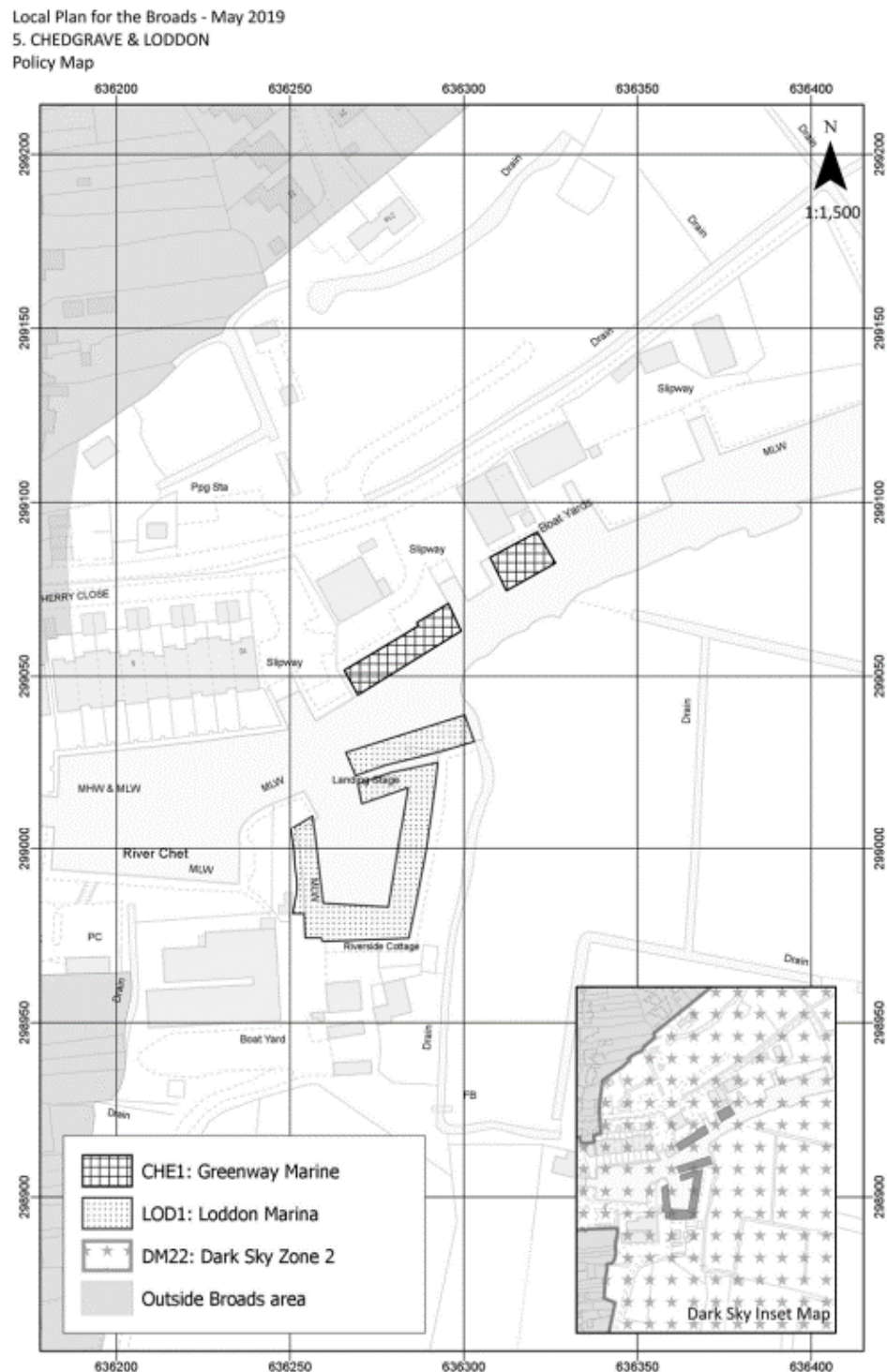
9.5. Additional considerations for residential moorings

Criteria	Assessment
1: How many residential moorings or what length of residential moorings is proposed?	6
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	See above
3: Are there moorings already? If so, what is the current use of the moorings (e.g., public, private, marina etc.)?	Yes – private
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	No – in a marina and boats there already
5: Is riverbank erosion an issue here? How would this be addressed?	Quay heading in place
6: What are the adjacent buildings or land used for	Marina
7: What is the character or appearance of the surrounding area?	Marina. Over the river, wildlife site.
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes
9: What car parking is there for people living on boats (e.g., car park or park on road)?	Car parking at marina
10: How can service and emergency vehicles access the area safely?	Down road to the site
11: How would waste and sewerage be disposed of?	Pump out at Marina
12: Is the area on mains sewerage?	See assessment
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	Not considered it would.
14: Who owns the site? If not, who does and have you told them about your proposal?	Site promoter
15: What is the current use of the site?	Marina

10. Greenway Marine, Chedgrave

10.1. Map of site

The site in question is CHE1 on the following map.



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10.2. Photos from site



10.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Ranger Services (impact on navigation)	The current restriction on length of vessels moored at this location must be maintained if moorings are converted to residential moorings to avoid impacting on vessels navigating.
Broads Authority Development Management Team	No comments
Broads Authority Ecologist	Assuming residential moorings would be within footprint of existing moorings, no comment. If creating from new, would have concerns about peat and potentially protected species/habitat, depending on location.
Broads Authority Design and Heritage	I have no objection to the proposal in design or heritage terms given the compatibility of the proposal to the existing use and character of the site.

Stakeholder	Comments
Broads Authority Landscape Architect	I have no objection to the existing allocation being carried forward
Norfolk County Council Highways	I note this site is already allocated and that Policy CHE1 already identifies the Highway concerns regarding access visibility. Having visited the site, these concerns remain and would need to be satisfactorily resolved in any formal application that may come forward.
Norfolk County Council – Lead Local Flood Authority.	a) The site is in Flood Zones 2 and 3 – the LLFA recommend that the EA are consulted. b) Safe access and egress must be considered
Anglian Water Services	<p>Utilities Capacity</p> <p>We have water supply and sewerage networks in proximity to the marina, so would anticipate the moorings would dispose of wastewater via the marina’s facilities and similarly use the marina’s facilities for their water supply.</p> <p>Utilities Infrastructure</p> <p>Chedgrave is within Sisland WRC catchment, which has capacity to accommodate this small-scale growth.</p>
South Norfolk Council	We note that this is an existing allocation in the Local Plan. We do not have any particular comments that we wish to make regarding residential moorings however we would draw your attention to the emerging Chet Neighbourhood Plan.

10.4. Site assessment

Site address: Greenway Marine Chedgrave	
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Allocated in Local Plan 2019 for 5 residential moorings.
Site Size (hectares)	N/A
Greenfield / Brownfield	Marina – water
Ownership (if known) (private/public etc.)	Private
Absolute Constraints Check	
Is the site in a ...	
SPA, SAC, SSSI or Ramsar	No
National Nature Reserve	No

Ancient Woodland		No
Flood risk zone 3b		Yes, but this is for residential moorings.
Scheduled Ancient Monument		No
Statutory Allotments		No
Locally Designated Green Space		No
At risk from Coastal Erosion		No
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 5 residential moorings.		
Density calculator		N/A
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		This site is already allocated and that Policy CHE1 already identifies the Highway concerns regarding access visibility. Having visited the site, these concerns remain and would need to be satisfactorily resolved in any formal application that may come forward.
Accessibility to local services and facilities		
Utilities Capacity		Chedgrave is within Sisland WRC catchment, which has capacity to accommodate this small-scale growth.
Utilities Infrastructure		We have water supply and sewerage networks in proximity to the marina, so would anticipate the moorings would dispose of wastewater via the marina's facilities and similarly use the marina's facilities for their water supply.
Contamination and ground stability		
Flood Risk		In flood zone 3b/body of water but is for residential moorings and residential moorings policy has provisions relating to flood risk.
Coastal Change		
Market Attractiveness		Has potential to be attractive as a place to visit and live as it is by the Broads
Impact	Score red/amber/green	Comments

Nationally and Locally Significant Landscapes		Boats are part of the character of the area.
Townscape		
Biodiversity and Geodiversity		Recreational impacts will need to be mitigated.
Historic Environment		
Open Space		
Transport and Roads		This site is already allocated and that Policy CHE1 already identifies the Highway concerns regarding access visibility. Having visited the site, these concerns remain and would need to be satisfactorily resolved in any formal application that may come forward.
Compatibility with neighbouring / adjoining uses		Boats are typical of the area. The Residential Moorings policy (and guide) talk of the need for a management plan.
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
Local Plan allocation	CHE1	5 residential moorings
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No.	
When might the site be available for development (tick as appropriate)	Immediately	✓
	Within 5 years	
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):	All in 1 year.	
Comments	Immediate start and completed in a year.	
Achievability (including viability)		
Comments	Generally achievable with limited development.	

Overcoming Constraints	
Comments	Meeting the general policy requirements for residential moorings, including relating to flood risk. Water and sewer connection. Access visibility. GI RAMS – payment likely.
Trajectory of development	
Comments	Immediate start and take one year to complete.
Barriers to Delivery	
Comments	At the time of writing, Nutrient Enrichment.
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is suitable for development.	

10.5. Additional considerations for residential moorings

Criteria	Assessment
1: How many residential moorings or what length of residential moorings is proposed?	5
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	Many services and facilities nearby.
3: Are there moorings already? If so, what is the current use of the moorings (e.g., public, private, marina etc.)?	Yes – private
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	No – in a marina and boats there already
5: Is riverbank erosion an issue here? How would this be addressed?	Quay heading in place
6: What are the adjacent buildings or land used for	Marina
7: What is the character or appearance of the surrounding area?	Marina.
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes
9: What car parking is there for people living on boats (e.g., car park or park on road)?	Car parking at marina
10: How can service and emergency vehicles access the area safely?	Down road to the site

Criteria	Assessment
11: How would waste and sewerage be disposed of?	Pump out at Marina
12: Is the area on mains sewerage?	See assessment
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	Not considered it would.
14: Who owns the site? If not, who does and have you told them about your proposal?	Site promoter
15: What is the current use of the site?	Marina

11. Hipperson's Boatyard, Gillingham - 5 residential moorings

11.1. Map of site



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11.2. Photos from sites





11.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Ranger Services (impact on navigation)	The inclusion of residential moorings would not impact on the navigation as the moorings would be within the marina.
Broads Authority Development Management Team	No comments.
Broads Authority Ecologist	Some photos show some natural edge with pontoon style moorings rather than hard edge. Keeping this would be ideal.
Broads Authority Design and Heritage	The site is adjacent to the Beccles Conservation Area, but the proposal would not change the character of the area and so there are unlikely to be any particular design or heritage concerns.
Broads Authority Landscape Architect	No objection to the site being taken forward. Would support similar wording to existing policy to secure/restrict the appearance and other matters related to landscape.
Norfolk County Council Highways	<p>Although unclear as to whether existing moorings will be utilised, or new ones proposed.</p> <p>Located close and with links to local services and public transport links, so likely to be less reliance on the motor vehicle.</p> <p>Vehicular access appears acceptable and therefore subject to the usual caveats regarding access, parking, EV charging, pedestrian and cycle provision I see so fundamental issues with this proposal in highway terms.</p>
Anglian Water Services	Utilities Capacity

Stakeholder	Comments
	<p>Water and sewerage connections already exist at the boatyard. Beccles Marsh Lane WRC has some limited capacity - depending on cumulative development within the WRC catchment area. If further investment is required AW will undertake this once planning permission is granted.</p> <p>Utilities Infrastructure</p> <p>No constraints apparent on site</p>
South Norfolk District Council	We do not have any particular comments that we wish to make in relation to the proposed residential moorings at this time.

11.4. Site assessment

Site address: Hipperson's Boatyard, Gillingham		
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Allocated in the Local Plan 2019 for 5 residential moorings.	
Site Size (hectares)	0.38 hectares	
Greenfield / Brownfield	Boatyard – water	
Ownership (if known) (private/public etc.)	Private	
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar	No	
National Nature Reserve	No	
Ancient Woodland	No	
Flood risk zone 3b	Yes, but this is for residential moorings.	
Scheduled Ancient Monument	No	
Statutory Allotments	No	
Locally Designated Green Space	No	
At risk from Coastal Erosion	No	
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space):		
5 residential moorings		
Density calculator	N/A	
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Vehicular access appears acceptable and therefore subject to the usual caveats regarding access, parking, EV charging, pedestrian and cycle provision NCC see so

		fundamental issues with this proposal in highway terms.
Accessibility to local services and facilities		Many facilities within walking distance of the site. Footway able to be used.
Utilities Capacity		Water and sewerage connections already exist at the boatyard. Beccles Marsh Lane WRC has some limited capacity - depending on cumulative development within the WRC catchment area. If further investment is required AW will undertake this once planning permission is granted.
Utilities Infrastructure		No constraints apparent on site
Contamination and ground stability		
Flood Risk		In flood zone 3b/body of water but is for residential moorings and residential moorings policy has provisions relating to flood risk.
Coastal Change		
Market Attractiveness		Has potential to be attractive as a place to visit and live as it is a village by the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		Whilst in the Broads, boats are typical of the character of this area.
Townscape		
Biodiversity and Geodiversity		County wildlife site nearby. Recreational impacts will need to be mitigated.
Historic Environment		Some listed buildings nearby, but away from the proposal.
Open Space		
Transport and Roads		Vehicular access appears acceptable and therefore subject to the usual caveats regarding access, parking, EV charging, pedestrian and cycle provision NCC see so fundamental issues with this proposal in highway terms.
Compatibility with neighbouring / adjoining uses		

Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
Allocated for residential moorings.	BEC1	Local Plan 2019.
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No.	
When might the site be available for development (tick as appropriate)	Immediately	
	Within 5 years	
	5-10 years	✓
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		5 per year.
Comments	Presumed it will take one year to complete the development.	
Achievability (including viability)		
Comments	The development will likely be attractive to people to live in. There is no reason to consider this site not achievable.	
Overcoming Constraints		
Comments	GI RAMS – payment likely. Meeting the general policy requirements for residential moorings, including relating to flood risk.	
Trajectory of development		
Comments	All five developed within a year.	
Barriers to Delivery		
Comments	None obvious.	
Conclusion (e.g., is included in the theoretical capacity)		
According to the HELAA assessment, the site is suitable for development.		

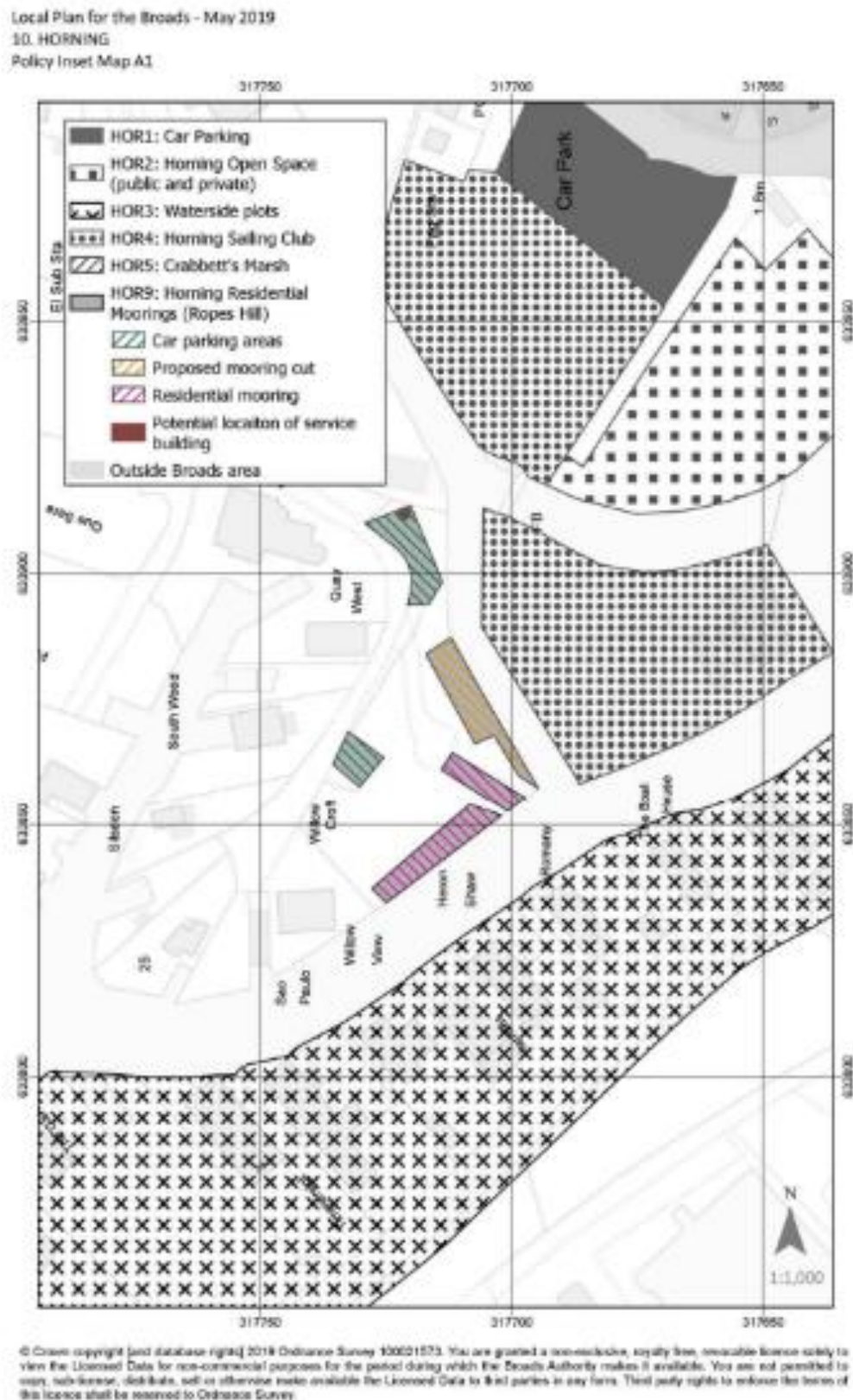
11.5. Additional considerations for residential moorings

Criteria	Assessment
1: How many residential moorings or what length of residential moorings is proposed?	5
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	Yes
3: Are there moorings already? If so, what is the current use of the moorings (e.g., public, private, marina etc.)?	Yes – private
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	No – in a marina and boats there already
5: Is riverbank erosion an issue here? How would this be addressed?	Quay heading in place
6: What are the adjacent buildings or land used for	Marina
7: What is the character or appearance of the surrounding area?	Marina. On edge of settlement.
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes
9: What car parking is there for people living on boats (e.g., car park or park on road)?	Car parking at marina
10: How can service and emergency vehicles access the area safely?	Marina is off main road.
11: How would waste and sewerage be disposed of?	Pump out at Marina
12: Is the area on mains sewerage?	See assessment
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	Not considered it would.
14: Who owns the site? If not, who does and have you told them about your proposal?	Site promoter
15: What is the current use of the site?	Marina

12. Ropes Hill, Horning - 6 residential moorings

12.1. Map of site

The site is represented by area HOR9 in the map below:



12.2. Photos of the site



12.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	No comments
Broads Authority Ranger Services (impact on navigation)	The inclusion of residential moorings would not impact on the navigation as the proposed moorings are along a side channel. Maintaining access along the channel will need to be considered.
Broads Authority Design and Heritage	The site is immediately adjacent to the Horning Conservation Area and in close proximity to two locally listed chalets (Romany to the south-west and the Garden House to the north-west). The setting of these heritage assets will therefore need to be considered.

Stakeholder	Comments
	<p>Given the location and character of the area, the proposal could be considered acceptable in design terms, again dependent on the type of boats proposed (e.g., boats rather than floating mobile homes) and the position, design etc of ancillary facilities.</p>
<p>Broads Authority Landscape Architect</p>	<p>No landscape objection to the site being carried forward with similar wording to existing policy to secure/maintain appearance and matters relating to landscape.</p>
<p>Norfolk County Council Highways</p>	<ul style="list-style-type: none"> a) Whilst accessible to limited local service provision without total reliance of the motor vehicle, it is likely that the latter would still be the primary mode of transport. b) Ropes Hill is a private drive and currently serves eleven residential properties together with numerous boat moorings. The access track is substandard and does not meet current highway standards with limited scope for any improvement. It is considered inadequate to serve the scale of development proposed. c) Ropes Hill has no passing places, and this development increases the propensity for vehicles needing to reverse either in the vicinity of the adjacent public highway or out onto the public highway itself if, after turning onto Ropes Hill, their passage is obstructed by on-coming vehicles. Given the alignment of the public highway at this location, reversing back onto the public highway would give rise to conditions detrimental to highway safety. d) Even if the number proposed was reduced in scale, it would still result in an intensification of use Ropes Hill and the highway access and comments in that respect would still be applicable in the absence of proffered mitigation.
<p>Anglian Water Services</p>	<p>Utilities Capacity</p> <p>Horning-Knackers Wood WRC - constraints for future development. AW would need to understand how current sewage from moorings is managed at the mooring site - whether there are private treatment arrangements in place or whether this is connected to our network, in which case we would not consider further connections to be sustainable given the challenging issues in this location currently affecting our network and WRC operations. A number of works have been carried out to address groundwater and river water infiltration to our network and further works planned.</p> <p>Utilities Infrastructure</p>

Stakeholder	Comments
	No constraints apparent on site
Norfolk County Council Lead Local Flood Authority	<p>a) The site is in Flood Zones 2 and 3 - LLFA recommend the EA are consulted.</p> <p>b) Safe access and egress must be considered</p>
Broads Authority Ecologist	Some sedge dominated vegetation in mooring surrounds indicating peat potential. Would like to see this maintained & managed & not impacted by proposal
North Norfolk District Council	<p>a) Horning is identified in the Settlement Hierarchy as a Small Growth Village as part of NNDC's emerging Local Plan. The Plan identifies an indicative housing allowance for Horning of 29 dwellings that could be delivered over the Plan Period through a mix of new allocations, 'infill' developments and existing commitments.</p> <p>b) The Plan does not allocate any sites in Horning.</p> <p>c) Anglian Water and the Environment Agency have confirmed that the Horning Knackers Wood Water Recycling Centre (WRC) does not have capacity to accommodate further foul flows and that if the flows continue to rise there is a risk of increased nutrient loading to the river and therefore deterioration in water quality. There is also increased risk of sewer flooding. NNDC, the Broads Authority and EA have agreed in a Joint Position Statement to assume a presumption against any future development that could increase foul water flows to Horning WRC from occurring in Horning. The details of this can be found in appendix E of NNDC's emerging Local Plan's Infrastructure Delivery Plan.</p> <p>d) The site is immediately adjacent to the Horning Conservation Area and resides within Flood Zone 2 and 3. The site lies outside the settlement boundary and is considered part of the countryside.</p> <p>e) The site is reasonably well located to existing services and facilities though the settlement is a small growth village and does not include significant provision of services. The impact the site may have on the Horning Knackers Wood WRC means the site is potentially unsuitable for development based on the site's risk of increasing foul water flows into the WRC. There are flood risk concerns on this site and the careful</p>

Stakeholder	Comments
	consideration would need to be given to the Horning Conservation Area.

12.4. Site assessment

Site address: Ropes Hill, Horning		
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Currently allocated in the Local Plan for 6 residential moorings.	
Site Size (hectares)	0.1 hectares	
Greenfield / Brownfield	Greenfield/established moorings	
Ownership (if known) (private/public etc.)	Private	
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar	No	
National Nature Reserve	No	
Ancient Woodland	No	
Flood risk zone 3b	Yes – but this is for residential moorings.	
Scheduled Ancient Monument	No	
Statutory Allotments	No	
Locally Designated Green Space	No	
At risk from Coastal Erosion	No	
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 6 residential moorings		
Density calculator	N/A	
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		<p>a) Ropes Hill is a private drive and currently serves eleven residential properties together with numerous boat moorings. The access track is substandard and does not meet current highway standards with limited scope for any improvement. It is considered inadequate to serve the scale of development proposed.</p> <p>b) Ropes Hill has no passing places, and this development increases the propensity for vehicles needing to reverse either in the vicinity of the adjacent public highway or out onto the public highway itself if, after turning onto Ropes Hill, their passage is obstructed by on-coming vehicles. Given the alignment of the public highway at this location,</p>

		reversing back onto the public highway would give rise to conditions detrimental to highway safety.
Accessibility to local services and facilities		Bus service and post office/shop within 300m.
Utilities Capacity		Horning Knackers Wood Water Recycling Centre capacity issues.
Utilities Infrastructure		
Contamination and ground stability		
Flood Risk		In flood zone 3b/body of water but is for residential moorings and residential moorings policy has provisions relating to flood risk.
Coastal Change		
Market Attractiveness		Has potential to be attractive as a place to visit and live as it is a village by the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		
Townscape		
Biodiversity and Geodiversity		Site is on peat and proposals require peat to be excavated to make a mooring cut although if the proposal was for 4 residential moorings, there would be no need to excavate peat. Recreation impacts will need mitigating.
Historic Environment		The site is immediately adjacent to the Horning Conservation Area and in close proximity to two locally listed chalets (Romany to the south-west and the Garden House to the north-west). The setting of these heritage assets will therefore need to be considered.
Open Space		Some green infrastructure might be lost as a result of excavation to provide room for two more moorings. But 4 residential moorings could be provided with no loss of green infrastructure.
Transport and Roads		a) Ropes Hill is a private drive and currently serves eleven residential properties together with numerous boat moorings. The access track is substandard and does not meet current highway

		<p>standards with limited scope for any improvement. It is considered inadequate to serve the scale of development proposed.</p> <p>b) Ropes Hill has no passing places, and this development increases the propensity for vehicles needing to reverse either in the vicinity of the adjacent public highway or out onto the public highway itself if, after turning onto Ropes Hill, their passage is obstructed by on-coming vehicles. Given the alignment of the public highway at this location, reversing back onto the public highway would give rise to conditions detrimental to highway safety.</p>
Compatibility with neighbouring / adjoining uses		
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
Allocated for 6 residential moorings.	HOR9	Local Plan 2019
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No	
When might the site be available for development (tick as appropriate)	Immediately	
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	
	Comments: Important to note the issues relating to the Water Recycling Centre (see earlier).	
Estimated annual build out rate (including justification):		6 per year.
Comments	Presumed it will take one year to complete the development.	
Achievability (including viability)		
Comments	Being a village by the Broads, the development will likely be attractive to people to live in. Detailed viability information will be calculated at Planning	

	Application stage. A Viability Assessment will also accompany the Local Plan.
Overcoming Constraints	
Comments	Peat policy and guide – reduce to 4 residential moorings so no peat excavated? Setting of the heritage assets. Access concerns. Water Recycling Centre Concerns. Meeting the general policy requirements for residential moorings, including relating to flood risk. GI RAMS – payment likely.
Trajectory of development	
Comments	6 in one year.
Barriers to Delivery	
Comments	Water recycling centre capacity issues.
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is not suitable for development.	

12.5. Additional considerations for residential moorings

Criteria	Assessment
1: How many residential moorings or what length of residential moorings is proposed?	6 has been put forward, but 4 would mean no peat would be excavated.
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	See above
3: Are there moorings already? If so, what is the current use of the moorings (e.g., public, private, marina etc.)?	Yes – private
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	No – moorings are there already for 4 boats. If another two were to be provide, land would be excavated so no impact on navigation.
5: Is riverbank erosion an issue here? How would this be addressed?	Quay heading in place
6: What are the adjacent buildings or land used for	Residential and sailing club.
7: What is the character or appearance of the surrounding area?	Residential and sailing club.

Criteria	Assessment
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes
9: What car parking is there for people living on boats (e.g., car park or park on road)?	Car parking would be provided nearby as part of the scheme.
10: How can service and emergency vehicles access the area safely?	Down road to the site
11: How would waste and sewerage be disposed of?	A small utilities block may be provided. But issues regarding capacity at the Water Recycling Centre.
12: Is the area on mains sewerage?	See assessment. But issues regarding capacity at the Water Recycling Centre.
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	Not considered it would.
14: Who owns the site? If not, who does and have you told them about your proposal?	Site promoter
15: What is the current use of the site?	Moorings and an area of open space.

13. Land next to Loddon Marina – 10 residential moorings

13.1. Map of site



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13.2. Photos of site





13.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Ranger Services (impact on navigation)	The inclusion of residential moorings would not impact on the navigation however consideration to the safe access for boats joining the main river from the dyke would need to be considered.
Broads Authority Development Management Team	The site is in the Conservation Area, so all trees are protected. There have been some recent applications for works to trees.
Broads Authority Design and Heritage	<p>This site is within Loddon Conservation Area and on the eastern edge of the settlement.</p> <p>The proposal is for additional residential moorings down a dyke that extends north-south at the eastern edge of the Marina. I would have some concerns if the dyke had to be widened, as it is currently quite narrow, and this had a detrimental impact on neighbouring trees, which contribute to the character of the conservation area. Equally consideration would also need to be given to the provision of ancillary facilities, such as boardwalks and storage and how this might be achieved so that it preserves and enhances the character of the conservation area.</p>
Broads Authority Landscape Architect	The use of the dyke for residential moorings would result in a change in character of the existing feature and partial sub-urbanisation and formalisation of the bank edges if quay heading were required. The call for sites application states that the

Stakeholder	Comments
	<p>residential moorings would result in an improvement to the character and appearance of the site through attractive landscaping, however the existing character has some value, including an existing Willow tree which could be lost with widening of the dyke.</p> <p>Consideration would be required of the potential disturbance of peat.</p> <p>Overall, the use of the dyke and associated engineering works associated with making it suitable for residential moorings would not be considered positive in landscape terms and could be detrimental to the appearance of the area.</p>
Norfolk County Council Highways	<p>Access to highway network suitable for scale of development proposed and unlikely to give rise to any specific highway safety concerns.</p> <p>Site located with access to schools, local services, etc, without reliance on the private motor vehicle, albeit some service provision, employment likely to be sought further afield.</p>
Anglian Water Services	<p>Utilities Capacity Sisland WRC catchment - WRC has capacity available.</p> <p>Utilities Infrastructure No constraints apparent</p>
South Norfolk District Council	<p>Consideration should be given to the identified constraints on and adjacent to the site and we would draw your attention to the emerging Chet Neighbourhood Plan, however we do not have any particular comments that we wish to make in relation to this representation at this time.</p>
Broads Authority Ecologist	<p>Potential environmental issues with excavation of ditch, particularly water voles. Would need ecological survey. Surveys likely.</p>

13.4. Site assessment

Site address: Land next to Loddon Marina – residential moorings	
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Submitted through 2022 call for sites.
Site Size (hectares)	0.07 hectares

Greenfield / Brownfield		Dyke next to marina
Ownership (if known) (private/public etc.)		Private
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar	No	
National Nature Reserve	No	
Ancient Woodland	No	
Flood risk zone 3b	Yes, but for residential moorings.	
Scheduled Ancient Monument	No	
Statutory Allotments	No	
Locally Designated Green Space	No	
At risk from Coastal Erosion	No	
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 10 residential moorings		
Density calculator	N/A	
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Access to highway network suitable for scale of development proposed and unlikely to give rise to any specific highway safety concerns
Accessibility to local services and facilities		Site located with access to schools, local services, etc, without reliance on the private motor vehicle, albeit some service provision, employment likely to be sought further afield.
Utilities Capacity		Sisland WRC catchment - WRC has capacity available.
Utilities Infrastructure		
Contamination and ground stability		
Flood Risk		In flood zone 3b/body of water but is for residential moorings and residential moorings policy has provisions relating to flood risk.
Coastal Change		

Market Attractiveness		Has potential to be attractive as a place to visit and live as it is an area by the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		Overall, the use of the dyke and associated engineering works associated with making it suitable for residential moorings would not be considered positive in landscape terms and could be detrimental to the appearance of the area.
Townscape		
Biodiversity and Geodiversity		Loss of habitat due to the straightening and hardening of the dyke edges. Recreational impacts will need mitigating (but that does not make the assessment rate red). Site is on peat so dyke widening would result in excavation of peat.
Historic Environment		In Conservation Area. Concerns if the dyke had to be widened, as it is currently quite narrow, and this had a detrimental impact on neighbouring trees, which contribute to the character of the Conservation Area. Equally consideration would also need to be given to the provision of ancillary facilities, such as boardwalks and storage and how this might be achieved so that it preserves and enhances the character of the conservation area.
Open Space		
Transport and Roads		Access to highway network suitable for scale of development proposed and unlikely to give rise to any specific highway safety concerns
Compatibility with neighbouring / adjoining uses		
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
Not allocated		
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No	
	Immediately	✓

When might the site be available for development (tick as appropriate)	Within 5 years	
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		10 per year.
Comments	Presumed it will take one year to complete the development.	
Achievability (including viability)		
Comments	The development will likely be attractive to people to live in. There is no reason to consider this site not achievable.	
Overcoming Constraints		
Comments	Seems the development will require widening of the dyke, which is peat. This widening likely to have impacts on character. Not clear how these constraints can be overcome. GI RAMS – payment likely. Peat.	
Trajectory of development		
Comments	10 in one year.	
Barriers to Delivery		
Comments	Peat and impact of widening dyke and impact on landscape.	
Conclusion (e.g., is included in the theoretical capacity)		
According to the HELAA assessment, the site is not suitable for development.		

13.5. Additional considerations for residential moorings

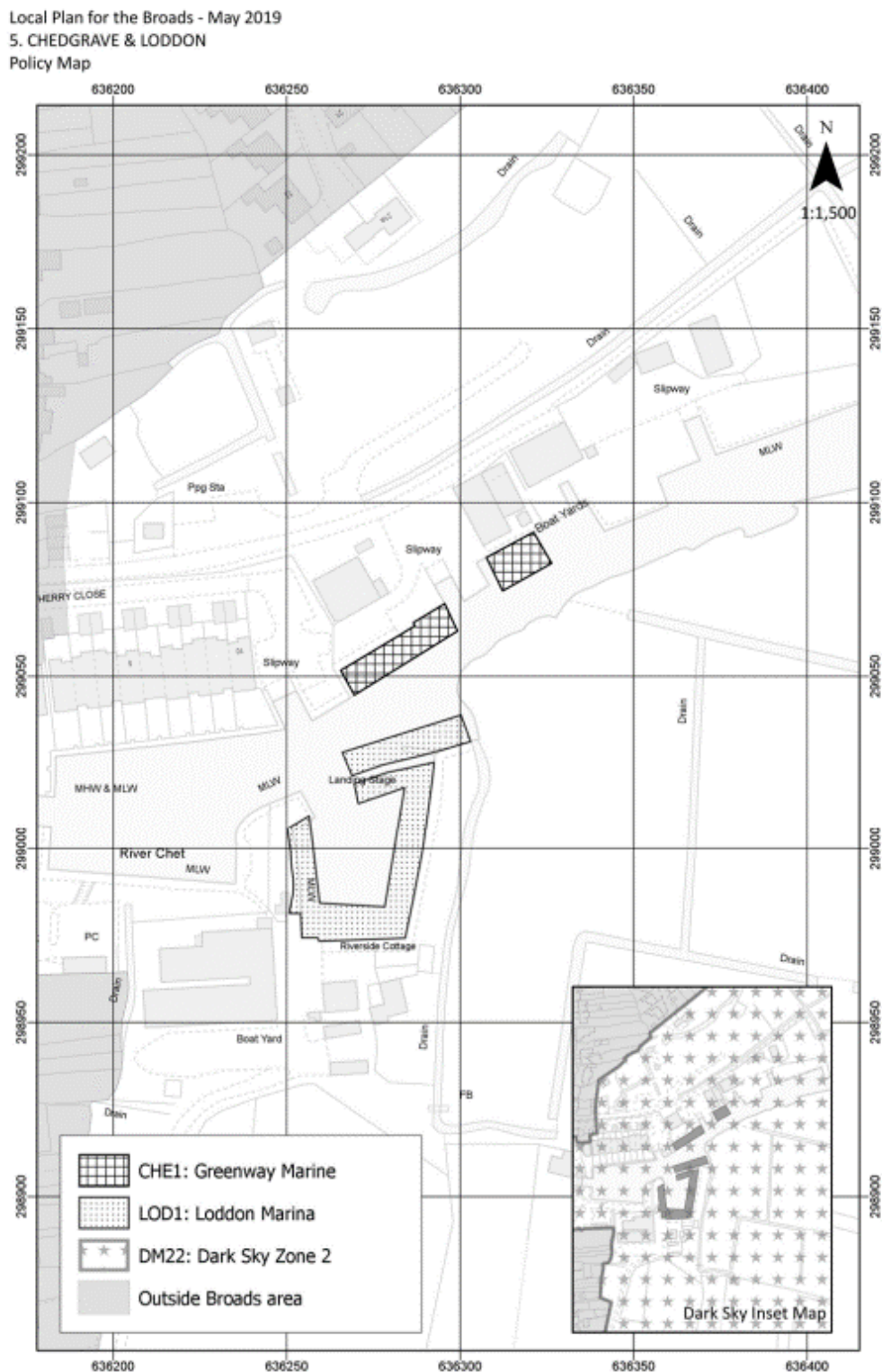
Criteria	Assessment
1: How many residential moorings or what length of residential moorings is proposed?	10
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	See above
3: Are there moorings already? If so, what is the current use of the moorings (e.g., public, private, marina etc.)?	One boat moored there on-site visit. But this is a dyke.
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	Widening seems to be required. Off the main navigation.
5: Is riverbank erosion an issue here? How would this be addressed?	No quay heading currently.

Criteria	Assessment
6: What are the adjacent buildings or land used for	Marina/rural open area.
7: What is the character or appearance of the surrounding area?	Marina/rural open area.
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes
9: What car parking is there for people living on boats (e.g., car park or park on road)?	Car parking at marina
10: How can service and emergency vehicles access the area safely?	Down road to the site
11: How would waste and sewerage be disposed of?	Pump out at Marina
12: Is the area on mains sewerage?	See assessment
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	Not considered it would.
14: Who owns the site? If not, who does and have you told them about your proposal?	Site promoter
15: What is the current use of the site?	Dyke

14. Loddon Marina - 10 residential mooring

14.1. Map of site

The site is shown as the area described by LOD1 on the map below:



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14.2. Photos of site



14.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Ranger Services (impact on navigation)	The inclusion of the proposed residential moorings within the marina will not impact on the navigation. Any vessels moored on the river side of the marina must not extend further into the channel than the existing vessels to avoid impacting vessels navigating.
Broads Authority Development Management Team	No comments
Broads Authority Design and Heritage	I have no objection in design or heritage terms to the allocation of up to 10 residential moorings at Loddon Marina, as set out in the existing Local Plan Policy (LOD1).
Broads Authority Landscape Architect	I have no landscape comments/objections to the current allocation of 10 residential moorings at Loddon being carried forward.
Norfolk County Council Highways	Given the allocation is in the local plan I have no specific comment – LOD1 already refers to highway considerations.

Stakeholder	Comments
	Clearly, we would address any highway matters in response to any formal application made.
Anglian Water Services	Utilities Capacity Sisland WRC catchment - WRC has capacity available. Utilities Infrastructure No constraints apparent
Broads Authority Ecologist	No comments.
South Norfolk District Council	We note that this is an existing allocation in the Local Plan. We do not have any particular comments that we wish to make regarding residential moorings however we would draw your attention to the emerging Chet Neighbourhood Plan.

14.4. Site assessment

Please note that this site has not been submitted as part of the Call for Sites for this Local Plan. It has been rolled forward from the current Local Plan. Some of the information within this assessment is estimated and highlighted as such.

Site address: Loddon Marina - 10 residential mooring	
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Currently allocated in Local Plan for 10 residential moorings.
Site Size (hectares)	0.11 hectares
Greenfield / Brownfield	Marina – water
Ownership (if known) (private/public etc.)	Private
Absolute Constraints Check	
Is the site in a ...	
SPA, SAC, SSSI or Ramsar	No
National Nature Reserve	No
Ancient Woodland	No
Flood risk zone 3b	Yes – but this is for residential moorings
Scheduled Ancient Monument	No
Statutory Allotments	No
Locally Designated Green Space	No
At risk from Coastal Erosion	No
<i>If yes to any of the above, site will be excluded from further assessment.</i>	
Development Potential (number of dwellings, hectares of employment land or town centre use floor space):	

10 residential moorings		
Density calculator		N/A
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		LOD1 already refers to highway considerations and Norfolk County Council would address any highway matters in response to any formal application made.
Accessibility to local services and facilities		Many facilities within walking distance.
Utilities Capacity		Generally acceptable although detail regarding sewerage disposal required.
Utilities Infrastructure		
Contamination and ground stability		
Flood Risk		In flood zone 3b/body of water but is for residential moorings and residential moorings policy has provisions relating to flood risk.
Coastal Change		
Market Attractiveness		Has potential to be attractive as a place to visit and live as it is a village by the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		Boats are characteristic of the marina.
Townscape		
Biodiversity and Geodiversity		Recreation impacts will need mitigating.
Historic Environment		In Conservation Area, but boats are characteristic of the marina.
Open Space		
Transport and Roads		
Compatibility with neighbouring / adjoining uses		
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments

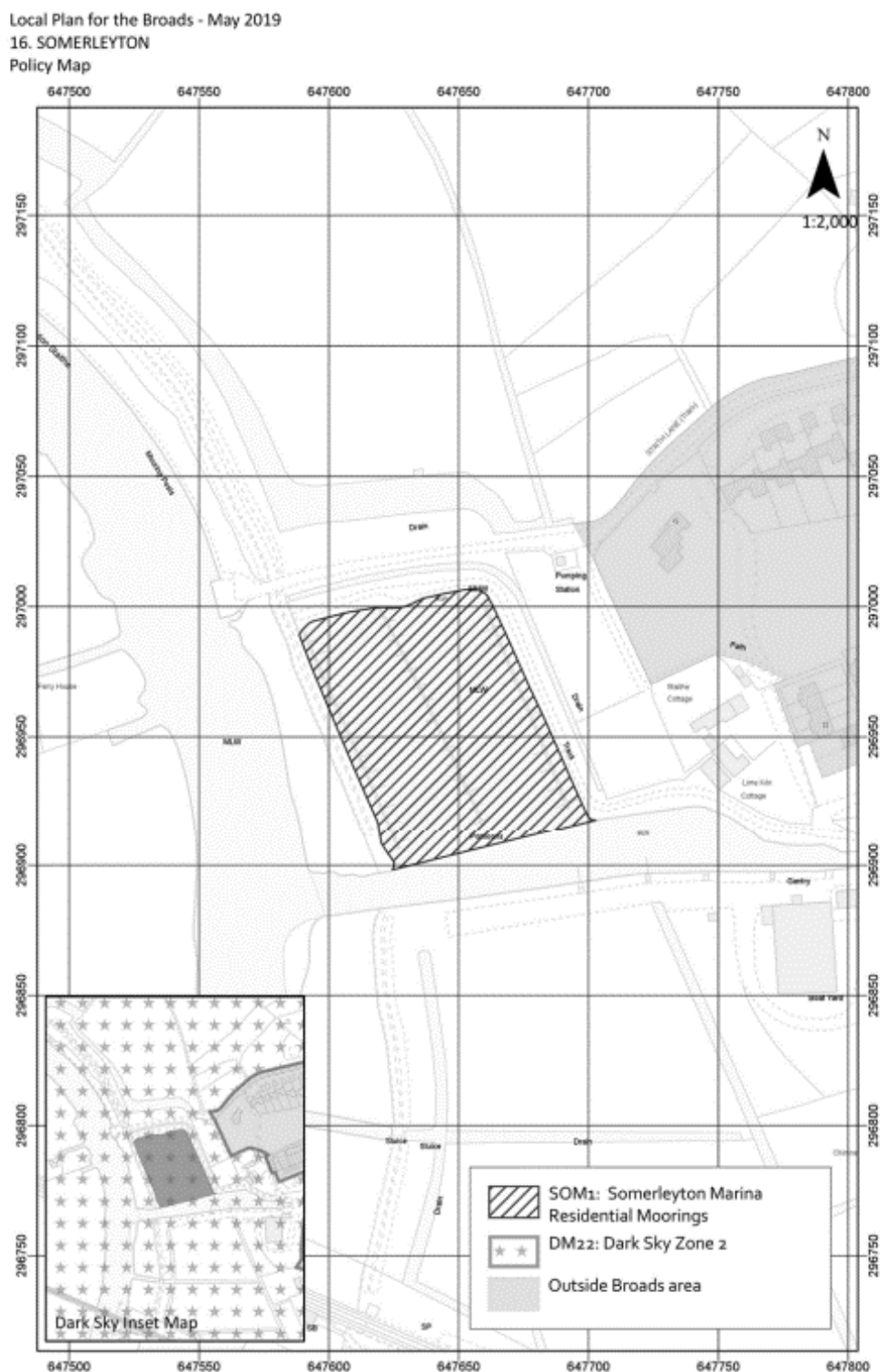
Allocated for residential moorings	LOD1	Local Plan 2019
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No	
When might the site be available for development (tick as appropriate)	Immediately	✓ (estimated)
	Within 5 years	✓ (estimated)
	5-10 years	
	10-15 years	
	15-20 years	
	Comments: This is estimated.	
Estimated annual build out rate (including justification):	All in the same year – estimated.	
Comments		
Achievability (including viability)		
Comments	The development will likely be attractive to people to live in. Detailed viability information will be calculated at Planning Application stage. A Viability Assessment will also accompany the Local Plan. There is no reason to consider this site not achievable.	
Overcoming Constraints		
Comments	Detail regarding sewerage disposal would be needed as part of a planning application. Flood risk would need to be addressed as well as other residential moorings policies. GI RAMS – payment likely.	
Trajectory of development		
Comments	10 in one year.	
Barriers to Delivery		
Comments	None obvious.	
Conclusion (e.g., is included in the theoretical capacity)		
According to the HELAA assessment, the site is suitable.		

14.5. Additional considerations for residential moorings

Criteria	Assessment
1: How many residential moorings or what length of residential moorings is proposed?	10

Criteria	Assessment
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	See above
3: Are there moorings already? If so, what is the current use of the moorings (e.g., public, private, marina etc.)?	Yes – private
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	Part of allocation in a marina. Part on river frontage so length would be a consideration in any plans/policy.
5: Is riverbank erosion an issue here? How would this be addressed?	Quay heading in place
6: What are the adjacent buildings or land used for	Marina
7: What is the character or appearance of the surrounding area?	Marina.
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes
9: What car parking is there for people living on boats (e.g., car park or park on road)?	Car parking at marina
10: How can service and emergency vehicles access the area safely?	Down road to the site
11: How would waste and sewerage be disposed of?	Pump out at Marina
12: Is the area on mains sewerage?	See assessment
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	Not considered it would.
14: Who owns the site? If not, who does and have you told them about your proposal?	Site promoter
15: What is the current use of the site?	Marina

15.1. Map of site



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15.2. Photos of site



15.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Ranger Services (impact on navigation)	The inclusion of residential moorings would not impact on the navigation as the moorings would be within the marina.
Broads Authority Ecologist	Concerns re excavation and loss of reed bed, but no comments if marina not extended and existing marina used.
Broads Authority Development Management Team	No comments
Broads Authority Design and Heritage	In terms of additional residential moorings, I have no objection to that proposal which will be in keeping with the existing use and character of the area.
Broads Authority Landscape Architect	The site is immediately adjacent to and partially within the Somerleyton Conservation Area. The existing boatyard buildings (within the proposed allocation) are also within the conservation

Stakeholder	Comments
	<p>area. There are also a number of locally listed buildings in the vicinity, including the Duke's Head PH and outbuildings, the Brickfields terraces, the Swing Bridge and Signal Box, the remains of the Belgian Kiln and brickworks site and the Wherry Dyke and Crown Boat Yard, the setting of which will need to be considered.</p> <p>It is noted that there are potentially remains of the Wherry Dyke and Crown Boatyard and the Somerleyton brickworks on and adjacent to the site. The protrusion of the conservation area boundary to the west would appear to be in order to cover the former Wherry Dyke, which was cut as a canal in order to allow access for brick-laden boats between the brickworks and river.</p> <p>It will be necessary to ensure that associated infrastructure (e.g., parking, hardstanding, lighting, storage etc) is kept to a minimum to mitigate any potential harm to the character and appearance of the area and that the impact on designated and non-designated heritage assets is considered.</p>
Suffolk County Council Highways	Content that the marina has existing parking and pedestrian links, so this small expansion is acceptable. However, any additional moorings would need to provide sufficient parking in line with the adopted parking standards.
Suffolk County Council Education	No concerns.
Anglian Water Services	<p>Utilities Capacity: Somerleyton Marsh Lane WRC - currently capacity available.</p> <p>Utilities Infrastructure: No constraints apparent on site.</p>
East Suffolk Council	No comments received.

15.4. Site assessment

Site address: Somerleyton Marina	
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Currently allocated in the Local Plan for 10 residential moorings.
Site Size (hectares)	0.87 hectares
Greenfield / Brownfield	Marina - water
Ownership (if known) (private/public etc.)	Private

Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar	No	
National Nature Reserve	No	
Ancient Woodland	No	
Flood risk zone 3b	Yes – but this is for residential moorings	
Scheduled Ancient Monument	No	
Statutory Allotments	No	
Locally Designated Green Space	No	
At risk from Coastal Erosion	No	
If yes to any of the above, site will be excluded from further assessment.		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 15 residential moorings		
Density calculator	N/A	
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		
Accessibility to local services and facilities		Train station and school within 1.2km of site. Shop being considered at the pub that is within 500m of the site. Important to note that the marina is adjacent to a development boundary (in East Suffolk Council area).
Utilities Capacity		Somerleyton Marsh Lane WRC - currently capacity available.
Utilities Infrastructure		
Contamination and ground stability		
Flood Risk		In flood zone 3b/body of water but is for residential moorings and residential moorings policy has provisions relating to flood risk.
Coastal Change		
Market Attractiveness		Has potential to be attractive as a place to visit and live as it is a village by the Broads
Impact	Score red/amber/green	Comments

Nationally and Locally Significant Landscapes		It will be necessary to ensure that associated infrastructure (e.g., parking, hardstanding, lighting, storage etc) is kept to a minimum to mitigate any potential harm to the character and appearance of the area and that the impact on designated and non-designated heritage assets is considered.
Townscape		
Biodiversity and Geodiversity		County Wildlife Site nearby. Recreation impacts will need mitigating.
Historic Environment		
Open Space		
Transport and Roads		It will be necessary to ensure that associated infrastructure (e.g., parking, hardstanding, lighting, storage etc) is kept to a minimum to mitigate any potential harm to the character and appearance of the area and that the impact on designated and non-designated heritage assets is considered.
Compatibility with neighbouring / adjoining uses		
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
Allocated for 10 residential moorings.	SOM1	Local Plan 2019.
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No	
When might the site be available for development	Immediately	
	Within 5 years	✓
	5-10 years	
	10-15 years	

(tick as appropriate)	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		15 per year.
Comments	Presumed it will take one year to complete the development.	
Achievability (including viability)		
Comments	The development will likely be attractive to people to live in. Detailed viability information will be calculated at Planning Application stage. A Viability Assessment will also accompany the Local Plan. There is no reason to consider this site not achievable.	
Overcoming Constraints		
Comments	Meeting the general policy requirements for residential moorings, including relating to flood risk. GI RAMS – payment likely. Heritage considerations and landscape impact considerations.	
Trajectory of development		
Comments	15 in one year.	
Barriers to Delivery		
Comments	None obvious.	
Conclusion (e.g., is included in the theoretical capacity)		
According to the HELAA assessment, the site is suitable for development.		

15.5. Additional considerations for residential moorings

Criteria	Assessment
1: How many residential moorings or what length of residential moorings is proposed?	15
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	See above
3: Are there moorings already? If so, what is the current use of the moorings (e.g., public, private, marina etc.)?	Yes – private
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	No – in a marina and boats there already
5: Is riverbank erosion an issue here? How would this be addressed?	Quay heading in place
6: What are the adjacent buildings or land used for	Marina

Criteria	Assessment
7: What is the character or appearance of the surrounding area?	Marina. Over the river, wildlife site.
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes
9: What car parking is there for people living on boats (e.g., car park or park on road)?	Car parking at marina
10: How can service and emergency vehicles access the area safely?	Down road to the site
11: How would waste and sewerage be disposed of?	Pump out at Marina
12: Is the area on mains sewerage?	See assessment
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	Not considered it would.
14: Who owns the site? If not, who does and have you told them about your proposal?	Site promoter
15: What is the current use of the site?	Marina

16. Richardson's Boatyard, Stalham Staithe - 10 residential moorings

16.1. Map of site



16.2. Photos of site



16.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Ranger Services (impact on navigation)	The inclusion of the proposed residential moorings within the marina will not impact on the navigation. Any vessels moored on the river side of the marina must not extend further into the channel than the existing vessels to avoid impacting vessels navigating.
Broads Authority Development Management Team	No comments
Broads Authority Ecology	No comments
Broads Authority Design and Heritage	I have no objection to the proposal for 10 additional residential moorings at Richardson's. Such a use is likely to be in keeping with the existing character of the area and is unlikely to have any detrimental impact on the setting of the Stalham Staithe Conservation area which is in close proximity.

Stakeholder	Comments
Broads Authority Landscape Architect	<p>Assuming that the proposals would involve use of existing moorings, it seems unlikely that there would be any significant adverse effects on Landscape character. However, the northwest area of the site is close to residential and public waterside areas along Mill Road and Staithe Road. To reduce impacts, the number, size, and scale of boats using the moorings could be controlled using conditions.</p> <p>It may be more appropriate to cluster the residential moorings together as close to the centre of the overall site as possible to avoid impacts on residential and carr woodland to west.</p>
Norfolk County Council Highways	<p>Without knowing the exact location of the proposals, I can only make general comments, but have no objection in principle.</p> <p>It is unclear as to whether additional moorings for residential use, or if existing moorings will be sacrificed, and clearly this has bearing in terms of overall traffic movements with increased trips based on residential use. On the presumption that all vehicular access will be via the main entrance off Staithe Road, I do not foresee any significant concerns subject to visibility improvements at the access and better pedestrian links to existing facilities. There should be no increased use or vehicular access from Mill Road given its constraints.</p> <p>Whilst the site is located close to local services and transport links, this does involve crossing the A149. Accordingly, residential use will increase footfall and use of local services and therefore Improvements to existing pedestrian links especially along and crossing of the A149 to link to town will need to be duly considered.</p>
Anglian Water Services	<p>Utilities Capacity Stalham WRC - currently has capacity available.</p> <p>Utilities Infrastructure No constraints apparent on site.</p>
North Norfolk District Council	<p>Stalham is identified in the Settlement Hierarchy as a Small Growth Town as part of NNDC's emerging Local Plan. The Local Plan sets a housing target of 305 dwellings for the settlement and to be</p>

Stakeholder	Comments
	<p>delivered within the plan period via a combination of small scale 'infill' developments, new allocations and existing commitments.</p> <p>The emerging Local Plan allocates two sites in Stalham, ST23/2, Land North of Yarmouth Road, East of Broadbeach Gardens for 80 dwellings, and ST19/A, Land Adjacent to Ingham Road for 70 dwellings.</p> <p>The site lies outside the settlement boundary to Stalham, and the entirety of Stalham Staithe is considered to be within the countryside. The site is not very well located to the town centre and existing services and facilities within Stalham, being separated from the main settlement by the A149, although Stalham Junior and Infant School is within approximately 500m of the site.</p> <p>Parts of the site are within Flood zones 2 and 3.</p> <p>The Stalham Fen County Wildlife Site is immediately adjacent to the northeast of the site, the A149 intersects the two.</p> <p><i>Conclusion</i></p> <p>The site is poorly located to existing services and facilities, but residential moorings already exist in this area and there are flood risk concerns. Careful consideration would need to be given to the Stalham Fen County Wildlife Site.</p>

16.4. Site assessment

Site address: Richardson's Boatyard, Stalham Staithe	
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Submitted through 2022 call for sites.
Site Size (hectares)	0.9 hectares
Greenfield / Brownfield	Marina/boatyard
Ownership (if known) (private/public etc.)	Private
Absolute Constraints Check	
Is the site in a ...	
SPA, SAC, SSSI or Ramsar	No
National Nature Reserve	No
Ancient Woodland	No

Flood risk zone 3b		Yes – but this is for residential moorings
Scheduled Ancient Monument		No
Statutory Allotments		No
Locally Designated Green Space		No
At risk from Coastal Erosion		No
If yes to any of the above, site will be excluded from further assessment.		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 10 residential moorings.		
Density calculator		N/A
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		On the presumption that all vehicular access will be via the main entrance off Staithe Road, I do not foresee any significant concerns subject to visibility improvements at the access and better pedestrian links to existing facilities. There should be no increased use or vehicular access from Mill Road given its constraints.
Accessibility to local services and facilities		Over the A149 from many key services. Improvements to existing pedestrian links especially along and crossing of the A149 to link to town will need to be duly considered.
Utilities Capacity		Stalham WRC - currently has capacity available
Utilities Infrastructure		
Contamination and ground stability		
Flood Risk		In flood zone 3b/body of water but is for residential moorings and residential moorings policy has provisions relating to flood risk.
Coastal Change		
Market Attractiveness		Has potential to be attractive as a place to visit and live as it is a village by the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		the northwest area of the site is close to residential and public waterside areas along Mill Road and Staithe Road. To reduce impacts, the number, size, and scale of
Townscape		boats using the moorings could be controlled using

		conditions. It may be more appropriate to cluster the residential moorings together as close to the centre of the overall site as possible to avoid impacts on residential and carr woodland to west.
Biodiversity and Geodiversity		Some designated sites nearby, but away from the proposal. Nutrient enrichment and recreational impacts will need to be mitigated.
Historic Environment		
Open Space		
Transport and Roads		On the presumption that all vehicular access will be via the main entrance off Staithe Road, I do not foresee any significant concerns subject to visibility improvements at the access and better pedestrian links to existing facilities. There should be no increased use or vehicular access from Mill Road given its constraints.
Compatibility with neighbouring / adjoining uses		It may be more appropriate to cluster the residential moorings together as close to the centre of the overall site as possible to avoid impacts on residential and carr woodland to west.
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
Wider area has a criteria-based policy to guide what can happen on site.	STA1	Local Plan 2019
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No	
When might the site be available for development (tick as appropriate)	Immediately	✓
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	

Estimated annual build out rate (including justification):	10 per year.
Comments	Presumed it will take one year to complete the development.
Achievability (including viability)	
Comments	Despite the lack of services nearby, being a village by the Broads, the development will likely be attractive to people to live in. Detailed viability information will be calculated at Planning Application stage. A Viability Assessment will also accompany the Local Plan. There is no reason to consider this site not achievable.
Overcoming Constraints	
Comments	Consider access over A149, cluster to avoid impact on nearby uses, GI RAMS – payment likely. Nutrient Neutrality.
Trajectory of development	
Comments	10 in one year.
Barriers to Delivery	
Comments	At the time of writing, nutrient enrichment.
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is suitable for development.	

16.5. Additional considerations for residential moorings

Criteria	Assessment
1: How many residential moorings or what length of residential moorings is proposed?	10
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	See above
3: Are there moorings already? If so, what is the current use of the moorings (e.g., public, private, marina etc.)?	Yes – private
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	No – in a marina and boats there already
5: Is riverbank erosion an issue here? How would this be addressed?	Quay heading in place
6: What are the adjacent buildings or land used for	Marina

Criteria	Assessment
7: What is the character or appearance of the surrounding area?	Marina. Over the river, wildlife site.
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes
9: What car parking is there for people living on boats (e.g., car park or park on road)?	Car parking at marina
10: How can service and emergency vehicles access the area safely?	Down road to the site
11: How would waste and sewerage be disposed of?	Pump out at Marina
12: Is the area on mains sewerage?	See assessment
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	Not considered it would.
14: Who owns the site? If not, who does and have you told them about your proposal?	Site promoter
15: What is the current use of the site?	Marina

17. Cantley Sugar Beet Factory – extension of area to which policy applies

17.1. Map of site

CAN1: Cantley (with proposed extension)

Scale: 1:1,500



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17.2. Photos of site



17.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	Generally, seems a reasonable request.
Broads Authority Ecologist	No comments.
Broads Authority Design and Heritage	The proposed extension of the policy area appears to cover the public Cantley Staithe and the proposal should not have implications for public access to this area. It will also be important that the tree belt along the eastern edge of the track to the river, staithe and pub

Stakeholder	Comments
	<p>is retained. However, policy CAN1 would appear to sufficiently protect this wildlife, habitats and amenity.</p> <p>It should also be noted that the Reedcutter PH is protected by Local Plan Policy SSPUBS, which seeks to enhance the appearance of businesses, although clearly it is already very much within the setting of the Factory.</p>
Broads Authority Landscape Architect	<p>From a landscape point of view, no objection to including the additional area in blue. In terms of site-specific policy covering that area, due to the proximity to the pub and residential around Station Road I would encourage retention of the existing vegetation and trees, and to maintain a green margin, if possible, within any development proposals. It would be better for this area not to contain anything of height, that will be noisy etc, but could accommodate ground level use.</p>
Norfolk County Council Highways	<p>On the basis that Policy CAN1 already states that <i>“Development on this site which secures and enhances the sugar works’ contribution to the economy of the Broads and wider area will be supported where this also: ... : c) Avoids severe residual impacts on highway capacity or safety...”</i>, there is no specific comment/objection in respect to the proposal in highway terms.</p>
Anglian Water Services	<p>Utilities Capacity</p> <p>Cantley WRC has limited capacity so ability to accept growth is dependent on nature and scale of development on the site to expand/enhance operations in the future.</p> <p>In terms of future development and water supply needed for enhanced/expanded operations on the site - this would be dependent on the nature and quantum of water supply required (or if the site has its own abstraction licence). Working in partnership with the Environment Agency we would welcome policy interventions that require water efficiencies, water re-use to create headroom for customers that require additional non potable supplies or water neutral development that can be offset by achieving water efficiencies in current operations and water use by other customers.</p> <p>Utilities Infrastructure</p>

Stakeholder	Comments
	A water main is within the site area. AW would require any proposals to take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then this will need to be diverted at the developers cost.
Broadland District Council	BDC do not have any particular comments that we wish to make in relation to this representation at this time

17.4. Site assessment

Site address: Cantley Sugar Beet Factory		
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.		Submitted through 2022 consultation as an extension of the current policy area.
Site Size (hectares)		1.66 hectares
Greenfield / Brownfield		Brownfield.
Ownership (if known) (private/public etc.)		Private
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar		No
National Nature Reserve		No
Ancient Woodland		No
Flood risk zone 3b		Indicative Flood Zone 3b
Scheduled Ancient Monument		No
Statutory Allotments		No
Locally Designated Green Space		No
At risk from Coastal Erosion		No
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): Associated with the Cantley Sugar Beat operation		
Density calculator		N/A
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		No concerns as policy already includes wording relating to highways and access.

Accessibility to local services and facilities		There is a train station next to the factory.
Utilities Capacity		Cantley WRC has limited capacity so ability to accept growth is dependent on nature and scale of development on the site to expand/enhance operations in the future. In terms of future development and water supply needed for enhanced/expanded operations on the site - this would be dependent on the nature and quantum of water supply required (or if the site has its own abstraction licence).
Utilities Infrastructure		A water main is within the site area. AW would require any proposals to take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then this will need to be diverted at the developers cost.
Contamination and ground stability		The land is currently hard standing and most used as car park. It is not considered that contamination is a significant concern.
Flood Risk		Land in flood zone indicative 3b, 3a and 2.
Coastal Change		
Market Attractiveness		N/A as the site would be used for operations associated with the factory.
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		In terms of site-specific policy covering that area, due to the proximity to the pub and residential around Station Road I would encourage retention of the existing vegetation and trees, and to maintain a green margin, if possible, within any development proposals. It would be better for this area not to contain anything of height, that will be noisy etc, but could accommodate ground level use.
Townscape		
Biodiversity and Geodiversity		Near to a site which is a SPA, SAC, SSI and RAMSAR. Would bring development closer to this site. Will be a consideration in any application/scheme and policy. It will also be important that the tree belt along the eastern edge of the track to the river, staithe and pub is retained. BGS shows peat nearby, so any works may need to do augers.

Historic Environment		The proposed extension of the policy area appears to cover the public Cantley Staithe and the proposal should not have implications for public access to this area. It will also be important that the tree belt along the eastern edge of the track to the river, staithe and pub is retained.
Open Space		
Transport and Roads		No concerns as policy already includes wording relating to highways and access.
Compatibility with neighbouring / adjoining uses		Will need to consider and address impacts on the pub.
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
General allocation for continued use and appropriate changes.	CAN1	Local Plan 2019.
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No	
When might the site be available for development (tick as appropriate)	Immediately	
	Within 5 years	
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		N/A
Comments	N/A	
Achievability (including viability)		
Comments	N/A – land will be part of the general policy for the area and if a change is needed, application will come forward to address that and be considered in line with the policy.	
Overcoming Constraints		

Comments	Policy will need to ensure proposals consider flood risk, water supply and disposal, water infrastructure on site, the staithe, tree belt, pub, river and nature sites.
Trajectory of development	
Comments	N/A – land will be part of the general policy for the area and if a change is needed, application will come forward to address that and be considered in line with the policy.
Barriers to Delivery	
Comments	None obvious.
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is suitable to be included as an area to which CAN1 will apply.	

18. Whitlingham Lane, Trowse – Class E uses

18.1. Map of site

Proposed policy



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18.2. Photos of site





18.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	Class E is a very wide use class. Whilst some E Class Uses might be acceptable, some E Class Uses may not – for example, some may be town centre uses.
Broads Authority Design and Heritage	<ul style="list-style-type: none"> a) The site contains two buildings. b) The proposal appears to suggest that the other building could be retained and converted. I would suggest that the retention and conversion (if necessary) of both buildings would be preferable. c) Any development here should preferably retain the ‘boatyard’ character and would also need to enhance the wider landscape setting of the site. The only other buildings in the vicinity are small-scale traditional Estate Cottages, built with vernacular materials in a traditional style and these would certainly be considered locally identified heritage assets. Any development would need to consider these buildings.
Broads Authority Landscape Architect	I have no objection to the proposed allocation for commercial use on the site, any redevelopment that might come forward should consider enhancing the frontage specifically.
Norfolk County Council Highways	<ul style="list-style-type: none"> a) The site is remote from local service and transport provision, but there are pedestrian links to such facilities, albeit the site is likely to be highly reliant on the private motor vehicle as a primary mode of transport. b) Having regard to existing use of the site, the proposed redevelopment of the site is unlikely to give rise to any

Stakeholder	Comments
	<p>specific highway safety concerns or have a severe detrimental residual effect on the highway network.</p> <p>c) Currently two points of vehicle access to Whitlingham Lane, it is considered that any development should rationalise to one point of access, along with appropriate parking, cycle and electrical vehicle charging, in accordance with current guidance.</p>
Broads Authority Ecologist	<p>Existing buildings have potential as bat roost locations. All would require survey. Retention and conversion preferred over demolition.</p> <p>Brownfield nature of site suggests potential for reptile interest, plus nearby semi-natural grassland.</p> <p>Conversion/improvement activities would need to be informed by Preliminary Ecological Survey.</p>
Anglian Water Services	<p>Utilities Capacity</p> <p>Mains water supply adjacent to the site. Sewer connection not evident but within 300m. Whitlingham Trowse WRC catchment – capacity currently available. Anglian Water are obligated to accept the foul flows from development with the benefit of planning consent and would therefore take the necessary steps to ensure that there is sufficient treatment capacity should the Planning Authority grant planning permission.</p> <p>Utilities Infrastructure</p> <p>No constraints apparent on site</p>
Norfolk County Council Lead Local Flood Authority.	<p>a) The access route appears to be in Flood Zones 2 and 3 – LLFA recommend the EA are consulted.</p> <p>b) The access route appears to be at low risk of surface water flooding.</p> <p>c) Safe access and egress must be considered</p>
South Norfolk District Council	<p>We would recommend that consideration is given to the relationship between the Strategic Regeneration Area and Whitlingham Country Park, as well as whether this is an appropriate area for an unrestricted Class E use. We would draw your attention to Trowse with Newton Neighbourhood Plan which has been submitted to the relevant authorities for</p>

Stakeholder	Comments
	progression through the final stages of consultation, examination and potential referendum.

18.4. Site assessment

Please note that this site was not submitted through the call for sites, but rather as a representation suggesting the site should be allocated as an area for change.

Site address: Whitlingham Lane, Trowse.		
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.		Submitted through 2022 consultation as an area for change.
Site Size (hectares)		0.51 hectares
Greenfield / Brownfield		Brownfield.
Ownership (if known) (private/public etc.)		Private
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar		No
National Nature Reserve		No
Ancient Woodland		No
Flood risk zone 3b		No
Scheduled Ancient Monument		No
Statutory Allotments		No
Locally Designated Green Space		No
At risk from Coastal Erosion		No
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): Class E uses.		
Density calculator		-
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Having regard to existing use of the site, the proposed re-development of the site is unlikely to give rise to any specific highway safety concerns or have a severe detrimental residual effect on the highway network. Currently two points of vehicle access to Whitlingham Lane, it is considered that any development should rationalise to one point of access, along with

		appropriate parking, cycle and electrical vehicle charging, in accordance with current guidance.
Accessibility to local services and facilities		Whilst the wording of this constraint is orientated towards housing, it can be reversed; the location of the site in relation to those who would use it for E class uses can be considered. The site is remote form local service and transport provision, but there are pedestrian links to such facilities, albeit the site is likely to be highly reliant on the private motor vehicle as a primary mode of transport.
Utilities Capacity		Generally acceptable although detail regarding sewerage disposal required.
Utilities Infrastructure		
Contamination and ground stability		May have been oil spills in the past.
Flood Risk		Part of periphery of site in flood zone 2 and 3.
Coastal Change		
Market Attractiveness		Something in this location may be successful given its proximity to Whitlingham Country Park and also the potential bridge from the East Norwich development.
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		Whilst in the Broads, the development is in an already built-up area so no obvious negative impact on the landscape or townscape. Could be conversion or maybe demolition and rebuild. Design is an important aspect of all development within the Broads.
Townscape		
Biodiversity and Geodiversity		Local Nature Reserve boundary seems to include part of the site. This would be a consideration. Good quality semi-improved grassland on site next door.
Historic Environment		Registered park and garden over the road.
Open Space		
Transport and Roads		
Neighbouring Uses		Some E Class Land Uses may be more suited to the site than others.
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
Not allocated.		

Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No	
When might the site be available for development (tick as appropriate)	Immediately	
	Within 5 years	
	5-10 years	
	10-15 years	
	15-20 years	
	Comments: It is unknown as it may depend on when one of the current users of the site ceases their operation.	
Estimated annual build out rate (including justification):	Unknown.	
Comments	-	
Achievability (including viability)		
Comments		
Overcoming Constraints		
Comments	Details of sewerage needed. Part of site at risk of flooding and is part of nature reserve, but the design could accommodate these constraints. Would need to consider how it fits in with the bridge from the East Norwich regeneration scheme. Some Class E uses may not be suitable here. Only one access onto Whitlingham Lane.	
Trajectory of development		
Comments	Unknown.	
Barriers to Delivery		
Comments	None obvious.	
Conclusion (e.g., is included in the theoretical capacity)		
According to the HELAA assessment, the site is suitable for development.		

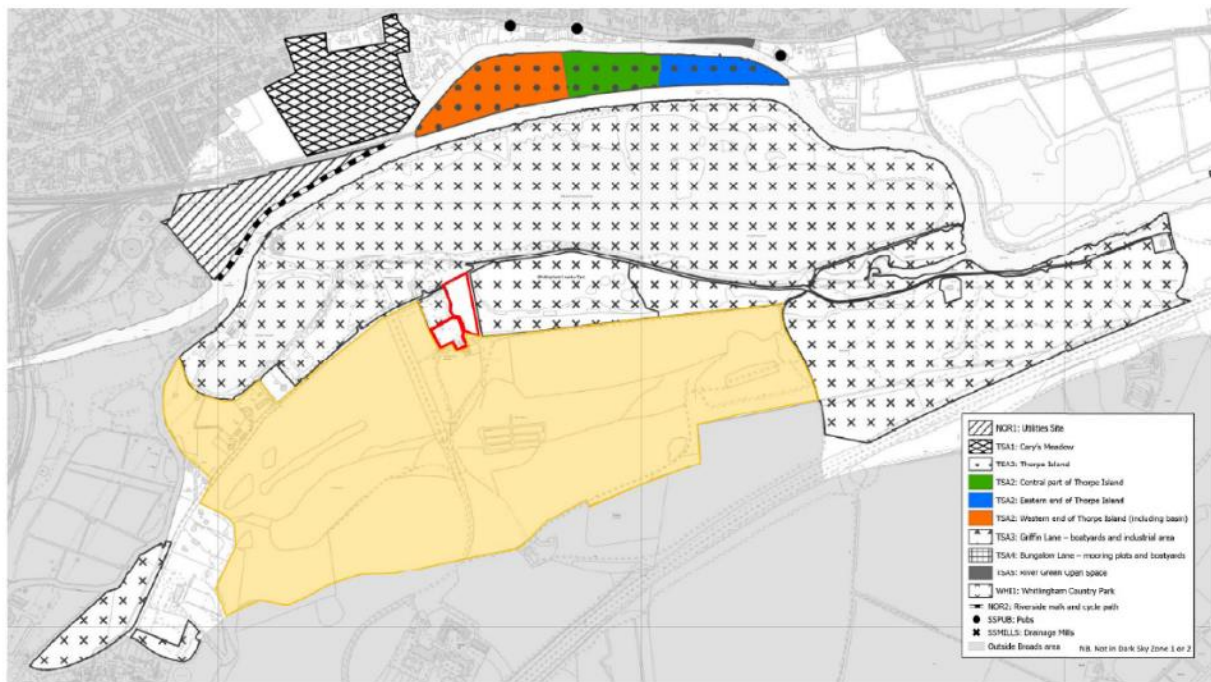
19. Whitlingham Area – extension to area covered by policy WHI1.

19.1. Map of site

Taken from the published policies map and further annotated by Agent.

The extra areas under consideration are the areas in red and in yellow.

The current extent of WHI1 is the area covered by dots.



19.2. Photos of site





19.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	No comment
Broads Authority Design and Heritage	My main concern would be if it led to more new development, scattered across the yellow area, thereby changing its character. However, I think the policy, especially clause c should enable us to control this sufficiently.
Broads Authority Ecologist	Extensions, particularly the yellow area offer good opportunities to see a change from intensive agriculture with potential for real gains for biodiversity, assuming the retention of existing woodland.
Broads Authority Environment Advisor	I see no reason to not support this extension, and welcome the transition out of agriculture and, in particular, intensive arable cropping, and a shift towards a more leisure and ecology-focussed use of the land. However, careful consideration and planned access will be required to protect existing nesting sites from disturbance resulting from an increase in access and recreational use. If protections and lack of disturbance can't be achieved under the proposal, I recommend a programme of assessment and mitigation should be designed and put in place. For example, tawny owls and ground nesting birds currently occupy land within the extension area and are likely to be negatively impacted by the proposed increase in recreational disturbance resulting in a biodiversity loss.
Broads Authority Landscape Architect	Generally, don't feel there would be any landscape reasons to object to the additional areas (both that outlined red and the yellow hatch) being included in the policy. So long as the wording of the policy is sufficiently robust to prevent the loss of the parkland character to this land. I know the policy aims to avoid the

Stakeholder	Comments
	<p>proliferation of buildings, but I feel they should be specifically excluded from some areas, and I would also be concerned about allowing certain uses that the policy might seem to support (such as tourism) on this part of the land, this is simply due to its openness and that there are extensive and sequential views along Whitlingham Lane which contribute to an understanding of the wider landscape.</p>
Norfolk County Council Highways	<p>Clearly the wording of the current Policy includes the following and would presumably remain unchanged to the wider proposed policy area:</p> <p><i>d) Improve provision for cycling and pedestrians.</i></p> <p><i>e) Maximise access by water and public transport.</i></p> <p><i>f) Do not generate levels or types of traffic which would have adverse impacts on safety and amenity on Whitlingham Lane and the wider road network;</i></p>
Anglian Water Services	<p>Anglian Water has no comments on the extension to the WH1 policy area given the specific policy protections within the current policy and the wider policy requirements guiding development in the Broads Executive Area.</p> <p>We do have water supply and water recycling network assets within the proposed extension area, which are protected by easements and should not be built over. Given the small-scale nature of development and the focus on enhancing biodiversity and recreation opportunities, any connections or diversion requirements would be dealt with at the application stage when/if development proposals come forward.</p>
South Norfolk District Council	<p>In principle we don't have any concerns about this at an officer level, however we would suggest that it would be helpful for there to be an understanding of how the proposals relate to the East Norwich Regeneration area (combined traffic/travel implications, connectivity between the two, this acting as a recreation resource to support the housing/commercial proposals etc.) and also how it might help fulfil the aims of the Greater Norwich Physical Activity and Sport Strategy, particularly in terms of Active Environments. We would also draw your attention to the</p>

Stakeholder	Comments
	emerging Trowse Neighbourhood Plan and possible implications/ interrelations between the two.

19.4. Site assessment

Site address: Crown Point Estate, Whitlingham		
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.		Comments provided on policy by landowners and agent.
Site Size (hectares)		In the region of around 30 to 40 hectares
Greenfield / Brownfield		Greenfield
Ownership (if known) (private/public etc.)		Private
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar		No
National Nature Reserve		No
Ancient Woodland		No
Flood risk zone 3b		No
Scheduled Ancient Monument		No
Statutory Allotments		No
Locally Designated Green Space		No
At risk from Coastal Erosion		No
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space):		
Extension to area to which policy WH1 applies.		
Density calculator		N/A
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Wording of existing policy has a criterion relating to transport and travel.
Accessibility to local services and facilities		Not necessarily that appropriate to this site as it is not for housing or employment. Although it is noted there is no public transport to the site.
Utilities Capacity		Within Whitlingham Trowse WRC catchment – capacity currently available.

Utilities Infrastructure		Water main and sewer assets within the proposed site area.
Contamination and ground stability		The proposals are varied and could be on agricultural land.
Flood Risk		
Coastal Change		
Market Attractiveness		Not necessarily that appropriate to this site as it is not for housing or employment.
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		Proposals should not affect the parkland and open character. Buildings may not be suitable in some areas. Part is Candidate County Geological Site.
Townscape		
Biodiversity and Geodiversity		Careful consideration and planned access will be required to protect existing nesting sites from disturbance resulting from an increase in access and recreational use. Wood pasture and parkland and deciduous wood priority habitats. Part is County Wildlife Site and Local Nature Reserve.
Historic Environment		Part is registered park and garden which would need consideration.
Open Space		Some of the area is open space, but the policy has criteria to guide what can happen.
Transport and Roads		Wording of existing policy has a criterion relating to transport and travel.
Compatibility with neighbouring / adjoining uses		
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
Criteria based policy in the Local Plan.	WHI1	Local Plan for the Broads 2019
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g.,	No	

where, by whom, how much for etc.)		
When might the site be available for development (tick as appropriate)	Immediately	
	Within 5 years	
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):	N/A	
Comments	This is for an extension to the area which a criteria-based policy applies.	
Achievability (including viability)		
Comments	This is for an extension to the area which a criteria-based policy applies.	
Overcoming Constraints		
Comments	Whilst not being showstoppers, proposals would need to consider contaminated land, geodiversity, the status as a registered park and garden as well as how proposals relate to East Norwich.	
Trajectory of development		
Comments	This is for an extension to the area which a criteria-based policy applies.	
Barriers to Delivery		
Comments	This is for an extension to the area which a criteria-based policy applies.	
Conclusion (e.g., is included in the theoretical capacity)		
According to the HELAA assessment, the site seems suitable to be included within WHI1.		

20. Utilities Site

20.1. Map of site

See NOR1 on this map: [12. NORWICH Policy Inset Map \(PDF | \[broads-authority.gov.uk\]\(https://broads-authority.gov.uk\)\)](#)

The Utilities Site forms part of the wider East Norwich Regeneration Scheme whereby several parcels of brownfield land are being considered together as a larger scheme. There is a Masterplan being produced that will eventually become a Supplementary Planning Document that would be adopted by the Broads Authority, Norwich City Council and South Norfolk and Broadland Councils. That document will address all of the various topic areas covered by this HELAA. As such, that site is not included in this version of the HELAA but may be included in future iterations as and when the Masterplan and SPD are completed. The general conclusion however is that the Utilities Site is appropriate for development, albeit with many constraints to overcome.

21. Windfall

Windfall development in the Broads is typically varied. Furthermore, given the low annual development figures of less than 20 in a typical year, a change either way of plus or minus 3 for example, is a fairly large percentage. As such, and similar to the last Local Plan, no windfall allowance will be included in this Local Plan.

22. Larger sites with planning permission

The following sites that are included in the 2019 Local Plan benefit from planning permission that has commenced:

Local Plan Policy	Planning Application Number	Location	Scale and type of development
OUL2	BA/2012/0271/FUL	Oulton Broad	76 dwellings plus office
THU1	BA/2017/0103/OUT	Thurne	6 market dwellings and 10 holiday homes
STO1	BA/2021/0181/FUL	Stokesby	4 marketing dwellings
GTY1	BA/2019/0118/FUL BA/2020/0053/FUL	Great Yarmouth	9 dwellings 12 residential moorings

These sites have not been assessed as part of the HELAA as they have planning permission. It is intended to continue with a policy relating to these sites in the new Local Plan as the schemes are not completed at the time of writing.