



Broads Authority

From the Housing and Economic Land Availability
Assessment to the Local Plan.

Part 2

February 2025

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1. Introduction

1.1. About this document

The purpose of this document is to log how each site assessed in the [HELAA \(part 2\)](#) has been considered as an allocation in the Local Plan. This document also discusses how the residential moorings and residential dwellings need will be met. It also includes a housing and residential moorings trajectory (in table form). Finally, if a site has not been included in the Local Plan, the sustainability appraisal for that site is included at the end of this document.

This is additional to the September 2023 document of the same name that can be found here: [From the Housing and Economic Land Availability Assessment to the Local Plan](#). The HELAA part 2 and From HELAA to Local Plan part 2 assess the sites that came forward as part of the December 2024 call for sites.

It is important to note that the HELAA is a piece of evidence. It may conclude that some sites are suitable for the development proposed, but there are other considerations to take account of. For example, the grade of agricultural land is not specifically part of the HELAA methodology, although it is mentioned in the HELAA. Another consideration includes whether sites have been marketed or not. Finally, whilst the HELAA may conclude that a site rates 'amber' as there are between 1 and 3 key services within walking distance, the Authority does not consider that one key service within walking distance makes a sustainable development and as such, sites with only one key service are not taken forward for allocation.

2. Land south of Marsh Road, Halvergate

- According to the HELAA, the site was deemed not suitable for 43 dwellings.
- This is because of:
 - Lack of services and facilities within a walking distance from the site (only a bus service)
 - Landscape and townscape impacts.
 - There is also a Highways objection.
- **The site will not be allocated for 43 dwellings.**

- According to the HELAA, the site was deemed not suitable for 4 dwellings.
- This is because of
 - Lack of services and facilities within a walking distance from the site (only a bus service).
 - There is also a Highways objection.
- **The site will not be allocated for 4 dwellings.**

3. Land north of Thrigby Road, Filby

- According to the HELAA, the site was deemed not suitable for 5 dwellings.
- This is because of:
 - Eroding gap between Thrigby and Filby.
 - Would put development pressure on the site opposite, in GYBC planning area.
 - Conflict between removal of hedge for visibility and need to retain hedge for townscape/landscape purposes.
 - Access on a bend where national speed limits apply.
 - Highway objection to the proposed allocation. There is a lack of footway provision, the access would require significant tree removal and there is insufficient forward visibility to form a safe access.
- Also of relevance is that the site is on grade 1 agricultural land.
- **The site will not be allocated for 5 dwellings.**

4. Land at Ivy Lane, Oulton Broad

- According to the HELAA, the site was deemed not suitable for 15 residential moorings
- This is because of:
 - Peat excavation.
 - Settlement fringe area.
 - Changing character of the area.
 - Mature hedgerow at risk in order to accommodate road and footway.
 - Development would likely result in loss of biodiversity.
 - Assessment required regarding capacity of bridge to accommodate more traffic and construction traffic.
- **The site will not be allocated for 15 residential moorings.**
- According to the HELAA, the site was deemed not suitable for 250 residential caravans.
- This is because of:
 - Settlement fringe area.
 - Changing character of the area.
 - Assessment required regarding capacity of bridge to accommodate more traffic and construction traffic.
 - Development would likely result in loss of biodiversity.
 - Setting of Ivy Farm
 - Mature hedgerow at risk in order to accommodate road and footway.
 - Concern re impact on mature trees on site.
- **The site will not be allocated for 250 residential caravans.**
- According to the HELAA, the site was deemed not suitable for 80 residential dwellings.
- This is because of:

- Settlement fringe area.
- Changing character of the area.
- Assessment required regarding capacity of bridge to accommodate more traffic and construction traffic.
- Development would likely result in loss of biodiversity.
- Setting of Ivy Farm
- Mature hedgerow at risk in order to accommodate road and footway.
- Concern re impact on mature trees on site.
- **The site will not be allocated for 80 residential dwellings.**

5. Land at Home Farm, The Street, Thurne

- According to the HELAA, the site was deemed not suitable for 3 dwellings.
- This is because of:
 - Lack of access to key services.
 - This site has high biodiversity value.
- Also of note, the site has not been marketed in accordance with policy, and this is one of the reasons a previous scheme had been refused in the past.
- Also, the site is on grade 2 agricultural land.
- **The site will not be allocated for 3 dwellings.**

It should be noted that the site at Hedera House was included in the Sites Specifics Local Plan (2014) by the Inspector because of the deemed need for replacement holiday accommodation in the area. That site has permission and at the time of writing is being built.

6. Land off Hall Lane, Postwick

- According to the HELAA, the site was deemed not suitable for 5 dwellings.
- This is because of
 - Lack of access to key services.
 - Highways objection.
 - Landscape impact.
- Also, the Parish Council say that the development is in conflict with the emerging Neighbourhood Plan of which the draft has been recently submitted.
- **The site will not be allocated for 5 dwellings.**

7. Land north of Marsh Road, Tunstall

- According to the HELAA, the site was deemed not suitable for 3 dwellings.
- This is because of:
 - Highway Objection to the proposed allocation.
 - No key services.

- Negative impact on landscape character.
 - Negative impact on church and setting.
- Also, the site is on grade 2 agricultural land
- **The site will not be allocated for 3 dwellings.**

8. Land south of Marsh Road, Tunstall

- According to the HELAA, the site was deemed not suitable for 4 dwellings.
- This is because of:
 - Highway Objection to the proposed allocation.
 - No key services.
- Also, the site is on grade 2 agricultural land.
- Also of note, the site has not been marketed in accordance with policy
- **The site will not be allocated for 4 dwellings.**

9. Land at Broad Lane, Filby

- According to the HELAA, the site was deemed not suitable for 4 dwellings.
- This is because of:
 - flood risk.
 - Highways objection, mainly relating to visibility with the main road.
 - Near to peat and so a survey would be needed.
 - Loss of marsh and habitat.
- **The site will not be allocated for 4 dwellings.**
- According to the HELAA, the site was deemed not suitable for 2 dwellings.
- This is because of:
 - Highways objection, mainly relating to visibility with the main road.
 - Near to peat and so a survey would be needed.
 - Loss of marsh and habitat.
- **The site will not be allocated for 2 dwellings.**

10. The Old Boatyard, Whitlingham Lane, Trowse

- According to the HELAA, the site was deemed not suitable for 8 dwellings.
- This is because of:
 - Townscape character
- **The site will not be allocated for 8 dwellings.**
- According to the HELAA, the site was deemed suitable for 4 dwellings.
- However, the site will not be allocated for 4 dwellings because of the site has not been marketed in accordance with policy.

- **The site will not be allocated for 4 dwellings.**

11. Land at Half Moon Barn, Upper Street, Horning

- According to the HELAA, the site was deemed not suitable for 2 dwellings.
- This is because of:
 - lack of services and facilities within a walking distance from the site
 - the site being with Horning Knackers Wood Water Recycling Centre catchment
 - Highways objection.
 - Adequate visibility from access is likely to be unachievable.
 - New access onto a corridor of movement not supported.
- Also, the site is on grade 1 agriculture land
- **The site will not be allocated for 2 dwellings.**

12. Land to the north of Upper Street, Horning

- According to the HELAA, the site was deemed not suitable for 45 dwellings.
- This is because of:
 - lack of services and facilities within a walking distance from the site
 - the site being with Horning Knackers Wood Water Recycling Centre catchment
 - landscape and townscape impacts
 - Highways objection.
 - Adequate visibility from access is likely to be unachievable.
 - New access onto a corridor of movement not supported.
- Also, the site is on grade 1 agriculture land
- **The site will not be allocated for 45 dwellings.**

13. Car Park at former Windboats site, Grange Walk, Norwich Road, Wroxham

- According to the HELAA, the site was deemed not suitable for 2 dwellings.
- This is because of lack of:
 - Highway Objection to the proposed allocation. Adequate visibility from existing access to the south on A1151 Norwich Road is likely to be unachievable.
 - Will closing two car parks result in illegal or inconsiderate parking by those visiting the site?
- Also of note, the site has not been marketed in accordance with policy
- **The site will not be allocated for 2 dwellings.**

14. Former Windboats site, Grange Walk, Norwich Road, Wroxham

- According to the HELAA, the site was deemed not suitable for 15 dwellings.
- This is because of lack of:
 - Highway Objection to the proposed allocation. Adequate visibility from existing access to the south on A1151 Norwich Road is likely to be unachievable.
 - Will closing two car parks result in illegal or inconsiderate parking by those visiting the site?
- Also of note, the site has not been marketed in accordance with policy
- **The site will not be allocated for 15 dwellings.**

15. Land at Marlpit House Belaugh, Green Lane, Coltishall

- According to the HELAA, the site was deemed not suitable for 2 dwellings.
- This is because of
 - lack of services and facilities within a walking distance from the site
 - landscape and townscape impacts.
 - Highways objection.
 - Adequate visibility from access is likely to be unachievable.
- **The site will not be allocated for 2 dwellings.**

16. Total number of residential dwellings

The need to be addressed in the Local Plan is 358 dwellings. Please note that permissions granted since April 2021 will count towards the need and this totals 49 dwellings. The Local Plan will not allocate new sites for residential dwellings as no suitable sites have come forward through the three calls for sites. Housing is a potential use for the Utilities Site in Norwich, but the policy is not an allocation for housing. The Authority will need to liaise with our District Councils, under the Duty to Cooperate, regarding any unmet need.

17. Total number of residential moorings

The following table shows the sites that are intended to be allocated for residential moorings – from both HELAAs (although no new sites from the HELAA part 2 are taken forward in the Local Plan). It shows a total of 43 residential moorings would be allocated. The need to be addressed in the Local Plan is 48 residential moorings.

Site	Number of residential moorings
Brundall Gardens Marina – small marina	2
Brundall Gardens Marina – large marina	6
Greenway Marine, Chedgrave	5
Hipperson’s Boatyard, Gillingham	5
Somerleyton Marina	15
Richardson’s Boatyard, Stalham Staithe	10
Total:	43

18. Housing Trajectory

Please note that THU1 and OUL2 already have planning permission and were not assessed in the HELAA but will still be included in the Local Plan until they are built out. This table sets out the estimated trajectory for the sites that are to be included in the Local Plan. Please also note that the trajectory does not include the Utilities Site as that is not an allocation for housing specifically. If the Utilities Site were to come forward for housing, that would be much later in the plan period.

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041
THU1		16															
OUL2			15	15	15	15	16										
Total		16	15	15	15	15	16										

19. Residential moorings trajectory

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041
Brundall Gardens Marina – small marina			2														
Brundall Gardens Marina – large marina			8														
Greenway Marine, Chedgrave			5														
Hipperson's Boatyard, Gillingham						5											
Somerleyton Marina								15									
Richardson's Boatyard, Stalham Staithe								10									
Total			15			5		25									

20. Sustainability Appraisals of sites

The following tables set out the sustainability appraisals of the sites **not taken** forward in the Local Plan.

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

21. Assessment of sites not being taken forward to the Local Plan

		Land north of Thrigby Road, Filby – 5 dwellings		Ivy Lane, Oulton Broad – 15 residential moorings		Ivy Lane, Oulton Broad – 250 residential moorings		Ivy Lane, Oulton Broad – 80 residential moorings		Land at Home Farm, The Street, Thurne – 3 dwellings		Land off Hall Lane, Postwick - 5 dwellings		Land north of Marsh Road, Tunstall - 3 dwellings		Land south of Marsh Road, Tunstall – 4 dwellings
ENV1	-	Highways objection to access and visibility splays as site is near bend and in a National Speed Limit area.	?	Impacts on junction unknown. Impacts on rail bridge of more traffic unknown.	?	Impacts on junction unknown. Impacts on rail bridge of more traffic unknown.	?	Impacts on junction unknown. Impacts on rail bridge of more traffic unknown.	?	Potential impact when combined with development next door.	-	Highway Objection to the proposed allocation. The highway network is not of a standard to support further development.	-	Highway Objection to the proposed allocation.	-	Highway Objection to the proposed allocation.
ENV2																
ENV3	-	Mature trees and hedgerows at risk – loss of habitat. Likely affect biodiversity.	-	Would result in peat being excavated and loss of habitat. Mature trees and hedgerows at risk.	-	Mature trees and hedgerows at risk – loss of habitat.	-	Mature trees and hedgerows at risk – loss of habitat.	-	Mature trees and hedgerows at risk – loss of habitat. Likely affect biodiversity.	-	Mature trees and hedgerows at risk – loss of habitat. Likely affect biodiversity.	?	Ecological appraisal would need to be carried out.	?	Ecological appraisal would need to be carried out. Potential for impact on barn owls and bats.
ENV4			-	Would impact on the character of the area.	-	Would impact on the character of the area.	-	Would impact on the character of the area.			-	Would impact on the character of the area.	-	Would impact on the character of the area		
ENV5																
ENV6	?	Some surface water issues on the boundary which could be addressed as part of the scheme. Design could reflect this.	?	Residential moorings would be on the water. There will be flood risk considerations if a scheme were to be brought forward.	?	At risk of tidal flooding with allowance for climate change. Design could reflect this.	?	At risk of tidal flooding with allowance for climate change. Design could reflect this.	?	Access is flood zone 3 and a small part to the west is flood zone 2. Design could reflect this.	?	Some elements of surface water flood risk along the eastern boundary. Drainage ditch nearby. Design could reflect this.	?	Some surface water issues on the boundary which could be addressed as part of the scheme. Design could reflect this.		
ENV7	-	Greenfield land and grade 1 agricultural land.	-	Greenfield land	-	Greenfield land	-	Greenfield land	-	Part greenfield land	-	Greenfield land	-	Greenfield land	-	Greenfield land
ENV8																
ENV9			-	Impact on conservation area. Other heritage concerns, but they could potentially be addressed.	-	Impact on setting of Ivy Farm. Other heritage concerns, but they could potentially be addressed.	-	Impact on setting of Ivy Farm. Other heritage concerns, but they could potentially be addressed.	?	Potential impact on setting of church.			-	Impact on setting of church.	?	Need to consider impact on setting of church, conservation area and other heritage assets.
ENV10																
ENV11																
ENV12																

	Land north of Thrigby Road, Filby – 5 dwellings		Ivy Lane, Oulton Broad – 15 residential moorings		Ivy Lane, Oulton Broad – 250 residential moorings		Ivy Lane, Oulton Broad – 80 residential moorings		Land at Home Farm, The Street, Thurne – 3 dwellings		Land off Hall Lane, Postwick - 5 dwellings		Land north of Marsh Road, Tunstall - 3 dwellings		Land south of Marsh Road, Tunstall – 4 dwellings	
SOC1																
SOC2																
SOC3																
SOC4	+	If allocated, this would provide housing.	+	If allocated, this would provide residential moorings.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.
SOC5																
SOC6									-	Key services not within walking distance.	-	Key services not within walking distance.	-	Key services not within walking distance.	-	Key services not within walking distance.
SOC7																
ECO1									-	Farm barns would be lost.					-	Farm barns would be lost.
ECO2																
ECO3																

		Land at Marlpit House Belaugh, Green Lane, Coltishall – 2 dwellings	Land at Half Moon Barn, Upper Street, Horning – 2 dwellings	Land to the north of Upper Street, Horning – 45 dwellings	Land south of Marsh Road, Halvergate – 4 dwellings	Land at Broad Lane, Filby – 2 dwellings.	The Old Boatyard, Whitlingham Lane, Trowse – 4 dwellings	Car park at former Windboats site, Grange Walk, Wroxham – 2 dwellings	Former Windboats Site, Grange Walk, Wroxham – 15 apartments
ENV1	-	Highway Objection to the proposed allocation. There is a lack of footway provision. Adequate visibility from access is likely to be unachievable.	- Highway Objection to the proposed allocation. Adequate visibility from access is likely to be unachievable. New access onto a corridor of movement not supported.	- Highway Objection to the proposed allocation. Adequate visibility from access is likely to be unachievable. New access onto a corridor of movement not supported.	- This is because of lack of services and facilities within a walking distance from the site (only a bus service). There is also a Highways objection.			- Highway Objection to the proposed allocation. Adequate visibility from existing access to the south on A1151 Norwich Road is likely to be unachievable.	- Highway Objection to the proposed allocation. Adequate visibility from existing access to the south on A1151 Norwich Road is likely to be unachievable.
ENV2			- Horning Knackers Wood Water Recycling issues	- Horning Knackers Wood Water Recycling issues			? Whitlingham Water Recycling Centre issues – development could be phased.		
ENV3	-	Mature trees and hedgerows at risk – loss of habitat.			- Mature trees and hedgerows at risk – loss of habitat.	- Mature trees and hedgerows at risk – loss of habitat. Potential for peat to be on site.			
ENV4	-	Would impact on the character of the area.	- Would impact on the character of the area.	- Would impact on the character of the area.	- Would impact on the character of the area.				? 15 units could be out of keeping with the area.
ENV5									
ENV6	?	In flood zone 1. Some surface water flood risk on site. Design could reflect this.		? Mostly flood zone 1, some 2 and 3 according to SFRA. Design could reflect this.	? Some surface water issues on the boundary which could be addressed as part of the scheme. Design could reflect this.	? Indicative flood zone 3b nearby. Design could reflect this.	? Very small part flood zone 2 and 3. Small pocket of surface water on site. Design could reflect this.	Some surface water flooding on boundary. Design could reflect this.	? / - Area around office is flood zone 2. Major surface water issues / constraints identified which will require further assessment. Design could reflect this.
ENV7	-	Greenfield land	- Greenfield land	- Greenfield land	- Greenfield land	- Greenfield land			
ENV8									
ENV9									
ENV10									
ENV11									

	Land at Marlpit House Belaugh, Green Lane, Coltishall – 2 dwellings		Land at Half Moon Barn, Upper Street, Horning – 2 dwellings		Land to the north of Upper Street, Horning – 45 dwellings		Land south of Marsh Road, Halvergate – 4 dwellings		Land at Broad Lane, Filby – 2 dwellings.		The Old Boatyard, Whitlingham Lane, Trowse – 4 dwellings		Car park at former Windboats site, Grange Walk, Wroxham – 2 dwellings		Former Windboats Site, Grange Walk, Wroxham – 15 apartments	
ENV12																
SOC1																
SOC2																
SOC3																
SOC4	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.
SOC5																
SOC6	-	Key services not within walking distance.	-	Key services not within walking distance.	-	Key services not within walking distance.	-	Only one key service within walking distance.								
SOC7																
ECO1											-	Boatyard would be lost.	-	Loss of commercial site.	-	Loss of commercial site.
ECO2																
ECO3																