

Housing and Economic Land Availability Assessment Addendum III (Dec 2020) of the GNLP (Regulation 19 – March 2021)

Representation on behalf of Orbit Homes
Prepared by David Lock Associates

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1.0 INTRODUCTION

- 1.1 The following representation is made by David Lock Associates (DLA) on behalf of Orbit Homes, *hereinafter referred to as Orbit*, in response to the Pre-Submission (Regulation 19) consultation on the Greater Norwich Local Plan 2018 – 2038. Orbit are the promoter of the Silfield Garden Village (SGV), a mixed-use development proposal for circa 6,500 homes south of Wymondham. Orbit have been actively engaged in the plan-making process of the GNLP, most recently submitting representations to the Regulation 18c consultation in March 2020.
- 1.2 This representation relates to the Housing and Economic Land Availability Assessment Addendum III (December 2020), hereinafter referred to as the HELAA Addendum, which forms part of the evidence base for the emerging Greater Norwich Local Plan (GNLP). These representations are submitted alongside and supplement comments on the GNLP Strategy Document and Sustainability Appraisal.

2.0 SILFIELD GARDEN VILLAGE PROMOTION BACKGROUND

- 2.1 DLA on behalf of Orbit, submitted representations to the Regulation 18c consultation (March 2020) which provided extensive comments on the draft GNLP and evidence base. The representations also provided a suite of technical information with regards to the development of the SGV site.
- 2.2 The Regulation 18c consultation representations (March 2020) also highlighted that a number of sites related to the current SGV proposal area have been promoted on behalf of the landowner in previous GNLP consultations for large scale development. The Regulation 18c consultation representations suggested the various sites previously submitted under separate representations are consolidated into a single site promotion as SGV (*See overleaf, reproduced from the March 2020 representations*).
- 2.3 During Summer 2020 DLA, on behalf of Orbit, liaised with GNLP officers to consolidate the sites referenced in the March 2020 representations and ensure the site boundary for the GNLP Sites Map was accurate. The consolidated site promotion was given the new site reference **GNLP4057A**, which includes 6,500 residential dwellings, local green infrastructure, education provision, employment etc. (see Silfield Garden Village Prospectus, September 2019 – submitted as part of the Regulation 18c consultation representations) and represents the core SGV proposal. The revised site promotion (GNLP4057A) was subject to a revised assessment within the HELAA Addendum, Orbit support this approach and are of the view this represents a sound approach to plan-making, but this representation addresses points from this assessment.
- 2.4 Through this liaison DLA also clarified that Orbit are promoting additional land to the south of the SGV proposal boundary (Site Reference: GNLP4057A) for additional green infrastructure, circa 68.66 ha (Site Reference: GNLP4057B) and a solar farm, circa 54.91ha (Site Reference: GNLP4057C). The proposed additional green infrastructure and solar farm are ancillary to the core SGV proposal as additional benefits but are not necessary to make the core SGV development acceptable or policy compliant. Therefore, Orbit support the individual assessment of the additional green infrastructure (Site Reference: GNLP4057B) and solar farm (Site Reference: GNLP4057C) promotions within the HELAA Addendum and support the conclusion that both score N/A for the purposes of the HELAA Addendum assessment.

Reproduced from DLA Covering Letter dated 16th March 2020

Site Ref (HELAA/SEA)	Name	Site Use	Area (ha)	No of Dwgs
GNLP reference 2168	Park Farm, Silfield	Residential (new settlement)	340.28	6,500
GNLP reference 0515	Land at South Wymondham. North of A11 and West of Park Lane	Residential, Community, open space and GI	112.90	1,500
GNLP reference 0402	Land to the north-east of Silfield Road, and south of the A11	Residential, infrastructure, community uses and open space	26.87	800
GNLP reference 0403	Land to the south-west of Silfield Road, and south of the A11	Residential, infrastructure, community uses and open space	13.30	400

3.0 SILFIELD GARDEN VILLAGE HELAA SITE ASSESSMENT

- 3.1 We offer the following commentary on the HELAA Addendum Site Assessment, firstly in respect of assessing GV scale development in the same way as general development sites, and secondly, in respect of the specific scoring assigned to the SGV site.

HELAA Assessment for Strategic Sites

- 3.2 Whilst a recognised and commonly understood part of the evidence base for local plan making, the HELAA assessment is somewhat limited in its applicability when considering the relative suitability and deliverability of strategic scale development. There are two reasons for this:

- (i) Firstly, once a certain threshold is reached – most notably around the point at which new on-site services, facilities and infrastructure are included within large scale development proposals – then the accessibility of the site to existing services and the need to show ‘spare capacity’ of services and facilities in the local area to accommodate new development becomes a largely moot point. It is a prerequisite – and indeed, is one of the advantages of strategic scale development allocations – that new services and facilities are required to be planned and delivered alongside new homes and jobs; and
- (ii) Secondly, the ability to build in mitigation for existing site characteristics or constraints from the outset into the design and masterplan is much greater for strategic scale development for smaller sites. Therefore, the proximity of the site to sensitive features, or limitations of existing accesses or service provision does not mean that the site should score less than other sites which ‘plug into’ the existing system (often without mitigation or with only a contribution to unspecified improvements able to be secured).

- 3.3 Similarly, the nature of strategic scale development – which in terms of overall site capacity, commonly delivers between 50-60% of the site as built development, with the balance remaining as open land for green infrastructure, open space, surface water attenuation, woodland *et al* – means that specific parts of a strategic site which are subject to constraints identified in the HELAA are commonly taken into account by the promoter in identifying the overall development capacity and suitability of the site for the quantum of development being promoted. Furthermore, the masterplanning of large-scale sites can result in beneficial outcomes for existing constraints in terms of mitigation and betterment.

- 3.4 **We would welcome some recognition of these points in the assessment methodology and outputs.** Nevertheless, the commentary below sets out our response to the HELAA assessment in respect of the strategic sites assessed.

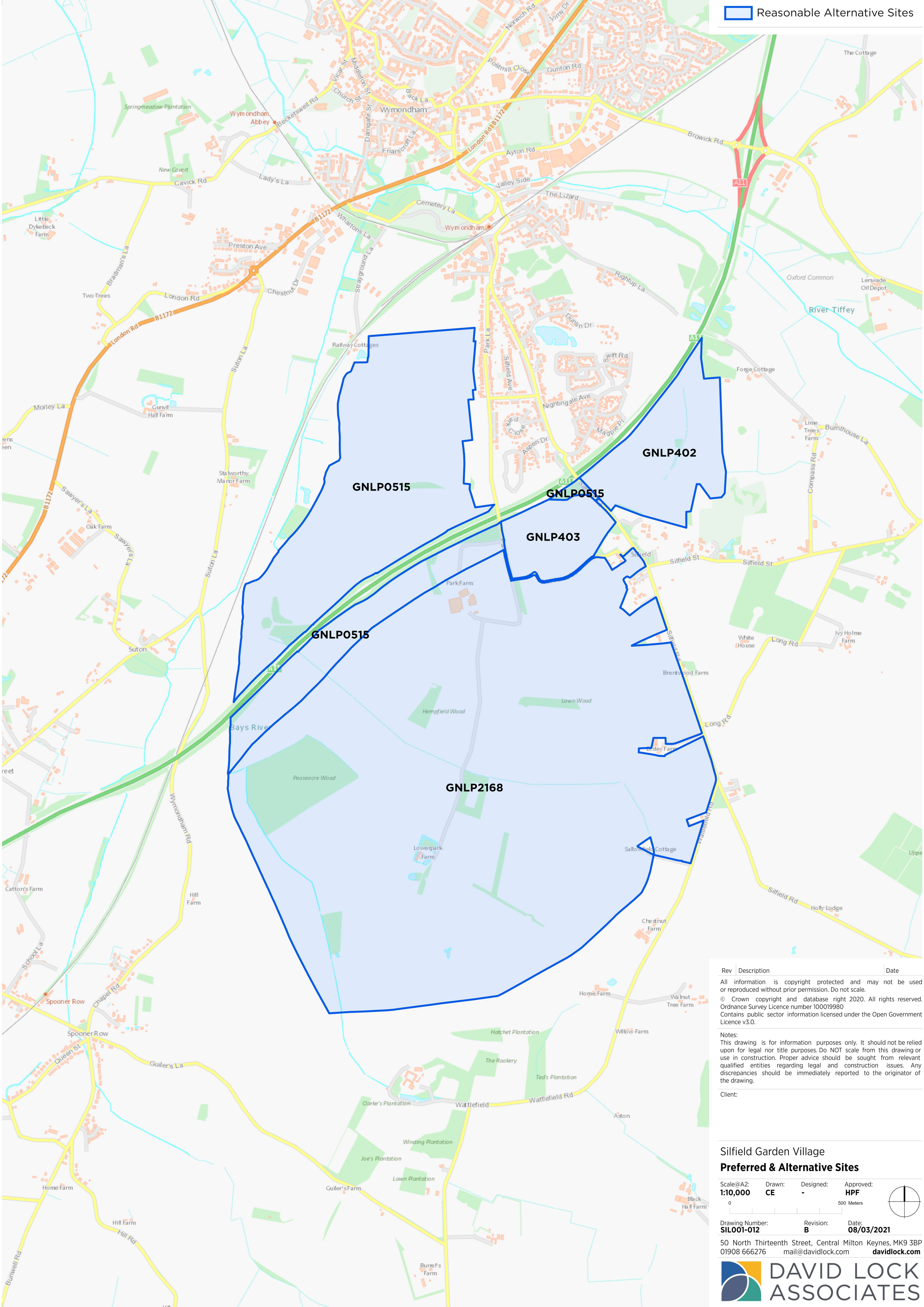
Table 1, *overleaf*, presents a side-by-side summary of the previous HELAA site assessments of the individual parcels which make up the Silfield Garden Village proposal.

Table 2, *overleaf*, presents our commentary on the HELAA site assessment for the revised Silfield Garden Village site promotion (Reference: GNLP4057A).

Table 1: Previous Individual HELAA Site Assessments for land comprising SGV (Please refer to Figure 1, overleaf, for spatial extent of each site)

HELAA Assessment	GNLP Site Reference			
	GNLP0402 (HELAA Dec 17)	GNLP0403 (HELAA Dec 17)	GNLP0515 (HELAA Dec 17)	GNLP2168 (HELAA ADDENDUM 1 – Oct 18)
Location	Land to the north-east of Silfield Road	Land to the south-west of Silfield Road	Land at south Wymondham – north of the A11	Park Farm
	North of A11	North of A11	North of A11	North and South of A11
Site Area (Hectares)	26.87	13.30	115	340.28
Proposed Development	Residential development of up to 800 dwellings and associated land uses e.g., infrastructure, community use, open space.	Residential development of up to 400 dwellings and associated land uses e.g., infrastructure, community use, open space.	Residential-led development of approx. 1,500 dwellings, supporting and community uses, open space, landscaping associate infrastructure	New settlement (6,500 dwellings proposed)
CONSTRAINTS ANALYSIS				
Access	Amber	Amber	Amber	Amber
Accessibility to Services	Amber	Amber	Amber	Red
Utilities Capacity	Amber	Amber	Amber	Amber
Utilities Infrastructure	Green	Green	Green	Green
Contamination and Ground Stability	Green	Green	Amber	Green
Flood Risk	Amber	Amber	Amber	Amber
Market Attractiveness	Green	Green	Amber	Amber
IMPACT ANALYSIS				
Significant Landscapes	Green	Green	Amber	Green
Townscapes	Green	Green	Green	Amber
Biodiversity and Geodiversity	Amber	Amber	Amber	Amber
Historic Environment	Amber	Amber	Amber	Green
Open Space and GI	Green	Green	Green	Green
Transport and Roads	Amber	Amber	Amber	Amber
Compatibility with Neighbouring Uses	Green	Green	Amber	Green
HELAA CONCLUSION	SUITABLE	SUITABLE	SUITABLE	SUITABLE

Reasonable Alternative Sites



Rev	Description	Date
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Client:

**Silfield Garden Village
 Preferred & Alternative Sites**

Scale@A2:	Drawn:	Designed:	Approved:
1:10,000	CE	-	HPF

Drawing Number:	Revision:	Date:
SIL001-012	B	08/03/2021

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Table 2: Suggested Adjustments to the Dec 2020 GNLP HELAA Site Assessment in respect of Silfield Garden Village (GNLP Site Ref: GNLP4057A)

HELAA Assessment	GNLP Site Reference	Suggested adjusted HELAA score	Reason for suggested adjustment to scoring
	GNLP4057A (HELAA ADDENDUM III – Dec 20)		
Location	Silfield Garden Village		N/A
Site Area (Hectares)	454.80		N/A
Proposed Development	Silfield Garden Village – Core Development Area		No change
CONSTRAINTS ANALYSIS			
Access	Amber	Amber	No change – it is agreed that this represents a fair assessment i.e., there are potential access constraints on the site for the scale of development proposed (albeit it would be a pre-requisite of a GV policy allocation that access constraints would be addressed as part of the proposed GV). SGV has been tested in terms of access options as part of its evolution, and the proposals incorporate viable and deliverable technical solutions to provide appropriate access for all modes.
Accessibility to Services	Amber	Amber	No change - The site currently exceeds the HELAA assessment distance to some of the core services. However, to be found sound in any plan a GV scale development must include on-site service provision to meet the needs of the new community in terms which are not better off met elsewhere (education, employment, local centres, health, leisure and social facilities, plus public transport provision). Furthermore, we note that access to a peak-time public transport service to/from a higher order settlement is included as a criterion. SGV is on the fringes of the 1,200m distance to the Wymondham railway station which provides services to Norwich, Nottingham, Cambridge, and Stansted Airport. It is worth noting that of the three new settlement proposals (SGV, Honingham Thorpe and Hethel), SGV is the closest proposal to a railway station – a station which offers peak time services to and from a higher order settlement. Not only that but the SGV proposal is sufficiently close to the

HELAA Assessment	GNLP Site Reference	Suggested adjusted HELAA score	Reason for suggested adjustment to scoring
	GNLP4057A (HELAA ADDENDUM III – Dec 20)		
			<p>station to maximise direct north-south active travel opportunities to Wymondham railway station (e.g., attractive, segregated bike lanes and/or a 'greenway' between SGV and the station prioritising active travel modes), something which the other new settlement proposals cannot achieve because of their distance/lack of direct routes to rail stations.</p> <p>The SGV proposal also proposes an extension of the existing 13(A-D) and/or 9/14/15/15A bus service into the SGV development thereby satisfying the distances required for this criterion. The extension of this service would itself be a peak-time public transport service to/from a higher order settlement (Wymondham – SGV) but also connect to other public transport services such as Wymondham railway station, therefore further enhancing the opportunities for future residents to access peak-time public transport services. The extension of an existing bus service is more deliverable than introducing a completely new service and would be instrumental in achieving a shift in travel mode to sustainable means from the outset, something which only the SGV proposal can offer. As such, we consider therefore that the amber score represents a worst-case scenario, and it is likely that the development of this site will result in all core services being within the assessment distances.</p> <p>More broadly, we wish to make the point that whilst access to a peak-time public transport service is a key sustainability consideration, as currently drafted the criterion suggests this as a singular requirement. The NPPF is clear that planning should maximise <u>opportunities</u> from existing or proposed transport infrastructure and opportunities to promote sustainable transport modes (Paragraphs 102 & 108). Therefore, we suggest opportunities (plural) to promote sustainable transport modes and distance to existing infrastructure proposed infrastructure should be factored into the assessment criteria in further iterations of the HELAA, and/or the new settlement assessment and 'success criteria' to be progressed during 2021.</p>
Utilities Capacity	Amber	Amber	<i>No change</i> – it is agreed that this represents a fair assessment i.e., no available utilities capacity.

HELAA Assessment	GNLP Site Reference	Suggested adjusted HELAA score	Reason for suggested adjustment to scoring
	GNLP4057A (HELAA ADDENDUM III – Dec 20)		
			However, there is no overriding technical or viability constraint which cannot be addressed in terms of improvements to capacity as part of the GV proposal. Indeed, for Silfield GV, the proposal includes the provision of a solar farm on land adjacent, meaning (a) that SGV would be self-sufficient in terms of sustainable energy provision and use, and (b) that sustainable energy capacity in the local area would be significantly improved as a result.
Utilities Infrastructure	Amber	Green	<p>This site incorporates a number of sites referenced as GNLP2168, 0515, 0402 and 0403. Table 1 presented above shows all of these sites score 'Green' for this criterion. Based on this it is not known why the accumulation of these sites into a holistic development would result in a lower score.</p> <p>The accumulation of the sites does not introduce any new utilities infrastructure constraints; therefore, the score is inconsistent and should be corrected as Green.</p>
Contamination and Ground Stability	Amber	Amber	<i>No change</i> – it is agreed that the site has the potential to include areas of ground stability issues that could be mitigated. However, it should be noted that this constraint is confined only to that part of the area referenced as GNLP0515 as demonstrated by Table 1, <i>presented above</i> .
Flood Risk	Amber	Green	<p>The site lies predominantly in Flood Zone 1. There are minimal areas within Flood Zones 2 and 3 associated with the Bays River running through the site and along its north western boundary, although these would remain outside of any future development area.</p> <p>A network of minor drains and watercourses traverse the site which are associated with hedgerows and will be incorporated into the design of the Garden Village as part of the surface water drainage proposals.</p> <p>Therefore, whilst some of the site is within Flood Zone 2 and 3a this represents a very small proportion of a site that measures over 400ha and as such offers the potential to exclude future development within these areas without impacting on the overall quantum of development. The score should therefore be adjusted to Green.</p>

HELAA Assessment	GNLP Site Reference	Suggested adjusted HELAA score	Reason for suggested adjustment to scoring
	GNLP4057A (HELAA ADDENDUM III – Dec 20)		
Market Attractiveness	Amber	Green	<p>The site is located within the Cambridge to Norwich Tech Corridor (CNTC) and as such accessible to the existing and prospective job market job market. The site is also well located to take advantage of existing road and rail transport to job markets and services at Cambridge, Central Norwich and beyond. The site is also situated within the highest land value area within GN outside of central Norwich.</p> <p>Taking the above into account, the HELAA score should be adjusted to Green.</p>
IMPACT ANALYSIS			
Significant Landscapes	Amber	Green	<p>The site is not located within a National Park, the Broads, an Area of Outstanding Natural Beauty or strategic gap. The site is unconstrained in terms of statutory landscape or ecological designations.</p> <p>In terms of wider landscape impact, it should be recognised as part of the HELAA that the development of this site would enable pressure to be reduced through avoiding the need for further smaller scale edge settlement’ development which adversely impacts on the existing strategic gap between Wymondham and Hethersett by offering a new development opportunity that would deliver a significant proportion of housing need in the long-term.</p> <p>The size of the SGV site also offers the opportunity to deliver significant on-site landscape enhancement built in to the GV proposal, as well as enhancing and making publicly accessible a range of existing landscape features.</p> <p>Taking the above into account, the HELAA score should be adjusted to Green.</p>
Townscapes	Amber	Amber	<p><i>No change</i> - The site is not located within a National Park, the Broads or an Area of Outstanding Natural Beauty. The site is also some distance from the Wymondham Conservation Area, beyond its setting.</p>

HELAA Assessment	GNLP Site Reference	Suggested adjusted HELAA score	Reason for suggested adjustment to scoring
	GNLP4057A (HELAA ADDENDUM III – Dec 20)		
			Therefore, taking the worst-case scenario it is considered that development of this site would have a neutral impact on townscapes. However, it is more likely that the development of this site would result in a positive impact on the townscapes, in that allocation of this site for strategic scale development would reduce the pressure to develop more sensitive sites/locations within close proximity to the Wymondham Conservation Area and other townscapes of merit.
Biodiversity and Geodiversity	Red	Green	<p>We <u>object</u> to the adverse scoring for biodiversity/geodiversity.</p> <p>The site is predominantly arable land which is of low ecological value currently. The development of the site has been designed to avoid detrimental impact on any designated site, protected species or ecological network but rather have a positive impact on the environment. In particular, the provision of new strategic GI in the western part of the GV is designed to relieve recreational pressure on existing biodiversity assets in the local area (such as the Lizard SSSI).</p> <p>Identified ecological features are limited to specific parts of the site and have informed the site planning and overall development capacity. Furthermore the network of hedges, woodland and small copses within the site has provided a strong base from which the concept plan for the green infrastructure of the Garden Village has been developed.</p> <p>The GV will result in a more varied green environment than that which exists currently, benefiting both wildlife and the well-being of the new residents and delivering biodiversity gains over the existing situation.</p> <p>Taking the above into account, the scoring should be adjusted to Green. As a minimum, a Neutral score would be appropriate.</p> <p>We would welcome a response and feedback from officers on this assessment outcome.</p>

HELAA Assessment	GNLP Site Reference	Suggested adjusted HELAA score	Reason for suggested adjustment to scoring
	GNLP4057A (HELAA ADDENDUM III – Dec 20)		
Historic Environment	Amber	Amber	<p><i>No change</i> - There are no designated heritage assets within the Silfield Garden Village. A non-designated historic moated site is present at Lowerpark Farm and was potentially part of a medieval deer park.</p> <p>This moated site has been sensitively incorporated into the concept plan for SGV to provide a focal point for the new community, ensuring it is enhanced and preserved in perpetuity. The closest listed building outside of Silfield Garden Village is Silfield Old Hall, the setting of which will be respected within the Garden Village design.</p> <p>Therefore, the development of this site is likely to have a positive impact on heritage assets. However, we acknowledge that it is not possible to confirm this impact until further information becomes available later in the development process.</p> <p>Taking the above into account, we have suggested no change to the scoring, but we are of the view that this score represents a worst-case scenario.</p>
Open Space and GI	Green	Green	<p><i>No change</i> – it is agreed that this represents a fair assessment i.e., development of the site would not result in the loss of any open space: indeed, the proposals would increase the amount of publicly-accessible open space and GI</p>
Transport and Roads	Amber	Amber	<p><i>No change</i> – it is agreed that this represents a fair assessment i.e., any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.</p>
Compatibility with Neighbouring Uses	Amber	Amber	<p><i>No change</i> - The proposed development of SGV is not incompatible with existing neighbouring uses or land, and in the following respects would be beneficial to the surrounding area:</p> <ul style="list-style-type: none"> ▪ this site will provide services and facilities that benefit both the residents of the new development but also the existing communities in and around

HELAA Assessment	GNLP Site Reference	Suggested adjusted HELAA score	Reason for suggested adjustment to scoring
	GNLP4057A (HELAA ADDENDUM III – Dec 20)		
			<p>Wymondham (particularly in respect of secondary education, public transport enhancement);</p> <ul style="list-style-type: none"> ▪ it would provide new on-site GI to help relieve pressure on existing protected habitats in the area (eg. the Lizard SSSI); ▪ at the strategic scale, it is situated within the Cambridge-Norwich Tech Corridor, and therefore highly complementary in terms of providing homes to support existing employment destinations in the locality; and ▪ including a number of on-site employment and homeworking facilities will support local communities in reducing the need to travel further afield (thereby benefiting the environment of the Wymondham area). <p>On the basis of the above assessment – and that there are no immediate neighbouring uses likely to be adversely affected by the GV - we consider that the amber score represents a worst-case scenario, and it is likely the development will have a positive impact on neighbouring uses.</p>
HELAA CONCLUSION	SUITABLE	SUITABLE	

Site Suitability Conclusions

- 3.5 As outlined above and demonstrated by Table 2, we are broadly supportive of the HELAA assessment subject to some suggested changes.
- 3.6 The HELAA Addendum concludes that 38.37ha of the site should be excluded from the Silfield site. Very little explanation is given as to why this extent of land should be excluded, nor is this land identified on a plan or otherwise to aid understanding of the approach. We suggest this could be rectified by the identification of the land to be excluded on a plan, and the explanation for this exclusion could be elaborated upon prior to the submission of the GNLP (or alternatively could be further explored as part of the new settlement work proposed by draft Policy 7.6 New Settlements).

4.0 COMPARISON OF HELAA SITE APPRAISALS FOR NEW SETTLEMENTS

- 4.1 Notwithstanding the HELAA Addendum critique above, we have compared the latest HELAA site assessment scores given for each of the three new settlement proposals and are of the view that there are a number of inconsistencies and inaccuracies with the HELAA site assessment scores given, reinforcing similar comments we have made in our representation on the Sustainability Assessment site assessment (*see Section 4, Sustainability Appraisal representation (March 2021)*).
- 4.2 As mentioned above, an inconsistent approach has been adopted with regard to the assessment of new settlement sites. Unlike Hethel or Silfield which are tested within the HELAA Addendum –the Honingham Thorpe proposal was last assessed within the HELAA (October 2018), with the assessment taking a different approach by assessing individual parcels. DLA has previously raised procedural concerns regarding this approach, as set out at paragraphs 3.19 – 3.26 of our March 2020 *GNLP Sites Document* representation, and we have reiterated these concerns within the Sustainability Appraisal representation (March 2021) submitted as part of our Reg 19 representations.
- 4.3 The way in which Flood Risk is assessed in the HELAA site assessment highlights the inconsistent assessment approach. The Flood Risk criterion is based upon the flood zone within which the promoted site falls within. Notwithstanding the HELAA site assessment critique above, SGV scores Amber for this criterion as does the Hethel new settlement proposal (See Appendix 1), as both have been assessed across the entirety of their site area thereby increasing the likelihood some areas may fall within Flood Zones 2 and 3a. In comparison, the Honingham Thorpe new settlement proposal scores a mix of Green and Amber as some parcels are within Flood Zone 1 and Flood Zone 2 and 3a respectfully. For those less familiar with the intricacies of the HELAA assessment process or detail of the Honingham Thorpe new settlement proposal may assume that on this basis, the evidence base finds the Honingham Thorpe the more favourable site in terms of flood risk. Equally it makes it difficult for GNLP officers to compare like for like as part of the new settlement work as proposed in draft Policy 7.6. This inconsistency should be corrected.
- 4.4 Table 3, overleaf, presents a comparison of the suggested SGV HELAA score (as highlighted in table 2) against the HELAA addendum score for the Hethel NS proposal and a consolidated score for Honingham Thorpe which we have calculated from an average of the scores across the individual parcels.
- 4.5 We also wish to raise an administrative error which appears to have occurred in relation to the Honingham Thorpe HELAA site assessment which could have implications for the soundness of the GNLP evidence base. The spatial extent of parcels B & C for the Honingham Thorpe proposal were changed between the original HELAA and HELAA addendum I (October 2018) but were not reassessed – see Appendix 2. We are of the view that the changes in spatial extent were relatively minor and as such are unlikely to have an impact on the site assessment scores but we suggest the reasoning for not reassessing these individual parcels is set out more clearly or the work undertaken prior to submission of the Reg 19 plan in the interest of soundness.

Table 3: Suggested HELAA site assessment comparison of the three new settlement proposals

HELAA Assessment	GNLP Site Reference				
	GNLP4057A (HELAA ADDENDUM III – Dec 20)	GNLP4057A – <i>Suggested adjusted HELAA score (Table 2 above)</i>		GNLP1055R (HELAA ADDENDUM III – Dec 20)	GNLP0415 (Parcels A-D & G) (HELAA Oct 18 – <i>Consolidated score</i>) (Exc. Country Park & Nature Reserve)
Location	Silfield Garden Village	Silfield Garden Village		West of Hethel, Stanfield Hall Estate, Stanfield Road	Honingham Thorpe
Site Area (Hectares)	454.80	454.80		353.41	277.54 (Exc. Country Park & Nature Reserve) 481.04 (Inc. Country Park & Nature Reserve)
Proposed Development	Silfield Garden Village – Core Development Area	Silfield Garden Village – Core Development Area		New high-tech employment uses together with residential and community facilities in the form of a new Garden Village.	Strategic mixed-use development (A – D & G) consisting of residential development.
CONSTRAINTS ANALYSIS					
Access	Amber	Amber		Amber	Amber
Accessibility to Services	Amber	Amber		Amber	Amber
Utilities Capacity	Amber	Amber		Amber	Amber
Utilities Infrastructure	Amber	Green		Green	Green
Contamination and Ground Stability	Amber	Amber		Amber	Amber
Flood Risk	Amber	Green		Amber	Amber
Market Attractiveness	Amber	Green		Amber	Amber
IMPACT ANALYSIS					
Significant Landscapes	Amber	Green		Amber	Amber
Townscapes	Amber	Amber		Amber	Green
Biodiversity and Geodiversity	Red	Green		Amber	Amber

HELAA Assessment	GNLP Site Reference				
	GNLP4057A (HELAA ADDENDUM III - Dec 20)	GNLP4057A – <i>Suggested adjusted HELAA score (Table 2 above)</i>		GNLP1055R (HELAA ADDENDUM III – Dec 20)	GNLP0415 (Parcels A-D & G) (HELAA Oct 18 – <i>Consolidated score</i>) (Exc. Country Park & Nature Reserve)
Historic Environment	Amber	Amber		Amber	Amber
Open Space and GI	Green	Green		Green	Green
Transport and Roads	Amber	Amber		Amber	Amber
Compatibility with Neighbouring Uses	Amber	Amber		Amber	Green
HELAA CONCLUSION	SUITABLE	SUITABLE		SUITABLE	SUITABLE

5.0 CONCLUSIONS

- 5.1 The consolidation of the Silfield Garden Village proposal was given the revised site reference GNLP4057A which includes 6,500 residential dwellings, local green infrastructure, education provision, employment etc. (see Silfield Garden Village Prospectus, September 2019 – submitted as part of the Regulation 18c consultation representations) and represents the core Silfield Garden Village proposal. The additional green infrastructure (Site Reference: GNLP4057B) and solar farm (Site Reference: GNLP4057C) promoted by Orbit as an additional benefit to the SGV core proposal have been assessed independently of one another within the HELAA Addendum. Orbit support this method and consider this represents a sound approach to plan-making.
- 5.2 Nevertheless, we are of the view that:
- (i) the HELAA Addendum incorrectly assesses the core SGV proposal against some of the HELAA criteria. Table 2, above, sets out where we consider that an alternative score should be given against each of the HELAA criteria for the SGV proposal and the reason for this change. Once assessed appropriately (as demonstrated by Table 2) the SGV proposal scores favourably against the HELAA criteria when considered alongside the two alternative new settlement proposals currently being promoted;
 - (ii) the HELAA Addendum does not address site assessment inconsistencies across the three new settlement proposals and reinforces concerns previously raised by DLA (paragraphs 3.19 – 3.26 of our GNLP Sites Document representation March 2020 refer). We are of the view that these inconsistencies should be addressed prior to the submission of the GNLP (and addressed prior to, or as the initial stage of, the commencement of the new settlement work as proposed by draft Policy 7.6);
 - (iii) The HELAA criteria have limitations when considering alternative locations for new settlement-scale growth, and when assessing new settlements against other spatial options for growth such as smaller piecemeal 'edge of settlement' developments. Most notably, when considering impacts on 'townscape' and 'compatibility with neighbouring uses' in a new settlement-scale context, new settlement locations remote from existing settlements (in the middle of the open countryside) will inevitably achieve a higher score (despite this remote location being less sustainable in terms of securing benefits to existing communities and access to existing facilities and services) than those in more sustainable and accessible locations closer to existing services, facilities and public transport infrastructure found in existing settlements. This is the case for the 'townscape' and 'neighbouring uses' assessment scoring for SGV when considered against more remote locations such as Honingham Thorpe, for example.
- 5.3 Taking the above into account, the HELAA assessment for new settlements should be treated with a degree of caution and not considered in isolation, but as only one element of a broader assessment of sustainable, suitable and deliverable strategic-scale growth options.

6.0 APPENDICES

Appendix 1 - Hethel New Settlement Proposal HELAA Site Assessment December 2017 vs December 2020 Comparison

HELAA Assessment	GNLP Site Reference	
	GNLP1055 (HELAA Dec 17)	GNLP1055R (HELAA ADDENDUM III – Dec 20)
Location	West of Hethel, Stanfield Hall Estate, Stanfield Road	West of Hethel, Stanfield Hall Estate, Stanfield Road
Site Area (Hectares)	364	353.41
Proposed Development	New high-tech employment uses together with residential and community facilities in the form of a new Garden Village.	New high-tech employment uses together with residential and community facilities in the form of a new Garden Village.
CONSTRAINTS ANALYSIS		
Access	Green	Amber
Accessibility to Services	Amber	Amber
Utilities Capacity	Amber	Amber
Utilities Infrastructure	Green	Green
Contamination and Ground Stability	Amber	Amber
Flood Risk	Amber	Amber
Market Attractiveness	Amber	Amber
IMPACT ANALYSIS		
Significant Landscapes	Green	Amber
Townscapes	Amber	Amber
Biodiversity and Geodiversity	Amber	Amber
Historic Environment	Amber	Amber
Open Space and GI	Green	Green

HELAA Assessment	GNLP Site Reference	
	GNLP1055 (HELAA Dec 17)	GNLP1055R (HELAA ADDENDUM III – Dec 20)
Transport and Roads	Amber	Amber
Compatibility with Neighbouring Uses	Amber	Amber
HELAA CONCLUSION	SUITABLE	SUITABLE

Appendix 2 - Honingham Thorpe NS Proposal HELAA Site Assessment December 2017 vs October 2018 Comparison

HELAA Assessment	GNLP Site Reference						
	GNLP0415-A (HELAA Dec 17)	GNLP0415-B (HELAA Dec 17)	GNLP0415-C (HELAA Dec 17)	GNLP0415-D (HELAA Dec 17)	GNLP0415-E (HELAA Dec 17)	GNLP0415-F (HELAA Dec 17)	GNLP0415-G (HELAA Dec 17)
Location	Honingham Thorpe - Site A Norwich Road	Honingham Thorpe - Site B Norwich Road	Honingham Thorpe - Site C Norwich Road	Honingham Thorpe - Site D Norwich Road	Honingham Thorpe - Site E Norwich Road	Honingham Thorpe - Site F Norwich Road	Honingham Thorpe - Site G Norwich Road
Site Area (Hectares)	113	16	56	84	200	3.5	13
Proposed Development	Strategic mixed-use development (A - G) consisting of residential development, employment, country park, nature reserve.	Strategic mixed-use development (A - G) consisting of residential development.	Strategic mixed-use development (A - G) consisting of residential development.	Strategic mixed-use development (A - G) consisting of residential development.	Country Park	Nature reserve.	Strategic mixed-use development (A - G) consisting of residential development, employment, country park, nature reserve.
CONSTRAINTS ANALYSIS							
Access	Green	Amber	Amber	Amber	Blank	Blank	Amber
Accessibility to Services	Amber	Red	Amber	Amber	Blank	Blank	Amber
Utilities Capacity	Amber	Amber	Amber	Blank	Blank	Blank	Amber
Utilities Infrastructure	Green	Green	Amber	Green	Blank	Blank	Green
Contamination and Ground Stability	Green	Amber	Amber	Amber	Blank	Blank	Green
Flood Risk	Amber	Amber	Amber	Amber	Blank	Blank	Green
Market Attractiveness	Amber	Amber	Amber	Amber	Blank	Blank	Amber
IMPACT ANALYSIS							
Significant Landscapes	Amber	Green	Amber	Amber	Blank	Blank	Green
Townscapes	Green	Green	Amber	Green	Blank	Blank	Green
Biodiversity and Geodiversity	Amber	Green	Amber	Amber	Blank	Blank	Green
Historic Environment	Amber	Amber	Amber	Green	Blank	Blank	Amber
Open Space and GI	Green	Green	Green	Green	Blank	Blank	Green
Transport and Roads	Amber	Amber	Amber	Amber	Blank	Blank	Amber

HELAA Assessment	GNLP Site Reference						
	GNLP0415-A (HELAA Dec 17)	GNLP0415-B (HELAA Dec 17)	GNLP0415-C (HELAA Dec 17)	GNLP0415-D (HELAA Dec 17)	GNLP0415-E (HELAA Dec 17)	GNLP0415-F (HELAA Dec 17)	GNLP0415-G (HELAA Dec 17)
Compatibility with Neighbouring Uses	Green	Green	Amber	Green	Blank	Blank	Green
HELAA CONCLUSION	SUITABLE	SUITABLE	SUITABLE	SUITABLE	UNSUITABLE	UNSUITABLE	SUITABLE

HELAA Assessment	GNLP Site Reference				
	GNLP0415-A (HELAA Oct 18)	GNLP0415-B (HELAA Oct 18)	GNLP0415-C (HELAA Oct 18)	GNLP0415-D (HELAA Oct 18)	GNLP0415-G (HELAA Oct 18)
Location	Honingham Thorpe - Site A Norwich Road	Honingham Thorpe - Site B Norwich Road	Honingham Thorpe - Site C Norwich Road	Honingham Thorpe - Site D Norwich Road	Honingham Thorpe - Site G Norwich Road
Site Area (Hectares)	113	15	53.36	85.53	10.65
Proposed Development	Strategic mixed-use development (A - G) consisting of residential development, employment, country park, nature reserve.	Strategic mixed-use development (A - G) consisting of residential development,	Strategic mixed-use development (A - G) consisting of residential development,	Strategic mixed-use development (A - G) consisting of residential development,	Strategic mixed-use development (A - G) consisting of residential development, employment, country park, nature reserve.
CONSTRAINTS ANALYSIS					
Access	Blank	Blank	Blank	Amber	Amber
Accessibility to Services	Blank	Blank	Blank	Amber	Amber
Utilities Capacity	Blank	Blank	Blank	Amber	Amber
Utilities Infrastructure	Blank	Blank	Blank	Green	Green
Contamination and Ground Stability	Blank	Blank	Blank	Green	Green
Flood Risk	Blank	Blank	Blank	Amber	Green
Market Attractiveness	Blank	Blank	Blank	Amber	Amber
IMPACT ANALYSIS					
Significant Landscapes	Blank	Blank	Blank	Amber	Green
Townscapes	Blank	Blank	Blank	Green	Green

HELAA Assessment	GNLP Site Reference				
	GNLP0415-A (HELAA Oct 18)	GNLP0415-B (HELAA Oct 18)	GNLP0415-C (HELAA Oct 18)	GNLP0415-D (HELAA Oct 18)	GNLP0415-G (HELAA Oct 18)
Biodiversity and Geodiversity	<i>Blank</i>	<i>Blank</i>	<i>Blank</i>	Amber	Green
Historic Environment	<i>Blank</i>	<i>Blank</i>	<i>Blank</i>	Amber	Amber
Open Space and GI	<i>Blank</i>	<i>Blank</i>	<i>Blank</i>	Green	Green
Transport and Roads	<i>Blank</i>	<i>Blank</i>	<i>Blank</i>	Amber	Amber
Compatibility with Neighbouring Uses	<i>Blank</i>	<i>Blank</i>	<i>Blank</i>	Green	Green
HELAA CONCLUSION	UNSUITABLE	UNSUITABLE	UNSUITABLE	UNSUITABLE	UNSUITABLE
	Site boundary has not changed - not reassessed	Site boundary has not changed - not reassessed	Site boundary has not changed - not reassessed		