

South Norfolk VCHAP Note for the Inspector following the submission of additional representations in relation to the proposed allocation at VC ROC1 (Rockland St Mary)

1. The Inspector accepted additional notes on behalf of Dr and Dr Godley and Mrs Church in respect of the proposed allocation VC ROC1 at Rockland St Mary following the close of the Hearing session which took place on Thursday 15th January 2026.
2. The Inspector has subsequently invited the Council to comment on these submissions. This note confirms the Council's position on the matter and includes proposed modifications to the wording of the allocation policy to reflect the discussions around this site.
3. A separate note was submitted by the Council to the Inspector in response to a question regarding a possible reduction in the site area of VC ROC1 to deliver road frontage development only.
4. **The Council maintains that an allocation for 25 dwellings on a site area of 1.47ha is sound.**

Matters of clarification arising from the Speaking Notes submitted on behalf of Dr and Dr Godley and Mrs Church

5. The Council does not wish to respond to all of the matters raised on behalf of the neighbouring residents as these matters were discussed in detail during the relevant hearing session. However, there are a small number of points of clarification the Council does wish to make in response to this submission.
6. Firstly, the suggestion that evidence base has been undertaken to justify a predetermined allocation is erroneous. Preparation of the supporting evidence base for the VCHAP has been an ongoing and iterative process throughout the Plan preparation period. This includes the preparation of the Heritage Impact Assessments (HIA).
7. In accordance with legislative requirements and best practice, the Council first published a number of options for the village clusters in the 2021 Regulation-18 consultation, including the initial site assessments which clearly demonstrated how the site categorisations had been reached at that time. The Regulation-18 consultation is an important part of the evidence gathering, following which the Council undertook to produce the detailed technical evidence base.
8. The HIA for VC ROC1 was undertaken by the Council following the Regulation-18 consultation, in liaison with Historic England who advised the Council on best practice. All of the HIAs produced by the Council at this time were subsequently published alongside the Regulation-19 submission version of the Plan. In response to comments received at the

Regulation-19 stage of the process, including from Historic England, the Council undertook to review a small number of the original HIAs. This included the HIA prepared in relation to the site at Rockland St Mary.

9. As part of this review of the original HIA, the Council attended an on-site visit with Historic England and the Council's own Senior Heritage and Design Officer. The conclusion to these discussions is clearly reflected in both the HIA and the proposed allocation wording; namely, the inclusion of an area of open space to the west of the site to protect views to and from the listed buildings and retain a visual link to the agricultural land. The policy was updated accordingly and republished in the Regulation-19 Addendum. At no stage have these discussions indicated that the site is not suitable for allocation within the originally proposed boundaries.
10. As a second point of clarification, Ms Lambert suggests in her submission that Historic England may not have been aware of the presence of a single storey listed building to the west of the proposed allocation. This is incorrect. The site visit undertaken with Historic England included walking the existing field access alongside 134B The Street. The impact of the proposed allocation was carefully considered from both the east and the west of the site during this visit which concluded that an area of open space to the west of the site would provide sufficient mitigation for the adjacent heritage assets.
11. The Council would also like to note the modern extension to 134B The Street and make the distinction between the heritage value of this later addition and the residential amenity that could be affected by the new development. In the Council's judgement the assessment should recognise the distinction between the heritage value of 134B The Street and the residential amenity that would be preserved by removing the secondary pedestrian access from the policy requirement.
12. Finally, the Council also contends that to suggest the Plan has not been positively prepared is also incorrect. The submitted policy wording, as well as the supporting evidence, clearly demonstrate that the Council has addressed the heritage issues appropriately. Furthermore, Ms Lambert states that the Council has erred by not providing sufficient detail to provide clarity about the nature and scale of development proposed. This is also incorrect. Each policy within the Plan clearly sets out the site area, the quantum of development proposed and any site-specific considerations. Policy maps clearly illustrating the site boundaries will also form part of the Local Plan.

Proposed modifications to VC ROC1 policy wording

13. Notwithstanding the above, the Council has reviewed the proposed amendment to the policy wording submitted on behalf of Dr and Dr Godley and Mrs Church and has prepared alternative wording which it considers would address the concerns raised by the interested parties. The suggested amendments are set out at the end of this note.

14. As confirmed during the hearing sessions, the Council is minded to agree that, in the interests of residential amenity (with particular reference to 134B The Street), the proposed secondary pedestrian access to the site could be omitted from the site allocation without adversely impacting the acceptability of the overall site allocation.
15. The Council also proposes that the policy is updated to reflect a requirement to submit a Heritage Impact Assessment at the time of any future planning application on the site, and that this should inform the scale, layout and design of the proposal. The suggested policy wording continues to include a clear requirement for an area of open space to the west of the site, as per the earlier wording in the submission Plan.
16. The Council does not propose to publish a policy map which defines the extent of this area of open space. This would most appropriately be considered through the evolution of detailed design proposals for the site and would subsequently be assessed through the development management process, once further information about the scale, form and layout of development is available. As noted in paragraph 14 above, this would be informed by the preparation of a Heritage Impact Assessment at the planning application preparation stage.
17. The updated wording proposed by the Council is as follows:

Policy VC ROC1: Land south of New Inn Hill

1.47ha of land is allocated for approximately 25 dwellings.

The developer of the site will be required to ensure that:

- **A Landscape and Visual Impact Appraisal is submitted as part of the detailed planning application to identify the impact of development on the landscape, particularly the Broads Authority Area, and to inform the scale, layout and design of development;**
- **A Heritage Impact Assessment is submitted as part of the detailed planning application to identify the impact of development on the adjacent heritage assets to the west of the site, and to inform the scale, layout and design of development;**
- **Protection of the mature trees to the east of the site, including during the construction phase of development;**
- **Appropriate landscaping and boundary treatments along the north, east and south boundaries of the site to minimise the visual impact of the development in the landscape;**
- **On- and off-site highways works to include a pedestrian footway across the site frontage to connect to the existing pedestrian footway to the west of the site, ~~as well as a secondary pedestrian access to the east of Old Hall Barn and providing a linkage to the local footpath network;~~**
- **An area of open space which respects the setting of the heritage assets to be retained in the western section of the site, to preserve long views**

- between the group of listed buildings and the agricultural land to the south; and**
- Historic Environment Record to be consulted to determine the need for any archaeological surveys prior to development.**