



SOUTH NORFOLK VILLAGE CLUSTERS HOUSING ALLOCATIONS DOCUMENT

STATEMENT OF CONSULTATION

PART 2 – SOUTH NORFOLK COUNCIL CONSULTATIONS (REG. 18)

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1. Introduction

- 1.1 This document, Part 2 of the Statement of Consultation, details the methodologies and results of the consultations that have been undertaken by South Norfolk Council in the development of the Village Clusters Housing Allocations Plan (VCHAP); specifically the Technical Consultation (June-July 2020) and the Regulation 18 Consultation (June-August 2021).
- 1.2 Part 1 of this Statement sets out the earlier stages of consultation that were undertaken as part of work to produce the Greater Norwich Local Plan (GNLP), prior to the decision by South Norfolk Council to produce an independent VCHAP document.
- 1.3 The contents of the Statement are set out in chronological order. For each of the two consultation exercises that are presented in Part 2, the following information is provided:
 - a) The aim of the exercise;
 - b) The timescale of the exercise;
 - c) The consultees invited to take part;
 - d) A description of the exercise methodology;
 - e) A results summary;
 - f) Ongoing engagement (in the case of the first consultation exercise);
- 1.4 These sections are followed by a summary of the main issues that were raised by respondents as part of the Regulation 18 community and stakeholder consultation on the draft document, and South Norfolk Council's responses to these issues. Various appendices illustrate consultation and publicity material that was developed to support the consultations on the VCHAP.

2. 'Technical Consultations' (June-July 2020 and January 2022)

Aim

- 2.1 The intention of this focused consultation was to seek technical comments from specific stakeholder bodies in relation to the new submitted for potential allocation sites in rural South Norfolk (the Village Clusters, as defined in the GNLP). This covered sites that had been put forward during various GNLP consultations, up to and including on the 'Draft Strategy & Site Allocations', consultation between January and March 2020. Also in March 2020 the Council contacted all relevant site promoters to confirm that they wished to continue having their sites considered as part of the Village Clusters process and, if so, whether they wished to make any amendments to their sites to fit better with the scale being sought in the VCHAP.
- 2.2 The Technical Consultation comprises one of the key stages in the Housing and Economic Land Availability Assessment (HELAA) methodology.

Timescale

- 2.3 Identified stakeholder bodies were emailed on 24th June 2020 and invited to make responses before 31st July 2020 – a period of 27 working days.
- 2.4 Stakeholders were advised to contact the Council if they were not able to meet this deadline, with a view to agreeing an extension.

Consultees

- 2.5 The following stakeholder bodies were identified as technical consultees and invited to make responses as part of this consultation:
- Historic England
 - Natural England
 - Environment Agency
 - Norfolk Wildlife Trust
 - Anglian Water
 - UK Power Networks
 - National Grid
 - Lead Local Flood Authority
 - Norfolk County Council – Highways
 - Norfolk County Council – Ecology
 - Norfolk County Council – Historic Environment Service
 - Norfolk County Council – Children's Services
 - Norfolk County Council - Minerals and Waste

2.6 As well as external consultees, the Technical Consultation also sought input from the Council's internal specialists:

- The Senior Heritage and Design Officer
- The Landscape Architect and the Conservation and Tree Officer
- Environmental Services (Environmental Management and Community Protection)

Description

2.7 Up to and including the GNLP 'New, Revised and Small Sites' (October - December 2018) consultation rural sites in South Norfolk were assessed as part of the GNLP under the GNLP assessment process. Subsequently, the work to identify and allocate sites within the South Norfolk Village Clusters was taken up by South Norfolk Council.

2.8 However, the third stage Regulation 18 consultation in relation to the GNLP ('Draft Strategy and Site Allocations'), which took place between 29 January and 16 March 2020, approximately 80 new sites were proposed in the South Norfolk Village Cluster locations.

2.9 Rather than being assessed by the GNLP team, details of these new sites were passed to South Norfolk Council for assessment in relation to the Village Clusters Housing Allocations document.

2.10 In addition to the new sites promoted as part of the GNLP 'Draft Strategy and Site Allocations' consultation, there were also a number of sites in South Norfolk villages that were originally submitted to the GNLP, but which were subsequently re-submitted to South Norfolk Council, having been amended to fit within the remit of the Village Clusters Housing Allocations document. These would also need to be re-assessed, and they were also subject to consultation with the technical bodies.

2.11 These sites were re-submitted following an email (see Appendix 1) that was sent by South Norfolk Council on 6th March 2020 (with a follow-up on 26th March), to the site promoters who had originally promoted sites in South Norfolk villages as part of the GNLP process. The email explained the fact that the Council would now be taking forward the South Norfolk Village Clusters work and that if promoters would like to re-submit amended site proposals, they should do so by 31st March (subsequently amended to 9th April, reflecting the start of the first national Covid lockdown in March 2020).

2.12 The Norfolk HELAA methodology (which has been adopted by South Norfolk Council under the Norfolk Strategic Planning Framework) requires technical consultation with specific stakeholder bodies as part of the site assessment process. The Council therefore undertook a consultation with the technical bodies, on all of the South Norfolk Village Cluster site submitted in the January to March 2020 GNLP consultation or previously submitted and confirmed by the

site promoter for continued consideration, in order to inform the HELAA assessment.

- 2.13 An example of the email that was sent to the stakeholder bodies as part of this technical consultation features as Appendix 2. The email was specifically tailored depending on which body it was being sent to, in order that they could be directed to the appropriate part of the HELAA assessment template. The example provided here is a copy of the email that was sent to Norfolk County Council Highways.

Results Summary

- 2.14 The majority of technical bodies consulted provided responses within the site assessment template that they had been sent. Details of the responses from the technical bodies on specific sites can be found within the site assessment forms, which are part of the evidence base.

Ongoing Engagement

- 2.15 Following the Regulation 18 consultation in summer 2021, as detailed in the following section, a second Technical Consultation was undertaken on sites that were either newly submitted or substantively revised during the Regulation 18 consultation. This followed a similar format this initial Technical Consultation.
- 2.16 To better understand some of the responses to the Technical Consultations, a series of meetings were held with some of the consultees, including Historic England, Anglian Water and the Highways, Lead Local Flood Authority and Children's Services teams at Norfolk County Council.

3. Reg. 18 Draft Consultation (June-August 2021)

Aim

- 3.1 The aim of this significant and extensive consultation (marking the main phase of Regulation 18 consultation on the emerging Village Clusters Housing Allocations Plan) was to seek the views of the public and of key stakeholder bodies on the Council's preferred sites for allocation as part of the Plan. It also provided consultees with the option to comment on:
- sites that were proposed to be 'shortlisted';
 - sites that were proposed to be 'rejected';
 - other proposed amendments to Settlement Limits;
 - a series of general policies and the overall objectives for the Plan;
- 3.2 In addition, respondents had the opportunity to promote new sites for consideration within the emerging Plan.
- 3.3 This consultation followed the earlier consideration of sites and consultation activity undertaken by the GNLP and the technical consultation / review of sites undertaken by South Norfolk Council during summer 2020.

Timescale

- 3.4 This consultation took place between 7th June and 2nd August 2021.

Consultees

- 3.5 This was an extensive public and stakeholder consultation and, as such, it involved a significant amount of publicity and notification of appropriate bodies.
- 3.6 In accordance with Regulation 18 of the Town & Country Planning (Local Plans) (England) Regulations 2012, South Norfolk Council notified those specific and general consultation bodies that it considered would be appropriate, as well as interested businesses and residents that had previously registered to be notified in relation to progress with the Local Plan.
- 3.7 A list of specific consultation bodies consulted (including the 'Relevant Authorities') can be found in Appendix 3. These bodies were notified by email/letter, a copy of which can be found in Appendix 4.
- 3.8 In addition, all 4,400 contacts registered on South Norfolk Council's Local Plan consultation database were notified of the start of the consultation. This database comprises specific and general consultation bodies, interested individuals, organisations and businesses that had previously formed part of the Greater Norwich Local Plan (GNLP) database, and which had subsequently been passed to South Norfolk Council once the latter had commenced work on the VCHAP. In addition, South Norfolk Council had also kept its own register of

individuals and organisations that had asked to be kept informed of progress with the Village Clusters Housing Allocations Plan (VCHAP) and these bodies were also notified of the consultation.

- 3.9 The Council also ensured that notifications were sent to those individuals/organisations which had promoted sites for consideration, whether through the GNLP originally, or through South Norfolk Council during the earlier stages of preparing the VCHAP.

Description

Consultation Document

- 3.10 The consultation took the form of an online document, to which consultees were directed via a URL in their notification email/letter or via one of the many forms of wider publicity (see later) concerning this consultation. Essentially, this was a draft version of the VCHAP, interspersed with consultation points whereby respondents could provide comments on various aspects of the Plan. The document was arranged into sections comprising:

- a) Introduction and Background
- b) The Plan Objectives
- c) Core Policies (including Standard Requirements, Design and Housing Mix)
- d) The Assessment of Sites
- e) Evidence Base
- f) Monitoring
- g) Village Cluster chapters (including details of 'Form and Character', 'Settlement Limit and Constraints', 'Preferred and Shortlisted Sites' and 'Rejected Sites')
- h) Monitoring Framework
- i) Glossary

- 3.11 The bulk of the document comprised section g), above, setting out the proposed categorisation of sites. The consultation points relating to these sites also allowed respondents to view the proposals on an interactive map of the district.

- 3.12 The consultation document is available to view online at www.south-norfolk.oc2.uk/document/1.

Supporting Documents

3.13 Alongside the main consultation document (and also hosted on the Council's consultation platform), the Council made available an array of supporting documentation. This comprised:

- Habitat Regulations Assessment*
- Sustainability Appraisal Report*
- Sustainability Appraisal Scoping Report
- Greater Norwich Water Cycle Study (2021)
- Greater Norwich Strategic Flood Risk Assessment (Level 1) (2017)
- Greater Norwich Local Plan Viability Appraisal (2020)
- Statement of Consultation (Interim)
- Norfolk HELAA Methodology – July 2016
- South Norfolk Village Cluster Site Assessment Form
- South Norfolk Village Cluster Assessment Criteria
- Equality Impact Assessment
- Virtual Exhibition Display Material (see below)
- Frequently Asked Questions
- Map booklets highlighting Preferred, Shortlisted and Rejected sites for each Village Cluster area
- Site assessment booklets for each Village Cluster area

*Respondents were also able to provide comments on these documents, if they wished.

New Sites form

3.14 As mentioned above, respondents also had the opportunity to promote new sites for consideration during this consultation period. An online form was made available from the consultation platform for anyone wishing to do this, asking for specific details regarding the site in question (including details of the site boundary, which could be simply plotted using interactive mapping).

Virtual Exhibition

3.15 Alongside the consultation document, and with a view to publicising and providing further context to the VCHAP, South Norfolk Council also produced a 'virtual exhibition' that mirrored the information typically displayed through in-person events.

3.16 The URL for accessing the virtual exhibition was made available via the Council's website, the online consultation platform, and via the many forms of publicity issued in support of the consultation (see below).

3.17 The choice to host a virtual exhibition rather than holding in-person events was predominantly due to the ongoing Covid-19 pandemic and the restrictions imposed by the Government on holding events.

3.18 The virtual exhibition included:

- a short introductory video by the Leader of the Council, setting the scene for growth within South Norfolk's villages;
- a range of interactive display panels which provided background and further information relating to the VCHAP;
- links to the consultation platform and to the various supporting documents highlighted above;
- an opportunity to enter into a live chat with one of the planning officers at set times during each week of the consultation period;

3.19 All of the above material was available to view for the duration of the consultation period.

3.20 A selection of images, highlighting the virtual exhibition, is available to view in Appendix 5.

3.21 Analytics information is available from the virtual exhibition. This shows that 3,447 users accessed the exhibition, resulting in a total of 18,475 page views. The most popular pages were, perhaps predictably: the maps showing the extent of the village cluster areas, the maps of individual sites and the information board on how suitable sites were identified.

3.22 Just over 30% of users provided information on gender and age. This information shows a broadly even split between gender 47.5% female to 52.5% male. More significantly, whilst the majority of people visiting the site were in the 65+ age range (approx. 22.5%), the split across age ranges was much more even than is typically experienced during face-to-face exhibitions, with nearly 20% of site users being in the 25-34 age range.

Publicity

3.23 A variety of publicity was undertaken in support of the consultation on the draft document and in order to bring it to the attention of as wide a cross section of the public as possible. Specific measures included:

- A poster advertising the consultation (see Appendix 6), which was distributed to libraries, GP surgeries and Parish Councils (for putting on parish noticeboards) across the district.
- A press release which was issued to local media (see copy of EDP article from 03.06.2021 that forms Appendix 7).
- Updates on South Norfolk Council's social media accounts (see Appendix 8)
- Details on the South Norfolk Council / Broadland District Council website (www.southnorfolkandbroadland.gov.uk/emerging-local-plan/south-norfolk-village-clusters-housing-allocations-plan)

- An article in the spring 2021 issue of the South Norfolk Council 'Link' magazine (see Appendix 9) which is issued to every household and business in the district.

Parish Councils Webinar

- 3.24 South Norfolk Council also organised an online presentation and 'Question & Answer' session for Parish Councils in the district, in order to explain the context to the VCHAP and the consultation, the elements that were subject to consultation and how respondents could have their say. This took place on the evening of Thursday 10th June and was held using the Zoom Webinars software.
- 3.25 All Parish Councils were invited and 64 representatives attended the event.
- 3.26 The webinar took the form of a presentation from Planning officers (see Appendix 10) followed by questions and answers. The presentation was available to those parishes who could not attend and a full report of questions and answers was issued to attendees following the event.

Results Summary

- 3.27 A significant number of representations were received in response to the public consultation on the VCHAP. In total there were 2,189 individual comments received from 784 individuals or organisations.
- 3.28 The majority of these representations (68%) were submitted directly via the online consultation platform. 30% of representations were submitted via email and 2% were received as hard copy submissions.
- 3.29 The majority of submitted representations (49%) were marked as objections to specific proposals. 40% were marked as comments (neither explicitly supporting nor objecting to proposals), and 11% were marked as supportive of specific proposals.
- 3.30 Figure 1, below, shows the ten Village Cluster areas subject to the highest numbers of representations as part of this particular consultation. The Village Cluster area which was subject to the highest number of representations was Rockland St. Mary, Hellington and Holverston (207), which was followed closely by Brooke, Howe and Kirstead (200). The average number of representations per Cluster area was 42, whilst the lowest numbers received were in Heywood, Keswick & Intwood, and Ketteringham Cluster areas, which received 1 representation each.

Village Cluster	Number of representations
Rockland St. Mary, Hellington, Holverston	207
Brooke, Howe, Kirstead	200
Little Melton, Great Melton	190
Alpington & Yelverton, Bergh Apton	185
Wicklewood	137
Newton Flotman, Swainsthorpe	122
Bressingham	88
Gillingham, Geldeston, Stockton	75
Barnham Broom, Kimberley, Carleton Forehoe, Runhall and Brandon Parva	60
Toft Monks , Burgh St Peter, Aldeby, Haddiscoe, Wheatacre	48

Figure 1 - the ten Village Cluster areas subject to the highest numbers of representations

4. Summary of main issues raised and how these have been considered

- 4.31 There were a variety of issues raised within submitted representations during the consultation on the draft document. For a summary of the issues raised and South Norfolk Council's responses to those issues (relating to each Village Cluster area and the VCHAP objectives, general policies and monitoring framework), please see the tables within Appendix 11.
- 4.32 In order to provide an overview of the main issues raised as part of this consultation, a categorisation of the subjects raised in representations has been carried out. This has highlighted a number of key themes which prevailed in representations across all of the Village Cluster areas. Figure 2 sets out these key themes and shows which of these were most predominant within the representations received.

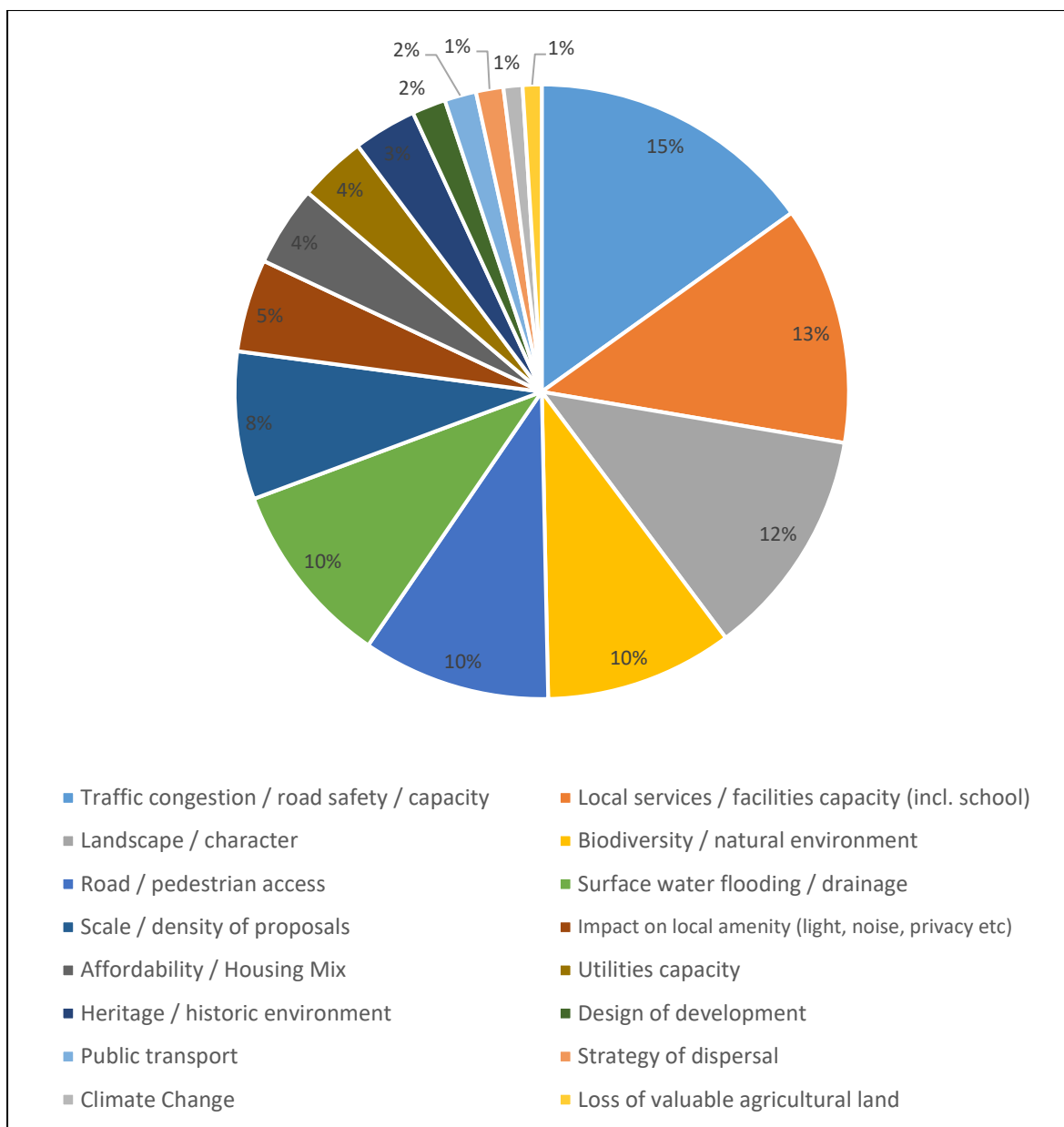


Figure 2 – Prevalence of main issues raised within representations

4.33 Figure 3, below, provides a South Norfolk Council response to each of these main issues, explaining how such issues have been considered in the development of the Village Clusters Housing Allocations Plan.

4.34 During the consultation, 63 new or revised sites were also submitted by respondents, for consideration as part of the ongoing work to produce the VCHAP. These new sites were added to maps of the Village Cluster areas which were then published on the Council's website following the close of the consultation, once details of all of the new sites had been confirmed. An assessment of these new sites was undertaken by the Council in order to help inform the development of the pre-submission version of the VCHAP.

Issue Raised	SNC Response
Traffic congestion, road safety and the capacity of local road networks	The Council has undertaken significant engagement with the Highways Authority (HA) throughout the site assessment and selection process. As a technical consultee the HA has provided comments on both immediate access into each site as well as a commentary on the wider road network. A technical review was undertaken by the HA for each site promoted to the VCHAP with subsequent discussions continuing with the HA on specific sites where queries arose or clarifications were needed. Meetings were held with the HA to review all of the shortlisted and preferred sites. Details of the HA comments are included in the Site Assessment forms. The detailed information provided by the HA has helped to inform the site selection process with sites considered to be unacceptable in highway safety terms rejected from the process. The HA has identified site specific highway mitigation works that would be required for each site, as well as local highway improvements that would be necessary in certain areas for a site to be acceptable in highway terms – these mitigation measures will be reflected in the site-specific planning policy text in due course. The Council acknowledges the concerns of residents about highways matters. The Council also recognises that growth in rural locations will result in some increase in traffic, but this is balanced with supporting existing local services (including public transport) through modest growth. The approach to the distribution of growth within the village clusters seeks to ensure that a higher proportion of growth is supported within the more accessible areas whilst seeking to limit new development in those areas that are either poorly connected or constrained by the local highway network. Furthermore, the scale of development that is proposed within the VCHAP, as well as its distribution, seeks to avoid significant highway impacts arising from this new development.
The capacity of local services/facilities (incl. schools, doctors etc.)	The Council recognises the concerns of residents about the impact of future growth on existing infrastructure. As part of the technical consultations that have been undertaken the Council has proactively engaged with infrastructure providers including utility providers, the local education authority and the Integrated Care System (ICS) which has responsibility for coordinating healthcare provision in the area. Discussions with the education authority at Norfolk County Council indicate that there is currently sufficient capacity within the existing primary school network to accommodate the level of growth proposed in the village cluster settlements. The perception of schools operating at capacity is based in part on the impact of parental choice of primary schools, as well as previous capacity issues. In addition, new provision and planned growth of primary schools in some areas (such as Hethersett, Wymondham and Trowse) has had a positive impact on some nearby village cluster schools previously considered to be at capacity. Moderate growth is seen as a positive way to support some of the smaller schools in the District which are currently experiencing falling pupil numbers.

Issue Raised	SNC Response
	The ICS has expressed some concerns about the level of growth proposed in the District. However, the Council recognises this is a strategic issue, most appropriately dealt with via the Greater Norwich Local Plan. Pressures faced by the healthcare system are in evidence nationwide and should not prevent the identified housing growth from being delivered. Therefore, whilst the Council remains sympathetic to the concerns of residents about this matter it is also not considered to be an issue that can be resolved at a local level via the VCHAP.
Impacts on the landscape and the form and character of the settlement	In common with many of the representations received during the Regulation-18 consultation the Council recognises the special value of both the landscape and the form and character of existing settlements throughout the South Norfolk District. The VCHAP assessment process seeks to protect and enhance these wherever possible for the ongoing benefit of both current and future residents. All site assessments have included an initial landscape and townscape assessment which has considered the key features, as well as identifying any impacts arising. In particular, the preferred and shortlisted sites have been specifically considered by the Council's Design, Landscape and Arboriculture specialists. Following comments received during the technical consultation it was determined that Landscape and Visual Appraisals (LVAs) should be undertaken for all sites preferred for allocation, to provide further information about the landscape and visual implications of development on these sites. A template appraisal form was prepared in conjunction with the Council's Landscape Architect. Mitigation measures identified via the site assessment process, the Regulation 18 consultation and the LVAs will be included within the site-specific policy allocation text as appropriate. The site assessments have also included an assessment of the townscape impact of proposed allocation sites, with advice sought from the Council's Senior Heritage and Design Officer on the existing form and character of an area. Whilst the evaluations and commentaries of the landscape and townscape impacts have helped to inform the site selection process it is recognised that all new development will result in an impact on the existing context. The site selection process is however seeking to minimise these effects, avoid harmful impacts and wherever possible enhance the existing situation.

Issue Raised	SNC Response
Impacts on biodiversity and the natural environment	The Council has given due regard to the impact of site development on the natural environment and existing biodiversity, both on-site and in proximity to the promoted sites. Technical comments of Norfolk County Council's ecology team and the Council's own Arboricultural Officer have been included in all site assessments and will be reflected, as appropriate, in the site-specific policy background and allocation text. This policy text may include identification of ecological areas of interest to help inform site layout and design, appropriate mitigation measures and any further information deemed to be of relevance to the development of a site. Both Norfolk Wildlife Trust and Natural England are consultees in the Development Plan process, and were contacted both prior to, during and after the Regulation 18 consultation, with some site-specific comments received from the former. In addition, the VCHAP will be supported by a Habitats Regulation Assessment.
Road and pedestrian access to sites	Accessibility of the sites to local services and facilities, as well as vehicular and pedestrian access into the sites, has been a key consideration in the determination of a site's suitability for allocation in the VCHAP but has remained of concern to local residents. One of the identified objectives of the VCHAP is the delivery of new development in a range of settlements to support and enhance the existing rural services and facilities that are already available; the proximity of a site to these local services and facilities has therefore formed an important part of the overall site assessment and selection process. Following the initial site assessment (which included reviewing the distance of a site from existing facilities and services set out in the agreed site assessment criteria) a significant focus of the ongoing discussions with the Highways Authority (HA) has been the opportunities to create safe vehicular and pedestrian access both into and from the sites. However, it is recognised that due to the rural nature of the District the ability to achieve pedestrian footways can be limited. Within this rural context it is considered reasonable that on occasion the only possible solution will be pedestrian links along quiet rural roads with stepping off places available. It is also accepted that it may not be possible to connect a site via pedestrian footways with all existing facilities and services within a settlement/ cluster. Wherever necessary, engagement has taken place with site promoters to seek assurances that the required accesses, visibility splays and pedestrian footways can be incorporated into the delivery of the site. As appropriate the requirements of the HA will be included within the site-specific policy allocation text and all highways details will be subject to scrutiny at the detailed planning application stage by the HA to ensure that they meet appropriate standards.

Issue Raised	SNC Response
Surface water flooding and site drainage	Concerns were raised in response to the Regulation-18 consultation about the current and future flood risk of development, as well as reference being made to both recent and historic flood events. The site assessment process included a review of both flood risk zones (which reflect fluvial flooding) and identified areas of surface water flooding that may affect the deliverability of the sites. This information was consolidated by technical consultation responses from the Lead Local Flood Authority (LLFA), the Internal Drainage Boards and the Environment Agency. Detailed discussions continued with the LLFA following receipt of their comments with these discussions resulting in the reclassification of some sites to avoid areas considered to be at risk, or which may cause off-site risks. As with other technical consultees, this process has resulted in mitigation measures being identified for some sites and as appropriate these will be incorporated into the site-specific policy allocation text. In addition to the engagement referred to above, the Council also commissioned a Part II Strategic Flood Risk Assessment (SFRA) which considers in further detail the potential impact of allocating some sites. This forms part of the evidence base for the final sites selected for allocation.

Issue Raised	SNC Response
The scale and density of growth / specific proposals	A number of representations were concerned about the suggested level of growth on promoted sites, both in terms of the scale promoted to the Council by the site promoter and the quantum of development suggested on a site by the Council at the Regulation-18 consultation stage. Some sites have subsequently been subject to a review of housing numbers following third party comments and observations and further consideration of the site itself. The Council has a responsibility (under National Planning Policy) to ensure the efficient use of land is achieved when approving new development. In recognition of the rural context of sites allocated in the village cluster plan it was considered that 25 dwellings per hectare was a reasonable site density, although where it is considered appropriate the density of a site will be adjusted to reflect its context within the final site-specific policy allocation text. As set out in the Reg-18 consultation material, the VCHAP seeks to allocate a series of smaller sites that are typically within the range of 12-50 homes. The site-specific policy wording will clearly set out the numbers of dwellings that the Council considers could be accommodated on a site, either as an approximate or maximum number, within the site area that is being allocated. Smaller sites (fewer than 12 dwellings) may come forward in due course following updates to some of the existing Local Plan Settlement Limits. Detailed proposals for development on these sites would be subject to assessment at the planning application stage against planning policies in place at the time. These smaller sites identified for inclusion within the settlement limits lie adjacent to existing settlement limits (or within newly formed settlement limits), and have been subject to the same site assessment as the allocation sites.
Impacts on amenity (e.g. light, noise, privacy etc.)	The Council acknowledges the concerns that existing residents have about the impact of new development on their existing residential amenities; however, detailed design matters including the relationship between the proposed and existing developments will be subject to assessment at the planning application stage. Planning applications will be assessed for compliance with the existing (or future) development management policies, including the impact of development on the amenities of existing residents. Where particular issues are identified through the site assessment process, such as changes in levels, orientation of properties and/or a predominance of single-story dwellings adjoining a site, these can be addressed in the site-specific policies.

Issue Raised	SNC Response
The affordability / mix of housing	In terms of the representations submitted relating to the affordability of new housing and the mix of housing on site, the Council is committed to delivering an appropriate mix of housing to meet the identified local need, as set out in the current SHMA (or subsequent SHMA at the time of any planning applications). Site promoters were required to confirm the viability of their site, as well as confirming their acceptance of the requirement to deliver the requisite amount of affordable housing on their site if allocated. Any proposed departure from either the specified housing mix or the percentage of affordable housing delivered on the site would need to be robustly justified and supported with appropriate evidence at the planning application stage. With regards to the comments received in relation to this topic, these representations were split between respondents seeking increased numbers of affordable housing, fewer affordable housing units or alternative housing mixes on sites but evidence to support these suggestions was generally not submitted.
The capacity of local utilities infrastructure (incl. sewerage, water supply, broadband)	In particular comments relating to the capacity of local utility infrastructure focused on the capacity of Anglian Water's wastewater recycling centres (foul water) and the availability of Broadband provision within a settlement. To support the VCHAP a Water Cycle Study (WCS) has been produced, which considers the in-combination impacts with those larger sites allocated in the GNLP, and this will highlight any particular areas of concern that may exist in the wastewater network. The Council has also met directly with Anglian Water to discuss network capacity and infrastructure issues, and, where we have been made aware of specific concerns by local residents that have not been addressed we have forwarded this information onto the consultants producing the WCS to review. The Council has considered the availability of all utility infrastructure to a site and where known developers have confirmed its availability (or otherwise). This information is reflected in the site assessment forms. The delivery of strategic infrastructure, or upgrades to existing networks, is ultimately the responsibility of the utility provider however in accordance with emerging Policy 4 of the GNLP it will be for applicants to make provision for on-site capacity and connections – either via the transfer of land or developer contributions. The availability of Broadband has been assessed via the Better Broadband for Norfolk website.

Issue Raised	SNC Response
Impacts on local heritage and the historic environment	The Council has liaised closely with both the Council's own Senior Heritage and Design Officer and Historic England during the site assessment and selection process. Following review of all sites, the Council's Heritage Officer was invited to comment on all of the preferred and shortlisted sites as part of the Technical Consultations, focussing on those considered to have a potential impact on identified heritage assets. These comments were included within the site assessments and helped to inform the sites selected as preferred and shortlisted options at Regulation 18. Historic England (HE) also provided comments as a statutory consultee to the VCHAP process. HE identified a number of sites considered to have a possible impact on the significance of the setting of a listed building (or Conservation Area) and requested that Heritage Impact Assessments be undertaken for these sites. The Council subsequently entered into discussions with HE to agree a template form and assessment criteria for the production of the HIAs. These have subsequently been completed and will be used to inform the site-specific policy allocation text as appropriate.
The design of development	The appropriate layout and design of a site is important, particularly when planning development within smaller settlements. The Council recognises this and, as appropriate, will include design requirements in the site-specific policy allocation text for certain sites. The design requirements set out in these policies will be informed by the assessments and ongoing discussions that have occurred during the VCHAP production process, including (but not limited to) the Heritage Impact Assessments and Landscape and Visual Appraisals. For all sites, the final detailed design and layout will also be subject to the usual requirements of the adopted Local Plan policies, including the South Norfolk Place Making Guide SPD and any adopted Neighbourhood Plans, and will be subject to full assessment against these at the planning application stage.

Issue Raised	SNC Response
Lack of public transport services locally	Infrequent connectivity via public transport was a concern raised in the consultation responses, alongside a lack of public transport in some locations. The Council has sought to identify existing public transport facilities locally as part of the site assessment process but recognises that these services and timetables have seasonal fluctuations and are subject to change at the discretion of the public transport providers. Nevertheless, where they exist regular public transport services are considered to be an advantage for a site. The constraints of the public transport network are acknowledged but it is also recognised that this is a limitation within any rural area. The VCHAP is seeking to distribute development throughout the District, focusing primarily on sites that have access to existing local facilities and services. Pedestrian connectivity of a site (either current or proposed) to existing facilities and services has also been a key factor in the site assessment process, at the same time recognising the constraints identified in the 'Road and pedestrian access to sites' section above. As a rural District it is also acknowledged that residents have a higher level of car ownership.
The overarching strategy of dispersing growth amongst villages	The overall distribution of development, including the allocation of 1,200 homes to the South Norfolk Village Clusters is covered by the GNLP and is an issue which has been raised through the GNLP Examination. Within this context, the Council carefully considered the available options for allocating the level of development required by the Greater Norwich Local Plan (GNLP) within the 48 village clusters in the District. Three scenarios were identified in the Sustainability Appraisal (SA) which sits alongside the VCHAP and forms part of the evidence base for the selection of sites. The VCHAP has been produced taking into account the findings of the SA and it is considered that this approach to distributing development throughout the village clusters offers the most opportunities for encouraging existing settlements, services and facilities to thrive in a sustainable manner.

Issue Raised	SNC Response
Impact of housing development on climate change	Climate change was a concern to some respondents and there was also an inter-play between this topic and others set out above (for example, flooding and biodiversity). The Council takes its role within the climate change agenda seriously and, through the VCHAP, is seeking to include appropriate design and mitigation measures into the final policy wording. The Greater Norwich Local Plan is responsible for setting out the strategic policy for addressing climate change throughout the whole of the Greater Norwich area, as well as the overall distribution of development. The VCHAP is part of this wider strategy that focuses the vast majority of growth on a strategic growth area that is well placed to exploit existing and future opportunities for alternative modes of transport such as walking, cycling and public transport. At a local level sustainable development and changes to the Building Regulations will play an important role in tackling climate change. The VCHAP recognises the shift in working patterns that has occurred, particularly the increase in working from home, which reduces the need to travel to workplaces. There is also a movement towards the increased usage of electric cars. At a more strategic level the Council continues to work with the County Council to address rural accessibility and transport issues. There is also a concern that without modest growth in villages the existing local services and facilities will not remain viable, resulting in additional journeys to schools, recreational opportunities etc.
Loss of valuable agricultural land	As part of the site assessment process the Council has identified the status of the agricultural land promoted for development, automatically classifying the most versatile land as having an 'amber' impact on the landscape in accordance with the approach taken by the GNLP. Whilst the Council is mindful of concerns about development occurring on agricultural land it recognises that in order to achieve the required housing growth within a rural context the majority of development will inevitably occur on greenfield land, much of which will be agricultural. However, it should also be noted that not all sites preferred or shortlisted within the VCHAP are currently within active agricultural use. Sites identified for allocation comprise a combination of agricultural land, commercial and brownfield sites, undeveloped areas of land as well as privately owned (non-agricultural) parcels of land. Overall the GNLP seeks to maximise the level of development on previously used land; however this would not be sufficient to accommodate the growth required.

Figure 3 – South Norfolk Council responses to main issues raised during consultation

5. Conclusion

- 5.31 Both parts of this Statement of Consultation demonstrate the broad programme of community and stakeholder involvement that has been carried out, firstly under the banner of the Greater Norwich Local Plan (GNLP), and secondly by South Norfolk Council, in the development of the Village Clusters Housing Allocations Plan (VCHAP).
- 5.32 The engagement and consultation has followed the requirements of South Norfolk Council's Statement of Community Involvement, in necessitating an initial stage of pre-production and evidence gathering, followed by a consultation on a draft Local Plan. The majority of the first stage was undertaken when this work was being dealt with as part of the GNLP, and the latter once South Norfolk Council had taken the decision to produce an independent VCHAP.
- 5.33 The initial GNLP activity of identifying sites, undertaking thematic discussions with stakeholders and holding two significant public and stakeholder consultations in 2018, resulted in a wealth of evidence that was passed to South Norfolk Council to develop further in the production of the VCHAP.
- 5.34 Following South Norfolk Council's initial consultation with technical bodies, the substantial public and stakeholder consultation on a draft of the VCHAP document was undertaken, as outlined in Section 3 of this Statement of Consultation – Part 2.
- 5.35 The methods used to engage with the public and stakeholders were (to a large degree) dictated by the then current restrictions on holding public events, due to the Coronavirus pandemic. However, South Norfolk Council considers that the measures used allowed for an open, accessible consultation, in line with the Council's Statement of Community Involvement (and the then current SCI Temporary Update).
- 5.36 The main issues which emerged from the consultation activity, as set out in Figure 3, have assisted South Norfolk Council in developing a Village Clusters Housing Allocations Plan for the Reg. 19 'Publication' stage, which it feels best meets the specific growth requirements of the individual Village Clusters across the district.

Appendix 1: South Norfolk Council email to promoters of sites in South Norfolk villages (March 2020)

Fri 06/03/2020 17:34

South Norfolk Village Clusters Housing Allocations Document - Confirmation of Existing Sites

Dear site promoter

You have previously submitted a site/sites for possible future housing development in one of the smaller villages in South Norfolk, as part of the Greater Norwich Local Plan (GNLP) process. As you will probably already be aware, the decision has now been made to take those sites forward in a separate South Norfolk Village Clusters Housing Allocations Document.

The purpose of writing to you at this stage is to confirm that you still wish your site/sites to be considered in the Village Clusters document, for future allocation and/or inclusion within the Settlement Boundary. The document will consider two broad groups of sites:

Sites of approximately 12-25 dwellings, which will be allocated to meet the need for at least 1,200 new dwellings in these settlements; and
Sites for 11 dwellings or fewer, for inclusion in the Settlement Limits, for future windfall development.

The current GNLP consultation, which ends at 5pm on Monday 16 March, includes a call for *additional* sites in Village Cluster locations in both Broadland and South Norfolk. The draft GNLP Strategy defines this as a site for a minimum for 12 units (approx..0.5 hectare) up to 1.0 hectare. If the site/sites you have previously promoted is/are outside those parameters, you might want to consider amending the boundaries to fit better with the aspirations of the Village Clusters document. In particular, if you have a site that is substantially larger than a hectare, we would like you to confirm that you would still be interested in the site being developed, should a scheme of approximately 12 to 25 units be allocated, as well as identifying on which part(s) of the site you think that could be best achieved.

In exceptional circumstances we may be considering larger sites, where these address particular local issues or bring particular benefits to a local community.

I would be grateful if you could confirm:

- (a) that you still wish your site/sites to be considered for inclusion in the South Norfolk Village Clusters Housing Allocations Document;

- (b) where relevant, that you consider the site viable to be brought forward for between 12 and 25 dwellings, taking into account the need to provide approximately 33% affordable homes, a mix of market dwellings (including bungalows or smaller units where relevant) and any other local infrastructure improvements necessary for proper development of the site; and
- (c) any amendments to your site/sites boundaries to better fit with the Village Clusters aspirations (if you wish to identify the remainder of a larger site, or other land in the same ownership, as a contingency, please ensure that this is clearly distinguishable from the main area being promoted).

We would be grateful if you could include your GNLP site reference(s) where you know this.

I would be grateful if you could provide **confirmation by Tuesday 31 March**, by email to:

LP@s-norfolk.gov.uk

or by post to:

Place Shaping Team,
Planning
South Norfolk Council
Cygnet Court
Long Stratton
NR15 2XE

If you have any questions on this issue, or concerns about meeting the deadline, please contact a member of the Place Shaping Team on 01508 533805.

Yours faithfully

Principal Infrastructure and Planning Policy Officer
Broadland District Council & South Norfolk Council

Follow-up email – 26th March 2020

Thu 26/03/2020 21:13

South Norfolk Village Clusters Housing Allocations Document - Confirmation of Existing Sites

Dear site promoter

Further to my email of 6 March, many thanks to those of you who have already responded and confirmed your sites; *if you have, there is no need to do anything further.*

For those who have *not* yet responded, due to the ongoing situation with the Coronavirus (COVID 19), we are extending the deadline to **Thursday 9 April.**

As mentioned in my last email, you have previously submitted a site/sites for possible future housing development in one of the smaller villages in South Norfolk, as part of the Greater Norwich Local Plan (GNLP) process; these will now be taken forward in a separate South Norfolk Village Clusters Housing Allocations Document.

The purpose of writing to you at this stage is to confirm that you still wish your site/sites to be considered in the Village Clusters document, for future allocation and/or inclusion within the Settlement Boundary. The document will consider two broad groups of sites:

Sites of approximately 12-25 dwellings, which will be allocated to meet the need for at least 1,200 new dwellings in these settlements; and
Sites for 11 dwellings or fewer, for inclusion in the Settlement Limits, for future windfall development.

The GNLP consultation, which ended on 16 March, included a call for *additional* sites in Village Cluster locations in both Broadland and South Norfolk. The draft GNLP Strategy defines this as a site for a minimum for 12 units (approx.0.5 hectare) up to 1.0 hectare. If the site/sites you have previously promoted is/are outside those parameters, you might want to consider amending the boundaries to fit better with the aspirations of the Village Clusters document. In particular, if you have a site that is substantially larger than a hectare, we would like you to confirm that you would still be interested in the site being developed, should a scheme of approximately 12 to 25 units be allocated, as well as identifying on which part(s) of the site you think that could be best achieved.

In exceptional circumstances we may be considering larger sites, where these address particular local issues or bring particular benefits to a local community.

I would be grateful if you could confirm:

- (a) that you still wish your site/sites to be considered for inclusion in the South Norfolk Village Clusters Housing Allocations Document;
- (b) where relevant, that you consider the site viable to be brought forward for between 12 and 25 dwellings, taking into account the need to provide approximately 33% affordable homes, a mix of market dwellings (including bungalows or smaller units were relevant) and any other local infrastructure improvements necessary for proper development of the site; and
- (c) any amendments to your site/sites boundaries to better fit with the Village Clusters aspirations (if you wish to identify the remainder of a larger site, or other land in the same ownership, as a contingency, please ensure that this is clearly distinguishable from the main area being promoted).

We would be grateful if you could include your GNLP site reference(s) where you know this.

Please provide **confirmation by Thursday 9 April**, by email to:

LP@s-norfolk.gov.uk

or by post to:

Place Shaping Team,
Planning
South Norfolk Council
Cygnet Court
Long Stratton
NR15 2XE

If you have any questions on this issue, or concerns about meeting the deadline, please contact a member of the Place Shaping Team on 01508 533805.

Yours faithfully

Principal Infrastructure and Planning Policy Officer
Broadland District Council & South Norfolk Council

Appendix 2: South Norfolk Council email to technical bodies (June 2020)

(N.B. Example provided is that sent to NCC Highways)

Wed 24/06/2020 19:39

South Norfolk Village Clusters Housing Allocations Plan - HELAA and Technical Consultation

Dear Consultee

You may already be aware that South Norfolk is currently preparing a Village Clusters Housing Allocations Plan. The Village Clusters Plan sits alongside the Greater Norwich Local Plan (GNLP) and, as the title suggests, is specifically focused on allocating the sites for at least 1,200 homes in the smaller settlements in South Norfolk. It was originally intended that sites for these homes would be allocated directly through the GNLP.

Approximately 450 sites are being considered across the South Norfolk Village Cluster settlements. As sites within the Cluster areas were originally considered through the GNLP, your organisation has been previously been consulted on the vast majority of these as part of the preparation of the Greater Norwich Housing and Economic Land Availability Assessment (HELAA) and Regulation 18 consultations on the GNLP. Therefore, you will only need to reassess sites if you think circumstances have changed since you originally made comments.

Whilst the vast majority of sites are those already known to you, 85 'new' sites have now been submitted and 48 sites have had their boundaries revised. You will be able to identify which sites are new, have been revised or that are the same as previously considered using the referencing explained below.

All of the sites have a unique four-digit reference:

- where a site has previously been submitted to the GNLP we have retained the same four-digit reference number, although the prefix to the reference will have changed from GNLPXXXX to SNXXXX.
- New sites have a four-digit reference beginning with a four, i.e. SN4XXX.
- Sites with revised boundaries are have the suffix 'REV' after their reference number;
- In a limited number of cases sites have been subdivided into two or more parts, these sites have the suffix REVA, REVB, etc after their reference number.

The HELAA for the Village Clusters Plan is being undertaken using the same agreed Norfolk-wide methodology as the GNLP, which you will already be familiar with. The HELAA is a broad assessment of every site which has been submitted to us, and a relatively brief, desk-based approach would be appropriate for giving a Red/Amber/Green HELAA score. We are seeking your views on the 'Access to Site' and 'Transport and Roads' elements of the HELAA, and the definition of each of the scores is:

Access to Site

- *Green*: Access by all means is possible.
- *Amber*: There are potential access constraints on the site, but these could be overcome through development
- *Red*: No possibility of creating access to the site.

Transport and Roads

- *Green*: Development of the site will not have a detrimental impact on the functioning of trunk roads and/or local roads.
- *Amber*: Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.
- *Red*: Development of the site would have an unacceptable impact on the functioning of trunk roads and/or local roads that cannot be reasonably mitigated.

Attached is a spreadsheet to record your responses. It has been formatted so that if you put a 'x' in the appropriate column, it will colour the cell. Please would you score the sites red, amber or green as per the description above. A 'HELAA comments' column is also included, should you wish to note any particular sensitivities and/or supporting reasoning for your scores. We would also be grateful if you would be able to confirm your scores/comments on sites that you have previously commented upon.

In order to retain a focussed timetable for the Village Cluster Plan we are undertaking the HELAA in parallel with the initial site assessment process. As such, you may wish to comment on the sites outside of the constraints of the HELAA scores. If you do, an 'Other Comments' column is also included on the attached spreadsheet.

Also attached are the Shapefiles for all of the sites. Please note, in some instances, the spreadsheet may include an 'SL' as part of the site reference, which is not part of the label for the corresponding shapefile; however, if the four digit numerical reference corresponds, this is the same site. If for any reason you find any discrepancies between the spreadsheet and Shapefiles, please do not hesitate to contact us.

I would be grateful if you could acknowledge receipt of this email and let me know who will be coordinating and/or undertaking the assessment for your organisation.

Given the limited number of new and revised sites we would be grateful if you could respond by **Friday 31 July 2020**. If you think there will be problems in making this deadline, please let us know as soon as possible and we will be happy to discuss an achievable deadline.

Many thanks for your help. If you have any questions then please contact me, using the details below.

Yours faithfully

Principal Infrastructure and Planning Policy Officer
Broadland District Council & South Norfolk Council

Appendix 3: Specific Consultation Bodies

3

Anglian Water
British Telecom / EE / Plusnet
Cadent Gas
City Fibre
CLH Pipeline System
Coal Authority
CTIL
Environment Agency
Highways England
Historic England
Homes England
Hyperoptic
ITS Technology
Marine Management Organisation
Mobile Operators Association
National Grid
Natural England
Network Rail
New Anglia LEP
NHS England
Norfolk and Waveney Integrated Care System
O2 Telefonica
Police and Crime Commissioner for Norfolk
Police and Crime Commissioner for Suffolk
SSE Telecom
UK Power Networks
Virgin Media
Vodafone
Wild Anglia LWP
Zayo

Relevant authorities:

Breckland District Council
Broadland District Council
The Broads Authority
East Suffolk District Council
Great Yarmouth Borough Council
Mid Suffolk District Council
Norfolk County Council
Norwich City Council
Suffolk County Council
All Parish & Town Councils in South Norfolk
All Parish & Town Councils adjacent to the South Norfolk District boundary

Appendix 4: Consultee notification email / letter

Dear Consultee,

South Norfolk Village Clusters Housing Allocations Plan Regulation 18 Consultation

A draft version of the South Norfolk Village Clusters Housing Allocations Plan (VCHAP) has been published for **8 weeks consultation, between 9am Monday 7 June and 5pm on Monday 2 August 2021**.

The VCHAP is seeking to allocate sites for at least 1,200 new dwellings (over and above those that already have permission), distributed across 48 Village Clusters centred around the Primary Schools in South Norfolk. The preferred allocation sites are between 12 and 50 dwellings, reflecting the scale of the settlements which they will form a part of. As well as allocation sites, the draft VCHAP proposes some smaller amendments to Development Boundaries, to accommodate windfall developments of up to 11 dwellings, which are in addition to the 1,200 dwelling requirement. We are now seeking your views on the choice of sites, including what specific criteria might need to be applied to the larger allocation sites.

The VCHAP sets out some suggestions for overarching policies which would apply to all housing proposals, whether they be on the allocations or the windfall sites. These are concerned with design quality, housing mix and common criteria, such as maximising the improving for walking/cycling, and your comments are also sought on these.

There may still be suitable sites in the Village Clusters which have not yet been promoted to us, so there is an opportunity to submit those additional sites as part of the consultation. For those considering submitting sites, it will be useful to consider the Council's Assessment Criteria when completing a site submission form.

The VCHAP sits alongside the Greater Norwich Local Plan, which you may already have commented on, and which will continue to set the strategic planning policies for South Norfolk and make both the housing allocations in larger settlements and also any non-housing allocations.

The consultation can be viewed at www.south-norfolk.gov.uk/vchap. Here you will find not only a link to the consultation document itself, plus a range of supporting documents that have been used to prepare the draft VCHAP, but also a virtual exhibition which may help answer some of your questions. As well as commenting on the main document, you may also wish to comment on the Interim Sustainability Appraisal and Habitats Regulation Assessment documents.

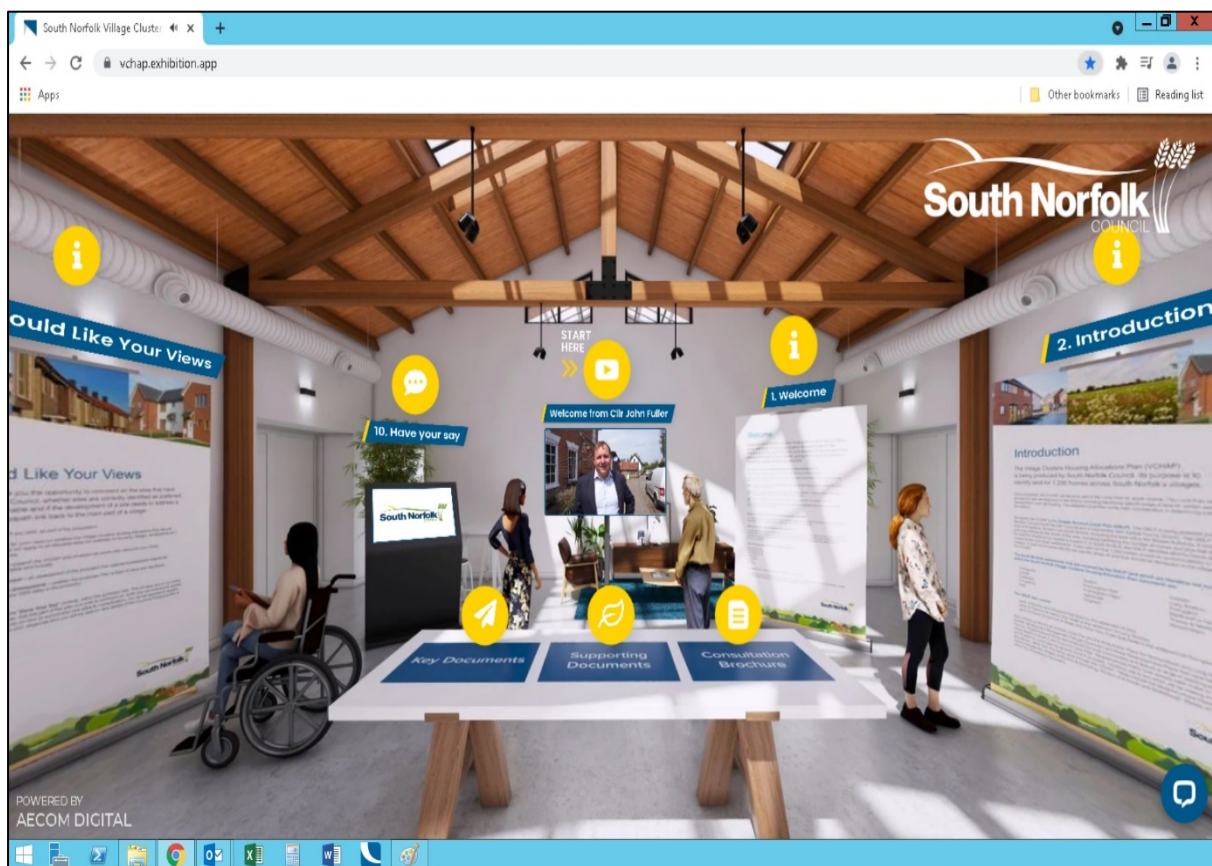
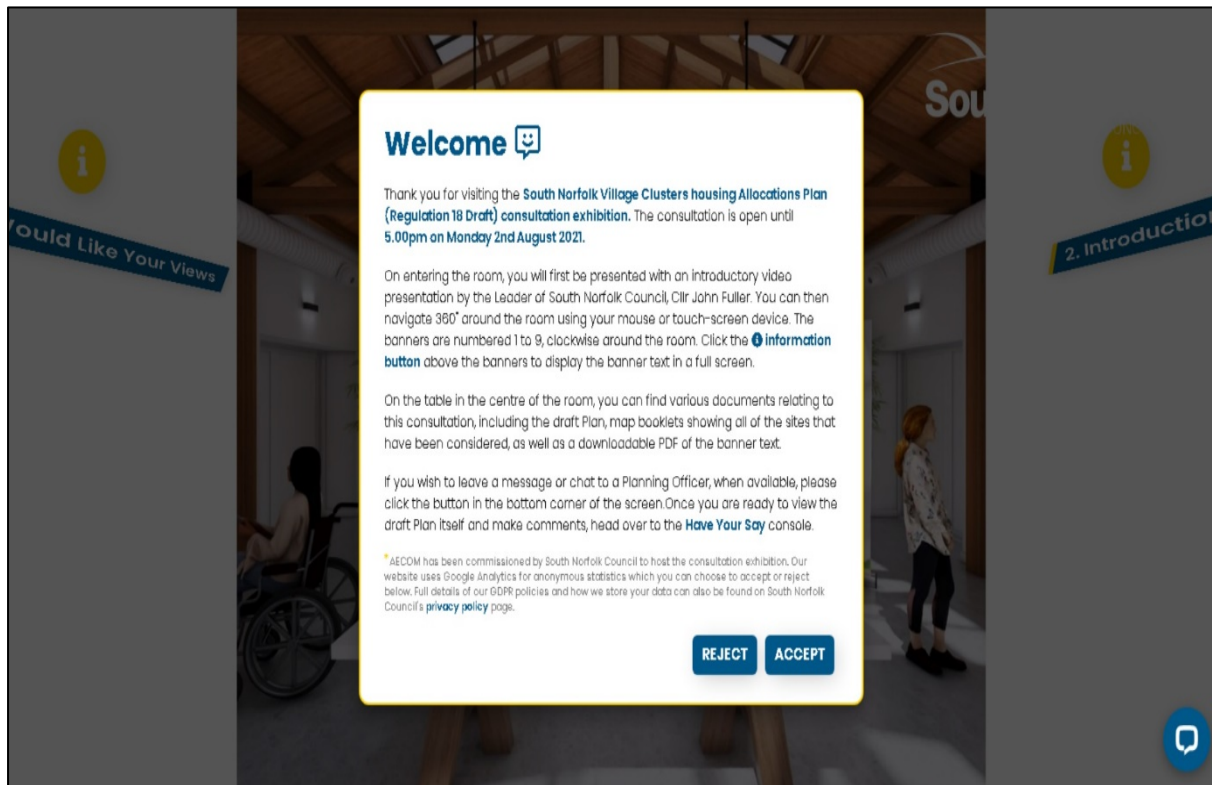
If you would like to contact the Place Shaping Team about the consultation (including letting us know if you wish to be removed from our consultation contacts) please call on 01508 533805, email LP@s-norfolk.gov.uk, or contact us via a webchat between 10am and 2pm on a Tuesday, or 2pm and 6pm on a Thursday, throughout the consultation (see VCHAP webpage for details).

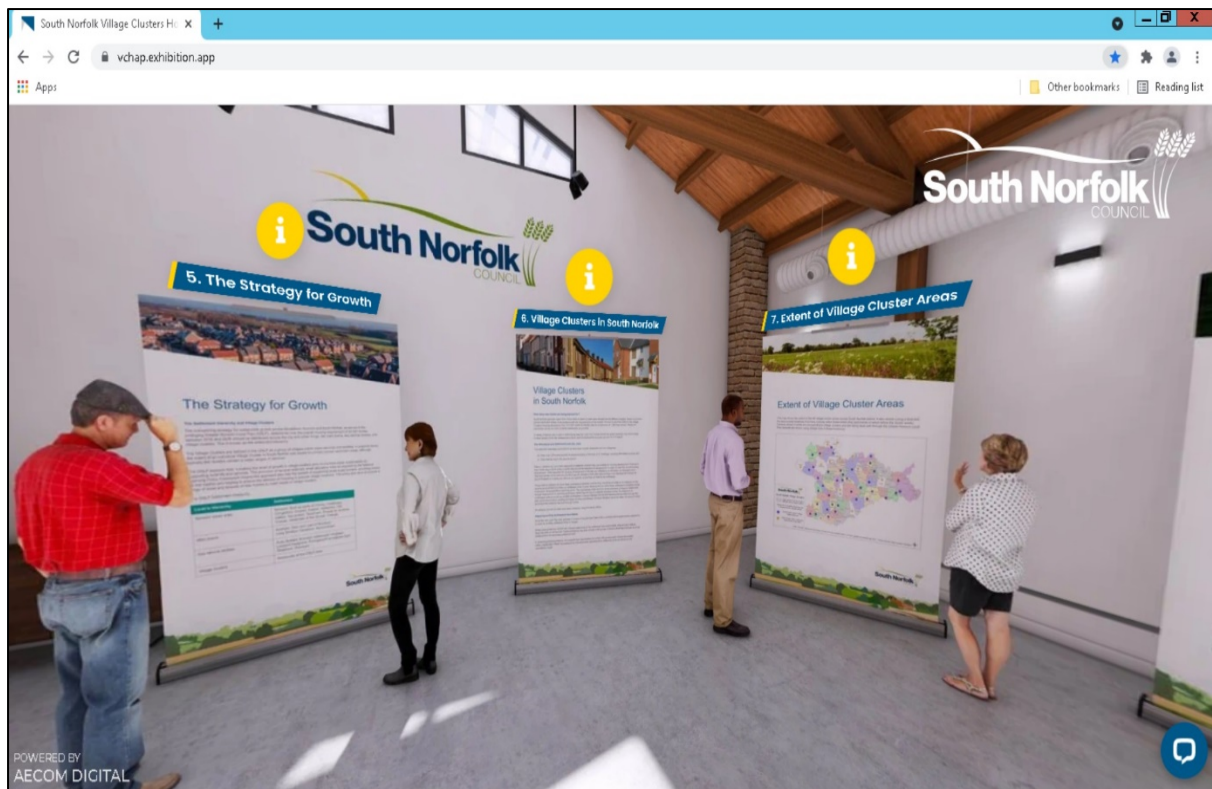
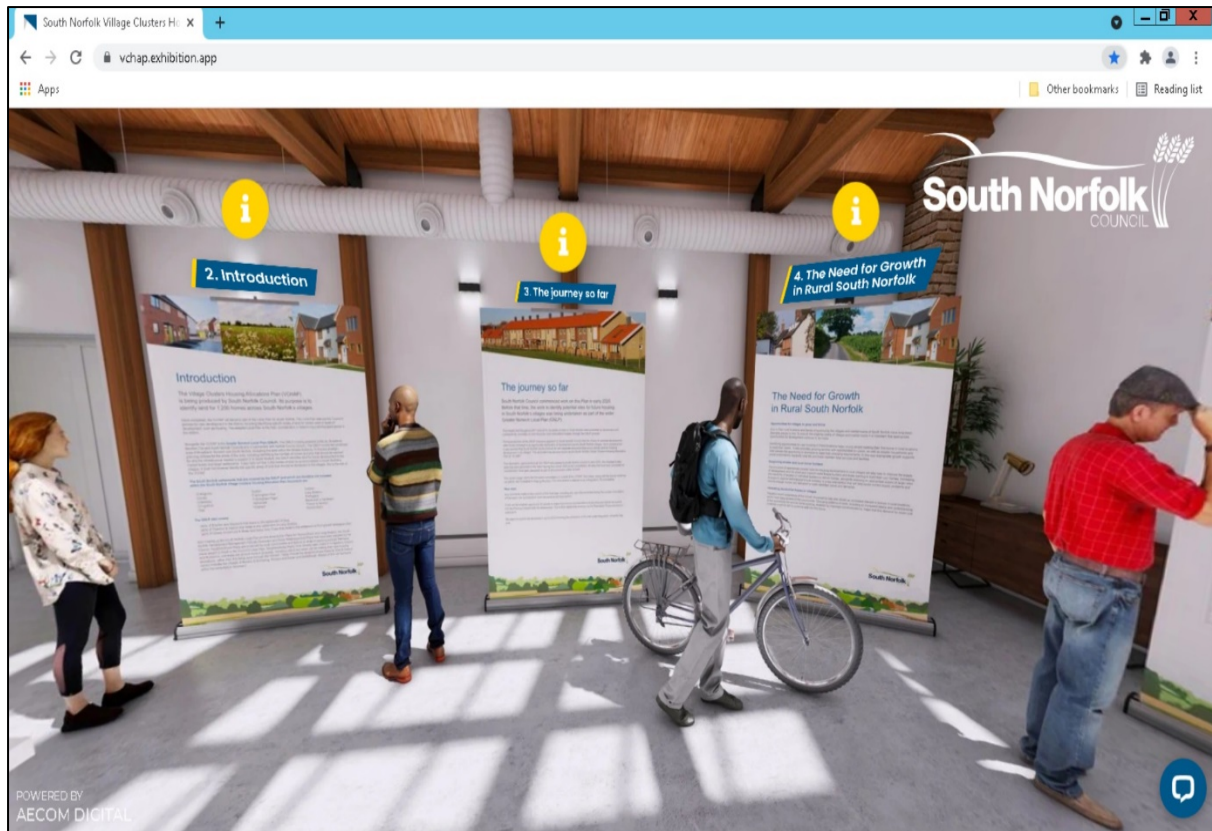
Please remember to **submit any comments by 5pm on Monday 2 August 2021**.

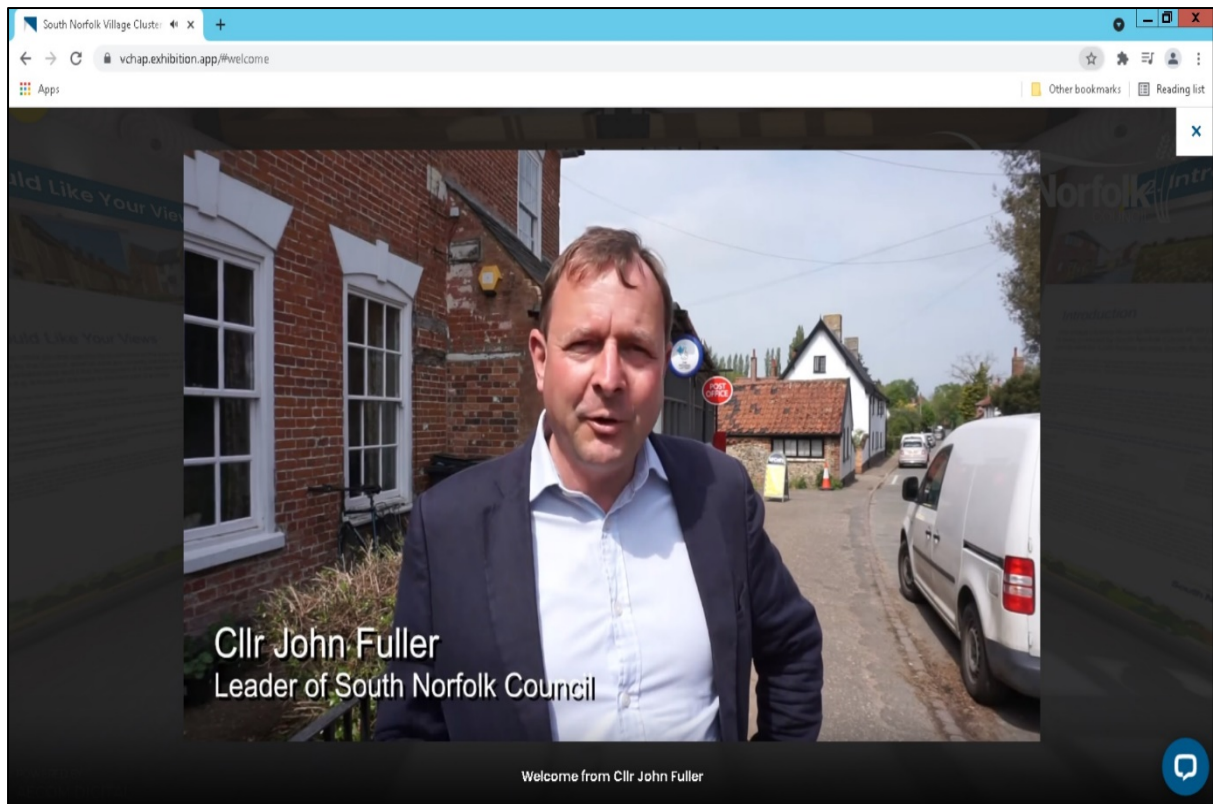
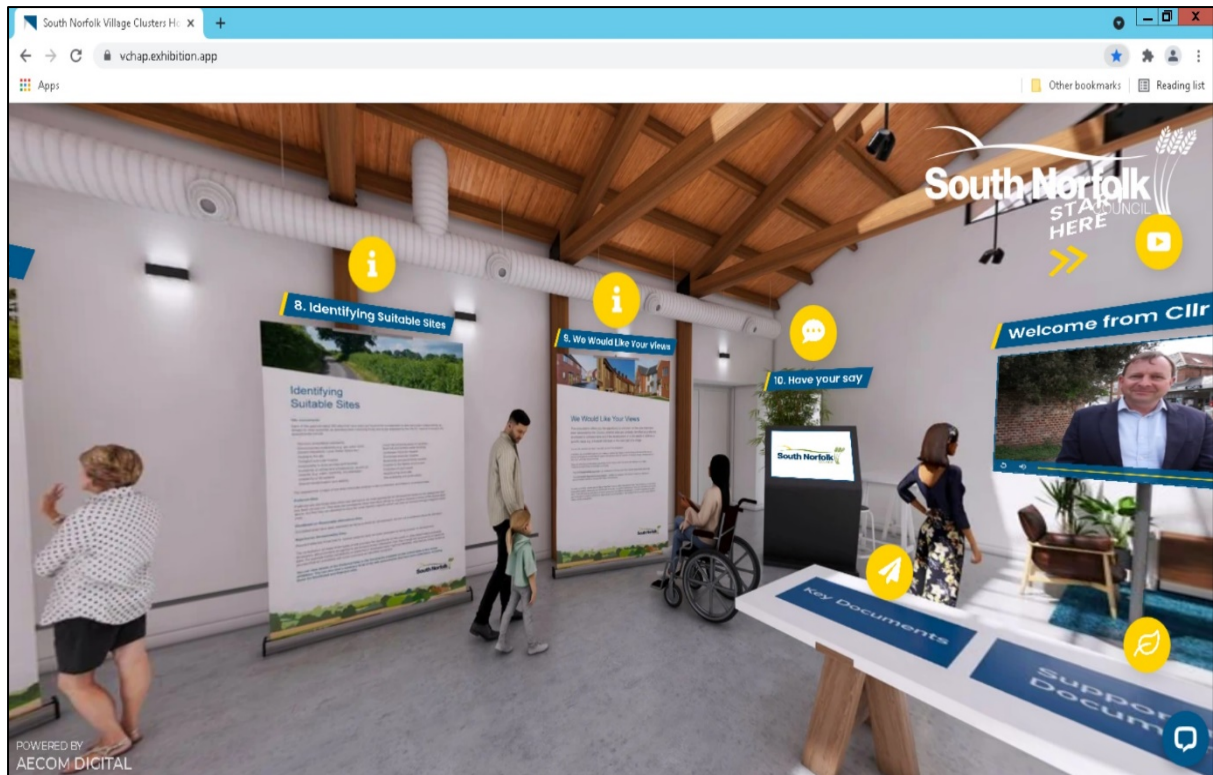
Yours faithfully

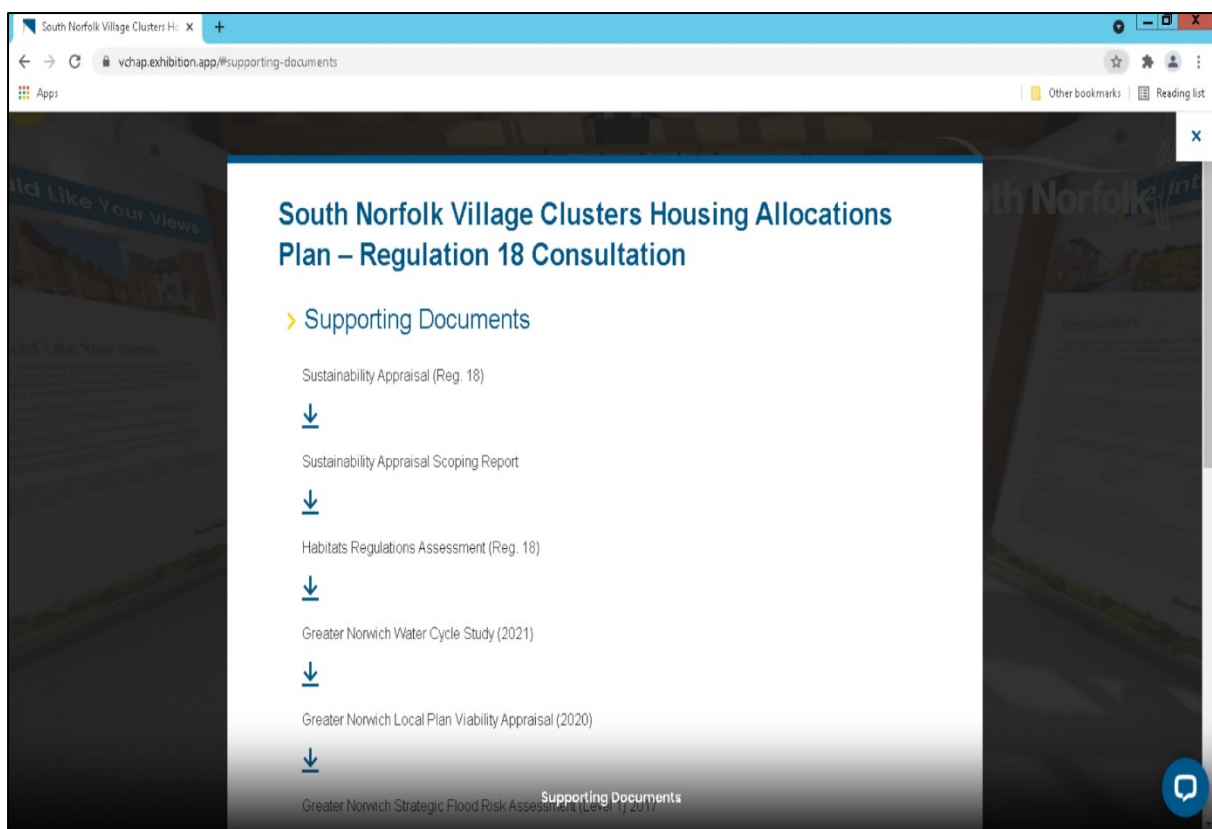
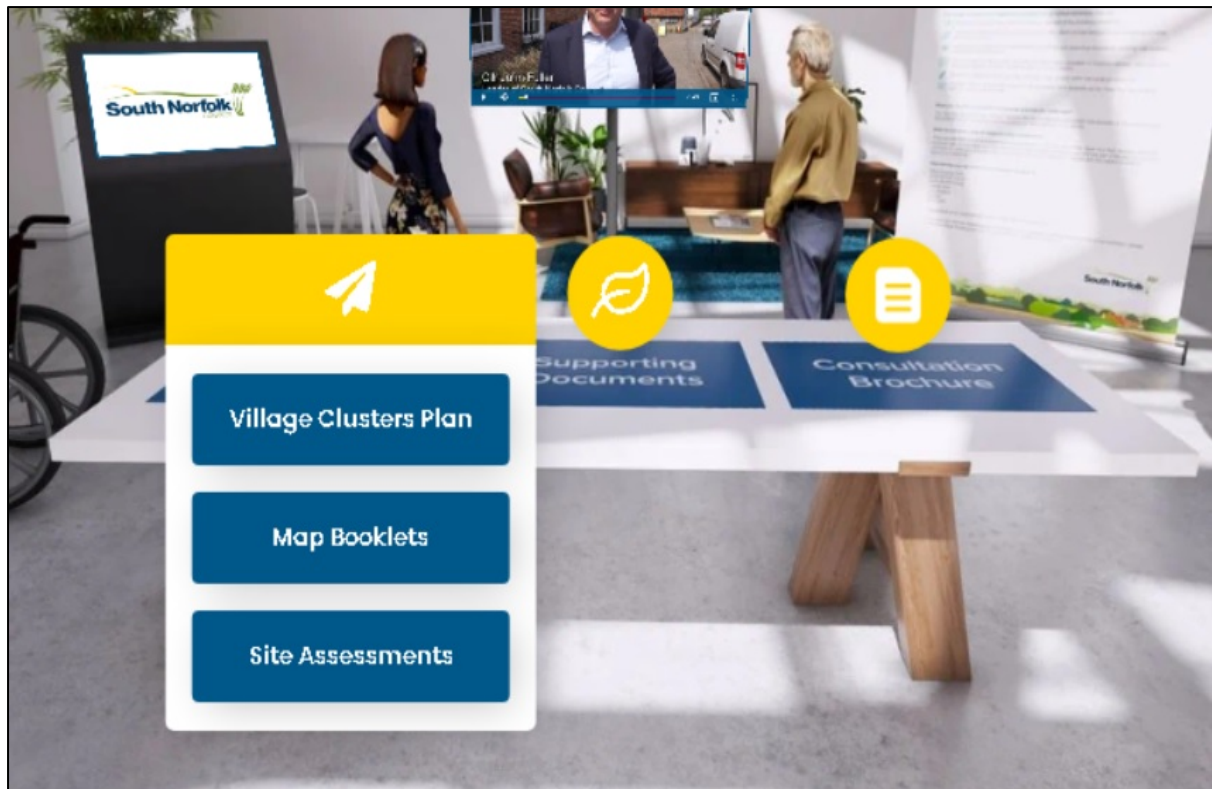
Paul Harris
Place Shaping Manager

Appendix 5: Images taken from virtual exhibition









Appendix 6: Consultation Poster



We'd like your views on future development in South Norfolk's villages

Between 7 June and 2 August, South Norfolk Council is consulting on a draft of its Village Clusters Housing Allocations Plan (VCHAP). This is a new Local Plan document that will allocate sites for housing growth in smaller villages across South Norfolk.

To ensure the ongoing vitality of South Norfolk's villages it is important that appropriate opportunities for sustainable development continue to be found. These villages have been grouped into 48 different clusters and our ambition is to distribute sites for growth across as many of the clusters as possible.

You can view and comment on sites that have currently been identified as Preferred Options, as well as those that have not been selected as preferred. Anyone wishing to put forward alternative areas of land for consideration will also be able to do so as part of this consultation.

**To find out more and comment, please visit
south-norfolk.gov.uk/vchap
where you can also attend our virtual exhibition.**

Any comments made on the draft Plan will be taken into consideration when we produce the final version, which is expected to be published in early 2022.

If you have questions please contact the Council's Place Shaping Team at lp@s-norfolk.gov.uk or 01508 533805.



Appendix 7: Eastern Daily Press article (03.06.2021)

Where should 1,200 Norfolk village homes be built?

George Thompson, Local Democracy Reporter

Published: 6:54 PM June 3, 2021

Updated: 11:07 AM June 4, 2021



Building new homes, bridges, tunnels, motorways could fend off high unemployment as the UK prepares to bolster the economy after Covid-19, says Peter Sharkey - Credit: Getty Images/iStockphoto

A council wants your thoughts on where more than 1,000 homes should be built in small Norfolk villages.

South Norfolk Council will be holding an eight-week consultation for its village clusters housing allocation plan (VCHAP).

In total, the council wants to build 1,200 homes between now and 2038, as part of the Greater Norwich Local Plan (GNLP), which sets out home building policies across Broadland, Norwich and South Norfolk.



South Norfolk Council leader John Fuller. Picture: ROSE SAPEY - Credit: Rose Sapey

"We need to plan for those people living here tomorrow - not everyone wants to be living in the city or close to the city," said John Fuller at a meeting of the SNC cabinet on Tuesday.

"Many people want to live in the countryside or villages for a variety of reasons.

Around 450 sites have been considered for the VCHAP, with 66 identified as preferred and a further 24 on the shortlist of alternatives.

While much of the GNLP focuses on development in built-up areas around Norwich, the VCHAP looks to small villages typically for only 12- 25 houses.

Mr Fuller said around 90pc of the homes in the GNLP are in or close to Norwich, but some need to be in villages.

Cabinet members stressed that the plans were not a “done deal” and that consultation would be used to identify the right sites.



South Norfolk Council wants to start the consultation next week - Credit: Archant

Kay Mason-Billig said: “We have got to think about the reasons why we did this in the first place.

“Things have changed a lot in the two years with Covid, people seem to appreciate more their home space.

“We don’t want dormant villages where people leave in the morning, lock the door and the place becomes quiet with no life in it.

“This is an opportunity for us to revitalise the spaces, bring more people in and have more services there.” Cabinet agreed for the consultation to go ahead, which is due to start on Monday, June 7.

For a list of parishes covered by the local plan visit the South Norfolk Website.

Appendix 8: South Norfolk Council social media posts



Twitter post – re-tweeted on 12th June, 16th June, 29th June, 16th July 2021.



Facebook post – re-posted on 12th June, 16th June, 29th June, 16th July 2021.

Appendix 9: Article in South Norfolk Council 'Link' magazine, spring 2021

Have your say on new development

Due to their rural locations and sense of community the villages and market towns of South Norfolk have always been desirable places to live. To ensure the ongoing vitality of the district it is important that appropriate opportunities for development continue to be made. This will help young people seeking their first home in a rural location as well as helping provide growing families or older people with opportunities to upsize or downsize. In this way appropriate growth supports social sustainability, supports rural life and helps maintain local services and facilities.

People's recent experience of the COVID-19 lockdown has also driven an increased interest in homes in rural locations, with easy access to the countryside. Changing patterns of work, including an increased desire for home working, enabled by improved communications, mean that this demand for more rural locations could continue well into the future.

The provision of appropriate smaller sites for housing development in rural villages will also help to improve the supply of development land for small and medium-sized housebuilders and those wanting to build their own homes. Increasing the capability of smaller or individual builders to deliver homes, alongside ensuring an appropriate supply of larger sites to support regional and national housebuilders, is a key intervention that will help tackle current supply problems and ensure enough homes are delivered to meet identified needs and demands.

In recognitions of these factors, we are planning a public consultation on our draft Village Clusters Housing Allocations Plan this spring and summer. This will be a new Local Plan document, allocating sites for housing growth in smaller settlements across South Norfolk between now and 2038.

South Norfolk parishes have been divided into 48 different clusters, based on primary school catchment areas. The Village Clusters Plan will identify sites for a minimum of 1,200 new homes. Factors, including access to local services and facilities, the impact on local roads and flood risk, will play a key part in determining how the development will be spread between the cluster areas.

Due to the rural characteristics of South Norfolk's villages, in most cases, sites allocated through the plan are expected to be smaller in size, capable of accommodating between 12 to 25 homes and distributed across as many of the clusters as possible.

6 | SOUTH NORFOLK LINK SPRING 2021



Larger sites may be proposed where they offer the opportunity to achieve particular benefits that could not be achieved through a smaller site or where a site needs to provide significant infrastructure improvements.

Approximately 450 sites located within the village clusters are being assessed to see which may or may not be suitable for future housing development. This includes sites that were originally submitted for consideration as part of work to produce the Greater Norwich Local Plan, and previous consultation comments relating to those sites have also been included in the assessment. Our aim is to publish a document containing the results of those site assessments for public consultation by May.

Those taking part in the consultation will be able to comment on the sites that have been assessed. It remains possible for anyone wishing to promote a potential development site for consideration to do so through this public consultation.

The consultation will be hosted on our website where you will be able to view an interactive map showing the proposals and leave your comments online. There will be plenty of publicity once the consultation goes live, including articles in the local press, posters in and around South Norfolk's communities, and features on the Council's social media channels.

Following this consultation, it is anticipated that the final Plan will be submitted to the Planning Inspectorate in early 2022, after which it will be subject to independent examination. It is expected that the document will be adopted by the Council in early 2023.

For further details, please contact the Place Shaping Team at lp@s-norfolk.gov.uk

Appendix 10: Parish Councils webinar presentation

Two Councils - One Team

South Norfolk Village Clusters Housing Allocations Plan

Regulation 18 Consultation

June 2021

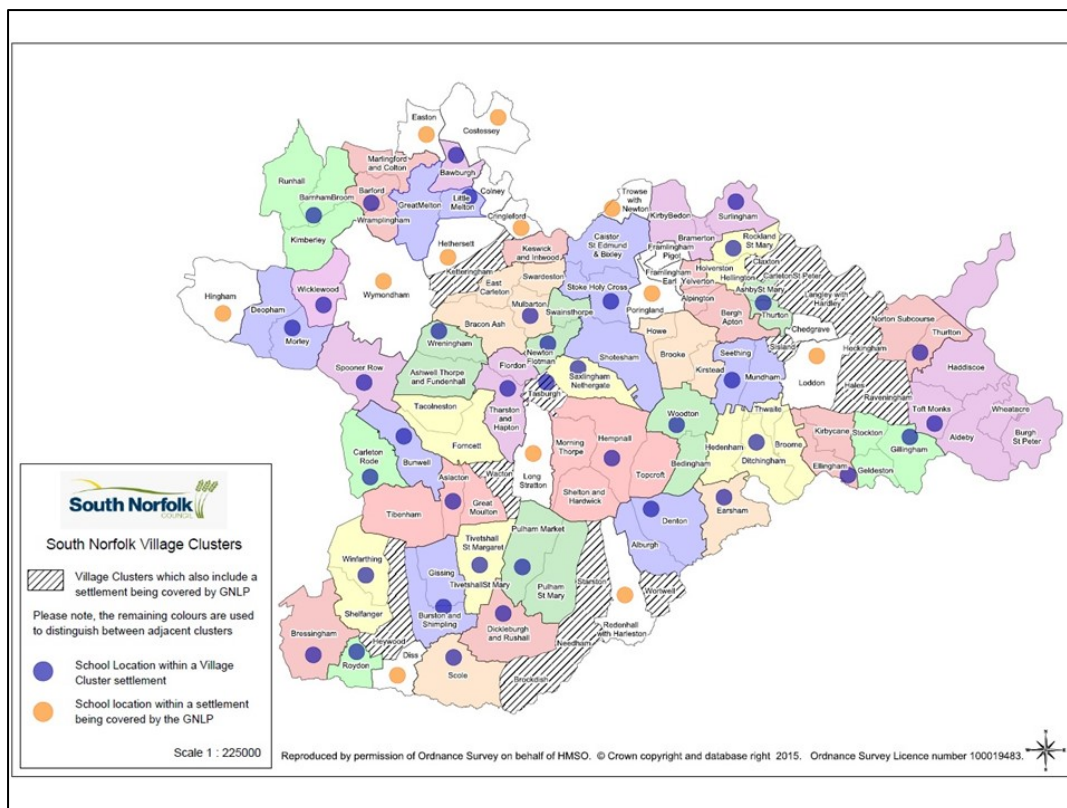


Two Councils - One Team

What is the Village Cluster Plan?

- South Norfolk Village Clusters Housing Allocation Plan (VCHAP) is a Local Plan document being produced by South Norfolk Council (SNC).
- Purpose of VCHAP is to identify sufficient land for a minimum of 1,200 homes in Village Clusters.
- The VCHAP follows on from Greater Norwich Local Plan (GNLP). GNLP sets out strategic policies, identified land in larger settlements and establishes the housing requirement.
- Approx. 450 Sites assessed in accordance with the criteria agreed by SNC Councillors. Selection of sites reflects Council's preference for small sites across a range of suitable settlements.





Two Councils - One Team

What is being consulted upon?

- Regulation 18 Document, which includes:
 - 3 Objectives
 - Proposals for 3 Core Policies
 - Contextual and Settlement Limit information about each of the Village Clusters
 - Proposals for the 66 Preferred, 24 Shortlisted and remaining Rejected Sites.
 - Proposed Monitoring Framework
- Also being consulted on are the Sustainability Appraisal and Habitat Regulations Assessment that have been produced to accompany the plan.
- The consultation also offers the opportunity for landowners, site promoters and developers to put forward further sites.

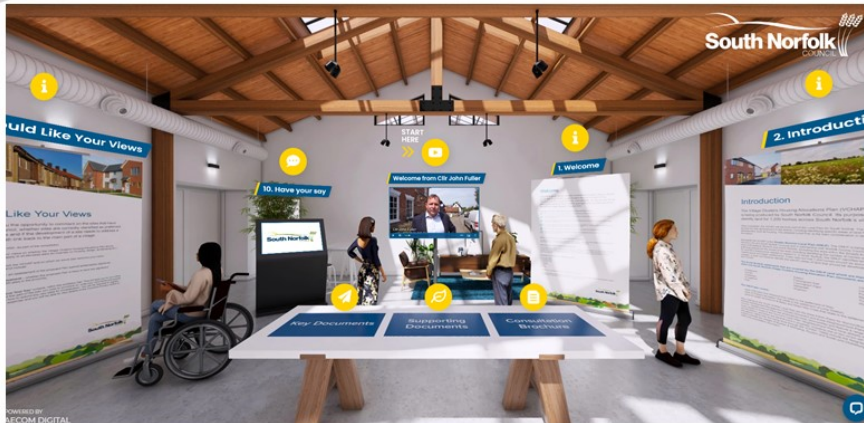
Two Councils - One Team

When is the consultation, how can I comment and where can I find more information?

- Consultation documents published on 7th June. Consultation will run for 8 weeks finishing on 2nd August.
- Comments can be submitted via Council's consultation website.
- Further information published through the VCHAP Virtual Exhibition.
- The public and other stakeholders can contact the team through live webchat (on Tuesdays 10-2 and Thursdays 2-6), via email or by phone.



Two Councils - One Team



Two Councils - One Team

Next Steps...

- After consultation:
 - Analysis of representations;
 - Assessment of new sites;
 - Additional evidence gathering; and,
 - Review of preferred, shortlisted and rejected sites.
- Regulation 19 Consultation – March 2022.
- Submission to Secretary of State – June / July 2022.
- Adoption – April 2023.



Two Councils - One Team

Useful Links and Contact Details

- Council Webpage: www.south-norfolk.gov.uk/VCHAP
- Email: lp@s-norfolk.gov.uk
- Telephone: 01508 533805



Appendix 11: Summary of consultation responses, per Village Cluster, and South Norfolk Council responses

Introduction

The following tables set out a summary of comments and issues raised made during the Regulation 18 Draft consultation on the proposed Village Clusters Housing Allocations Plan, which took place during summer 2021. The tables also include responses by South Norfolk Council to the issues raised.

Each table, below, relates to a different Village Cluster area and there is a separate table relating to the VCHAP Objectives, proposed Core Policies, and the Monitoring Framework. Representation summaries are set out within each table by specific question number from within the Reg 18 draft document, with the details/subject of that specific question also being highlighted, for ease of reference.

Please use 'Bookmarks' to navigate between different sections.

Plan Objectives, Core Policies & Monitoring Framework

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 1: Do you agree with the Plan Objectives?	1752	Object	Hempnall Parish Council considers that the Village Cluster proposals are unnecessary because they form part of an un-sound (and quite possibly not legally compliant), unnecessarily high Total Housing Potential number which is not compatible with NPPF paragraphs 148 and 149 and does not comply with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050 The Village Cluster proposals are also un-sound because they form part of a policy to disperse a significant amount of development. A widespread dispersal of development in to villages also conflicts with the requirements of NPPF paragraphs 148, 149 and 150 and the objective of the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050. Nor does it follow the guidance provided by National Planning Practice Guidance (PPG) (2019) Setting the housing number so high and dispersing some development in the way the GNLP suggests including via village clusters will result in a number of very negative consequences in regard to the landscape and the environment and loss of green space and countryside.	Hempnall Parish Council objection to the proposed Spatial Distribution of Growth across Greater Norwich, the overall level of growth proposed, the principle of Village Clusters, the allocation of 1,200 homes to the South Norfolk Village Clusters and its request for the Village Clusters to be removed from the GNLP is self-evidently a matter for the GNLP. Such issues cannot be resolved through the Village Cluster Plan, which is bring prepared in the context of those policies. Consideration as to whether the policies of the GNLP are "Sound" is matter specifically considered as part of the GNLP examination. For the sake of brevity those matters are not addressed in detail here, although the Council would set out that it considers the approach set out in the GNLP is fully justified, and that the allocation of 9% of the overall planned growth to the locations (the village clusters) that currently contain 25% of the current housing stock is not disproportionate and illustrate the skew of new growth toward larger settlements and the Norwich urban area. Whilst the Parish comment at length about the impact of the overall approach to Village Clusters as set out within the GNLP, it does not clearly set out objections to the specific approach	993	The Parish Council comments in relation to the objectives substantively related to matters that are the concern of the Greater Norwich Local Plan (GNLP) not the South Norfolk Village Cluster Plan. Therefore no specific actions are considered necessary as a result of this representation in relation to the draft objectives of the plan.

Alburgh & Denton

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QUESTION 6: Should any of the rejected sites be allocated?	1391	Comment	No comment on specific site but please consider infrastructure implications in East Suffolk.	These comments are noted and it will be necessary initially to determine whether these third parties provided representations to the Regulation 18 consultation. However, specifically in terms of observations relating to the potential impact of site allocations on education facilities within adjacent settlements in the Suffolk area enrolment in primary schools would be managed through a combination of parental choice and alternative schools as many children now attend schools out of their catchment areas. Similarly, whilst many GPs can offer registrations for patients who reside outside their area these registration applications can be refused on appropriate grounds (including being closed to new patients) which can help to mitigate the impact of new development on these practices. The existing pressures on the NHS and GP practices within the area are however recognised.	864	Review whether the Integrated Care System (ICS) and Suffolk County Council provided representations during the Reg 18 consultation. Engage with these bodies as appropriate.
QUESTION 6: Should any of the rejected sites be allocated?	1920	Comment	Part of the Parish is located within the Waveney, Lower Yare and Lothingland IDD. The Board's byelaws apply to any new developments within the IDD.	Comments noted.	863	No action required.
QUESTION 6: Should any of the rejected sites be allocated?	1833, 1834, 1835, 1836	Comment	SN4031SL, SN00168, SN4011 and SN00193: The Environmental Protection Team are not aware of any significant land quality issue with the site or adjacent land.	Comments noted.	862	No action.

Alpington, Yelverton and Bergh Apton

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QUESTION 7: Settlement Limit	1707	Comment	The assessment of Site SN1012 has failed to take into account a number of factors and this site should be included in the extended settlement boundary because: 1. Insufficient consideration has been given to this part of the settlement contributions to rural growth under NPPF para 79; 2. The site is within walking distance of Green Pastures, which includes farm shop, cafe and Post Office, as well as bus services on the A146; 3. There is a public footpath to the school which avoid walking on carriageway or pavement, in any event the road is class C with a 30mph limit; 4. The junctions at either end of Mill Road are of a similar standard to those elsewhere in the cluster which would be used to access the preferred sites; 5. The frontage of the site would be in keeping with the linear pattern of development along Mill Road.	1. This part of Alpington/Bergh Apton has an existing Development Boundary which was subject to a small Settlement Limit extension in the 2015 Local Plan. As such, the Council has not discounted this area from contributing to future growth; 2./3./4. The site assessment acknowledges that the site is within walking/cycling distance of Green Pastures and the A146 bus stops. However the Highways Authority is concerned about the distance from other services, the lack of footways, the fact that Mill Road is narrow in places and the standard of the junctions at each end of the road. The road is also unlit. Whilst a public footpath does exist from the site to Alpington Village (which then has pavements to the school), the majority of the 1.4km distance would be on unmade, unlit footpath, which bisects a group of working farm buildings. As such it is unlikely to be an attractive walking route for primary school children; 5. Developing the frontage of the site would broadly be in keeping with the form of development on Mill Road. However the frontage of the site includes substantial trees/hedging, which contribute to the character of the area, and it has not been demonstrated	704	No action required.

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				that the site could be accessed without the detrimental loss of these features.		
QUESTION 7: Settlement Limit	192, 1002, 1003, 1605	Comment	1. Roads in and out of the village are not able to support increased development. 2. Infrastructure and public transport is insufficient to support new development and Alington school is full.	1. Norfolk County Council, as Highway Authority has considered the scale of development proposed through the VCHAP and not raised a concern in terms of the levels proposed in this cluster. 2. The villages has access to a range of basic services, including village hall, school, pub, farm shop with Post Office, bus services (OurBus services through the village and more extensive services on the A146), and football club. Norfolk County Council have confirmed that, taking into account falling rolls and out of catchment pupils, there is not a capacity issue at Alington School. There is no evidence that infrastructure in the village (such as broadband and utilities) cannot support the level of development proposed.	703	No action required.
QUESTION 7: Settlement Limit	139, 513	Object	1. Access to the Church Meadow site is too narrow and roads in the village generally are too narrow. 2. Alington has limited facilities, the school is over capacity; 3. Concern over the loss of habitat at Church Meadow; 4. Access to the Footpath on the Church Meadow site.	1. Norfolk County Council, as Highway Authority has considered the scale of development proposed through the VCHAP and not raised a concern in terms of the levels proposed in this cluster. The direct access to the site was not a refusal reason in the 2015 application decision for 21 dwellings on the Church Meadow site (which was principally refused for being outside the Development Boundary with no overriding need demonstrated for the development), however some localised improvements at Church Road may be	702	Confirm with the Highways Authority whether off site works at Church Road are be required.

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				required, 2. Alington has access to range of basic services, including village hall, school, pub, farm shop with Post Office, bus services (OurBus services through the village and more extensive services on the A146), and football club. Norfolk County Council have confirmed that, taking into account falling rolls and out of catchment pupils, there is not a capacity issue at Alington School. 3. The site is not a designated wildlife site and there is no evidence that the site is of particular importance for protected species or that open space and landscaping on the site could not be used to enhance biodiversity. 4. Yelverton footpath FP4 runs immediately north of the site, but there are no public rights of way within the site itself.		
QUESTION 7: Settlement Limit	133, 178, 180, 211, 214, 298, 473, 626, 1034, 1112, 1168, 1183, 1252, 1341, 1361, 1395	Object	1. Highways concerns - ability of existing roads in/out of the villages to cope; lack of footways; speeding traffic. 2. Lack of local services - no shop/only shop is farm shop; school at/over capacity; no GP; limited bus service. 3. Development should be on brownfield sites first/loss of habitat; 4. Changing the character of the village(s);	1. Norfolk County Council, as Highway Authority have considered the scale of development proposed through the VCHAP and not raised a concern in terms of the levels proposed in this cluster. Whilst many areas do not have footways, the centre of Alington which contains the main facilities (village hall, school, pub, bus stops, football club) do have footways, and new development would connect to/extend these where possible. Existing speeding traffic should be addressed through other mechanisms.	701	No action required.

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				2. The villages have a range of basic services, including 2 x village halls, school, pub, farm shop with Post Office, bus services (OurBus services through the villages and more extensive services on the A146), and football club. Norfolk County Council have confirmed that, taking into account falling rolls and out of catchment pupils, there is not a capacity issue at Alington School. Ongoing discussions are taking place with the local NHS Integrated Care System over capacity within GP services. 3. The GNLP takes an approach of maximising development on brownfield sites, and one of the two proposals in this Cluster is brownfield. However, the scale of development required to 2038 cannot be accommodated via the reuse of existing buildings or on brownfield sites. 4. Under the GNLP the level of growth proposed in the Village Clusters (9%) is significantly lower than the percentage of the population that already lives in those parishes (25%), consequently the impacts on the character of those settlements is considered proportionate. The choice of sites will also aim to minimise those impacts.		
QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	1179	Object	Objection	Objection noted.	821	No action required.

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QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	548	Support	The allocation is supported. Technical work supporting a previous planning application demonstrates that: - the site, though mitigations including potential highway widening and haunching works can be adequately accessed and traffic from an additional (up to) 25 homes would not have a severe impact on the local highway network; - construction traffic can be managed by a construction management plan; - the site can be adequately drained to not cause a risk of flooding on site or elsewhere; - that there are no ecology or heritage concerns; and that the site would not have a detrimental landscape impact due to its enclosed nature.	Comments noted.	798	Confirm with the Highway Authority the extent of any necessary off-site works.
QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	1335	Support	Out of the three I feel that SN0400 is the best site and will be the least dangerous to both schoolchildren at the school along with the vehicles dropping them off along with the least disruptive for transport of building materials off the A 146.	Comments noted.	797	No action required.
QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	2187	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Site appears to be used for grazing and is surrounded on all sides by hedges (priority habitat). The site partly lies within the	Comments noted.	796	Consider the need for the allocation Policy to specifically reference the hedgerows bordering the site.

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			amber zone for DLL and a PROW runs to the north of the site. A search of MAGIC reveals there are no other priority habitats onsite.			
QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	2088	Comment	Mitigation required for heavy constraints. Standard information required at a planning stage. The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. The on-site flood risk forms the start of a moderate flow path in the 0.1% AEP event, dissecting the site south-north to roughly the north-centre of the site. Flow lines indicate this flood water flows south off of the site, contributing to a major flow path south of the site. We advise this must be considered in the site assessment. A large area of the site is unaffected by flood risk and has the potential to be developed. Assessment: Green	Comments noted. The site is allocated at a low density of 14 dwellings/ha, to allow the site to accommodate/mitigate the identified flow path.	795	Allocation policy to reflect the need to accommodate the surface water flow path.
QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	2028	Comment	Although this site is located quite close to the grade I listed St Mary's Church, the site is tucked behind existing development and so the impact on the heritage asset and its setting would be minimal.	Comments noted.	794	No action required.

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QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	1921	Comment	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).	Comments noted.	792	No action required.
QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	1837	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, then an alternative condition could be attached to any approval requiring its implementation.	Comments noted.	791	No action required.

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QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	319, 614, 1004, 1005, 1074, 1186, 1390	Comment	1. Highways - inadequate/narrow roads in/out of the village, lack of footways in parts of the village with consequent environmental/safety concerns, needs a wider 20mph limit. 2. Lack of local facilities, particularly capacity issues at the school. 3. Housing needs to be a mix, including affordable units. 4. Environmental/biodiversity concerns.	1. Norfolk County Council, as Highway Authority has considered the scale of development proposed through the VCHAP and not raised a concern in terms of the levels proposed in this cluster. Whilst many areas do not have footways, the centre of Alington which contains the main facilities (village hall, school, pub, bus stops, football club) does have footways, and new development would connect to/extend these where possible. 2. The cluster has a range of basic services, including village halls, school, pub, farm shop with Post Office, bus services (OurBus services through the villages and more extensive services on the A146), and football club. Norfolk County Council has confirmed that, taking into account falling rolls and out of catchment pupils, there is not a capacity issue at Alington School. 3. The mix of houses, including the proportion of affordable units will need to reflect the core policies within the VCHAP and the other policy requirements in place at the time of any planning application. 4. The GNLP takes an approach of maximising development on brownfield sites, and one of the two proposals in this cluster is brownfield. However the scale of development required to 2038 cannot be accommodated via the reuse of existing buildings or on brownfield	784	Confirm with the Highway Authority any necessary off-site Highways requirements. Consider allocation policy criterion relating to the protection of existing trees and hedgerows bordering the site.

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				sites. The site itself is not identified as being of significance in wildlife conservation terms, however the protection of existing trees and hedgerows can be made a requirement in the allocation policy for the site.		
QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	98, 99, 132, 138, 183, 185, 190, 193, 195, 196, 198, 199, 202, 206, 212, 213, 225, 253, 274, 287, 288, 291, 313, 367, 415, 425, 426, 488, 503, 624, 865, 879, 916, 1030, 1032, 1033, 1065, 1113, 1169, 1187, 1339, 1342, 1365, 1397, 1408, 1596, 1611, 1730	Object	1. Highways - narrow, poor quality roads in/out of the village, limited pavements, with consequent concerns re safety and environmental damage. Church Meadow too narrow and existing parking problems. Church Meadow/Church Road junction, busy due to bus stops (inc. secondary school pick up) and village hall opposite. Speeding traffic in the village. Parking issues at the primary school. 2. Facilities - lack of local facilities/bus services, with particular concerns about capacity at the school; 3. Environment/biodiversity issues - greenfield site, impact on trees and hedgerows, need for environmental features as part of the new development; 4. Impacts on immediate neighbours - noise, loss of light and privacy. 5. Public Right of Way across the site 6. Site outside the Development Boundary 7. Drainage problems on site/waste water disposal issues. 8. Impact on the character of the area/village.	1. Norfolk County Council, as Highway Authority has considered the scale of development proposed through the VCHAP and not raised a concern in terms of the levels proposed in this cluster. Whilst many areas do not have footways, the centre of Alington which contains the main facilities (village hall, school, pub, bus stops, football club) does have footways, and new development would connect to/extend these where possible. Similarly no concerns have been raised about the adequacy of Church Meadow, although the previous planning application for the site did raise the need for some off-site highways improvements. Existing speeding traffic should be addressed through other mechanisms. 2. The cluster has a range of basic services (the majority of which are close to the site) including village halls, school, pub, farm shop with Post Office, bus services (OurBus services through the villages and more extensive services on the A146), and football club. Norfolk County Council has confirmed that, taking into account falling rolls and out of catchment pupils, there is not a capacity issue at Alington School. Ongoing discussions are taking place	783	Confirm with the Highway Authority what offsite highways works might be required (including possible widening of Church Road and crossing between Church meadow and the Village Hall). Consider the inclusion of criteria within the allocation policy regard the protection of existing trees/hedgerows (depending on the wording of core policies) and links to the footpath to the north of the site.

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			9. Need for a mix of homes.	with the local NHS Integrated Care System over capacity within GP services. 3. The GNLP takes an approach of maximising development on brownfield sites, and one of the two proposals in this cluster is brownfield. However the scale of development required to 2038 cannot be accommodated via the reuse of existing buildings or on brownfield sites. The site itself is not identified as being of significance in wildlife conservation terms, however the protection of existing trees and hedgerows can be made a requirement in the allocation policy for the site. There is no justification for the inclusion of specific features, over and above the requirements of national and local policy. 4. The site is 1.87ha, and development of 25 dwellings would represent a net density of less than 14 dwellings/hectare (lower than the existing Church Meadow/Priory Close/St Mary's Close estate), as such there would be sufficient scope to ensure the development does not adversely impact the amenity of neighbouring properties. However, detailed issues, such as the use of one or one and half story dwellings would be dealt with at the planning application stage in the context of existing national and local policy to maintain residential amenity. 5. There is no Public Right of Way		

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				definitive County map, other than that just outside of the site to the north. However the allocation policy for the site could include a requirement to link Church meadow to the existing footpath across the north east corner of the site, to increase the connectivity in the area. 6. The process of preparing the VCHAP encompass changing the Development Boundary where appropriate. 7. Both a Stage 2 Strategic Flood Risk Assessment and addendum to the GNLP Water Cycle Study are being prepared to support the VCHAP, taking on board the views of the LLFA, Environment Agency and Anglian Water. 8. The scale and density of development is considered proportionate in the context of the level of growth required across the GNLP area. The site assessment process has indicated that this site is suitable as a visually contained site which does extend into the open countryside. 9. The mix of houses, including the proportion of affordable units will need to reflect the core policies within the VCHAP and the requirements in place at the time of any planning application.		
QUESTION 9: Preferred Site - SN0529SL , Nichols Rd, Alington	900	Comment	Site SN0529SL is in a sustainable location with services and facilities available in the local area, the land is immediately available, and the owner is committed to the development of the site.	Comments noted.	774	No action required.

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			An experienced local development company, Crabtree Living Limited have been in discussions to bring the development forward, they are looking to progress a scheme to bring a high-quality development that respects the area and enhances the village.			
QUESTION 9: Preferred Site - SN0529SL , Nichols Rd, Alington	2188	Comment	Rating: Green no major ecological constraints identified from desk-top search. Part of agricultural field to south of dwellings. No priority sites identified (see MAGIC) but aerial image on google out of date (2008). Site located in green risk zone for great crested newts (Identified by Natural England). Site in a SSSI IRZ, but residential development is not identified as a trigger for consultation with Natural England.	Comments noted.	773	No action required.
QUESTION 9: Preferred Site - SN0529SL , Nichols Rd, Alington	2122	Comment	Few or no constraints. Standard information required at a planning stage. The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Assessment: Green	Comments noted.	772	No action required.
QUESTION 9: Preferred Site -	1922	Comment	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment.	Comments noted.	771	No action required.

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SN0529SL , Nichols Rd, Alington			Minor development – no further comments			
QUESTION 9: Preferred Site - SN0529SL , Nichols Rd, Alington	1838	Comment	The Environmental Protection Team is not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, an alternative condition could be attached to any approval requiring its implementation.	Comments noted.	770	No action required.
QUESTION 9: Preferred Site - SN0529SL , Nichols Rd, Alington	1006	Comment	1. The school is already at capacity. 2. There has been recent housing development close to this proposed site and further development would cause increased level of traffic which cannot be supported by the roads.	1. Norfolk County Council has confirmed that, taking into account falling rolls and out of catchment pupils, there is not a capacity issue at Alington School. 2. Subject to extending the existing pavement to the site and potentially some limited widening of Nichols Road,	769	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
				the Highways Authority has not objected to this scale of development in this location.		
QUESTION 9: Preferred Site - SN0529SL , Nichols Rd, Alington	194, 200, 299, 615, 1018, 1029, 1037, 1066, 1170, 1181, 1253, 1340, 1343, 1366, 1393, 1606, 1617	Object	A number of concerns were raised about the site: 1. Highways - Nichols Road is narrow and used by walkers and cyclists, road network generally is unsuitable for additional development, parking for the school already causes problems. 2. Lack of services/facilities in the village, including capacity issues at Alington School. 3. Loss of greenfield/agricultural land/habitat/biodiversity, including a frontage oak tree, would require extensive landscaping where it faces the open countryside; 4. Loss of light/privacy for existing residents; 5. Impact on the landscape/character of the area.	1. Subject to extending the pavement to the site access, and potentially some road limited widening, the Highways Authority do not object to this scale of development in this location; 2. The village has a range of basic services, including village hall, school, pub, farm shop with Post Office, bus services (OurBus services through the villages and more extensive services on the A146), and football club. Norfolk County Council have confirmed that, taking into account falling rolls and out of catchment pupils, there is not a capacity issue at Alington School; 3. The GNLP takes an approach of maximising development on brownfield sites, and one of the two preferred allocations in this cluster is brownfield. However the scale of development required to 2038 cannot be accommodated via the reuse of existing buildings or on brownfield sites only. The use of this site would not prejudice the continued use of the rest of the field for agricultural purposes. There is no reason why the site cannot be accessed from the northern end, avoiding the need to remove the frontage oak tree and the use of appropriate landscaping can increase the biodiversity of the site; 4. The site offers plenty of scope for	723	No action required.

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				sufficient distances to be maintained to nearby properties. If the levels of the site are an issue, this could be addressed at the planning application stage through development which is one or one and a half story; however, there is no indication that this will be necessary. 5. The site will have a limited impact on the immediate landscape. However, the proposal does not extend development any further south on Nichols Road than the existing housing; as such, longer distance views will be read in the context of the school and existing houses.		
QUESTION 9: Preferred Site - SN0529SL , Nichols Rd, Alington	489, 1090, 1541	Support	Support for the site, for reasons including: 1. In keeping with the form and character; 2. Close to local facilities; 3. Least impact on the village; 4. Developer confirms the site is available and deliverable.	Comments noted.	722	No actions required. Site is proposed as a Settlement Limit extension, therefore there will be no specific allocation policy.
QUESTION 10: Preferred Site - SN0412REV, Former concrete works, Church Rd, Bergh Apton	2015	Comment	Located within 250 metres of an existing landfill that could result in the nearby community being exposed to impacts including odour, noise, dust and pests. The severity of these impacts will depend on the size of the landfill, the nature of the waste it takes and prevailing weather conditions. Planning policy requirements (paragraph 182 of the National Planning Policy	The site is approx. 200m north (at its closest point) of the closed and restored landfill sites, NE of Hillside Farm, Wellbeck Road. Only the Norfolk Council Council's household waste site on Wellbeck Road, over 800m from the proposed allocation, remains open. A number of existing properties are already in closer proximity to the closed landfill than the proposed allocation.	715	Confirm with Environmental Protection that there are no outstanding issues with the closed site.

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			Framework (NPPF)) state that new development should integrate effectively with existing businesses and not place unreasonable restrictions upon them.			
QUESTION 10: Preferred Site - SN0412REV, Former concrete works, Church Rd, Bergh Apton	1923	Comment	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).	Comments noted.	714	No action required at this stage.
QUESTION 10: Preferred Site - SN0412REV, Former concrete works, Church Rd, Bergh Apton	1839	Comment	The Environmental Protection Team is aware that this is a brownfield site which has been subject to uses that have the potential to give rise to significant land quality issues. Having regard to this, along with the size of the site and sensitivity of the proposed development it is considered that a Detailed Land Contamination Report (Phase One and Phase Two) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be applied.	Comments noted.	713	Identify a Detailed Land Contamination Report (Phase One and Phase Two) as part of the Policy requirements for the site.
QUESTION 10: Preferred Site - SN0412REV, Former concrete	919, 1118, 1192, 1288,	Comment	General support for building on a brownfield site, rather than further greenfield land. Subject to various caveats:	1. Whilst the Highways have some concerns about the site, it is also acknowledged that the site has a previous industrial use, with the	712	Seek clarification from the Highways Authority as to what local

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works, Church Rd, Bergh Apton	1344, 1618, 1620		1. Highways - Parish Council generally supportive, subject to some local improvements. However, also some concerns raised re the volume of traffic and the 60mph limit; 2. High proportion affordable units; 3. Too many houses proposed - implications for mains drainage capacity, 4. Would wish to be consulted on detailed designs	associated traffic generation which can be offset against development traffic. 2. The proportion of affordable housing sought will be consistent with the percentages in Planning Policy at the time of any planning application however see also (3.) below. 3. The Brownfield nature of the site, with associated remediation costs, means that a substantially smaller development would be unlikely to be viable, particularly if a policy compliant level of affordable housing is also going to be achieved. A Water Cycle Study is being prepared to accompany the Regulation 19 version of the VCHAP, in consultation with Anglian Water, which aims to identify any pinch points in waste water disposal. 4. Detailed design would be dealt with at the Planning Application stage, and residents can register for updates on planning applications in their local area via the Council's website.		improvements may be required.
QUESTION 10: Preferred Site - SN0412REV, Former concrete works, Church Rd, Bergh Apton	181, 414, 616, 1128, 1172, 1532	Object	A number of concerns are raised concerning the site, including: 1. Highways - impact on the local road network (speed of traffic, lack of footways etc.); lack of a safe walking/cycling route to Alington School. 2. Lack of local facilities;	1. Whilst the Highways have some concerns about the site, it is also acknowledged that the site has a previous industrial use, with the associated traffic generation. The Local Plan is not the mechanism to deal with any existing traffic speed issues; 2. The cluster has a range of basic services, including 2 x village halls,	707	Seek clarification from the Highways Authority as to what local improvements may be required.

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			3. Out of character with the area/too dense; Site needs to: 4. be well landscaped; 5. include a high proportion of affordable housing; 6. include a high proportion of single story homes; 7. include environmentally features.	school, pub, farm shop with Post Office, bus services (OurBus services through the villages and more extensive services on the A146), and football club. The NPPF notes that development in one settlement can help support services and facilities in nearby settlements; 3./4. The site is currently a derelict industrial site, and therefore not in keeping with the surrounding rural area. Redevelopment offers the opportunity to enhance the boundary treatments and the biodiversity of the site. 5. The proportion of affordable housing sought will be consistent with the percentages in Planning Policy at the time of any planning application. 6. There is no particular justification for a larger proportion of single story development on this site and it will be more important to secure a high quality of design which makes the best use of the site. 7. There is no particular justification to seek higher environmental standards that will be required by national and local policy at the time of any planning application.		
QUESTION 10: Preferred Site - SN0412REV, Former concrete	631, 1022	Support	A number of benefits to development of this site: 1. Currently an unattractive brownfield site, out of character with the surrounding rural area;	Comments noted.	706	Confirm with the Highways Authority what local improvements might be needed.

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works, Church Rd, Bergh Apton			2. The land is available immediately and FW Properties are confident that a scheme is deliverable; 3. Delivery of open space and the creation of domestic gardens would benefit wildlife/biodiversity; 4. Delivery could include affordable housing to support local housing needs; 5. Previous use of the site has shown that the local highways can sustain larger lorries.			
QUESTION 10: Preferred Site - SN0412REV, Former concrete works, Church Rd, Bergh Apton	201, 514, 625, 1038	Support	Whilst there are issues with the site (additional traffic on the A146, remediation of previous uses), it is preferable to redevelop brownfield land and the site is the least disruptive to the village.	Comments noted.	705	No action required.
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	490	Comment	Re SN0433. This site would continue the limited development along Wheel Road, which is the main east-west cross road through the village, and would be an attractive site, and not detrimental to Stacey Cottage, which is at some distance. While questioning the need to remove the WHOLE of the roadside hedge, it prevents any appreciation of the landscape, and makes that section of the road dangerous for drivers and walkers, as it is impossible to see round the bend opposite Fortune Green; a more open aspect would be beneficial. An improved junction at Reeder's Lane would also improve safety.	Comments noted. The hedgerow is considered to contribute to the rural character of this part of the settlement and it is likely that any new housing would equally limit views of the landscape beyond. However there is a balance to be struck between the need for new homes and the impacts of specific developments. Currently there is no indication that Wheel Road is unsafe in this location.	820	Consider the classification of SN0433.

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QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	921	Comment	Bergh Apton Parish Council is impressed by the thoroughness of the review of the sites put forward for development in Bergh Apton. The extensive Parkland to the north of Cooke's Road and Threadneedle Street is a very important feature of the village. The Parish Council are grateful that its heritage has been recognised in the review.	Comments noted.	818	No action required.
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	2109	Comment	SN0433 Few or no constraints. Standard information required at a planning stage. The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. A large area of the site is not at risk of flooding and has potential to be developed. The on-site flood risk contributes to, and is adjacent to, a major off-site flow path. We advise this must be considered in the site assessment. Assessment: Green	Comments noted.	817	Consider the classification of SN0433.
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	2190	Comment	SN0433 - Land at Wheel Road, Alington Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy	Comments noted. It is likely that there would need to be substantial hedgerow removal to achieve the required highways visibility onto Wheel Road, given the orientation of the road, with	816	Consider the classification of SN0433.

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			required. Site is mostly bounded by mature hedges (a UK Priority habitat) which may also be important under the Hedgerow Regulations 1997 (evidence of OS 1st Edition map). Any losses should be minimised and compensated for. There are no other priority habitats onsite (MAGIC) but broadleaved woodland is adjacent - consideration should be given to increasing the area of priority habitat in any landscaping plans. Site in SSSI IRZ but residential development not a trigger for consultation with Natural England. Site in amber zone for great crested newts and not in a strategic GI corridor, although development should still seek a net gain for biodiversity. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy should inform the design.	the consequent potential loss in terms of priority habitat.		
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	1853	Comment	SN0122SL The Environmental Protection Team is aware that historic ordnance survey maps show this site includes a former pond/void that has been historically filled with an unknown material. Having regard to this along with the size of the site and sensitivity of the proposed development it is considered that a Detailed Land Contamination Report (Phase One and Phase Two) should be required as part of any planning application.	Comments noted.	815	Potential issue to pick up in the Core Policies (if carried forward in the VCHAP) regarding Phase One and Phase Two Contamination Report and construction management plans.

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			Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application.			
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	1851	Comment	SN0433REV The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. The site is near to the Wheel Of Fortune PH which has a potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise and cooking odours. In addition, placing sensitive receptors close to this business could impact its future viability. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction	Comments noted.	814	Potential issue to pick up in the Core Policies (if carried forward in the VCHAP) regarding Phase One and Phase Two Contamination Report and construction management plans.

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			Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application.			
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	1850	Comment	SN0210 The Environmental Protection Team is aware that this site includes a former gravel pit that has been historically filled with an unknown material. Having regard to this along with the size of the site and sensitivity of the proposed development it is considered that a Detailed Land Contamination Report (Phase One and Phase Two) should be required as part of any planning application. The site is close to a commercial premises and the Norfolk County Council Recycling Centre in Welbeck both of which have the potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise, dust and odour. It is therefore considered that this will need to be addressed as part of any application for dwellings.	Comments noted.	813	Potential issue to pick up in the Core Policies (if carried forward in the VCHAP) regarding Phase One and Phase Two Contamination Report and construction management plans.
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	1847	Comment	SN2006 The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	Comments noted.	812	Potential issue to pick up in the Core Policies (if carried forward in the VCHAP) regarding Phase One and Phase Two Contamination Report and construction management plans.

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			The site is adjacent to the A146 which has a potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise and air pollution. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site if the form of both an air quality and noise assessment. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application.			
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	1840	Comment	SN0433 - The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. The site is adjacent to the Wheel Of Fortune PH which has a potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise and cooking odours. In addition, placing sensitive receptors close to this business could impact its	Comments noted.	811	Potential issue to pick up in the Core Policies regarding Phase One Contamination Report and construction management plans. If SN0433 were to become a Preferred Site, consider the need for allocation policy criteria regarding the adjoining Public House.

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			future viability. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application.			
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	1841, 1842, 1843, 1844, 1845, 1846, 1848, 1849, 1852, 1854	Comment	The Environmental Protection Team is not aware of any significant land quality issue with these sites or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application.	Comments noted.	810	Potential issue to pick up in the Core Policies (if carried forward in the VCHAP) regarding Phase One and Phase Two Contamination Report and construction management plans.

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QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	1039	Comment	None of the rejected sites are suitable.	Comments noted.	809	No action required.
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	1138	Support	The following sites should be considered for low density development (1-3 dwellings per site) and a similar scale to the surrounding properties - SN2117, SN0122, SN0533 (which might be suitable for starter homes similar to the cottages and the part-ownership properties on this road), SN0203, SN2015. Add that hedgerows should be planted or maintained, a 20 mph to The Street, 30mph for Threadneedle Street and part of Cookes Road, to slow traffic in lieu of footpaths. These sites, in addition to site SN0412, would maintain the village aesthetic without overwhelming any one area or being detrimental to neighbouring properties.	It is noted that these sites are proposed in addition to the Preferred Site in Bergh Apton. The scale of development proposed (2-3 dwellings per site) would be Settlement Limit scale of development, and it is not clear in all cases that the site promoter would bring the sites forward for those number of homes. In addition, there are strong reasons for resisting development on some of these sites, as set out in the Site Assessments. The submitted GNLP includes a policy to facilitate small scale development on plots outside, but adjacent to, Settlement Limits or infilling small gaps in groups of existing houses; some of the above sites may be suitable for consideration under that policy, should the site promoters be looking for that scale of development.	808	No action required.
QUESTION 11: Should any of the	1182, 1346	Object	None of the rejected sites should be preferred or shortlisted.	Comments noted.	807	No action required.

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shortlisted/rejected sites be allocated?						
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	137, 140, 142, 157, 226, 265, 423, 1706	Mixed	Rejected Site SN1012, reasons the site should not be rejected: 1. Development off a private drive would not result in the loss of trees. 2. The existing houses in this location would have poor walking routes to facilities. 3. The recent industrial buildings nearby will generate more traffic than the houses proposed for this site. 4. Mill Road is suitable for two way traffic and the junctions at either end are likely to be used by some residents of the preferred sites. 5. Not all recent development has been linear in form. 6. Existing footpath to the school. 7. The site is close Green Pastures Farm Shop/Cafe and Post Office, and the bus routes on the A146. 8. Insufficient consideration has been given to this part of the settlement contributions to rural growth under NPPF para 79	1. No plans have been provided to demonstrate that the required visibility splays can be accommodated without the loss of trees and hedgerow. 2. There are many dwellings across the district with poor walking routes to facilities, however the aim of the Local Plan is to promote more sustainable patterns of future development, where possible. 3. The application for the employment buildings will have been considered on their own merits through the Development Management process and does not automatically set a precedent for additional development. 4. Concerns have been raised by the Highway Authority about additional development in this location. 5. The most recent developments in this location have been linear in form; whilst development in depth would not necessarily be ruled out, pre-application advice referred to in the representations raised concerns about the proposed layout of development. 6. Whilst there is a public right of way to Alington Village Hall (which then has pavements to the school), a substantial part of the 1.4km distance would be on unmade, unlit footpath, which bisects a	799	Re-consider whether the front of the site could be included as a Settlement Limit extension.

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				group of working farm buildings. As such it is unlikely to be an attractive walking route for primary school children; 7. The site assessment acknowledges that the site is close to some local facilities. However the Highways Authority is concerned about the distance from other services, the lack of footways, the fact that Mill Road is narrow in places and the standard of the junctions at each end of the road. 8. This part of Alington/Bergh Apton has an existing Development Boundary which was subject to a small Settlement Limit extension in the 2015 Local Plan. As such, the Council has not discounted this area from contributing to future growth.		
QUESTION 12: Should any of the shortlisted sites be rejected?	515	Comment	The villages of Bergh Apton and Alington need to retain their rural character. Excessive development particularly in the Poringland area is having a knock on effect on these villages, especially with much greater numbers commuters and delivery vehicles using local narrow roads.	The Preferred Sites have been chosen taking into account the character of the villages concerned. Under the GNLP the level of growth proposed in the Village Clusters (9%) is significantly lower than the percentage of the population that already lives in those parishes (25%), consequently the impacts on the character of those settlements is considered proportionate. Norfolk County Council, as Highway Authority has considered the scale of development proposed through the VCHAP and not raised a concern in terms of the levels proposed in this cluster.	806	No action required.

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QUESTION 12: Should any of the shortlisted sites be rejected?	184, 197, 203	Object	A number of general concerns raised, covering: 1. Roads in/out of the village a poor quality and narrow in places, with consequent safety and environmental concerns. 2. Limited services in the villages/cluster.	1. Norfolk County Council, as Highway Authority has considered the scale of development proposed through the VCHAP and not raised a concern in terms of the levels proposed in this cluster. Whilst many areas do not have footways, the centre of Alington which contains the main facilities (village hall, school, pub, bus stops, football club) do have footways, and new development would connect to/extend these where possible. 2. The cluster has a range of basic services including village halls, school, pub, farm shop with Post Office, bus services (OurBus services through the villages and more extensive services on the A146), and football club.	805	No action required.
QUESTION 12: Should any of the shortlisted sites be rejected?	101, 292, 502, 1000, 1001, 1345, 1367, 1663, 1664	Object	SN0433 should not become a Preferred Site for reasons including: 1. Poor road network in the vicinity of the site, especially Readers Lane which links to the B1332 Norwich/Bungay Road, and lack of pavements. 2. Impact on the character of the area and the local landscape. 3. Impact on the listed buildings (principally Staceys Cottage).	A number of the issues raised are picked up in the assessment of SN0433; 1. The Highway Authority has considered both the scale of development proposed within the cluster and this site in particular and their main concern is the direct access onto Wheel Road, rather than the wider highway network; 2. The Site Assessment acknowledges that the removal of the frontage hedge of Wheel Road, to allow for the required highways visibility on the site frontage, would alter the rural character of the area. This would be true for both the smaller SN0433 and the larger	804	Consider whether SN0433 should be a rejected site.

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				SN0433REV. However this impact would be exacerbated for the larger site, which would extend development further into the open countryside than other previous development on Wheel Road. 3. The distance between SN0433 and Staceys Cottage is considered sufficient to maintain the rural setting of the latter; the same would not be true of the larger SN0433REV. The other Listed Buildings on Reeders Lane are not considered to be materially affected by SN0433.		
QUESTION 12: Should any of the shortlisted sites be rejected?	1040	Comment	SN0433 has been shortlisted as a reasonable alternative but on the site assessment form it was rejected as a reasonable alternative. I therefore do not understand why it had been shortlisted. The access to the site is extremely difficult as it is close to the narrow junction of Wheel Road, Reeders Lane and Burgate Lane.	Site SN0433 was put forward in two configurations, the smaller SN0433 and the larger SN0433REV. On the site Assessment forms, the former should have identified as a 'Reasonable Alternative' and the latter 'Rejected'.	803	Correct the Site Assessment form for SN0433 to show the site as a 'Reasonable Alternative'.
QUESTION 12: Should any of the shortlisted sites be rejected?	491	Comment	SN0400. I note that there is no plan showing the proposed development. The only conclusion to be drawn is that the proposers do not care how this development takes place as the increase of the over-development of this area, at an urban, not a village, density, is only detrimental to those who already live on the estate. No open space has been earmarked for protection. In the previous expansion of Church Meadow the developers initially proposed one row of houses and an area of grass. They then	SN0400 is the Preferred Site. The purpose of the Local Plan is to allocate suitable sites where the principle of development is acceptable, within the parameters of other national and local planning policies. Those local policies include the need for open space provision on development of 15+ dwellings. There is no requirement to produce a detailed layout to show how this will be incorporated into the site at this stage. As proposed the site would be allocated at a gross density of approximately 14 dwellings/hectare,	802	No action required.

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			retrospectively obtained permission for two rows of houses and no open space.	reflecting the known constraints on the site and to ensure a density that is compatible with surrounding residential development.		
QUESTION 12: Should any of the shortlisted sites be rejected?	1132	Support	SN0210 should not be considered a reasonable site for development. Located opposite the recycling centre (noise, smell, traffic congestion) it is also adjacent to the historic church and a conservation area.	The Site Assessment for this site recognises that this location is not suitable for new development for a variety of reasons.	801	No action required.

Aslacton, Great Moulton and Tibenham

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QUESTION 13: Settlement Limit	1482	Object	Silverley would suggest that the Settlement Limit of Aslacton is amended to encompass the preferred Site (SN0459) (as amended in the appended representations) so that future homes and local facilities are within the limit of the village.	During the consultation the Preferred Sites were not shown as being within the revised Settlement Limits, however previous South Norfolk Local Plan allocations have been shown within them, for the reason given in the representation.	861	Consider the principle of including new allocations within the Settlement Limit, and the extent to which the landscaping area proposed with this site needs to be within that Limit.
QUESTION 14: Preferred Site - SN0459, Land off Church Rd, Aslacton	627	Support	The provision of up to 25 new dwellings will ultimately mean the addition of more vehicles on the already narrow roads surrounding Aslacton and Great Moulton. With an average of 2 cars per property this could amount to 50 extra vehicles or more. It is likely that in peak times cars will use Carr Lane and High Green. Great Moulton Parish Council would therefore request that prior to the development of this site, Norfolk County Council Highways department seriously consider reducing the speed limit on Carr Lane to 30mph or at most 40mph.	Comments noted. Norfolk County Council is a consultee on the VCHAP and will make its requirements known to the Local Planning Authority, which can be incorporated into the Plan as necessary. However, the level of traffic generated by the new development as a proportion of the current traffic using these roads, may not justify a speed limit change purely on that basis and the issue may need to be pursued with the County Council as a separate issue.	1001	Raise with the speed limits on Carr Lane and High Green with the County Council.
QUESTION 14: Preferred Site - SN0459, Land off Church Rd, Aslacton	290, 1488	Mixed	Support the inclusion of the site, but potentially extend the site to the Muir Lane boundary with this inclusion of more community space within the site.	Support welcomed. Since the submission of the representations there has been ongoing discussion between the site promoters, the Parish Council and the wider community regarding proposals for the site, focusing on the provision of a village green a small car park. This would involve extending the site to the	1000	Consider extending the allocation site to accommodate 30-35 dwellings and make it a policy requirement to deliver a village green and parking area.

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				Muir Lane boundary and potentially a realignment of the northern boundary, ultimately delivering 30-35 homes on the site.		
QUESTION 14: Preferred Site - SN0459, Land off Church Rd, Aslacton	2191	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. The allocation site is located within an arable field with a hedge (priority habitat) running along the western boundary. The site is located within a strategic Green Infrastructure Corridor which should be considered within the design. A search of MAGIC reveals no other priority habitats onsite. The site is located within a SSSI Impact Risk Zone whereby residential development may require consultation with Natural England. The site is located within the Amber District Level License zone for great crested newts. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy should inform the design. Consideration should be given to delivering Biodiversity Net Gain.	Comments noted.	872	Consider the need for the allocation Policy to specifically reference the strategic Green Infrastructure Corridor and the hedgerows bordering the site. Consider reference to consultation with Natural England due to SSSI in supporting policy text.
QUESTION 14: Preferred Site - SN0459, Land off Church Rd, Aslacton	2161	Comment	Carriageway widening and frontage footway should be required. The footway should extend eastwards to link with the bus stops at Muir Lane.	Comments noted.	871	Inclusion of policy criterion relating carriageway widening and frontage footway. Confirm whether 3rd party land is required

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						(as noted within Site Assessment)
QUESTION 14: Preferred Site - SN0459, Land off Church Rd, Aslacton	2120	Comment	LLFA: Few or no constraints. Standard information required at a planning stage. The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Assessment: Green	Comments noted.	870	No action required.
QUESTION 14: Preferred Site - SN0459, Land off Church Rd, Aslacton	2030	Comment	Site SN0459 - Land off Church Road, Aslacton Whilst there are no designated heritage assets within the site boundary, there is a grade II listed Church Farmhouse to the south east of the site. However, given the distance and intervening development and vegetation, we consider that the development of the proposed allocation would have limited impact on the setting of the heritage asset.	Comments noted- limited impact of the setting of the heritage asset.	869	No action required.
QUESTION 14: Preferred Site - SN0459, Land off Church Rd, Aslacton	1924	Comment	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).	Comments noted.	868	No action required at this stage.

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QUESTION 14: Preferred Site - SN0459, Land off Church Rd, Aslacton	1855	Comment	Not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition could be attached to any approval requiring its implementation.	Comments noted.	867	No action required.
QUESTION 14: Preferred Site - SN0459, Land off Church Rd, Aslacton	175, 179	Object	Lack of existing infrastructure - can not withstand further development Existing sewage capacity issues causing flooding, especially along Muir lane Narrow and congested roads (especially at peak times) No facilities - no pub, shop etc No streetlights or public footpaths	The Council acknowledge the safety concerns regarding the access and the suitability of The Street for further development. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that development of the site is broadly acceptable in highways terms. However, this will be subject to achieving a suitable and safe pedestrian access. It	866	Confirm footpath provision and 3rd party land. Pub in Aslacton is now closed - confirm this and update cluster description

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				has been noted that this will require the potential removal of privately owned hedgerow, which will need to be confirmed prior to allocation. Concerns with the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies. With regards to limited facilities, whilst it is recognised that rural settlements offer fewer services and facilities than their urban counterparts, a continued concentration of development in these locations will result in the inevitable decline of existing services and facilities within the rural areas. Therefore, locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services. Norfolk County Council has confirmed that, taking into account falling rolls and out of catchment pupils, there is not a capacity issue at Aslacton School. Ongoing discussions are taking place with the local NHS Integrated Care System over capacity within GP services. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority (LLFA) and it is considered that on-site drainage solutions can often help to address		

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				existing surface water issues and as such it is considered that this issue can be adequately addressed during the planning application stage.		
QUESTION 15: Should any shortlisted/rejected sites be allocated?	1733	Comment	Submissions in respect of Sites SN0554SL, SN0555 and SN0557SL Great Moulton I am writing on behalf of Saffron Housing Trust to express our support for this site for residential development being promoted by ESCO Developments Ltd. We believe this is a site that could come forward in association with our company in terms of delivering sustainable development in line with the emerging draft Greater Norwich Local Plan. We believe that we have sufficient capacity to ensure that we can assist in bringing forward this site for development. Currently, we have programmed this site to come forward in our build programme within our current 3 year development strategy – the fact that the site is in our core area of operation (South Norfolk Council), this brings a general support from our Board as I am sure you will appreciate. We believe that the site, as described in the ESCO proposals, is viable and would contribute to resolving the housing need in the area. We are aware of the emerging policy requirements from the draft Local Plan and are confident that these can be met and the proposed development delivered in a cost effective manner. We will show how the development will be	The combination of sites SN0554SL, SN0555 and SN0557SL Great Moulton All of the above sites have been subject to detailed site assessments with various constraints were identified at that stage on each site.	887	No action required.

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			low carbon and contribute to the Local Plan's objectives.			
QUESTION 15: Should any shortlisted/rejected sites be allocated?	1308	Comment	With regard to site SN3008REV which I represent, although rejected at the current proposed size of development the feedback was generally positive towards the site being considered as a smaller development of up to 12 dwellings. Therefore I would ask that this site be reconsidered as a smaller windfall site which could be achieved by incorporating it within a slightly extended village envelope. The site was originally proposed as a smaller site, but we were advised that sites which could accommodate larger scale development would be preferential.	The Council notes the request for the site to be considered as a settlement limit extension to accommodate a development of up to 12 dwellings. The site was initially put forward for a larger scale development, the scale was subsequently reduced in order to try and mitigate impacts on landscape and townscape. However, it is also acknowledged the site is remote from accesses and is heavily constrained in regards to surrounding highway network and access. The removal of a large section of hedgerow would be required to access the site. It is the view of the Council that the combined constraints that are connected to the site, that the site remains unsuitable.	886	Confirm with Highways whether access onto Priston Green Land would be achievable
QUESTION 15: Should any shortlisted/rejected sites be allocated?	1857, 1858, 1859, 1860, 1861, 1862, 1863, 1864, 1865, 1866, 1867, 1868	Comment	In relation to the rejected sites: The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	Comments noted.	877	No action required.
QUESTION 15: Should any	1856	Comment	SN2118: South of Sneath Road, Aslacton The Environmental Protection Team are not aware of any significant land quality	Comments noted.	876	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
shortlisted/rejected sites be allocated?			issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition could be attached to any approval requiring its implementation.			
QUESTION 15: Should any shortlisted/rejected sites be allocated?	2090	Comment	Few or no constraints. Standard information required at a planning stage. At risk of surface water flooding Source Protection Zone 3 The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration	Comments noted.	875	Allocation policy to reflect the need to accommodate the surface water flow path.

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			should be utilised.# "Flood risk in 0.1% AEP event is moderate ponding. This can be mitigated through application of appropriate engineering methods. The site is adjacent to a flow path; advise this must be considered in the site assessment. Assessment: Green			
QUESTION 15: Should any shortlisted/rejected sites be allocated?	2192	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. The allocation site is located along the northern edge of an arable field. A search of MAGIC reveals, except for hedges, no priority habitats onsite. The northern boundary is boarded by a hedge (priority habitat) which appears on the first OS map and may qualify as important under the Hedgerow Regulations 1997. Breaches to, or loss of hedge should be kept to a minimum and compensation provided (consideration should be given to siting any footpath to the south of the hedge to avoid impacts). The site is in a SSSI impact zone but 'residential' is not listed in the trigger list for consultation with Natural England. The site is not located in a strategic GI corridor but net gains for biodiversity should be provided. The site is in the Amber zone for District Level Licensing. Applications for planning	Comments noted.	874	Consider the need to reflect the protection of hedgerows in any Policy for the site.

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			consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which should inform the design.			
QUESTION 15: Should any shortlisted/rejected sites be allocated?	1651	Support	SN2118 Council has two points of concern which we felt the need to address, as landowners: It is 5-8 minutes by car to the local school. Those living adjacent to land and doing school drop-offs would be driving away from the school and not adding to congestion. Prohibitive cost of housing has vastly altered the demographics of those who can afford to buy 'family-size' homes. Re. location, properties here could cater for those who need to be near A140 / A11, and also to commute using train (e.g. from Diss). Believe that the land has not flooded in 40 years. A water course runs beneath, but drainage is good and a ditch could be put in if needed.	Comments noted.	873	No action required.

Barford, Marlingford, Colton & Wrampingham

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QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1653	Comment	Taking the above into consideration site SN0425 is considered to be suitable for residential development, and doesn't generate any significant harm that could not be dealt with during the normal course of preparing a planning application. Given the village cluster strategy which is now being proposed by GNLP and South Norfolk requiring more sites to fulfil the identified need for 1,200 new homes in these locations. Marlingford has been considered to be a suitable location for development and this is the only site that has been put forward for development in the village and should be considered further.	Whilst the Council acknowledges the representation made in respect to the allocation SN0425, the Council is still of the view that the site is unsuitable for development and no further evidence has been presented to suggest otherwise. NCC Highways have raised significant concerns with the existing road network in terms of road and junction capacity. The nearest school is located over 2km from the site where there is no safe pedestrian route available, nor does one appear to be feasible. In addition, large parts of the site fall within flood zone 2, the site is located within a sensitive River Valley setting, is located in proximity to a listed building and would conflict with the linear character of the settlement. On balance, it is considered that the negative impact of development in this location would outweigh any positive contribution 5 dwellings would constitute.	510	No action or change required.
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1652	Support	SN0552: Site promoter now wishes to amend the proposal for this site. Now wish to promote a smaller area of land to accommodate 25 dwellings and c.6 ha of semi-natural public open space. Further benefits would include an enlarged attenuation pond to west of the site to divert any on-street surface water flooding along Watton Road; and a new	The Council will review the revised the site boundary and proposal.	509	Complete site assessment for revised site as a REV of SN0552.

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			vehicular/pedestrian route through the site from Back Lane onto Watton Road. Also, an area of new tree planting to manage any landscape impacts. Promoter is still prepared to increase the land area, if necessary, to deliver a larger scheme, perhaps as a strategic reserve.			
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1869	Comment	SN0552: Land off Watton Road, Barford The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. The site is adjacent to the Cock Inn which has a potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise and cooking odours. In addition, placing sensitive receptors close to this business could impact its future viability. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	307	No action required re. survey at this time. Consideration will need to be given to the Cock Inn which has a potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise and cooking odours however it is not uncommon for residential properties to be in close proximity to public houses and/or food outlets.

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			applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition could be attached to any approval requiring its implementation.			
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1870	Comment	SN0416: Land south of Barford Church and north of Barnham Broom Road The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition could be attached to any approval requiring its implementation.	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	306	No action required at this time.

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QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1871	Comment	SN0424: Land south of Marlingford Road, Colton The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition could be attached to any approval requiring its implementation.	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	303	No action required at this time.
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1872	Comment	SN0425: Land at Mill Road and Barford Road, Marlingford The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	302	No action required at this time.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition could be attached to any approval requiring its implementation.			
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1873	Comment	SN1013REV: Land between Church Lane and Back Lane, Barford The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	301	No action required at this time.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition could be attached to any approval requiring its implementation.			
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1874	Comment	SN0474: Land west of Colton Road, Marlingford The Environmental Protection Team is aware that historic ordnance survey maps show this site includes a former sand and gravel pit that has been historically filled with an unknown material. Having regard to this along with the size of the site and sensitivity of the proposed development it is considered that a Detailed Land Contamination Report (Phase One and Phase Two) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Detailed Land Contamination Report (Phase One and Phase Two) should be required as part of any planning application.	300	No action required at this time.

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			could be attached to any approval requiring its implementation.			
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1875	Comment	SN0475REVA: Land east of Highhouse Farm Lane, Colton The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, an alternative condition could be attached to any approval requiring its implementation.	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	299	No action required at this time.
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1999	Comment	Electricity Transmission: Site SN0552 - Land off Watton Road, Barford Asset description - 4VV ROUTE TWR (001 -	The Council Acknowledge the comments made by National Grid and note that the site been identified as being crossed or in close proximity to National Grid assets. The Council will ensure that the	298	Discussion with National Grid to clarify National Grid's rights in relation to their existing assets and the implications of

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			223): 400Kv Overhead Transmission Line route: NORWICH MAIN - WALPOLE 1 A plan showing details of the location and details of National Grid's asset is attached. It is our policy to retain existing overhead lines in-situ, though there may be exceptional circumstances that would justify the request (e.g. if the proposal is of regional or national importance). We would welcome a brief phone call to clarify National Grid's rights in relation to their existing assets and the implications of allocating sites without making these clear. Please ensure the identified issue is acknowledged in future iterations of the VCHAP (e.g. reference to National Grid assets in site constraints/parameters and requirement that these remain in-situ). These have not been acknowledged in the latest draft of the Local Plan.	identified issue is acknowledged in future iterations of the VCHAP.		allocating sites without making these clear. These will be reflected within any allocation policy wording if necessary.
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	2162	Comment	Barford SN0552 - Identified as a reasonable alternative. The site is shown in the map booklet, split in two with sections north and south of the B1108. It is not clear that a safe and acceptable pedestrian route could be provided between the sites and local facilities. In the absence of evidence to the contrary, it is possible the Highway Authority would object to applications at these sites.	The comments from the NCC highways are noted and should this site progress further in the VCHAP process further discussions will be required to determine whether an appropriate highways solution is achievable.	297	Evidence is required to show that a safe and acceptable pedestrian route could be provided between the sites and local facilities.

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QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	782	Comment	See no need for any other site to be allocated. As a Service Village the Joint Core Strategy (JCS) states that between 10-20 new dwellings are expected during the life of the plan, so far we have an increase of 16 dwellings (including 2 holiday lets) over the plan period to date, with still (in theory) five years of the JCS to run. There is also a pending application, which if granted permission would bring the total of new JCS dwellings in Barford to 23, which is beyond the upper limit of that expected for a Service Village.	The Council notes this objection but would note that the requirement for additional development has been set out in the Greater Norwich Local Plan (currently at Examination at the time of writing). Once adopted the JCS will be replaced by the GNLP, with many of the undeveloped sites in the associated site allocations plans being considered as carried forward allocations.	295	No action or change required.
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	773	Comment	Marlingford and Colton Parish Council welcome rejection of sites 424SL, 474 and 475. The lack of facilities/transport makes the parish unsuitable for significant development. This would likely apply if further sites were proposed. Please note that the PC previously supported 425 subject to strict conditions, but to accept the problems associated with access.	The Council acknowledge the comments from Marlingford and Colton Parish Council, including their support for SN0425.	294	No action or change required.
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1398	Object	Either Site SN0475REVA or SN0475REVB should be an allocated site in the Plan	The support for either SN0475REVA or SN0475REVB to be allocated is noted, however the representation made does not alter the opinion of the Council and these sites are still considered unsuitable.	293	No action or change required.
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1277	Object	Do not agree with the concept of the VCHAP and see no need for any other site to be allocated. Fully support the comments of Barford and Wramplingham Parish Council, and those of CPRE.	Objection noted	292	No action or change required.

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QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1876	Comment	SN0475B: Land east of Highhouse Farm Lane, Colton The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, an alternative condition could be attached to any approval requiring its implementation.	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	288	No action required at this time.
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1925, 2178	Comment	Water management comments: Part of the Parishes are located within the Norfolk Rivers IDD. The Board's byelaws apply to any new developments within the IDD. Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. The on-site flood risk	The comments made in relation to water management are noted and the requirement for geotechnical investigation these issues will be explored further with the LLFA.	287	Policy wording to include requirements of LLFA as appropriate.

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			forms a minor flow path in the 0.1% AEP event, contributing to a major flow path off-site in the 0.1% AEP event. The road between the two polygons is affected by flood risk in the 0.1% AEP event. There is opportunity to mitigate the flood risk leading off the site. The majority of the site is unaffected by flood risk and has the potential to be developed.			
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	2193	Comment	SN0552 - Land off Watton Road, Barford Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. The application site lies across two fields, one south of Watton Road (grazing? /rough grassland), and one on the corner of Back Land and Watton Road (arable). The application site at Barford is located within a SSSI IRZ but 'residential' is not listed as a trigger requiring consultation with Natural England. It is located within a Strategic GI corridor, which should inform the EcIA and layout/enhancement of the site. The site is also located in the Amber Zone for District Level Licensing. A search of MAGIC shows that no Priority Habitats are onsite (the field to the south is shown on the 1905 OS map as an orchard). Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy should inform the	NCC Ecologist comments noted.	286	No action required at this time.

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			design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	159	Support	Barford needs modest development to create a sustainable village community by justifying the current and additional services needed. The proposed development off the Watton Road has good access and offers green space for public access which the village is in real need of.	The support for shortlisted site SN0552 is noted.	285	No action or change required.
QUESTION 19: Should any of the shortlisted sites be rejected?	2077	Comment	Water management comments: Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised.	The comments made in relation to water management are noted and the requirement for geotechnical investigation these issues will be explored further with the LLFA	310	Policy wording to include requirements of LLFA as appropriate.
QUESTION 19: Should any of the shortlisted sites be rejected?	1287	Comment	I consider that the shortlisted village cluster sites in the Barford and Wramplingham area should be completely rejected because I do not agree with the concept of a village cluster plan and I see no case or need for any other site to be allocated. As a Service Village the Joint Core Strategy (JCS) states that between 10-20 new dwellings are expected during the life of the plan. Barford has nearly reached the upper limit with still (in theory) five years of the JCS to run.	The Council notes this objection but would note that the requirement for additional development has been set out in the Greater Norwich Local Plan (currently at Examination at the time of writing). Once adopted the JCS will be replaced by the GNLP, with a number of the undeveloped sites in the associated site allocations plans being considered as carried forward allocations.	309	No action or change required.
QUESTION 19: Should any of the shortlisted sites be rejected?	783	Comment	We consider that the shortlisted village cluster sites in the Barford and Wramplingham area should be completely rejected because we do not agree with the concept of a village cluster plan and we	Objection to shortlisted site noted.	308	No action or change required.

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			see no case or need for any other site to be allocated.			

Barnham Broom, Kimberley, Carleton Forehoe, Runhall and Brandon Parva

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 20: Settlement Limit	579	Object	NCC need to develop a climate action plan before any new builds take place. We need more green spaces, a village meadow and ways of conserving what is here rather than increase stress on the failing infrastructure and struggling wildlife.	Alongside the VCHAP is the Greater Norwich Local Plan (GNLP). The GNLP is being prepared jointly by Broadland, Norwich City and South Norfolk Councils and in partnership with Norfolk County Council. The GNLP covers the combined area of Broadland, Norwich and South Norfolk, excluding the area within the Broads Authority. It includes strategic planning policies for the whole of the area, including mitigating and addressing climate change. For example GNLP emerging Policy 2, in conjunction with other plan policies, requires development to be designed to minimise emissions. It is a broad strategic policy covering a wide range of design issues which is supported by the requirement for a Sustainability Statement to show how development will be low carbon. It also provides flexibility in what will undoubtedly be an era of rapid technological change to 2038 to ensure development seizes the broad range of opportunities to be designed to reduce emissions. Carbon emissions in Greater Norwich will continue to be monitored using district wide figures produced by Government on transport, domestic and industrial emissions. It is the GNLPs ambition is to reduce per capita emissions and thereby contribute to meeting the national target to bring all greenhouse gas emissions to net zero by	882	No action required.

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				2050/51, as well as helping to meet local targets, statements and plans. Measures contained within the GNLP will enable further emissions reductions, continuing recent year-on-year trends. Further to the concerns raised around wildlife, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 20: Settlement Limit	1099	Support	This seems the best option with the least impact on other residents. Already on the main Norwich Road with easy access in and out of the village without any disruption.	Support noted.	881	No action required.
QUESTION 21: Preferred Site - SN0018SL, Land north of Norwich Road, adj 101	2066	Comment	Please see attached for full response. Few or no constraints. Standard information required at planning stage. Source Protection Zone 3 The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration	Comments noted.	890	Note Ground Source Protection Zone 3 in policy/ supporting text. No further action required.

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			should be utilised. Assessment: Green			
QUESTION 21: Preferred Site - SN0018SL, Land north of Norwich Road, adj 101	2005	Comment	Foul Water Capacity For sites SN0552, SN0018SL, SN2110, SN4051, SN0055, SN0174 and SN0196 available information indicates may be around 150 houses planned here in total for preferred and shortlisted sites. Barnham Broom has some capacity for foul water flows (for approximately 50 houses) but not for all the houses planned in these developments. Discussions will need to be held with Anglian Water (AWS), and development must be phased in line with WRC treatment capacity being made available.	Comments noted; Barnham Broom has some capacity for foul water flows (for approximately 50 houses). Note that not all of the sites listed would be brought forward under the VCHAP.	889	Discussions with Anglian Water (AWS), and development must be phased in line with WRC treatment capacity being made available.
QUESTION 21: Preferred Site - SN0018SL, Land north of Norwich Road, adj 101	1926	Comment	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. Minor development – no further comments	Comments noted.	888	No action required.
QUESTION 21: Preferred Site - SN0018SL, Land north of Norwich Road, adj 101	2194	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. The application site comprises a single field. Except for the hedges, there are no Priority Habitats onsite (MAGIC). It is located within a SSSI Impact Risk Zone, but housing is not identified as requiring consultation with Natural England. It is	Comments noted	885	No action or change required.

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			located in an area identified as an amber zone for great crested newts.			
QUESTION 21: Preferred Site - SN0018SL, Land north of Norwich Road, adj 101	1877	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. The site is adjacent to a telephone exchange which has a potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site.	The Council notes these comments, including the reference to the adjacent telephone exchange. As an extension to the existing Settlement Limit (rather than an allocation) the site would not be subject to specific policy. Instead, specific matters would need to be dealt with in accordance with DM policies at the planning application stage.	884	No action required
QUESTION 21: Preferred Site - SN0018SL, Land north of Norwich Road, adj 101	1, 36	Support	The site is most in keeping with the rest of the village, and will have the least negative environmental impact in an area already heavily constrained by agricultural activity. Appropriate reasonable size	Support noted.	883	No action required.
QUESTION 22: Preferred Site - SN2110, Land south of Norwich Road, Barnham Broom	578	Object	NCC need to develop a climate action plan before any new builds take place . We need more green spaces, a village meadow and ways of conserving what is here rather than increase stress on the failing infrastructure and struggling wildlife.	Alongside the VCHAP is the Greater Norwich Local Plan (GNLP). The GNLP is being prepared jointly by Broadland, Norwich City and South Norfolk Councils and in partnership with Norfolk County Council. The GNLP covers the combined area of Broadland, Norwich and South Norfolk, excluding the area within the Broads Authority. It includes strategic planning policies for the whole of the area, including mitigating and	925	No action or change.

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				addressing climate change. For example GNLP emerging Policy 2, in conjunction with other plan policies, requires development to be designed to minimise emissions. It is a broad strategic policy covering a wide range of design issues which is supported by the requirement for a Sustainability Statement to show how development will be low carbon. It also provides flexibility in what will undoubtedly be an era of rapid technological change to 2038 to ensure development seizes the broad range of opportunities to be designed to reduce emissions. Carbon emissions in Greater Norwich will continue to be monitored using district wide figures produced by Government on transport, domestic and industrial emissions. It is the GNLPs ambition is to reduce per capita emissions and thereby contribute to meeting the national target to bring all greenhouse gas emissions to net zero by 2050/51, as well as helping to meet local targets, statements and plans. Measures contained within the GNLP will enable further emissions reductions, continuing recent year-on-year trends. Further to the concerns raised around wildlife, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development		

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				proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 22: Preferred Site - SN2110, Land south of Norwich Road, Barnham Broom	1262	Comment	In principal I support this site for up to 9 dwellings on the basis that it continues the existing building line, infills and does not impact directly upon a large number of other residents. However, the site could lend itself to a larger number of dwellings, which would be an issue. Also access to the proposed site, if approved should not be via an access left vacant between two existing properties, which would be detrimental. The retention of the existing mature trees should be guaranteed. Entry and exit to site should be contained within the site.	With regards to the potential number of dwellings coming forward on the site, as a Settlement Limit extension site this will be determined at the planning application and will be influenced by current policies dealing with amenity, scale, etc. In determining any application, the Council will seek to ensure that an appropriate density is achieved. In addition, any future scheme will be subject to achieving a satisfactory access and be in accordance with the Highways Authority.	897	No action required.
QUESTION 22: Preferred Site - SN2110, Land south of Norwich Road, Barnham Broom	2195	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. The site is part of an agricultural field, bounded along the northern edge by a ditch, and line of standard trees. To the north is an area of deciduous woodland (priority habitat) (see MAGIC). The site is in a SSSI Impact Risk Zone although 'residential' development would not trigger consultation with Natural England. The site is in an amber zone for great crested newts (identified by Natural England as part of DLL licensing).	Comments noted.	896	Consider the need for the allocation Policy to specifically reference priority habitats (e.g., hedgerows).

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			Consideration should be given to creating priority habitats (e.g., hedgerows).			
QUESTION 22: Preferred Site - SN2110, Land south of Norwich Road, Barnham Broom	2145	Comment	Few or no constraints. Standard information required at a planning stage. Source Protection Zone 3 The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Assessment: Green	Comments noted.	895	No action required.
QUESTION 22: Preferred Site - SN2110, Land south of Norwich Road, Barnham Broom	2006	Comment	Foul Water Capacity For sites SN0552, SN0018SL, SN2110, SN4051, SN0055, SN0174 and SN0196 available information indicates may be around 150 houses planned here in total for preferred and shortlisted sites. Barnham Broom has some capacity for foul water flows (for approximately 50 houses) but not for all the houses planned in these developments. Discussions will need to be held with Anglian Water (AWS), and development must be phased in line with WRC treatment capacity being made available.	Comments noted; Barnham Broom has some capacity for foul water flows (for approximately 50 houses) but not for all the houses planned in these developments. Note that not all of the sites listed would be brought forward under the VCHAP.	894	Discussions will need to be held with Anglian Water (AWS), and development must be phased in line with WRC treatment capacity being made available.
QUESTION 22: Preferred Site - SN2110, Land south	1927	Comment	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment.	Comments noted.	893	No action required.

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of Norwich Road, Barnham Broom			Minor development – no further comments			
QUESTION 22: Preferred Site - SN2110, Land south of Norwich Road, Barnham Broom	1878	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	Comments noted. The requirement for Contamination Report would be addressed at the planning application stage in response to existing policy and legislative requirements.	892	No action required.
QUESTION 22: Preferred Site - SN2110, Land south of Norwich Road, Barnham Broom	2, 37, 858, 1100	Support	Support; small logical connection linking to the rest of the village.	Support noted.	891	No action required.
QUESTION 23: Preferred Site - SN4051, Land on the corner of Bell Road and Norwich Road, Barnham Broom	576	Object	NCC need to develop a climate action plan before any new builds take place. We need more green spaces, a village meadow and ways of conserving what is here rather than increase stress on the failing infrastructure and struggling wildlife.	Alongside the VCHAP is the Greater Norwich Local Plan (GNLP). The GNLP is being prepared jointly by Broadland, Norwich City and South Norfolk Councils and in partnership with Norfolk County Council. The GNLP covers the combined area of Broadland, Norwich and South Norfolk, excluding the area within the Broads Authority. It includes strategic planning policies for the whole of the area, including mitigating and addressing climate change. For example, GNLP emerging Policy 2, in conjunction with other plan policies, requires development to be designed to minimise emissions. It is a broad strategic policy covering a wide range of design issues which is supported by the requirement for a Sustainability Statement to show how development	926	No action required.

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				will be low carbon. It also provides flexibility in what will undoubtedly be an era of rapid technological change to 2038 to ensure development seizes the broad range of opportunities to be designed to reduce emissions. Emerging policies 1, 2, 3, 4 and 7 support further development of the green infrastructure network which will provide for mitigation of and adaptation to climate change, including promoting biodiversity net gain and improved and linked habitats. Carbon emissions in Greater Norwich will continue to be monitored using district wide figures produced by Government on transport, domestic and industrial emissions. It is the GNLPs ambition is to reduce per capita emissions and thereby contribute to meeting the national target to bring all greenhouse gas emissions to net zero by 2050⁵¹, as well as helping to meet local targets, statements and plans. Measures contained within the GNLP will enable further emissions reductions, continuing recent year-on-year trends. Further to the concerns raised around wildlife, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be		

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				required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 23: Preferred Site - SN4051, Land on the corner of Bell Road and Norwich Road, Barnham Broom	2181	Comment	More houses need to be built, but it is wrong to use this one-dimensional approach. It should be about allowing communities to grow. This requires vision, leadership and a sense of what community might look like a generation ahead. Barnham Broom has a primary school, church, village hall and playing field, pub and shop. It faces real issues, particularly roads and transport, but deals with them - e.g. the much-used village hall, recent projects to restore the Church Bells, build a memorial garden, and rejuvenate the Barnham Broom Fuel Allotment Charity. A recent substantial residential development and continued infilling means the population is expanding. I fully support the attached letter, which proposes how SN4051 might be crucial to community development. Maybe the village playing field with its 60's village hall could be developed for housing and the proceeds used to acquire and develop SN4051, with improved village hall and playing field facilities. This would provide a gathering space in the centre of our village with village hall, shop and pub.	Comments noted. Locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services. The provision of several relatively small allocation sites as required by the National Planning Policy Framework means this approach also has the benefit of supporting small-scale builders, providing choice for the market and helping to ensure the delivery of housing in popular village locations. It is noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.	924	No action required.
QUESTION 23: Preferred Site - SN4051, Land on the corner of Bell Road and Norwich	3, 38, 86, 87, 859, 1101, 1263, 1814	Mixed	Concerns raised with increased traffic and highway safety issues, concerns with flooding, concerns with school capacity and environmental impacts.	The Council acknowledge the safety concerns regarding the access and the suitability of Bell Road. As part of the site selection process, NCC Highways officers have provided technical advice	916	Confirm junction realignment at Bell Road with Highways Authority and include

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Road, Barnham Broom				relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that development of the site is broadly acceptable in highways terms where development of the site offers the opportunity to realign Bell Road and improve the current junction arrangement. With regards to the concerns raised regarding flooding, discussions have taken place with the Lead Local Flood Authority (LLFA) who have provided feedback on the proposed allocations and made recommendations where appropriate. In addition, further comments are also expected from the Environmental Agency and Anglian Water, who will help inform individual allocation policy wording. The concerns about the capacity of the school and implications for further resources and facilities are acknowledged. This technical consultation has included discussions with NCC Children's Services, where information was shared on School capacity. At the time of writing, Barnham Broom is not yet at 100% capacity. Numbers at this school are expected to drop with the opening of the new school at Hethersett and the planned opening of the new school at Wymondham		appropriate wording in the policy

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				(currently scheduled for 2024). Further to the concerns raised around destruction of the environment, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 23: Preferred Site - SN4051, Land on the corner of Bell Road and Norwich Road, Barnham Broom	2118	Comment	See attachment for full details. Few or no constraints. Standard information required at a planning stage. Source Protection Zone 3 The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Assessment: Green	Comments noted.	902	No action required.
QUESTION 23: Preferred Site - SN4051, Land on the corner of Bell Road and Norwich	2007	Comment	Foul Water Capacity For sites SN0552, SN0018SL, SN2110, SN4051, SN0055, SN0174 and SN0196 available information indicates may be around 150 houses planned here in total for preferred and shortlisted sites.	Comments noted; Barnham Broom has some capacity for foul water flows (for approximately 50 houses) but not for all the houses planned in these developments. Note that not all of the	901	Discussions will need to be held with Anglian Water (AWS), and development must be phased in line with WRC treatment

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Road, Barnham Broom			Barnham Broom has some capacity for foul water flows (for approximately 50 houses) but not for all the houses planned in these developments.	sites listed would be brought forward under the VCHAP.		capacity being made available.
QUESTION 23: Preferred Site - SN4051, Land on the corner of Bell Road and Norwich Road, Barnham Broom	1879	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. The site is on the opposite side of Bell Road to The Bell Inn which has a potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise and cooking odours. In addition, placing sensitive receptors close to this business could impact its future viability. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site.	Comments noted. The site is on the opposite side of Bell Road to The Bell Inn which has a potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise and cooking odours. In addition, placing sensitive receptors close to this business could impact its future viability. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site.	900	Consider the need for the allocation Policy to specifically reference impact to and from the Bell Inn.
QUESTION 23: Preferred Site - SN4051, Land on the corner of Bell Road and Norwich Road, Barnham Broom	1928	Comment	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).	Comments noted.	899	No action required.
QUESTION 23: Preferred Site -	2196	Comment	Rating: Green no major ecological constraints identified from desk-top	Comments noted.	898	Consider the need for the allocation Policy to

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SN4051, Land on the corner of Bell Road and Norwich Road, Barnham Broom			search. Surveys, and biodiversity enhancement in accordance with policy required. The site is part of an agricultural field (grazed), bounded by hedgerows (priority habitats). To the north is an area of deciduous woodland (priority habitat) (see MAGIC). The site is in a SSSI Impact Risk Zone although 'residential' development would not trigger consultation with Natural England. The site is in an amber zone for great crested newts (identified by Natural England as part of DLL licensing). Impacts to priority habitats should be minimised and compensated for, and consideration to the creation of additional priority habitats.			specifically reference the priority habitats (hedgerows and deciduous woodland).
QUESTION 24: Should any shortlisted / rejected sites be allocated?	1762	Comment	Comments in support of SN0174 and SN0196: HIGHWAYS AND ACCESS: Client has retained a legal right over Bankside Way to provide access to these sites for the purpose of future residential development; allocation of SN0451 appears to resolve the highways constraint at Bell Road/ Mill Road/ Norwich Road junction; improvements associated with SN0451 could reduce the viability of this site and impact on the overall numbers possible, as well as the number of affordable units delivered; HOUSING NUMBERS: consider a more holistic approach to planning at Barnham Broom should be undertaken - consider	HIGHWAYS AND ACCESS: The Council welcomes the clarification that the landowner has retained legal rights for access to SN0174 and SN0196 via Bankside Way - should these sites be reclassified as preferred options for allocation the Council may require formal submission of evidence to support this confirmation. In terms of the identified highways improvements associated with the potential allocation of SN4051 consideration would need to be given to the phasing of development within Barnham Broom should SN0174 and SN0196 be reclassified to ensure that highway safety was not adversely affected by allocations in the wider area in advance of these works being undertaken. Further discussions would be required with the Highways Authority	933	Should either SN0174 and SN0196 be allocated consideration would need to be given to phasing of development to allow alterations to Bell Road/ Mill Road/ Norwich Road to be completed first - confirmation required from NCC Highways that this would be necessary/ appropriate. Review SN0451 to determine appropriate numbers of site and confirm viability with

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			that with highways constraints addressed the village could provide up to 125 dwellings - there is no upper limit to the amount of development proposed in the VCHAP; NEIGHBOURHOOD PLAN: request that Barnham Broom be allowed to bring forward a Neighbourhood Plan setting out proposals for up to 125 new dwellings (those identified as Shortlisted and Preferred sites in the Regulation 18 VCHAP document); it should be for the people of Barnham Broom to decide which sites are allocated and come forward over the Plan period alongside associated benefits; AMENDMENT TO SN4087SL: as originally proposed this site should be replaced and incorporated into SN0174 as 10 First Homes.	to understand the implications of this, as well as the contribution these sites may be required to make to facilitate these junction improvements works. HOUSING NUMBERS: The Council notes the suggestion that Barnham Broom could deliver significant additional growth to that currently proposed in the VCHAP however the Council does not consider that this would meet the objectives of the VCHAP, in particular dispersing growth widely throughout the District to support existing communities and their services and facilities. The approach set in the Village Clusters aims to achieve a number of goals, including supporting services and facilities across a wide range of rural settlements, including those that have not benefited from the support of new development in the recent past. This approach helps to achieve the Government's aim (NPPF para 69) of a proportion of housing on smaller sites. The aim being to diversify the housing market and housing delivery, with the consequent benefit this has to smaller-scale local builders and supply chains. NEIGHBOURHOOD PLAN: The Council encourages parishes wishing to undertake Neighbourhood Plans and proactively offers support to Neighbourhood Plan Groups throughout the process. There are currently a number of active Neighbourhood Plan Groups within the District, including		the promoter of the site in response to concerns raised about the cost of the identified junction improvements.

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				Plans seeking to undertake their own housing allocations. To date the Council has not been advised that a qualifying body is seeking to produce a Neighbourhood Plan for Barnham Broom and it is certainly not correct to suggest that the Council has prevented or refused the opportunity for this to occur. The Neighbourhood Plan allocation process would require a number of stages to be undertaken including an appraisal of available sites against an identified criteria and the production of an evidence base (including a Sustainability Appraisal) to support the allocations. It should be noted that in order to allocate additional sites or housing numbers within a Neighbourhood Plan appropriate evidence would be required to demonstrate a need above that identified by the GNLP and the VCHAP. SN4087SL: Finally, in respect of the amended proposal to incorporate 10 First Homes the Council acknowledges this suggestion. All planning applications are required to deliver an appropriate housing mix in accordance with the most up to date evidence. This includes the provision of affordable housing in accordance with planning policy. The Council notes that First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units and as such would be		

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				required as part of any new housing development in any case.		
QUESTION 24: Should any shortlisted / rejected sites be allocated?	1763	Comment	SN4087SL was originally submitted as an exception site for up to 10 self-build dwellings however on review of the VCHAP the proposal is amended to (a) 10 self-build dwellings within site SN1074; or (b) if SN1074 is not allocated or a Neighbourhood Plan is not brought forward a new site directly adjoining Bankside Way to the south.	The Council notes the alternative proposal submitted in respect of SN4087SL. Clarification should be obtained from the site promoter that SN4087SL is no longer being promoted to the VCHAP as a potential housing allocation site. The alternative proposals are noted and the site to the south of Bankside Way should be noted as a new site submission and be subject to the site assessment process.	932	New site to be registered and site assessment to be undertaken. Clarification to be sought from the site promoter that SN4087SL is to be removed from the VCHAP process.
QUESTION 24: Should any shortlisted / rejected sites be allocated?	1264	Support	SN0174, SN0196, SN4087SL all appear to offer more suitable alternative sites other than the preferred larger central site. The sites 0174 and 0196 do provide extensions to an existing dwellings site, which has proved successful and has the infrastructure and civis already established. Within these two sites the provision of 50+ dwellings could be established, without too much disruption to existing housing. SNC planners have discriminated against these sites on the basis that the Bell/Norwich Road layout needs addressing, which is agreed and yet the proposal is for a 45 build upon the junction? SN0055 also has merit.	Comments noted. SN0174 are both SN0196 shortlisted site and have been considered suitable for development. However, SN4087SL is considered to unsuitable for a Settlement Limit extension for reasons stated within the Regulation 18 consultation document.	930	No action required.
QUESTION 24: Should any shortlisted / rejected sites be allocated?	580	Object	NCC need to develop a climate action plan before any new builds take place. We need more green spaces, a village meadow and ways of conserving what is here rather than increase stress on the failing infrastructure and struggling wildlife.	Alongside the VCHAP is the Greater Norwich Local Plan (GNLP). The GNLP is being prepared jointly by Broadland, Norwich City and South Norfolk Councils and in partnership with Norfolk County Council. The GNLP covers the combined area of Broadland, Norwich and South	927	No action required.

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				Norfolk, excluding the area within the Broads Authority. It includes strategic planning policies for the whole of the area, including mitigating and addressing climate change. For example GNLP emerging Policy 2, in conjunction with other plan policies, requires development to be designed to minimise emissions. It is a broad strategic policy covering a wide range of design issues which is supported by the requirement for a Sustainability Statement to show how development will be low carbon. It also provides flexibility in what will undoubtedly be an era of rapid technological change to 2038 to ensure development seizes the broad range of opportunities to be designed to reduce emissions. Emerging policies 1, 2, 3, 4 and 7 support further development of the green infrastructure network which will provide for mitigation of and adaptation to climate change, including promoting biodiversity net gain and improved and linked habitats. Carbon emissions in Greater Norwich will continue to be monitored using district wide figures produced by Government on transport, domestic and industrial emissions. It is the GNLPs ambition is to reduce per capita emissions and thereby contribute to meeting the national target to bring all greenhouse gas emissions to net zero by 2050, as well as helping to meet local		

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				targets, statements and plans. Measures contained within the GNLP will enable further emissions reductions, continuing recent year-on-year trends. Further to the concerns raised around destruction of the environment, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 24: Should any shortlisted / rejected sites be allocated?	2197	Comment	SN0055- Land east of Spur Road and south of Norwich Road, Barnham Broom Agricultural field bounded by hedges (priority habitat). No other priority habitats onsite (see MAGIC). Site within an amber habitat zone for great crested newts (identified by Natural England). SN0174- Land off Bell Road, Barnham Broom Agricultural field bounded by hedge to the north which is a priority habitat. No other priority habitats onsite (see MAGIC). Site mostly within an amber habitat zone for great crested newts (identified by Natural England) and partly within a strategic Green Infrastructure corridor. Applications for planning consent should be accompanied by a Preliminary Ecological	Comments noted.	923	No action required at this stage.

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			SN0196 - Land to the west of Mill View, Barnham Broom Agricultural field bounded by hedges (priority habitat). No other priority habitats onsite (see MAGIC). Site partly within an amber habitat zone for great crested newts (identified by Natural England) and partly within a strategic Green Infrastructure corridor. Rating for these sites: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required.			
QUESTION 24: Should any shortlisted / rejected sites be allocated?	2107	Comment	SN0055 Few or no constraints. Standard information required at a planning stage. Source Protection Zone 3 The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Assessment: Green	Comments noted.	922	No action required.
QUESTION 24: Should any shortlisted /	2106	Comment	SN0174 - Few or no constraints. Standard information required at a planning stage. Source Protection Zone 3	Comments noted	921	No action required.

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rejected sites be allocated?			The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Assessment: Green			
QUESTION 24: Should any shortlisted / rejected sites be allocated?	2105	Comment	SN0196 - Few or no constraints. Standard information required at a planning stage. Source Protection Zone 3 The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Assessment: Green	Comments noted.	920	No action or change
QUESTION 24: Should any shortlisted / rejected sites be allocated?	2008	Comment	Foul Water Capacity For sites SN0552, SN0018SL, SN2110, SN4051, SN0055, SN0174 and SN0196 available information indicates may be around 150 houses planned here in total for preferred and shortlisted sites. Barnham Broom has some capacity for foul water flows (for approximately 50 houses) but not for all the houses planned in these developments. Discussions will need to be	Comments noted; Barnham Broom has some capacity for foul water flows (for approximately 50 houses) but not for all the houses planned in these developments. Note that not all of the sites listed would be brought forward under the VCHAP.	918	Discussions will need to be held with Anglian Water (AWS), and development must be phased in line with WRC treatment capacity being made available.

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			held with Anglian Water (AWS), and development must be phased in line with WRC treatment capacity being made available.			
QUESTION 24: Should any shortlisted / rejected sites be allocated?	1880, 1881, 1882, 1883, 1884, 1885	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	Comments noted. The requirement for Contamination Report would be addressed at the planning application stage in response to existing policy and legislative requirements.	917	No action required.
QUESTION 24: Should any shortlisted / rejected sites be allocated?	1383	Comment	Site SN0174 is approximately 150m from Barnham Broom Fen County Wildlife Site. Notwithstanding any other concerns, any development on this site would need to demonstrate that there would not be any indirect impacts on the CWS, should there be any hydrological connectivity.	NCC Senior Ecologist has provide comments on the site and it has been noted that the agricultural field bounded by hedge to the north is a priority habitat. No other priority habitats onsite (see MAGIC). Site mostly within an amber habitat zone for great crested newts (identified by Natural England) and partly within a strategic Green Infrastructure corridor. It should be noted that applications for planning consent will be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy will inform the design.	904	No action required.
QUESTION 24: Should any shortlisted /	39	Object	These should all be rejected, they will affect the feel of the village and severely disrupt other people's way of life	The Council notes the objection to all of the sites that have been promoted within the cluster. The VCHAP seeks to allocate the identified housing requirement set out in the Greater	903	No action required.

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rejected sites be allocated?				Norwich Local Plan through a dispersal of housing on smaller sites throughout the village cluster area; as set out in the objectives of the Plan this is to boost the vitality of these areas, improve local choice and support existing services and facilities within these communities.		
QUESTION 25: Should any of the shortlisted sites be rejected?	40, 1102	Mixed	Comments submitted objecting to shortlisted sites SN0174 and SN0196: These sites should be rejected; Bankside Way has not been constructed for through traffic and the access is not fit for purpose; Would result in the loss of the cul-de-sac area where children currently play safely and would have a negative impact on the existing community that has been established at Bankside; New properties would be disconnected from the village; Intrusive visual impact on the Yare Valley; and Existing land suffers from flooding.	The Council recognises these concerns towards the proposed shortlisted sites west of Bankside Way. In terms of the highways concerns, further discussions have taken place with the Highways Authority who have raised queries about the possible existence of a ransom strip at the end of Bankside Way, as well as the need to include third party land to create appropriate visibility splays. Should the sites be reclassified as part of the continuing site selection process it would be necessary to ensure that access to these sites is both achievable and accessible. The site assessment forms note that development in this location would have the potential to have both an adverse landscape and townscape impact, including connectivity to the main village (depending on the access arrangements to the site). The concerns were reflected in the concluding section of the site assessment and in part formed the reason for these sites not being considered as preferred options for allocation. In particular these assessments note that development	931	If reclassified to preferred sites, confirmation would need to be sought that access to these sites is both achievable and acceptable (possible need for third party land). If reclassified to preferred sites, the site boundaries should be reviewed to address the landscape impact and improve the relationship with the existing development to the north.

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				within the western areas of these sites would have the most landscape impact however it was also recognised that the site boundaries could be reduced to address this impact. Should the classification of these sites be amended the site boundaries of the sites should be reviewed to reduce the landscape impact. A reduction in the proposed site area would also improve the relationship between the shortlisted sites and the existing development to the north. Concerns have also been raised about possible surface water flooding in this location however discussions with the LLFA have not raised any technical concerns. The Council is aware that a surface water flowpath runs parallel to the western boundaries of the sites and it would be necessary to ensure that any development on these sites did not contribute to this flowpath. Surface water drainage would need to be accommodated within the boundaries of the site in accordance with current policy and legislation.		
QUESTION 25: Should any of the shortlisted sites be rejected?	581	Support	NCC need to develop a climate action plan before any new builds take place. We need more green spaces, a village meadow and ways of conserving what is here rather than increase stress on the failing infrastructure and struggling wildlife.	Alongside the VCHAP is the Greater Norwich Local Plan (GNLP). The GNLP is being prepared jointly by Broadland, Norwich City and South Norfolk Councils and in partnership with Norfolk County Council. The GNLP covers the combined area of Broadland, Norwich and South Norfolk, excluding the area within the Broads Authority. It includes strategic	928	No action required.

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				planning policies for the whole of the area, including mitigating and addressing climate change. For example GNLP emerging Policy 2, in conjunction with other plan policies, requires development to be designed to minimise emissions. It is a broad strategic policy covering a wide range of design issues which is supported by the requirement for a Sustainability Statement to show how development will be low carbon. It also provides flexibility in what will undoubtedly be an era of rapid technological change to 2038 to ensure development seizes the broad range of opportunities to be designed to reduce emissions. Emerging policies 1, 2, 3, 4 and 7 support further development of the green infrastructure network which will provide for mitigation of and adaptation to climate change, including promoting biodiversity net gain and improved and linked habitats. Carbon emissions in Greater Norwich will continue to be monitored using district wide figures produced by Government on transport, domestic and industrial emissions. It is the GNLPs ambition is to reduce per capita emissions and thereby contribute to meeting the national target to bring all greenhouse gas emissions to net zero by 2050, as well as helping to meet local targets, statements and plans. Measures contained within the GNLP will enable		

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				further emissions reductions, continuing recent year-on-year trends. Further to the concerns raised around destruction of the environment, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 25: Should any of the shortlisted sites be rejected?	4	Object	SN0055 is not an appropriate site for development. Required footways would narrow the existing road which is already prone to speeding by traffic making it more dangerous, particularly as no footways currently exist on either side. Traffic calming measures may mitigate this. Any proposed development should be more environmentally aware than the recent bank side development where there appear to be no obvious environmental measures (increased vegetation, renewable energy etc). A further development of this sort would damage the health and sustainability of the village.	These comments are noted. The Council has undertaken site assessments on all of the promoted sites within the village and concluded that those sites selected pre-Regulation 18 were the most suitable options for development, including shortlisted site SN0055. As part of the consultation and site assessment process technical discussions have taken place with a number of technical consultees. Mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include the provision of a footway. Whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the	919	No action required.

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				impact of alterations to the existing road, as well as the increased traffic movements, on the local ecology are also noted however these matters would be dealt with during the planning application and it would be necessary for all new development to adhere to existing Development Management policies relating to the environment. In addition, emerging Policy 2 of the GNLP 'Sustainable Communities', is a wide-ranging policy and amongst other things, seeks to promote low carbon development and helps to address climate change. This policy states that if the potential to set more demanding standards locally is established by the Government, the highest potential standard will be applied in Greater Norwich. Point 10 of this policy specifically requires all new development to provide a 19% reduction against Part L of the 2013 Building Regulations (amended 2016). If adopted, all development will be subject to the requirement set out in these policies.		

Bawburgh

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QUESTION 26: Settlement Limit	586	Object	The addition of the preferred site to the settlement limit would adversely contribute to the valley setting and rural entrance to the village.	There is existing development to the north and south of the site, as well as some limited development to the west on the opposite side of Stocks Hill. This existing pattern of development will limit the visual impact of new development in this location, reducing its impact on the valley setting and the entrance to the village. Consideration of the landscape and townscape impact has formed part of the site assessment process, and landscaping of the site would play a key role in protecting the character of the area.	15	None required
QUESTION 27: Preferred Site - SN4053, Land to the east of Stocks Hill	2208	Comment	Technical ecological comments for SN4053: Green rating - no major ecological constraints identified from desktop search; surveys and enhancement in accordance with policy required; agric field bounded by hedgerows (priority habitat) on 3x sites - no other priority habitats on site; site in GI corridor; and green habitat zone for GCNs.	The Council notes the comments of the county ecologist and that no significant ecological constraints have been identified on this site. The developer of the site will be required to ensure an appropriate site design that as far as possible seeks to retain natural features on the site. If retention is not possible any proposal on the site will be required to mitigate and/or compensate for their loss as appropriate in accordance with planning policy.	698	No action required
QUESTION 27: Preferred Site - SN4053, Land to	1929, 2115	Comment	Comments received relating to water management: Site is adjacent to a flow path and this should be considered in the site	Note the comments relating to both the adjacent flowpath and potential discharge arrangements for future development on the site. Ongoing discussions with the LLFA will be	23	Discussion with the LLFA regarding the implications of the adjacent flowpath and any possible mitigation

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the east of Stocks Hill			assessment; Outside the IDD boundary; Within the Norfolk Rivers IDB watershed catchment; and If surface water discharges within the watershed catchment of the Board's IDD then discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS)	necessary to understand the implications of the flowpath for the site however it is not anticipated that it would preclude the development of this site.		requirements for policy text.
QUESTION 27: Preferred Site - SN4053, Land to the east of Stocks Hill	1886	Comment	Comments received from Environmental Protection Officer: Unaware of any significant land quality issues on-site or adjacent to the site; Due to scale of scheme a Phase One Land Contamination Report (desktop study) should accompany any planning application on the site; Proximity to the village hall may result in amenity issues for new residents (noise, car headlamps); Proximity of residential dwellings to the village hall could impact on the viability of the business; A Construction Management Plan is likely to be a requirement of any planning approval on the site.	The Council notes the comments relating to the land quality issues and the requirements for both a Construction Management Plan and Contamination Report as part of any subsequent application on the site. It is considered that a sensitively designed site will address the concerns that have been raised about the proximity between the site and the village hall opposite. Design details will be agreed during the planning application process but can also be incorporated into the site allocation policy, if appropriate, to address concerns about potential residential amenity and village hall viability issues however it is also noted that there is already residential development immediately adjacent to the village hall.	21	Requirement for a Phase One Land Contamination Report (desktop study) and a Construction Management Plan to accompany any planning application submitted for the site - to be included in a site allocation policy if appropriate. Consideration to be given to the wording of a site allocation policy to address site layout/ design and the potential residential amenity issues that have been identified.
QUESTION 27: Preferred Site - SN4053, Land to	573, 587, 2031	Object	Concerns have been raised about the following issues:	The site is considered to be well related and proportionate in scale.	19	A Heritage Impact Assessment will be undertaken to

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the east of Stocks Hill			Traffic concerns, including the narrow bridge; Flooding in the village and concerns about drainage issues; Lack of local amenities and poor connectivity to reach facilities; Environmental impact on the green belt; Townscape and landscape impacts; Light pollution; Represents an inappropriate level of growth relative to the number of dwellings in the village; and Adjacent to the Bawburgh Conservation Area - a Heritage Impact Assessment will be required to determine site suitability and possible mitigation measures.	in scale to the existing built form of the settlement. The site is also well located in relation to existing services and facilities within the village, including the village hall and the primary school. NCC Highways has assessed the site and concluded that the site was acceptable in both access and highway safety terms. The Lead Local Flood Authority (LLFA) has noted that site is adjacent to a flowpath and advised that this should be considered as part of the site assessment. The LLFA has not raised an objection to the allocation of this site. The comments of Historic England are noted, as are the concerns relating to landscape and townscape impact of development on this site, and these issues will be subject to further review and assessment where appropriate. These assessments could identify mitigation measures/ enhancements to be incorporated into a site allocation policy to address any issues that may be identified.		determine the site significance and possible mitigation measures. Site will be reviewed to determine whether a Landscape Visual Appraisal (LVA) is required for this site. Discussion with the LLFA to determine whether any site specific policy wording would be required for an allocation on this site to address the adjacent flowpath identified.
QUESTION 27: Preferred Site - SN4053, Land to the east of Stocks Hill	1782	Support	The site is well located, 330m from school and 350m to the pub; village hall is directly opposite. There are good footways and main road is 20mph . Owners of site wish to include provision for a village shop as part of scheme. Land is relatively level, and is an 'infill' parcel. There are limited mature hedges/trees; A47 traffic is not notably known. Site not highly visible in landscape - notable views	The Council notes the ongoing support for this site from the site promoter.	16	No action required

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			towards Norwich Highways proposals, for access and footway connections have been considered further. Flood risk EA preliminary assessment undertaken to demonstrate no issue. Landscape assessment concludes that whilst site could detract from views towards bypass, there are positive measures e.g. central access road, with wide verges would create positive vista. Land is ready and available to be progressed.			
QUESTION 28: Should any of the shortlisted sites be rejected?	410	Object	Comments in support of rejected site SN0002SL: SN4053 sets a precedent for development; SN0002SL does not impact on neighbouring properties as it is surrounded by mature vegetation; development of SN0002SL would not result in development of similar sites along Stocks Hill as these sites are too small to develop; and would like to remain in Bawburgh but in a smaller, more efficient property.	The Council recognises the potential relationship between this site and the current preferred site SN4053 however concerns remain that this proposal would constitute backland development and could result in a poor relationship with both the host property and the preferred site. However, detailed matters such as design, layout and amenity impact would be considered in detail at the planning application stage. The site should be reassessed to determine suitability for an addition to the Settlement Limit.	699	Review the site assessment of SN0002SL to determine whether preferred allocation SN4053 could offer an opportunity for the extension of the settlement limit to include SN0002SL
QUESTION 28: Should any of the shortlisted sites be rejected?	1887, 1888, 1889, 1890	Comment	Comments received from Environmental Protection relating to sites SN4071, SN3032, SN0015 and SN0002SL: Unaware of any significant land quality	The above comments have been noted however at this stage it is not proposed that any of these sites are shortlisted or preferred for allocation. As such although these comments have been	25	No action required.

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			issues on the site or adjacent land; and Due to scale of development proposed a Phase One Land Contamination Report (desktop study) would be required with any application on these sites; and Size of development and proximity to existing dwellings is likely to require the submission of a Construction Management Plan. Additional comments received from Environmental Protection relating to site SN0015: The site is close to pig and poultry rearing that has the potential to adversely affect residential amenities of new residents (noise, odour, flies) and this could also impact on the future viability of the business.	retained for future reference it is not considered necessary comment further at this time.		

Bressingham

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QUESTION 29: Settlement Limit	279, 295, 648, 728, 770, 891, 1353, 1421, 1446, 1499	Mixed	The following concerns have been raised in response to Question 29: INFRASTRUCTURE: Primary school at capacity; lack of employment opportunities; additional pressures on GP and dental surgeries; poor IT infrastructure within the village; new wildlife habitats required ; HIGHWAYS: Inadequate local road network; widening of roads will have adverse impact on local ecology; inadequate treatment of roads locally during winter months; SL should be extended around recent development; issues with on-street parking; PRINCIPLE, LOCATION AND SCALE OF DEVELOPMENT: Already a disjointed settlement; location is ok but quantum of housing proposed and the associated traffic generated too great; do not wish to live in a housing estate;; disagree with the preferred sites; oppose the need for a VCHAP; approach is incorrect – should not rely on submission of sites by landowners for selection; VCHAP should plan for the future by creating new developments with adequate land and facilities to benefit village and residents; rejection of sites along A1066 is incorrect as there are easily accessible facilities and visitor attractions along this route; development along the A1066 is the historical centre of the village so should be recognised as such and be	The Council recognises the concerns that have been raised in response to Question 29. Question 29 specifically referred to proposes changes to the Settlement Limit and whether these are considered to be suitable. Many of the responses received focussed more generally on the principle of new development in Bressingham and concerns about the impact this could have on the existing services, facilities and residents, rather than alterations to the Settlement Limit. Where appropriate the Council has responded to these comments but in some instances further detail is provided in subsequent responses. It is recognised that Bressingham does not have a continuous defined Settlement Limit and that areas of the village are dispersed. The existing Settlement Limit reflects this pattern of growth and seeks to avoid the coalescence of these distinct areas by retaining gaps between them. To preserve the character of the settlement it is not proposed that the main Settlement Limit boundaries are amended as part of this revision (with the exception of the inclusion of new allocations which would be included within the Settlement Limits). Recent new dwellings at High Road are already within the existing Settlement Limit and therefore no further changes are	27	No action required.

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			within the Settlement Limits; retail and employment opportunities along the A1066 are critical for the success of the village; local objectives should be identified for the plan to be of relevance – 3rd cluster along the A1066 recognised, avoidance of roadside ribbon development, protection of gaps between distinct areas in the settlement, opportunities for in-depth housing and less restrictive settlement boundary to the west of Common Road.	necessary to include this development. Inclusion of an area within the defined Settlement Limit is not a reflection of the historic importance of that area; nor is its omission a reflection on the importance of that area to the functioning of the settlement. Rather, the function of the Settlement Limit is to differentiate between those areas in which new development is more likely to be supported and those areas in which it is more appropriate to apply more restrictive planning policies. As such the Council remains of the opinion that the areas of retail and employment sites along the A1066 to the south of the settlement are not suitable for inclusion within a defined Settlement Boundary. The level of growth identified for Bressingham is a balanced decision determined by a number of factors. These considerations include the overall objectives of the VCHAP, the findings of the Sustainability Appraisal and the level of services and facilities available within a settlement cluster. The Council considers that a reasonable level of growth has been identified for Bressingham taking all of these factors into consideration. In terms of more specific comments about the existing infrastructure the Council responds as follows: Bressingham is well located with good access to the services, facilities and employment opportunities within the		

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				nearby market town of Diss. A number of local facilities and services have also been identified within the settlement itself and these would be supported by new development. Emerging Policy 2 of the GNLPS sets out a requirement for new major developments to have access to fibre broadband. Representatives of NCC Education department have been contacted directly regarding the issues raised about the capacity of the school and whilst it is recognised that the school currently operates at capacity many of these pupils currently travel to the school from outside the catchment area. As such should additional pupils from within the catchment area wish to attend the school in the future there would be places available for these children. Meetings have also taken place between officers at South Norfolk Council and the Integrated Care Systems (NHS) to better understand the impact the VCHAP may have on existing NHS services within the South Norfolk (and adjacent) areas. However, whilst the Council recognises these concerns it is also clear that this is a national issue to be addressed. The ICS continues to be informed of the progress of the VCHAP and offered opportunities to be involved with the planning of growth within South Norfolk. The ICS has also been involved in wider discussions about the overall		

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				growth within the Greater Norwich Local Plan areas, of which the allocations made in the VCHAP will contribute towards. Discussions have taken place with NCC Highways officers to assess the suitability of the local road network. A number of sites that were promoted were discounted due in part to highways concerns - either due to constraints that would prevent safe access and egress to the site or impacts on the wider road network. Sites accessed directly from the A1066 would not be supported by NCC Highways for new residential development precluding housing allocations in these locations. Discussions with NCC Highways have identified highway mitigation measures to address issues that have been identified during the site selection process and these will be incorporated into final policy text where appropriate.		
QUESTION 29: Settlement Limit	112, 259, 1477	Support	Comments received: Settlement Limit should remain as already defined; local infrastructure cannot support extension with some already unable to cope with the existing demands; future development should be infill within the existing Settlement Limit only; and consider these to be the best sites	The Council notes these representations which support the retention of the existing Settlement Limit rather than an increase in the defined boundaries. There is currently no proposal to amend the Settlement Limit at Bressingham with the exception of sites that are allocated as part of the VCHAP being included in the Settlement Limit as a consequence of their allocation. The Council considers the preferred sites at Bressingham to be well related to the existing pattern of development and	26	No action required.

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				would form a natural extension to the existing Settlement Limits. Comments relating to the capacity of the local infrastructure are acknowledged and have been addressed via the technical consultation which was undertaken as part of the site selection process. These matters are dealt with in more detail in subsequent questions and answers.		
QUESTION 30: Preferred Site - SN3019, Land west of School Road	2032, 2209	Mixed	Ecological and heritage consultee comments for SN3019SL: Site is opposite Grade II listed Pine Tree Cottage therefore a Heritage Impact Assessment should be undertaken; and Ecology - green rating following desktop assessment; green habitat zone for GCNs; standard information required at the planning application stage.	The Council notes these comments from the technical consultees. At this time the inclusion of SN3019SL as a preferred allocation site is under review following the identification of flood risk issues on the site, however should the site remain within the VCHAP as either a shortlisted/ preferred site then a Heritage Impact Assessment will be required.	734	Heritage Impact Assessment required
QUESTION 30: Preferred Site - SN3019, Land west of School Road	260, 280, 335, 555, 582, 611, 618, 646, 730, 756, 764, 892, 1425, 1434, 1490, 1500, 1625, 1628, 1716, 1791, 2274	Mixed	A summary of the representations received relating to SN3019SL: FLOODING & DRAINAGE MATTERS: Serious flooding across the site due to inadequate drainage; School Road already experiences regular flooding, including those properties at the bottom of School Road; and no mains drainage. INFRASTRUCTURE MATTERS: School operates at capacity; inadequate existing infrastructure in the village to support the proposed growth; no employment potential; poor IT infrastructure within the village; impact on existing GP and dental surgeries; limited existing services mean a	The Council's responses to the representations received to Question 30 have been grouped together below by category: FLOODING & DRAINAGE MATTERS: Concerns that have been raised by both local residents and technical consultees regarding the possible flood risk associated with the development of this site have been recognised and explored further in direct discussions with the Lead Local Flood Authority. As such the Council considers that it is appropriate to review the inclusion of this site as a preferred allocation.	40	Review of the inclusion of SN3019SL as a preferred allocation site following discussions with the Lead Local Flood Authority. If the site remains as either a shortlisted/ preferred allocation site a Heritage Impact Assessment will be required.

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			well-related site is irrelevant; existing issues with connections to both water and electrical supplies; ECOLOGY/ LANDSCAPE/ HERITAGE MATTERS: This site is a haven for wildlife; oak tree should be protected as well as hedgerows; loss of peace and tranquility resulting; site is more detached than others and more prominent in the landscape; existing pattern of development is single frontage; detrimental impact on townscape and landscape; development would be urban sprawl and further extension into the countryside; topography of the site within the landscape has not been considered HIGHWAYS MATTERS: Existing congestion along School Road would be exacerbated by increased traffic levels; School Road is in poor condition and too narrow to cope with the additional traffic; restricted visibility and safety concerns about the junction with the A1066 with no highways comments to address this issue; concerns about the impact of construction traffic; opportunities exist to provide a safe pull-in for school traffic along the site frontage; negative impact of additional traffic on wellbeing of residents; environmental impact of road widening, including impact on ecology and increased carbon footprint of the village; SCALE & LOCATION: Disproportionate amount of development within a small area; why is proximity to schools being	INFRASTRUCTURE MATTERS: a key objective of the VCHAP is the distribution of new development throughout the settlements in the District to support existing services and facilities within these communities. Whilst it is recognised that rural settlements offer fewer services and facilities than their urban counterparts, a continued concentration of development in urban areas will lead to an inevitable decline of existing services and facilities within rural areas. The VCHAP seeks to re-balance this, as well as offer new opportunities for growth within local communities. Technical consultees have been invited to submit representations relating to their capacity constraints and these comments have been taken into account during the site selection process. Discussions with Anglian Water are continuing however at this stage no specific infrastructure constraints have been identified. Meetings between Council Officers and the Integrated Care System (NHS) have also taken place in order to understand the constraints and opportunities new development will offer for existing NHS services. However, as noted elsewhere, matters relating to capacity within the NHS are a part of a larger nationwide issue being considered outside the remit of the planning system. Similarly, discussions with NCC Education have acknowledged that whilst the school is currently		

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			promoted above all other considerations?; unclear about the housing mix; housing associations have experienced problems moving tenants into the village; and consideration should be given to smaller sites within the village.	operating at capacity this is in response to children attending out-of-catchment. A combination of falling numbers of pupils on the school roll and a reduction in out of catchment school places mean that the school would be able to accommodate local children should the need arise. ECOLOGY/ LANDSCAPE/ HERITAGE MATTERS: The site selection process has included an assessment of the impact of development on the environment. This included heritage, landscape, townscape and ecology. It has been noted separately that Historic England have requested the completion of a Heritage Impact Assessment should this site remain within the process in order to assess the impact development would have on the significance of Pine Cottage (opposite). If the site remains as either a shortlisted/ preferred site within the VCHAP a HIA will need to be completed to inform site specific planning policy wording if appropriate. The scale of development proposed on this site is considered to be commensurate to the surrounding pattern of development and whilst recognising that there would be some landscape impact the Council does not consider that it would be to a detrimental degree and furthermore, that with good design the development of this site could create a rural entrance to the village. Finally, it would be a requirement that any planning application for development of the site		

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				would be accompanied by the submission of the appropriate ecological surveys, mitigation measures and biodiversity enhancement opportunities – a desktop study by the County Ecologist has not indicated any specific ecological constraints on this site. HIGHWAYS MATTERS: NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network, including safety aspects where appropriate. Mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include carriageway widening along the site frontage as well as the provision of a footway to the school. Norfolk County Council have assessed the road network as a whole to determine whether the traffic from the proposed number of houses could be accommodated, and the fact that a particular road or junction has not been explicitly commented on does not mean it has not been considered as part of this process. Whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage.		

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				Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, on the local ecology are also noted however these matters would be dealt with during the planning application and it would be necessary for all new development to adhere to existing Development Management policies relating to the environment, as well as emerging Policy 2 of the GNLP. SCALE & LOCATION: Proximity to local schools has been used as an important assessment criteria for the site selection process however a wide range of additional criteria also determine the suitability of a site for allocation in the VCHAP including (but not restricted to) accessibility to local services and facilities and the availability of public transport locally. It is therefore an incorrect statement that the proximity of a site to a primary school is the overriding concern in the site selection process. In addition to the Council's own site assessment process (which has used agreed methodology) the site selection process is also informed by the production of a Sustainability Appraisal which provides important supporting evidence about the suitability of sites in terms of their overall sustainability. The details of the housing mix on allocated sites will be determined at the planning application stage however it will be guided by policy requirements, the most		

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				recent housing need evidence and discussions with the Council's Housing Enabling Officer to ensure that development that comes forward is the most appropriate for the area. Throughout the village of Bressingham a significant number of sites have been promoted for allocation enabling the Council to consider the most appropriate options for the village. The Council remains of the opinion that the location of the selected sites was acceptable at the Regulation 18 stage of the process however as noted above matters relating to the flood risk on site SN3019SL will lead to a review of this site within the VCHAP.		
QUESTION 30: Preferred Site - SN3019, Land west of School Road	1713	Comment	Additional comments: New development will require additional allotments for new residents due to the small size of gardens; Adjacent Parish land is being proposed as a woodland site and this would mean expansion of the allotments would not be possible; and All current plots are in use and allocated.	The requirement for additional allotment sites is noted and there may be an opportunity to explore the provision of allotment provision within the site allocations for Bressingham to address this issue.	35	To consider whether a site for allotments is an appropriate addition to a site allocation in Bressingham.
QUESTION 30: Preferred Site - SN3019, Land west of School Road	1443	Comment	Specific comments relating to the impact on the local school: The school is at capacity and further local housing would mean the Local Authority would be required to enable and finance the following: extension of school owned land, additional buildings to provide	The concerns about the capacity of the school and implications for further resources and facilities are acknowledged. Discussions with NCC Education have included a review of the status of Bressingham Primary School. Whilst it was noted that the school was currently operating at capacity it was	32	Review of NCC Highways recommendations for inclusion in policy allocation text.

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			further classrooms and services, extension of the playground and extension of the current playing field area; Additional housing could exacerbate existing parking and road safety issues; and Further parking on site SN4036 would be welcomed although previous discussions also took place at Pascoe Place but did not come to fruition.	also recognised that the majority of these do not attend from within the school's catchment area. Therefore should additional pupils from within the Bressingham Primary School catchment area choose to attend this school there would be sufficient places for them to do so. A number of suggestions have been put forward to address the existing parking and road safety issues as part of this representation. Discussions with NCC Highways have identified proportionate mitigation measures that should be brought forward as part of the site allocation policy text.		
QUESTION 30: Preferred Site - SN3019, Land west of School Road	113, 1930, 2140	Comment	Comments relating to water management issues: Outside the IDB boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment - If surface water discharges within the watershed catchment of the Board's IDB, this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS); notice must be taken of run-off and drainage from this site as this road is already subject to surface water flooding; a riparian owned watercourse runs adjacent to the southern site boundary; a major flow path affects the majority of the site - flow lines show this water flows south off the site;	The comments relating to the flood risk of this site are noted and have been the subject of further discussions with the Lead Local Flood Authority who have expressed concerns about development of this site. As such the inclusion of this site within the VCHAP will need to be reassessed.	31	Review the inclusion of the site based upon the identified flood risk and discussions with the LLFA to determine whether the site should be removed from the list of preferred allocation sites.

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			access to the site is heavily affected by the on-site flood risk; a small area to the west of the site is unaffected by flood risk; and advise that inclusion of this site in the plan is reassessed.			
QUESTION 30: Preferred Site - SN3019, Land west of School Road	1566	Support	Comments in support of this allocation: The site is well related and connected to the centre of the village; existing footpath provision; and any footpath or surface water drainage issues could be reasonably mitigated.	The Council acknowledges the ongoing support for the allocation of the site by the site promoter. However, whilst the Council maintains that this site has a number of benefits in terms of connectivity and proximity to existing facilities and services both the Regulation 18 consultation and the technical consultation resulted in the Council being made aware of serious concerns about surface water flow routes across this site, as well as related off-site flooding. Subsequent discussions with the Lead Local Flood Authority (LLFA) have resulted with a recommendation from the LLFA that this site should not be allocated being maintained. The Council will need to consider the preferred allocation status of this site in light of these comments.	30	The Council will need to review the preferred allocation status of this site following receipt of consultation responses.
QUESTION 31: Should any of the shortlisted / rejected sites be allocated?	297	Comment	Comments in a single representation suggesting a preference of site development within Bressingham (set out in order of preference): SN3037 (part) - 50 dwellings 1161 (2011 LP submission) - 35 dwellings	The Council welcomes comments on the site selection, including alternative options for allocation.	738	No action required

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			SN4037 - 12 dwellings (but only if essential) Commentary in a single representation setting out sites to be rejected: SN3019SL - should be retained as open landscape between the clusters of development - possible opportunity to provide a parking area to allow safer traffic and pedestrian movements - would also increase ribbon development SN2079 and SN2054 - essential to the open landscape and should be protected - SN2079 allows views of the war memorial SN3010, SN3036 and SN3038 - currently in employment use and should be retained as such SN3038 - premature to consider development on this site now - possible future employment land SN4026 and SN3023SL - outside the settlement boundary SN4033 - access issues and landscape impact			
QUESTION 31: Should any of the shortlisted / rejected sites be allocated?	2215	Comment	NCC Ecology comments on SN4037: Green rating with no ecological constraints identified during desktop survey; agricultural field bounded by priority habitat (hedgerows);	The Council notes these comments, including the existence of the PROW adjacent to the site, and is reassured that an appropriate ecological avoidance, mitigation and enhancement strategy would be achievable on this site. The developer of the site will be required to submit the appropriate	737	No action required

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			PROW along western boundary; green habitat zone for GCNs; site is SSSI IRZ but residential development is not a trigger for consultation; and planning applications to be accompanied by surveys and mitigation which inform the site design.	supporting evidence at the time of application, clearly indicating how this has informed the site design, in accordance with current planning policy. Consideration should also be given to the inclusion of Biodiversity Net Gain on development sites in line with emerging legislation.		
QUESTION 31: Should any of the shortlisted / rejected sites be allocated?	2078	Comment	LLFA response to SN4037: Green rating - the site contributes to an off-site flowpath; flowlines indicate flood water flows south-east to a large flow path southeast of the site; the majority of the site is not at risk of flooding and has the potential for development; this should be considered in the site assessment.	The Council has noted the concerns of the LLFA relating to the wider flowpath to the south of the site (specifically in relation to site SN3019SL) and has sought further clarification from the LLFA following receipt of these comments. Discussions with the LLFA indicated that appropriate design solutions on-site would be achievable and could improve the situation off-site as the flowpath originates within SN4037. However it was suggested that combined development of SN4036 and SN4037 may not be achievable and further clarification on this matter should be sought prior to the final site selection process.	736	Confirm with the LLFA whether the simultaneous allocation of site SN4036 and SN4037 is possible and review current site selections in Bressingham if appropriate.
QUESTION 31: Should any of the shortlisted / rejected sites be allocated?	1448, 1630	Comment	Preferred sites around Bressingham are too big; area around School Road is already congested; reconsider the smaller sites or areas that have roads more suited to the additional level of traffic;	These comments are noted. The Council has undertaken site assessments on all of the promoted sites within the village and concluded that those sites selected pre-Regulation 18 were the most suitable options for development for the reasons set out in the preceding questions and responses. Whilst the Council recognises the concerns raised in this representation about the size of	735	No action required

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			planning for the future is what is required, including forecasting growth; and a new development with land to incorporate facilities and services is needed.	the selected sites it remains of the opinion that this is a suitable approach as this will allow for the emergence of a coherently planned form of development with the potential for additional local benefits to be realised (for example, affordable housing, school car parking area). More generally, the GNLP has forecast growth in housing numbers (as well as employment land requirements) and plans for this accordingly, taking into consideration the existing and future infrastructure requirements. The housing targets set out within the VCHAP are derived from the evidence compiled for the GNLP with a key objective of the plan being the distribution of new housing to support the existing rural communities and their facilities within the District. As part of the site selection process consideration has been given to the level of existing services and facilities in proximity to promoted sites and technical discussions have taken place with infrastructure providers to determine capacity and constraints within the networks/ services. Specific reference has been made to healthcare facilities and whilst discussions have taken place with the ICS (NHS) about the proposed VCHAP strategy and housing numbers to be delivered it is recognised that capacity and resourcing issues within the NHS fall outside the remit of the planning system. Whilst there are often		

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				opportunities for new development to provide/offer land and/or buildings for NHS usage the uptake and resourcing of these facilities again falls outside of the planning system. Early engagement with the ICS however (as has occurred via both the GNLP and VCHAP processes) affords the ICS an opportunity to future plan their resources to accommodate the growth in local communities. Similarly, discussions with NCC Education relating to existing and anticipated future pupil on-roll numbers have informed the site selection process, and have included conversations about the potential expansion of schools were appropriate.		
QUESTION 31: Should any of the shortlisted / rejected sites be allocated?	552	Support	Support for SN2079: Better related to the village than other sites due to the housing opposite and would form a natural rounding of the boundary; no environmental designations on the site, low risk area to west only for surface water flooding; site could support 12 dwellings - single if necessary to address concerns about the scale [height]; no impact on amenities of properties opposite; public footpath could connect to existing along High Road and private driveways would address highways issues;	The site assessment recognised that this site relates well to the existing village but key concerns were raised relating to the highway impact, the potential for off-site flooding (although it was acknowledged that this was not shown on the flood maps) and the landscape impact of development in this location. Previous comments from NCC Highways suggested that whilst impacts on the wider road network were likely to be acceptable, immediate access to site would require road widening works to be undertaken. It is unclear whether private driveways (as suggested) would be an acceptable alternative solution but this could be explored further prior to final site allocations. Public comments submitted as part of	76	Review the site assessment in light of the Regulation 18 consultation and technical consultee comments and if the landscape impact is considered to be acceptable seek further technical comments from both LLFA and NCC Highways regarding the suggested solutions for the site put forward as part of this representation. The site may then be reconsidered as an allocation site.

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			site is well related to services and facilities; EA maps do not show the site to be located within an area of flood risk but this could be managed via a surface water management plan; no significant landscaping features on the site which is also relatively flat - development of the site could include soft landscaping; and site is not within the designated river valley and could be designed to sensitively address heritage assets.	earlier consultation by the GNLP expressed clear concerns about the risk of off-site flooding from this field, particularly affecting those properties immediately to the south. It is recognised that this is not shown on the EA flood maps and if the site is reviewed and considered to be acceptable in landscape terms then seeking specific comments from the LLFA to seek clarification about this issue would be a prudent next step. In terms of the landscape impact, it is noted that the evidence submitted to support the site promotion indicates that this parcel of land is elevated within the wider landscape. Furthermore in this context, the lack of significant site features would result in development in this location being more prominent. Appropriate on-site landscaping could potentially mitigate the impact of development on the openness of the war memorial at the junction of Folly Lane and Fersfield Road and a review of the extent of the River Valley designation confirms that this designated area lies further to the site, closest to the A1066. Notwithstanding these points the topography of the site remains a concern and development on this site should be considered within the wider landscape setting.		
QUESTION 31: Should any of the shortlisted /	262	Object	Objection to any new development in Bressingham: Infrastructure inadequate to support new	The Council recognises the concerns that exist concerning new development within existing rural communities however it also remains of the opinion	74	Review of the Water Cycle Study to determine the position of Anglian Water

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rejected sites be allocated?			development of this scale; poorly maintained and narrow roads; highway junction visibility concerns; school operating at capacity; inadequate drainage; lack of public transport as well as poor connectivity to services and facilities; and Rural communities such as this one can accommodate individual sensitively placed newbuilds but not substantial developments.	that distribution of development throughout these villages remains an appropriate approach to ensuring the ongoing vitality, growth and sustainability of our rural areas. The Council acknowledges that the level of services and facilities available within these areas will be fewer than those within the market towns or urban fringe areas and the Council has considered the existing services and facilities available to new and existing residents as an important consideration in the site selection process. Bressingham is considered to be a sustainable location for the level of growth proposed in the VCHAP. As part of the consultation and site assessment process technical discussions have taken place with a number of technical consultees. NCC Highways have advised that with some local highways improvements associated with site specific developments site allocation within Bressingham is acceptable however overall the preferred sites are considered favourably in highway terms. Discussions have also taken place with NCC Education who have confirmed that whilst the school is currently operating at capacity this is due to the large number of children enrolled from out of the catchment area therefore the school can accommodate children from Bressingham should spaces be required. The Lead Local Flood Authority has also		regarding new development within Bressingham.

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				provided technical advice about the sites promoted within Bressingham and these comments will lead to a review of the preferred allocation sites within Bressingham. Detailed comments from Anglian Water are pending and will be reviewed as part of the Water Cycle Study in due course.		
QUESTION 31: Should any of the shortlisted / rejected sites be allocated?	894, 1437	Object	Agree to the rejection of the unsuccessful sites in the village; Do not agree with the potential allocation of shortlisted site SN4037 (either instead of or in addition to the Preferred sites); Allocation of SN4037 does not meet the objectives of the Plan- SN4037 would not support the existing community and would damage the character of the village; negative impact on the wildlife in the adjacent woodland; and would result in additional flooding.	This Council considers that this site relates reasonably well to the existing form of development in Bressingham although recognises that it would represent a departure from the predominant linear form of development. It is unclear why development of this site would not support the existing community within the village, particularly given the proximity of this shortlisted site to the current preferred allocations. Similar objections have not been made to those potential development sites. On balance the site is considered to be less intrusive in the wider landscape than alternative sites that have been assessed due to existing development and vegetation around the site. Appropriate mitigation measures would be necessary to address any potential impacts on the adjacent listed building but the Council is satisfied that this would be achievable. Any planning application submitted for development on the site would be required to include an ecological survey (and mitigation measures) as supporting evidence in accordance with current policy as well	58	No action required

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				demonstrate Biodiversity Net Gain in accordance with emerging legislation. Detailed discussions have also taken place with the Lead Local Flood Authority who have suggested that an appropriate sustainable drainage scheme could be accommodated on the site and could improve the situation off-site to the south.		
QUESTION 31: Should any of the shortlisted / rejected sites be allocated?	914	Support	Support for SN3037: Derelict site with little ecological value; site is an eyesore and could be improved with sympathetic development; better connected to Diss; and a smaller number of dwellings with landscaping and a play area could be an asset to the southern end of the village.	Whilst the benefits of redeveloping brownfield sites is acknowledged this site was subject to a full site assessment and was considered to be unsuitable for a number of reasons including the piecemeal form of development that would result from dwellings in this location. NCC Highways have also confirmed that residential access onto the A1066 could not be supported. For this reason this the Council does not consider this to be a reasonable option for allocation as part of the VCHAP.	57	No action required.
QUESTION 31: Should any of the shortlisted / rejected sites be allocated?	912	Support	Support for site SN3038: Eastern edge could be suitable for a small number of dwellings - possibly no more than 6; Site benefits from mains drainage, bus route and being close to the shop; Loss of good farmland can be kept to a minimum with small developments; and	A significantly larger site was promoted for development in this location and was subject to a full site assessment. The site is a considerable distance from the main areas of the settlement and as such a smaller number of dwellings would not form an appropriate addition to the existing Settlement Limits of Bressingham - a minimum of 12 dwellings would be required for the site to be considered as an allocation. Whilst the benefits of utilising brownfield sites is recognised this site has poor connectivity back into the main	55	No action required

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			Use brownfield sites where possible to avoid loss of farmland.	areas of the village and would not be supported by NCC Highways who have advised that access to residential sites from the A1066 can not be supported for highway safety reasons. In landscape terms this site also lies within a designated River Valley and would appear as piecemeal development within the wider landscape. The Council therefore remains of the opinion that this site is not suitable for allocation in the VCHAP.		
QUESTION 32: Should any of the shortlisted sites be rejected?	2275	Comment	Comments submitted in response to proposed Settlement Limit boundaries and allocations in Bressingham including a number of alternative options for development in the settlement [including sites not promoted to the VCHAP] and an addition to the settlement limit comprising existing development along the A1066.	This representation raises a number of different issues but as it has been submitted in response to a number of questions relating to Bressingham ,and has been responded to in detail in relation to those questions, the Council does not consider it necessary to repeat the wider issues again in this response. The respondent has suggested that a number of alternative sites should be considered either for allocation or as additions to the settlement limit. For the reasons outlined previously the Council does not consider these to be appropriate options for allocation or settlement limit extensions. To be clear, the Council recognises that Bressingham does not have a continuous defined Settlement Limit and that areas of the village are dispersed. The existing Settlement Limit reflects this pattern of growth and seeks to avoid the coalescence of these distinct areas by retaining gaps between them. To	905	No action required

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				preserve the character of the settlement it is not proposed that the main Settlement Limit boundaries are amended as part of this revision (with the exception of the inclusion of new allocations which would be included within the Settlement Limits). Inclusion of an area within the defined Settlement Limit is not a reflection of the historic importance of that area; nor is its omission a reflection on the importance of that area to the functioning of the settlement. Rather, the function of the Settlement Limit is to differentiate between those areas in which new development is more likely to be supported and those areas in which it is more appropriate to apply more restrictive planning policies. As such the Council remains of the opinion that the areas of retail and employment sites along the A1066 to the south of the settlement are not suitable for inclusion within a defined Settlement Boundary.		
QUESTION 32: Should any of the shortlisted sites be rejected?	767	Object	Object to shortlisting of SN4037: Impact on the school; impact on road drainage (northern and southern ditches connect to School Road); and impact on a valuable wildlife habitat.	These comments have been noted. Discussions with NCC Education have taken place during the consultation process and it has been confirmed that whilst the school is operating at capacity the majority of pupils are travelling from outside the catchment area therefore the school does have places should children from within Bressingham choose to attend. Whilst certain on and off-site features have been noted by NCC Ecology it is considered that appropriate mitigation measures and sensitive design at a planning	80	Review the LLFA comments and the surface water flowpath to determine whether it remains suitable to shortlist this site,

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				application stage could address these concerns. The comments of the LLFA have been noted and whilst on-site surface water flooding is not considered to be an issue of concern it is recognised that surface water flowpaths from this site connect to a larger surface water flowpath to the south and that this flowpath has resulted in past flood events along School Road.		
QUESTION 32: Should any of the shortlisted sites be rejected?	895, 1438, 1440	Mixed	Support rejection of shortlisted site SN4037; Does not meet the Plan's objectives or policies; does not relate well to the existing community or settlement and will have a detrimental impact on the landscape, ecology, current traffic numbers and existing flood situation. [Note: The Council has noted that this representation variably refers to sites SN4036 and SN4037 but considers it likely that the respondent intended to make all of these comments in relation to SN4037, the shortlisted site that is one of the subjects of question 32]	The Council acknowledges these comments and has considered all of these matters within the initial site assessment, as well as in detail with a number of technical consultees who have provided further evidence/ information to inform the site selection process. As part of these discussion the LLFA has continued to express concerns about a local surface water flowpath and this may impact on the inclusion of this site within the VCHAP following a further review.	79	No action required.
QUESTION 32: Preferred Site - SN4036 - Land to the east of School Road	1502	Object	Comments objecting to Preferred sites SN3019SL and SN4036: Lack of local infrastructure; Detrimental to the townscape; Narrow roads; and	It is noted that this should be a response to Questions 30 and 32. The VCHAP seeks to distribute growth at a small scale evenly throughout the rural areas of the South Norfolk District to increase the sustainability of these settlements and communities. Growth	78	No action required

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			No consideration given to the local impact or the sustainability of development in this location at the scale proposed.	in areas that have not previously been supported by new developments will provide support for existing facilities and services within these areas whilst providing a broader range of housing choice. The assessment process has included discussions with technical consultees, including NCC Highways, NCC Education and the LLFA all of whom have provided feedback on the current proposed preferred and shortlisted sites. These comments form part of the site assessment and will be reviewed alongside submissions received during the public consultation to determine whether changes are required to the current proposed site allocations.		

Brooke, Kirstead and Howe

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 33: Settlement Limit	1806	Comment	1. The Settlement Limit in Brooke should be increased by no more than 25 new dwellings; this reflects the average requirement for additional housing allocations across the 48 village clusters in South Norfolk 2. Brooke has limited facilities - no post office, no medical facilities, very limited shopping provision and very limited employment opportunities; any significant expansion of the population would simply increase the number of people having to travel outside the village for their everyday living requirements 3. Brooke has already accommodated new dwellings on Howe Lane in excess of the allocation in the current Local Plan	1. Whilst an average of 25 dwellings each across the 48 village clusters would deliver the minimum 1,200 dwellings, the plan also recognises that some clusters include a wider range of services/facilities and have better access to nearby larger settlements and can therefore support larger developments. 2. Brooke has a range of basic services, including primary school, village hall, pubs, regular bus service to larger settlements, selection of employment opportunities etc. It is acknowledged that very few of the village clusters include a GP surgery and are reliant on nearby larger settlements for these. 3. The current Local Plan allocated two sites to accommodate new development in Brooke, but this did not represent a 'ceiling' on development, should planning applications be received on other suitable windfall sites, such as the infill site for three dwellings at Howe Lane.	642	No action required.
QUESTION 33: Settlement Limit	1304	Comment	Concerns: 1. volume of traffic using High Green - narrow road; primary school; large number of parked cars at peak times; access to shops/hairdresser's; 2. 50 houses encompassing both sides of the Norwich Road too many and larger	1. The Highways authority has not raised any objection in principle to an increase in traffic on High Green but have raised concerns about the suitability of the access to the promoted allocation-scale sites. 2. Whilst an average of 25 dwellings each across the 48 village clusters would	641	Consider the level of detail in the Policy re. access for the Preferred site(s) and the need to landscape the site(s) to take account of their location on the entrance to the village.

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			than envisaged average of up to 35 houses; would create a housing estate at the north end out of keeping with the appearance of the village; could presage more building behind the developments; access to/from a busy road hazardous; 3. no sites shortlisted at Kirstead/Howe. It seems that Brooke is bearing the brunt of development, which seems unfair.	deliver the minimum 1,200 dwellings, the plan also recognises that some clusters include a wider range of services/facilities and have better access to nearby larger settlements and can therefore support larger developments. Brooke comprises a range of development types and styles that have evolved over many years. The scale is comparable with previous developments at Brecon Road/Coniston Road and St. Peter's Road/Burgess Way. 25 dwellings per hectare is not considered inappropriate in a rural context. However careful consideration will be given to the landscaping of this approach to Brooke. Further development adjacent to this site would be subject to future iterations of this plan, or successor documents. 3. two sites at Kirstead were assessed, but not considered suitable for development, and no sites were proposed at Howe.		
QUESTION 33: Settlement Limit	1267, 1703	Mixed	The extent of the settlement area must be addressed. Currently there is little control over development distance from the road in an east west direction, only a limit to the North. The two proposed sites for up to 25 houses are a consequence of the inadequate definition of this area.	Both the VHCAP and previous Local Plans have set Development Boundaries/Settlement Limits for Brooke, which have managed the release of land for development over time, reflecting the needs at the time. Further development to the rear of the Preferred sites would be a matter for future iterations of this plan, or successor documents.	640	No action required.

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QUESTION 33: Settlement Limit	1377	Object	Concerns over the Shortlisted site (SN2119) re. drainage and flooding issues that are much worse than the proposal indicates. Proximity to wildlife meaning there would be significant adverse consequences in terms of ecology. Highways dangers given the location on arguably the blindest bend in the whole village.	A number of the issues raised are acknowledged in the Site Assessment of SN2119. In particular, the Highways Authority view that the site needs to be accessed via Astley Cooper Place, as access onto High Green does not appear to be achievable (poor alignment of the road and lack of footway) and would potentially result in the loss of trees/hedgerow, detrimental to the approach to the Conservation Area.	639	Assess whether the site should be included in the VCHAP or rejected, likely to need further input from Highways and the LLFA.
QUESTION 33: Settlement Limit	438	Object	Re. the Preferred Sites. I don't object to the site but to the number of properties. Highways state that if 50 properties were built then a roundabout might be required which would require even more houses to negate cost. The number of properties should be reduced to negate road alteration. Building what would be a housing estate on the main road into Brooke would have a massively detrimental visual impact on the village. If an allocation is to be made careful thought should be given to screening the sites to make them look more in character with the village.	The Highway authority has raised no objection in principle to accessing the Preferred site(s). Clarification on the specific highways requirements for the site will be sought and taken into account as part of the finalised policy. The scale is comparable with previous developments at Brecon Road/Coniston Road and St. Peter's Road/Burgess Way. 25 dwellings per hectare is not considered inappropriate in a rural context. However careful consideration will be given to the landscaping of this approach to Brooke.	638	Consider the level of detail in the Policy re. access for the site(s) and the need to landscape the site(s) to take account of their location on the entrance to the village.
QUESTION 33: Settlement Limit	356	Object	SNDC state "No alterations are proposed to the existing Settlement Limit" so if my understanding is correct nothing would change, and the Settlement area designated is considered to be adequate for Brooke.	The reference to 'no alternations proposed to the existing Settlement Limit' indicates that no changes are currently proposed to accommodate small infill/windfall development. Any new allocation in the VCHAP on the Preferred Site(s) would be in addition to altering the Settlement Limit for windfall/infill purposes.	637	No action required.

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QUESTION 33: Settlement Limit	1289	Comment	I don't object to new houses being built but think they should be smaller groups and near the centre of the village. Affordable for young families.	Delivery of affordable housing will be primarily as a proportion of the housing on allocated sites. Making such sites too small would make the delivery of affordable units inconsistent with national policy and/or potentially unviable. In additional, in order to have some assurance of delivery, the Council is working with those sites which have been actively promoted for development.	636	No action required.
QUESTION 33: Settlement Limit	28, 124, 152, 233, 254, 266, 282, 308, 536, 1196	Object	Concerns raised about the potential inclusion of the Preferred Site(s) on Norwich Road, including: 1. Will destroy the rural character of the existing properties. Inappropriate scale/density. Not part of the historic pattern of development. 2. Brooke does not have the facilities to support the level of development 3. No benefit to existing residents 4. Difficult to access/roundabout required which could lead to further development. 5. Reference to plans on SN0432REVA which were 'rejected'.	1. Brooke comprises a range of development types and styles that have evolved over many years. Whilst development has predominantly extended east/west along High Green and The Street, development has also extended north along Norwich Road. The scale is comparable with previous developments at Brecon Road/Coniston Road and St. Peter's Road/Burgess Way. 25 dwellings per hectare is not considered inappropriate in a rural context. However careful consideration will be given to the landscaping of this approach to Brooke. 2. Brooke has a range of basic services, including primary school, village hall, pubs, regular bus service to larger settlements, selection of employment opportunities etc. It is acknowledged that very few of the village clusters include a GP surgery and are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the	624	Consider the level of detail re. access in the Policy for the Preferred site(s).

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				number of out of catchment pupils, there is not a capacity issue at the school for local children. 3. The VCHAP aims to deliver development which supports local services and facilities and funding, via a proportion of CIL payments, is made to the parish. 4. The Highway Authority has raised no objection in principle to access to the preferred sites. Clarification on the specific highways requirements for the site(s) will be sought and taken into account as part of the finalised policy (see also 5.) 5. The previous planning application on the east side of Norwich Road (SN0432RVA) also encompassed SN2018, which has been rejected for the VCHAP. However, that application was withdrawn by the applicant, not refused by the Council. Further development adjacent to SN0432REVA would be subject to future iterations of this plan, or successor documents.		
QUESTION 33: Settlement Limit	474, 868	Comment	Site SN0020SL. Consideration should be given to revising the settlement boundary line created by The Mallows development, which resulted in a long narrow neck of 'countryside' extending into our curtilage dividing our dwelling from the Mallows boundary. This is inconsistent treatment of	This is a narrow strip between the rear of properties fronting High Green and the recently completed Mallows Walk development. Concern was raised in the site assessment about the possible loss of trees in the Conservation Area. However, as the site would be a relatively small Settlement Limit extension, and the numbers involved	623	Reconsider for inclusion within the Development Boundary/Settlement Limit.

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			the curtilage of our house with number 6 The Mallows.	would not be relied upon to meet the VCHAP requirements, the issues raised by this site could be dealt with via a planning application. As such, the inclusion of the site can be reconsidered.		
QUESTION 33: Settlement Limit	160	Comment	The Chairman says not everyone wants to live in the city. Of course he is right, but, to cut emissions and pollution, people should be encouraged to live near areas of employment and where there are retail, hospitality and entertainment venues - not in surrounding villages. Having said that, and given the current circumstances, the plan for Brooke is reasonable.	Comments noted.	622	No action required.
QUESTION 33: Settlement Limit	29, 146, 1197	Comment	Preference for the Preferred sites as the best alternatives for the village; although these would be better limited to one site not two. Note existing constraints on High Green, compared to Norwich Road.	Comments noted.	621	No action required.
QUESTION 33: Settlement Limit	127	Support	I agree with the limits but this area needs more affordable housing for the local community.	No changes are proposed to the Settlement Limit, other than for the potential inclusion of the Preferred site(s). The allocation of the Preferred site(s) is designed to deliver a mix of housing, including affordable units, as covered by proposed Policy SNVC 3.	620	No action required.
QUESTION 33: Settlement Limit	1245	Support	I agree with the current Settlement Limit, and it should not be extended. Development outside this limit should be discouraged unless it has the support of the community and there is a demonstrated need. Many services will	No changes are proposed to the Settlement Limit, other than potentially including the Preferred site(s). The need for additional development across Greater Norwich is already set out in the GNLP, which includes a Settlement	619	No action required.

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			need to be accessed outside the village by motor vehicle (or home deliveries). Further expansion of the village will not help reduce vehicle journeys to minimise climate change and will put further traffic on an already busy road.	Hierarchy for the appropriate distribution of development. The GNLP takes a balanced approach to the distribution of housing, with only 9% of new dwellings going to village cluster locations, compared to nearly 25% of the existing dwellings being in those parishes. Whilst Brooke does not have the same services as larger Market Towns and Key Service Centres, it is well served for a village of its size, with good public transport links to Poringland, Norwich and Bungay.		
QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	1268	Object	1. There is no need to build any new houses over and above those contained in the current South Norfolk Local Plan as there is an excess of housing stock in this plan to cater for the increases in the region of 4000 extra houses. 2. The proposed development to the North of Brooke is out of proportion to the rest of the village and represents a possible 20% increase in population and a 10% increase in housing stock to the village.	1. The level of housing across the Greater Norwich area is set out in the GNLP and will be tested through the Examination of that Plan. 2. The scale of development is comparable with previous developments at Brecon Road/Coniston Road and St. Peter's Road/Burgess Way. It is not clear why a 10% increase in housing stock is considered to lead to a 20% increase in population; however, a 10% increase is comparable with the village clusters as a whole, and significantly smaller than the percentage increase planned across Greater Norwich.	552	No action required.
QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	832, 901, 905	Object	Development set out in the VCHAP is not necessary, based on the response prepared by CPRE, and the level which is needed could be directed to Norwich and other larger settlements. Basing the VCHAP on school catchments does not recognise that some schools are at/near	Responses to the CPRE representation are covered under the Objectives and Core Policies. The GNLP takes a balanced approach to the distribution of housing, with only 9% of new dwellings going to village cluster locations, compared to nearly 25% of the existing	551	No action required.

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			capacity and does not represent 'good access to services and facilities'.	dwelling being in those parishes; however, this issue will be considered through the GNLP Examination in Public (spring 2022). Consultation with the County Council has indicated that, with falling rolls and many children attending out-of-catchment schools, capacity exists within most village cluster primary schools to accommodate the modest growth proposed. The VCHAP site assessment process clearly factors in access to local services and facilities, and support for existing local provision can prevent future reliance on (and travelling to) facilities in larger settlements.		
QUESTION 34: Preferred Site - SNO432REVA, East of Norwich Road	27, 95, 131, 153, 167, 186, 221, 255, 267, 271, 283, 309, 312, 357, 421, 424, 439, 537, 596, 635, 839, 872, 1008, 1011, 1141, 1199, 1261, 1290, 1295, 1309, 1386, 1696, 1739, 1797, 1807, 1817	Object	Various objections were raised, many of which relate to this being one of two preferred sites either side of Norwich Road, totalling 50 dwellings. Issues raised cover: 1. Will be detrimental to the approach to the village along Norwich Road/the character of the village/the rural character of existing properties. Not part of the historic pattern of development. Disproportionate to the scale of the settlement. Development will be too dense. The site will need to be carefully landscape/screened. Impacts on what makes a village a desirable location. 2. No benefits to the existing residents/village. 3. Concern over the numbers. Village is	1. Brooke comprises a range of development types and styles that have evolved over many years. Whilst development has predominantly extended east/west along High Green and The Street, development has also extended north along Norwich Road. The scale is comparable with previous developments at Brecon Road/Coniston Road and St. Peter's Road/Burgess Way. 25 dwellings per hectare is not considered inappropriate in a rural context. However careful consideration will be given to the landscaping of this approach to Brooke. 2. The VCHAP aims to deliver development which supports local services and facilities and funding, via a proportion of CIL payments, is made to the parish.	508	Policy for the site to consider: landscaping of the site, with particular regard to the approach from the north; the need for a roundabout to access the two preferred sites; crossing point on the B1332 to create a safe route to school. HIA to be undertaken to assess the heritage impact

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			only required to accept 25 dwellings. No limit on the number of dwellings, as further sites of 1-11 units could also come forward. Could infrastructure (especially the roundabout) mean more dwellings are needed? These sites facilitate future development on the remainder of the field(s). 4. Access/transport concerns - unsafe for children close to a busy main road. B1332 already too busy and difficult to cross. Increased traffic noise/pollution. Loss of the layby. Access needs to be a roundabout, with visual/traffic flow implications. More driveways onto a busy main road. Site poorly located in terms of access to local services with a lack of footway and cycleways. 5. Limited facilities to support additional development. No GP or post office. Amenities under pressure. Schools at capacity. 6. Blocks historic views of Brooke church. 7. Use Brownfield sites first. Greenfield land should be retained for agriculture. 8. No gas or streetlighting and poor drainage in some areas. 9. Alternative locations suggested - Infill the area behind The Street/St Peter's Road/Burgess Way; sites should be closer to Poringland; scatter development on small sites of approximately 5 units each.	3. Whilst an average of 25 dwellings each across the 48 village clusters would deliver the minimum 1,200 dwellings, the plan also recognises that some clusters include a wider range of services/facilities and have better access to nearby larger settlements and can therefore support larger developments. Both the VCHAP and the GNLP envisage that further windfall development will occur in the village clusters, however this will be primarily within the defined Development Boundaries/Settlement Limits, and therefore not unlimited. Further development adjacent to this site would be subject to future iterations of this plan, or successor documents. Clarification on the specific highways requirements for the site will be sought and taken into account as part of the finalised policy. 4. Highways have indicated that a crossing point on the B1332 will be required, creating a safe walking route to the primary school for new and existing residents. Access arrangements will need to balance the safe and free flow of traffic with measures which ensure traffic speed (raised as an issue by a number of respondents) is successfully managed; however, further driveways on to Norwich Road are unlikely. The site is considered to be well located in terms of walking/cycle access to services and facilities in the village, many of which are located close		

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			10. No plans to show what is going to be built. Homes likely to be poor quality of new homes.	to the Norwich Road/High Green Junction. Highways have not raised an objection to the loss of the lay-by. 5. Brooke has a range of basic services, including primary school, village hall, pubs, regular bus service to larger settlements, selection of employment opportunities etc. It is acknowledged that very few of the village clusters include a GP surgery and are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity issue at the school for local children. 6. A Heritage Assessment will be undertaken to a format agreed with Historic England. Notwithstanding this, the previous concerns raised in relation to a site in this location were to a significantly larger proposal, with greater impacts on the Conservation Area. 7. The GNLP prioritises the allocation of Brownfield sites in Norwich and other larger settlements; however, the housing requirements of the GNLP cannot be met without the use of Greenfield land. 8. Gas and streetlighting are not a prerequisite for new development, and nationally the move is away from further reliance on gas. Whilst details of		

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				drainage would be dealt with at the planning application stage, the statutory bodies have not raised any objection to this site. 9. The alternative locations suggested are not considered suitable for various reasons, including: not being promoted for development, and therefore having no assurance of deliverability/delivery; being too small to secure affordable housing, open space etc., yet cumulatively still potentially impacting on infrastructure; and/or being outside the scope of the VCHAP. 10. The level of detail sought would come at the planning application stage, and anything shown at this stage would be purely indicative. Housing would be constructed to the national and local standards in place at the time.		
QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	2216	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Agricultural field. Site in SSSI Impact Risk Zone but residential not identified for consultation with NE. No priority habitats onsite although hedge (a priority habitat) along southern boundary bordering neighbouring dwelling. Site within amber habitat zone for great crested newts.	Comments noted. A number of the requirements will be standard across all developments and can be reflected in the core policies as necessary.	503	Consider the need to reflect the protection of hedgerows in any Policy for the site.

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QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	2111	Comment	Few or no constraints. Standard information required at a planning stage. Assessment: Green	Comments noted.	502	No action needed.
QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	2034	Comment	Although there are no designated heritage assets on site, the site lies to the southeast of the grade II listed Brooke Lodge and to the north of the Brooke Conservation Area. Development has the potential to impact on the significance of these designated heritage assets. A heritage impact assessment of the site should be undertaken.	Heritage assets were considered as part of the assessment of sites; however a Heritage Assessment of the site will undertaken, to a format agreed with Historic England, which will document how these issues have been considered.	501	Complete the Heritage Assessment of the site and reflect the outcomes in the Regulation 19 version of the VCHAP.
QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	1704	Comment	Summary of Objections 1. There is no need to build any new houses in South Norfolk outside the current Local Plan as there is already an excess of housing stock. 2. The proposed development is out of proportion to the rest of the village and represents a possible 10% increase in housing stock to the village. A proposed development of no more than 6 houses may be acceptable, representing a potential 2% increase in housing stock. 3. Consideration of the carbon dioxide emissions of the construction and population has not been adequately addressed. 4. More details are required on access issues.	1. The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. 2. The proportion of new development in the Village Clusters is substantially lower than the proportion of the population that currently lives in those parishes. 3. The environmental performance of new development is an issue being addressed through national policy and the GNLP. An SA supports the production of the VCHAP and considers the issue of distribution of development in this context. 4. The site has been assessed by the highway authority, who agree in	500	Consider the level of detail re. access in the Policy for this site.

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			5. The timing of the plan is suspicious, re the history of planning permission refusals on these sites. 6. There is a significant risk of surface flooding, and a considerable risk to biodiversity.	principle that suitable access can be achieved. Further detail can be included in the Policy for the site, if necessary. 5. The previous planning application on this site, for a larger number of dwellings, was withdrawn by the applicant. The VCHAP considered 450 sites across the district, and preferred and shortlisted over 80 of them, full assessments were available as part of the consultation and the timing of the consultation was not related to any individual site. 6. Issues of surface water flood risk and biodiversity have been considered in the site assessment, in conjunction with the relevant technical consultees, and no overriding issues were identified for this site.		
QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	1547	Comment	Development of approximately 25 dwellings would be too dense and out of character. Any further development along Norwich Road should be similar to the existing (6-8 dwellings would seem more appropriate).	Brooke is made up a variety of development densities and styles, and new development does not necessarily need to repeat what is adjacent. Local Plan policies, including those on design, landscaping and amenity, are in place to guide the form of development. 25 dwellings/ha is not considered inappropriate for a rural location.	498	No action required.
QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	1932	Comment	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. Minor development – no further comments	Comments noted.	497	No action required.

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QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	116, 118, 148, 1198	Comment	Comments received: The most acceptable of the sites proposed, subject to a suitable mix of property types, including properties affordable to younger people; Good access to the B1332 and the Norwich-Poringland-Bungay bus route; Less disruptive for existing residents (good access during and after construction); and Walking distance of local facilities.	Comments noted. Development will be expected to meet the affordable housing requirements in place at the time of any application. Housing mix is considered under proposed core Policy SNVC 3.	496	No action required.
QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	66, 161, 273, 346, 632, 1215	Support	Comments received include: Village needs new houses, but these need to be a mix of properties, including affordable; Location is the least disruptive to the majority of residents; Good access to the B1332; Better access to local facilities; Least impact on habitats.	Comments noted. Development will be expected to meet the affordable housing requirements at the time of any planning application. Housing mix is covered by proposed core Policy SNVC 3.	492	No action required.
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	1269	Object	1. There is no need for new houses anywhere in SNDC outside the LDP as there is an excess of 4000 houses already planned. 2. The development is out of proportion and is a 20% population and 10% increase in housing	1. The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. 2. The proportion of planned new development in the Village Clusters (9%) is substantially lower than the	569	Consider the level of detail re. access in the Policy for this site.

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			3. Consideration of the carbon dioxide emissions of the construction and population has not been adequately addressed in any overall council housing strategy that requires reduction, not increases in emissions. 4. Access issues are ignored 5. The timing is suspicious post local elections 6. A significant risk of surface flooding, and a considerable risk to biodiversity exists	proportion of the population that currently lives in those parishes (almost 25%). A 10% increase in dwelling stock is comparable with the level across the Village Clusters and substantially lower the increase across the GNLP. It is also not clear why a 10% increase in dwelling stock will equate to a 20% increase in population. 3. The environmental performance of new development is an issue being addressed through national policy and the GNLP. An SA supports the production of the VCHAP and considers the issue of distribution of development in this context. 4. The site has been assessed by the highway authority, who agree in principle that suitable access can be achieved. Further detail can be included in the Policy for the site, if necessary. 5. The Regulation 18 version of the VCHAP has been production since early 2020 and was, unfortunately, partly delayed due to the impacts of COVID 19. 450 sites across the district were considered, and over 80 preferred and shortlisted. Full assessments were available as part of the consultation and the timing of the consultation was not related to any individual site. 6. Issues of surface water flood risk and biodiversity have been considered in the site assessment, in conjunction with the		

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				relevant technical consultees, and no overriding issues were identified for this site.		
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	833, 902, 906	Object	Development set out in the VCHAP is not necessary, based on the response prepared by CPRE, and the level which is needed could be directed to Norwich and other larger settlements. Basing the VCHAP on school catchments does not recognise that some schools are at/near capacity and does not represent 'good access to services and facilities'.	Responses to the CPRE representation are covered under the Objectives and Core Policies. The GNLP takes a balanced approach to the distribution of housing, with only 9% of new dwellings going to village cluster locations, compared to nearly 25% of the existing dwellings being in those parishes; however, this issue will be considered through the GNLP Examination in Public (spring 2022). Consultation with the County Council has indicated that, with falling rolls and many children attending out-of-catchment schools, capacity exists within most village cluster primary schools to accommodate the modest growth proposed. The VCHAP site assessment process clearly factors in access to local services and facilities, and support for existing local provision can prevent future reliance on (and travelling to) facilities in larger settlements.	568	No action required.
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	26, 96, 125, 128, 154, 168, 187, 222, 234, 256, 270, 284, 310, 358, 422, 440, 538, 597, 840, 874, 1009, 1201, 1278, 1291, 1296, 1310, 1373,	Object	Various objections were raised, many of which relate to this being one of two preferred sites either side of Norwich Road, totalling 50 dwellings. Issues raised cover: 1. Will be detrimental to the approach to the village along Norwich Road/the character of the village/the rural character of existing properties. Not part of the historic pattern of development.	1. Brooke comprises a range of development types and styles that have evolved over many years. Whilst development has predominantly extended east/west along High Green and The Street, development has also extended north along Norwich Road. The scale is comparable with previous developments at Brecon Road/Coniston Road and St. Peter's Road/Burgess Way. 25 dwellings per hectare is not	564	Policy for the site to consider: landscaping of the site, with particular regard to the approach from the north; the need for a roundabout to access the two preferred sites; creating a safe route to school; and protection of any on site

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	1387, 1699, 1798, 1818		Disproportionate to the scale of the settlement. Development will be too dense. The site will need to be carefully landscape/screened. Impacts on what makes a village a desirable location. 2. No benefits to the existing residents/village. 3. Concern over the numbers. Village is only required to accept 25 dwellings. No limit on the number of dwellings, as further sites of 1-11 units could also come forward. Could infrastructure (esp the roundabout) mean more dwellings are needed? These sites facilitate future development on the remainder of the field(s). 4. Access/transport concerns - unsafe for children close to a busy main road. B1332 already too busy and difficult to cross. Increased traffic noise/pollution. Loss of the layby. Access needs to be a roundabout, with visual/traffic flow implications. More driveways onto a busy main road. Site poorly located in terms of access to local services with a lack of footway and cycleways. Needs to retain access to the fields for agriculture. 5. Limited facilities to support additional development. No GP or post office. Amenities under pressure. Schools at capacity. 6. Blocks historic views of Brooke church.	considered inappropriate in a rural context. However careful consideration will be given to the landscaping of this approach to Brooke. 2. The VCHAP aims to deliver development which supports local services and facilities and funding, via a proportion of CIL payments, is made to the parish. 3. Whilst an average of 25 dwellings each across the 48 village clusters would deliver the minimum 1,200 dwellings, the plan also recognises that some clusters include a wider range of services/facilities and have better access to nearby larger settlements and can therefore support larger developments. Both the VCHAP and the GNLPS envisage that further windfall development will occur in the village clusters, however this will be primarily within the defined Development Boundaries/Settlement Limits, and therefore not unlimited. Further development adjacent to this site would be subject to future iterations of this plan, or successor documents. Clarification on the specific highways requirements for the site will be sought and taken into account as part of the finalised policy. 4. Highways have indicated that creating a safe walking route to the primary school will be a requirement. Access arrangements will need to balance the the safe and free flow of		biodiversity/landscape features.

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			7. Use Brownfield sites first. Greenfield land should be retained for agriculture. 8. No gas or streetlighting and poor drainage in some areas. 9. Alternative locations suggested - Infill the area behind The Street/St Peter's Road/Burgess Way; sites should be closer to Poringland; scatter development on small sites of approximately 5 units each. 10. No plans to show what is going to be built. Homes likely to be poor quality of new homes. 11. Protection of mature trees around the site.	traffic with measures which ensure traffic speed (raised as an issue by a number of respondents) is successfully managed; however, further driveways on to Norwich Road are unlikely. The site is considered to be well located in terms of walking/cycle access to services and facilities in the village, many of which are located close to the Norwich Road/High Green Junction. Highways have not raised an objection to the loss of the lay-by. 5. Brooke has a range of basic services, including primary school, village hall, pubs, regular bus service to larger settlements, selection of employment opportunities etc. It is acknowledged that very few of the village clusters include a GP surgery and are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity issue at the school for local children. 6. A Heritage Assessment will be undertaken to a format agreed with Historic England. 7. The GNLP prioritises the allocation of Brownfield sites in Norwich and other larger settlements; however, the housing requirements of the GNLP cannot be met without the use of Greenfield land.		

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				8. Gas and streetlighting are not a prerequisite for new development, and nationally the move is away from further reliance on gas. Whilst details of drainage would be dealt with at the planning application stage, the statutory bodies have not raised any objection to this site. 9. The alternative locations suggested are not considered suitable for various reasons, including: not being promoted for development, and therefore having no assurance of deliverability/delivery; being too small to secure affordable housing, open space etc., yet cumulatively still potentially impacting on infrastructure; and/or being outside the scope of the VCHAP. 10. The level of detail sought would come at the planning application stage, and anything shown at this stage would be purely indicative. Housing would be constructed to the national and local standards in place at the time. 11. Significant landscape/biodiversity features can be protected via the policy for the site.		
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	320	Comment	Development on the main road is not a good idea. New houses which have been built have been sold again because of road noise.	The B1332 is typical of many roads in rural and more urban areas, in terms of the volume and nature of traffic, and the road itself passes through Brooke and a number of other settlements. As such, the nature and volume of traffic is not	561	No action needed.

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				considered exceptional or a barrier to well-designed development.		
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	1548	Comment	Development of approximately 25 dwellings would be too dense and out of character. The large neighbouring dwellings immediately to the south are all set in spacious plots of approximately 0.4 acres and in a linear form. Any further development along Norwich Road should be similar.	Brooke comprises a range of development types and styles that have evolved over many years and the VCHAP is seeking to achieve a mix of dwellings as part of small-scale allocations. The scale is comparable with previous developments at Brecon Road/Coniston Road and St. Peter's Road/Burgess Way. 25 dwellings per hectare is not considered inappropriate in a rural context. However careful consideration will be given to the landscaping/the setting of this approach to Brooke.	560	Consider policy wording re the setting of Brooke on the Norwich Road.
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	2218	Comment	Rating: Green. No major ecological constraints identified from desk-top search. Surveys and biodiversity enhancement in accordance with policy required and to inform design. Site in SSSI Impact Risk Zone but residential not identified for consultation with NE. Site within amber habitat zone for great crested newts. Agricultural field with no priority habitats onsite, deciduous woodland is located to the north, a hedge (a priority habitat) along southern boundary bordering neighbouring dwelling.	Comments noted.	558	Consider reference to adjoining woodland/hedgerows within the policy for the site.
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	2113	Comment	Few or no constraints. Standard information required at a planning stage. Assessment: Green	Comments noted.	557	No action required.

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QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	1933	Comment	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. Minor development – no further comments.	Comments noted.	556	No action required.
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	1705	Comment	Summary of Objections 1. There is no need to build any new houses in South Norfolk outside the current Local Plan as there is already an excess of housing stock. 2. The proposed development is out of proportion to the rest of the village and represents a possible 10% increase in housing stock to the village. A proposed development of no more than 6 houses may be acceptable, representing a potential 2% increase in housing stock. 3. Consideration of the carbon dioxide emissions of the construction and population has not been adequately addressed. 4. More details are required on access issues. 5. The timing of the plan is suspicious, re the history of planning permission refusals on these sites. 6. There is a significant risk of surface flooding, and a considerable risk to biodiversity.	1. The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. 2. The proportion of new development in the Village Clusters (9%) is substantially lower than the proportion of the population that currently lives in those parishes (almost 25%). 3. The environmental performance of new development is an issue being addressed through national policy and the GNLP. An SA supports the production of the VCHAP and considers the issue of distribution of development in this context. 4. The site has been assessed by the highway authority, who agree in principle that suitable access can be achieved. Further detail can be included in the Policy for the site, if necessary. 5. The previous planning application on this site, for a larger number of dwellings on a substantially bigger footprint, was withdrawn by the applicant. The VCHAP considered 450	555	Consider the level of detail re. access in the Policy for this site.

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				sites across the district and preferred and shortlisted over 80 of them. Full assessments were available as part of the consultation and the timing of the consultation was not related to any individual site. 6. Issues of surface water flood risk and biodiversity have been considered in the site assessment, in conjunction with the relevant technical consultees, and no overriding issues were identified for this site.		
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	117, 120, 149, 347, 1202, 1323	Comment	Comments received raised some concerns over new development, especially if both preferred sites go ahead, but if it is to occur: there needs to be a mix of properties, including affordable; the site offers good access to the bus services; north of the village is least disruptive; and it needs a high standard of design, which includes shielding development from traffic noise.	Comments noted. Development will be expected to meet the affordable housing requirements at the time of any planning application. Housing mix is covered by proposed core Policy SNVC 3 and Design by SNVC 2, plus other national and local policies.	554	No action required.
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	30, 67, 162, 634, 1214, 1808	Support	Comments received include: Village needs new houses, but these need to be a mix of properties, including affordable; Location is the least disruptive to the majority of residents; Good access to the B1332; Site to the west of the B1332 least intrusive as it fills the gap between the existing housing and the grounds of Brooke Lodge.	Development will be expected to meet the affordable housing requirements at the time of any planning application. Housing mix is covered by proposed core Policy SNVC 3.	553	No action required.
QUESTION 36: Should any shortlisted /	2223	Comment	SN2119 Rating: Amber - measures required - priority habitat onsite or proximity to SSSI (recreational impact concerns) and or	Comments noted.	606	Concern re priority Habitat to be reflected in the Site Assessment.

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rejected sites be allocated?			buffer required. Site incorporates priority habitat (deciduous woodland). Site in amber habitat zone for great crested newts. Access via Astley Copper Place would impact deciduous woodland which should be avoided and as a last resort compensated for. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy should inform the design.			
QUESTION 36: Should any shortlisted / rejected sites be allocated?	2089	Comment	SN2119 Few or no constraints. Standard information required at a planning stage. Assessment: Green	Comments noted.	605	No action required.
QUESTION 36: Should any shortlisted / rejected sites be allocated?	1741	Object	Does not agree with the reasons for rejection used to rule out new residential development within discounted site SN0490, that is within the centre of the village. It simply cannot be the case that the heritage, townscape and landscape impacts that are relied upon to reject site SN0490 are so severe that this site should be discounted in favour of the serious landscape and highway safety harm that would result from the preferred sites SN0432REVA and SN0432REVB.	Much of the representation deals with why the Preferred Sites should not be taken forward, but includes some inaccuracies, including: 1. That the Preferred Sites are not in keeping with the pattern of development and are physically detached services/facilities - whereas the Preferred Sites immediately adjoin recently completed allocations from the 2015 Local Plan, which themselves adjoined older development on Norwich Road. The preferred sites are also closer to the majority services and facilities	604	No action required.

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				than SN0490. 2. That there is a lack of foot/cycleways from the Preferred Sites to the local services/facilities - whereas, apart from a short stretch on the west side of Norwich Road, there is a continuous footway to the centre of the village. For site SN0490 there is no footway on part of The Street that connects Mereside to the local services. 3. That the accesses for the Preferred Sites will cause a safety issues - whereas, in principle the Highways Authority are satisfied that safe access can be achieved. 4. That the Preferred Sites will have a detrimental effect on the Conservation Area - whereas SN0490 is considered more sensitive, being within the Conservation Area. A Heritage Assessment will be completed, to a format agreed with Historic England.		
QUESTION 36: Should any shortlisted / rejected sites be allocated?	1715	Comment	Site SN2174 should be allocated for the following reasons: 1. It is quite easy to cycle/walk from the site into Brooke to access services. 2. This field has never become flooded. The ditch along one side of the site has always taken all the water that it has needed to. The flood risk seems to be overstated in the assessment. 3. There is one mature tree on the front	Sites SN2174 at Kirstead, whilst having good access to the Norwich/Poringland/Bungay bus route, is at least 2.5km from the other services and facilities in Brooke, on a stretch of road at the national speed limit, which is unlikely to be attractive for walking and cycling for everyday journeys. Whilst the field may not have become flooded, that does not constitute evidence that the site is not at flood risk. Similarly, no evidence has been supplied	603	No change required.

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			line of this site which could be incorporated into any scheme. The rest of the hedge line is rather scrappy and any scheme could incorporate renewal.	to indicate that the mature tree and/or replacement hedging could be incorporated whilst also achieving a suitable access. Kirstead has not had a Settlement Limit/Development Boundary since the 1994 Local Plan (i.e. not in the 2003 or 2015 Plans), and inclusion of this site would require the reinstatement of a Settlement Limit, which could encourage further development in this location.		
QUESTION 36: Should any shortlisted / rejected sites be allocated?	1314	Comment	Three rejected sites could be reviewed: Two at Kirstead Green (SN2174 and SN4004). The arguments for rejection (apart from the issue of surface water) do not seem strong. Modest development here would fit the concept of sustainability whilst being reasonably near facilities and services. The site southeast of Mereside (SN0490). 'Visibility' from Hungate Lane (not a busy road) and a PRoW are not strong, although the situation and access require consideration. Inclusion of the above would alleviate pressure on the shortlisted sites whilst still potentially achieving the proposed number of houses.	Sites SN2174 and SN4004 at Kirstead, whilst having good access to the Norwich/Poringland/Bungay bus route, are at least 2.5km from the other services and facilities in Brooke, on a stretch of road at the national speed limit, which is unlikely to be attractive for walking and cycling for everyday journeys. Kirstead has not had a Settlement Limit/Development Boundary since the 1994 Local Plan (i.e. not in the 2003 or 2015 Plans), and inclusion of either of these sites would require the reinstatement of a Settlement Limit, which could encourage further development in this location. Site SN0490 is not in as prominent location as the Preferred Sites on the B1332, however the location within the Conservation Area is considered to be more sensitive. A number of other	601	No action required.

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				unresolved issues remain, including flood risk and ecology from the 2015 appeal dismissal and the provision of carriageway widening and footpaths off site. Overall, the above sites did not perform as well in the Site Assessment as the Preferred Sites.		
QUESTION 36: Should any shortlisted / rejected sites be allocated?	656	Comment	Reconsider the inclusion of SN4065SL. The site sits between two existing properties (the Oaks and Oaklands). Site is considered to comply with Paragraph 78 and Paragraph 68 of the NPPF and GNLP Policy 7.5 Small Scale Windfall Housing Development which support Windfall Development. Proposal would be for a single self-build property on the site that will have a "Fabric First" approach to Sustainable Development and support the Windfall Development numbers. The site is not in a flood risk area. Site has extremely good visibility of approximately 200m in each direction. The importance of Brooke Wood - This is on the opposite side of the road to our site and there is also a small strip of grazing land opposite that also helps increase the distance from our site.	Whilst the site promoters have a specific project in mind for the site, as an infill plot which is too small to allocate, the VCAHP would not have a mechanism to secure either the self-build or fabric first approach to development. Inclusion of this site would also require a Settlement Limit to be drawn around neighbouring properties, potentially encouraging further development in this location. The site is over 1.5km from the facilitates and services on an unlit, 60mph road, as such it is unlikely to be attractive to walk or cycle to local facilities, or to access public transport to larger settlements. The site is also identified as being partially at risk of surface water flooding using information from the Greater Norwich Strategic Flood Risk Assessment. Whilst the above factors would still be a consideration, the fact that the site is not considered suitable for inclusion in the VCHAP does not prevent an	598	No action required.

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				application under GNLP Policy 7.5, should that Policy become part of the adopted Development Plan, which would be able to control the form/nature of development through any grant of permission.		
QUESTION 36: Should any shortlisted / rejected sites be allocated?	1271	Object	If a smaller number of houses were allocated, opportunities should be taken as and when land or space becomes available or accessible in other areas of the village. this would fit better with the character of the village	The VCAHP needs to demonstrate that allocated sites are available to deliver the minimum 1,200 homes across the South Norfolk Village Clusters and cannot rely on windfall development on unidentified sites.	597	No action required.
QUESTION 36: Should any shortlisted / rejected sites be allocated?	475	Comment	Site SN0020SL should be reconsidered in relation to the current settlement boundary and a more logical and sensible revision made to the boundary line - please see comments in response to question 33. A site visit to see the present inconsistency would be welcomed.	This is a narrow strip between the rear of properties fronting High Green and the recently completed Mallows Walk development. Concern was raised in the site assessment about the possible loss of trees in the Conservation Area. However, as the site would be a relatively small Settlement Limit extension, and the numbers involved would not be relied upon to meet the VCHAP requirements, the issues raised by this site could be dealt with via a planning application. As such, the inclusion of the site can be reconsidered.	595	Reconsider for inclusion within the Development Boundary/Settlement Limit.
QUESTION 36: Should any shortlisted / rejected sites be allocated?	285	Comment	It appears that The Mallows site is yet to be completed and consideration should be given to this. Further development would not have such a detrimental visual impact.	The remaining units at The Mallows are part of the baseline figures for the Plan, and the VCHAP needs to make allocations which are in addition to this. Additional land adjacent to The Mallows has not been promoted for development, and therefore there	594	No action required.

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				would be no assurance of the deliverability of a site here.		
QUESTION 36: Should any shortlisted / rejected sites be allocated?	150, 268, 272, 1010, 1212, 1809	Comment	Shortlisted and rejected have no advantages over the preferred sites.	Comments noted.	592	No action required.
QUESTION 36: Should any shortlisted / rejected sites be allocated?	68, 235, 359, 875, 1282, 1800	Comment	SN0490 at Mereside should be preferred as it is central to the village, with good access to local services/facilities, is less visually intrusive and small in scale.	Although the site is centrally located in the older part of Brooke, the walking distances to services/facilities are similar to those for the Preferred Sites. Whilst the site is in a less predominant position, away from the main B1332, the location within the Conservation Area is considered to be more sensitive. In addition, given that the site would accommodate approximately 17 dwellings, it could only be seen as a replacement for one of the Preferred Sites.	591	No action required.
QUESTION 36: Should any shortlisted / rejected sites be allocated?	1031	Object	Concern over the volume of traffic and the suitability of Astley Cooper Place as an access. Occupiers are likely to use cars for the most journeys. Few services and facilities in the village.	Discussions are ongoing with the Highway Authority about the suitability of access to this site. However, Brooke is considered to have the basic range of services and facilities to support the level of growth envisaged in the VCHAP.	590	Ongoing discussions with Highways about suitable access to this site.
QUESTION 36: Should any shortlisted / rejected sites be allocated?	257	Object	Reasoned rejection of sites already stated.	Comments noted.	589	No action required.
QUESTION 36: Should any shortlisted /	155, 223, 1203, 1392	Object	None of the sites are acceptable and more housing is not needed in Brooke.	Whilst the Council considers there is a need for some new development in Brooke, as part of meeting requirements	588	No action required.

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rejected sites be allocated?				of the GNLP, the rejected sites have been turned down at this stage for a variety of reasons summarised in the Regulation 18 document and set out in the Site Assessment Booklet.		
QUESTION 36: Should any shortlisted / rejected sites be allocated?	129, 188, 311, 442, 539, 598	Support	Support for the shortlisted sites and various rejected sites: 1. SN2119 North of High Green – less visual impact; form of development would lead to a better sense of community; good mixes of houses; problems could be easily overcome. 2. SN0490 Mereside – little visual impact and could be screened by trees; existing access; close to facilities; limited/sympathetic development could be acceptable. 3. SN0584 West of Burgess Way – access left from existing development; extends an already developed area. 4. Small number of houses on a variety of sites.	1. SN2119 has been shortlisted by the Council, however concerns remain about the access arrangements, which the Highways authority require to be via Astley Cooper Place. The site also potentially impacts on the adjacent Listed Building and TPO trees. The layout of development/type of properties proposed by the promoter can only be treated as indicative at this stage, and there is nothing to prevent similar property types being delivered on the preferred site (s). 2. SN0490, permission has previously been refused on this site for a number of reasons, most significantly the impacts on the conservation area, the site is not considered suitable in townscape/landscape terms. 3. SN0584, whilst this site has been promoted for development, there remain concerns over its deliverability in terms of securing access rights. The site is promoted for 25 dwellings, which will be difficult to achieve on a site which is constrained by shape, adjoining bungalow development and being in the setting of the Conservation Area and Listed Buildings.	577	Continued discussion with the Highways Authority regarding the access to SN2119.

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				4. The option of a number of small sites is unlikely to deliver affordable housing or open space, and may be constrained in the housing mix that would be viable, or the off-site highways improvements that could be delivered, compared to a larger scheme. Cumulatively, such sites would still have the similar impact on infrastructure.		
QUESTION 36: Should any shortlisted / rejected sites be allocated?	163	Support	I think the two sites proposed are enough. No further development is appropriate.	Comments noted.	572	No action required.
QUESTION 37: Should any shortlisted sites be rejected?	1272	Support	All of them for reasons given to 33, 34 and 35	See responses to Q33, Q34 and Q35.	618	No further action required.
QUESTION 37: Should any shortlisted sites be rejected?	224	Comment	All of the shortlisted sites should be rejected. There is a danger that any new building will set a precedent for future planning relaxation which will in turn damage the character and integrity of our village.	The aim of the VCHAP is to allow for planned growth to meet the requirements of the GNLP, taking into account as far as possible the character of the settlements concerned.	617	No action required.
QUESTION 37: Should any shortlisted sites be rejected?	164	Comment	In the light of international crises, such as COVID and global warming, concerned that the focus nationally should be on reducing population growth and therefore the need for new housing.	The VCHAP needs to allocate sites to meet the requirements of the GNLP; not doing so would be likely to lead to more ad hoc development via speculative applications, with negative consequences in terms of being able to plan for development which addresses climate change.	615	No action required.

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QUESTION 37: Should any shortlisted sites be rejected?	130, 1285, 1316	Comment	Support for the possible inclusion of SN2119	A number of the issues raised in the Site Assessment of SN2119 have not yet been resolved. In particular the Highways Authority view that the site needs to be accessed via Astley Cooper Place, as access onto High Green does not appear to be achievable (poor alignment of the road and lack of footway), and would potentially result in the loss of trees/hedgerow, detrimental to the approach to the Conservation Area. The shape of the site and the need to take account of the TPO trees and Listed Building also constrain the potential development. Further discussion may also be required we the surface water flood risk on the site.	611	Assess whether the site should be included in the VCHAP or rejected, likely to need further input from Highways and the LLFA.
QUESTION 37: Should any shortlisted sites be rejected?	7, 84, 103, 151, 286, 333, 1208, 1810	Comment	Concerns raised about site SN2119, including: 1. Poor Access to High Green/via Astley Cooper Place. 2. Biodiversity of the site. 3. Poor drainage.	A number of the issues raised are acknowledged in the Site Assessment of SN2119. In particular the Highways Authority view that the site needs to be accessed via Astley Cooper Place, as access onto High Green does not appear to be achievable (poor alignment of the road and lack of footway). However, the Highways Authority have not raised a concern in principle about the use of Astley Cooper Place for access.	610	Assess whether the site should be included in the VCHAP or rejected, likely to need further input from Highways and the LLFA.
QUESTION 37: Should any shortlisted sites be rejected?	540, 609	Object	Concerns about the Preferred Sites, including the need for a roundabout and drainage of the sites.	These issues are dealt with in the responses to questions 34 and 35.	609	See actions in relation to questions 34 and 35
QUESTION 37: Should any	45, 69, 123, 134, 156, 177, 269, 366, 441,	Object	A number of responses were given for rejecting SN2119, including: 1. Poor access to High Green/Astley	A number of the issues raised are acknowledged in the Site Assessment of SN2119. In particular the Highways Authority view that the site needs to be	608	Assess whether the site should be included in the VCHAP or rejected, likely to need further

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shortlisted sites be rejected?	621, 876, 911, 1204, 1205		Cooper Place 2. Distance to local facilities and narrow footpaths won't encourage walking 2. Copse/Wood at the end of Astley Cooper Place has wildlife value 3. Site shape would lead to a poor form of development 4. Poor drainage/localised flooding 5. Heritage impacts on the Listed Building and Conservation Area 6. Impact on privacy 7. Development at The Mallows not yet complete.	accessed via Astley Cooper Place, as access onto High Green does not appear to be achievable (poor alignment of the road and lack of footway), and would potentially result in the loss of trees/hedgerow, detrimental to the approach to the Conservation Area. The shape of the site and the need to take account of the TPO trees and Listed Building constrain the potential development. However, the Highways Authority have not raised a concern in principle about the use of Astley Cooper Place for access, and concerns about overlooking would be considered as part of the detail design at the planning application stage. Whilst there may be other development in Brooke which has yet to be completed, the VCHAP is looking at the longer-term need for new dwellings across the Village Clusters.		input from Highways and the LLFA,
QUESTION 37: Should any shortlisted sites be rejected?	258	Support	They should be rejected on the grounds already stated.	Comments noted.	607	No action required.

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QUESTION 38: Settlement Limit	1530	Comment	Support for SN0537 providing that the total number of dwellings is gradual and eventually reached over a period of at least a decade and includes the 7 properties currently under construction on the adjoining site to the west. This reflects 2005 Bunwell Parish Plan which achieved a response of 78% of all Bunwell households and I believe would achieve a similar result today.	This representation has also been received in response to Question 39 which relates specifically to the allocation of SN0537. The Council has responded fully to Question 39 and refers the reader to that section of the document.	94	No action required
QUESTION 38: Settlement Limit	1465	Comment	Comments relating to sites promoted at The Turnpike: close proximity to the Church and previous objections to development in this location from Historic England; extensive development at The Turnpike would create a nucleated settlement away from the existing concentration of housing at Bunwell; and consideration must be given to road safety of school children and safe access to the B1113.	Whilst the Council acknowledges these comments the sites promoted for allocation as part of the VCHAP process along The Turnpike at Bunwell are not currently considered to be appropriate for allocation. The Council remains of the opinion that there are currently more appropriate sites for allocation within the settlement that would result in stronger relationships between the existing development in the settlement.	93	No action required.
QUESTION 38: Settlement Limit	947	Object	Objection submitted to preferred site SN0537: Bunwell is defined by ribbon development, estate development of 25 dwellings does not reflect the existing pattern of development; current development under construction has outstanding issues still to be resolved;	This representation principally focuses on objections to the development of preferred site SN0537, rather than specific alterations to the settlement limit for Bunwell, but has not been submitted against Question 39 so the Council's response is made against Question 38. In terms of the specific objections to	92	No further action required at this time.

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			existing poor ditch maintenance leads to flooding within Bunwell; ditches within Bunwell are not fit for purpose leading to flooding of Bunwell Street; negative environmental impact associated with the development of this site; and subject to drainage concerns no issues with other sites out forward within the village.	preferred site SN0537 whilst the concerns about the existing ditch maintenance, the current site development and the works traffic are noted these issues are considered to be matters that are most appropriately addressed outside the site allocation process and not as part of the current site allocation review. Whilst Bunwell has historically been formed by ribbon development, not all development within the settlement is characteristic of this, particularly in areas furthest away from the village core. It is therefore not considered that a modest scale development of up to 25 dwellings would significantly alter the overall character of the village. Views from the local footpath network would not be so significantly altered as to adversely impact on these local footpaths. The Lead Local Flood Authority has assessed this site and have noted that surface water contributes to a flowpath to the north-east of the village. In accordance with planning policy and guidance, new development must not result in an increase in off-site flooding. In addition it is considered that on-site drainage solutions can often help to address existing surface water issues and as such it is considered that this issue can be adequately addressed during the planning application stage.		

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				Comments about the environmental impact have also been noted however all development will be required to deliver net-gain on site and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site, as well as significant on-site features (e.g., trees and hedgerows). Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. Comments relating to the other sites within the village of Bunwell are also noted.		
QUESTION 38: Settlement Limit	942, 968	Support	Agree to the proposed settlement limit approach for Bunwell	The Council notes the comments of support that have been submitted in response to Question 38.	91	No action required
QUESTION 39: Preferred Site - SN0537, Land to the north of Bunwell Street	2128	Comment	Comments of the LLFA: The on-site flood risk forms the start of a flow path in the 0.1% AEP event. Flow lines indicate this flood water flows east from the site, contributing to a major flow path east of the site. We advise this must be considered in the site assessment. The majority of the site is unaffected by flood risk and has the potential to be developed.	These comments have been noted and will be subject to further discussion with the LLFA as appropriate. The Council welcomes the point that the majority of the site would not be affected and development would not be precluded.	109	To consider the implications of this surface water flowpath, including further discussions with the LLFA and policy wording implications if appropriate.
QUESTION 39: Preferred Site - SN0537, Land to	2009	Comment	Environment Agency comments relating to Forncett Foul Water Capacity: For sites SN0537, SN1057, SN0538REV,	Note the comments of the Environment Agency in relation to these sites. Further discussions continue to be held with Anglian Water (AW) following the	107	Schedule further follow-up discussions with Anglian Water to determine the

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the north of Bunwell Street			SN0539, SN2126 and SN0602, available information indicates there may be around 120 houses planned here in total. Forncett has some capacity for foul water flows (can accommodate the 'preferred' sites) but does not have capacity for all the houses planned in these developments. Discussions will need to be held with AWS if all development goes ahead, and development must be phased in line with Water Recycling Centre (WRC) treatment capacity being made available.	receipt of detailed AW comments on the site selection process however at this time the VCHAP is only seeking to allocate the preferred sites and therefore sufficient capacity should be available at the Forncett Waste Recycling Centre. This position will need to be reviewed further if the allocations and/ or numbers on these sites are amended. The Council is preparing a Water Cycle Study as part of the evidence base for the VCHAP which will assess the capacity and constraints within this infrastructure.		availability of foul water capacity as well as any planned works to these treatment plants. Review of the WCS when prepared to determine any particular issues and/or potential policy wording that may be required for specific sites.
QUESTION 39: Preferred Site - SN0537, Land to the north of Bunwell Street	1934	Comment	Water Alliance comments: Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).	These comments are noted.	106	No action required.
QUESTION 39: Preferred Site - SN0537, Land to the north of Bunwell Street	2035	Comment	Historic England comments: There are no designated heritage assets on site. Green Farmhouse listed at grade II, lies to the east of the site. However, given the distance we consider that the development of the proposed allocation would have limited impact of the setting of the heritage asset.	The HE comments are noted.	105	No actions required.
QUESTION 39: Preferred Site -	943, 970	Comment	Only support SN0537 if this is solely for residential development and not light	The Council is unclear of the source of reference to light industrial use of the	104	Reconsider the extent of the boundaries of

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SN0537, Land to the north of Bunwell Street			industrial as detailed in the Suitability Assessment; and Object to the boundary of this site extending north beyond the rear of BUN1 as this will impact on the view approaching from the B1113 and users of the adjacent footpath to the east.	site however for clarification, the VCHAP is solely seeking to allocate residential development and as such this site has only been considered to be a preferred option for housing. The comments relating to the northern boundary of the preferred site are noted and on reflection the Council concurs that a review of the northern boundary of this site is appropriate to ensure that a strong relationship would result between SN0537 and the adjacent site.		SN0537 and in particular the relationship between this site and the adjacent site.
QUESTION 39: Preferred Site - SN0537, Land to the north of Bunwell Street	995, 1056, 1058, 1347, 1476	Mixed	Objections received to Preferred site SN0537: Infill within the village would be preferable; Current building work on the adjacent site is already resulting in disruption; Bunwell has already provided its share of development to meet local housing need; - no local benefit arising; poor public transport network; limited facilities and services; WATER MATTERS: Ongoing ditch issues relating to future maintenance on BUN1 - concerns that development on this site would exacerbate these problems; surface water flood risk across part of the site; recent flooding within the village; ongoing drainage issues with the older sections of	Whilst Bunwell is characterised by linear development there are existing examples of small development pockets (including on the current development site adjacent to this preferred site) and a well-designed scheme would not be considered inappropriate in this location. Matters relating to the creation of a new access into the site, potential ecological implications of the adjacent pond and addressing on site drainage would be addressed in detail at the planning application stage however initial technical responses relating to all of these matters indicate that these issues could be satisfactorily addressed at that stage. Comments relating to both on-site drainage and surface water, as well as wider drainage issues within the village are noted. Discussions have taken place	100	Review the correspondence with NCC Highway Engineers regarding the existing piped drains to determine whether this needs to be considered further.

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			the drainage system operating at capacity (advised by Highways Engineer); HIGHWAYS MATTERS: No existing site access; highway constraints in the village, including narrow roads and several blind corners on the approach to SN0537; concerns that the roads are not suitable for an additional 25 dwellings; lack of street lighting; LANDSCAPE/ ECOLOGICAL MATTERS: pond adjacent to this site; loss of existing landscape features visible in views across this site on the approach from the B1113; impact on users of the footpath network; PLANNING HISTORY: previous preferred site to the west remains undeveloped; SN0537 previously subject to a withdrawn planning application [2020/1464]; Bunwell PC and Bunwell Development Housing Group have recommended two other sites for development - SN2126 and SN0538REV	with the Lead Local Flood Authority who have advised that with appropriate mitigation measures in place development of this site would be achievable. Wider flooding events in December 2020 were experienced in a large number of localities and have been attributed to saturated catchment flooding due to prolonged rainfall however the comments received relating to the adequacy of the existing drainage network have been noted and will be explored further with the relevant technical body. It is acknowledged that during the construction phase of development there will be disruption to existing residents. Whilst this can be difficult it is only a temporary issue and it would not be reasonable to restrict new development for this reason. Concerns about the withdrawal of a previous application on this site, as well as ongoing boundary/ ditch maintenance issues on the adjacent site have been discussed with those officers currently seeking a solution and the Council does not consider that these matters should result in this site being rejected as an allocation site. In fact, the allocation of this site may present an opportunity to resolve the issues on the adjacent site. The withdrawn application was considered to be of an inappropriate design which does not preclude the allocation of this site.		

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				It is recognised that a number of alternative sites within Bunwell have been promoted to the VCHAP and that these have varying levels of support locally. These sites have previously been assessed as alternative development options and have either been considered suitable for shortlisting should SN0537 be re-categorised or have been rejected due to their identified constraints. Although the concerns expressed above have been noted the Council is seeking to ensure that the most appropriate option for development is brought forward within Bunwell and remains of the opinion that SN0537 is a suitable site for allocation.		
QUESTION 39: Preferred Site - SN0537, Land to the north of Bunwell Street	1428, 1527	Support	Comments of support for SN0537: recognition of need for additional housing and attractiveness of Bunwell; SN0537 is the best option for maintaining the linear pattern of development whilst having less impact on existing properties and retaining open feel in the village; and support for SN0537 providing gradual development of the site over a decade, and the total number includes the 7 properties under construction on the adjoining site to the west.	With reference to the timescales for development: If this site is allocated within the VCHAP the timescale for development of the site would be dependent upon the submission of a subsequent planning application. It is not considered reasonable or necessary to restrict this modestly sized site to a phased development timescale which would typically be more appropriate for a larger scale of development. Development of 25 dwellings on site SN0537 would not include the 7 dwellings currently under construction to the west of the site. These dwellings were approved separately under reference 2019/1542 and were allocation BUN1 in the 2015 Site Specific Allocations and Policies Document.	95	No action required

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				The Council notes the additional comments supporting SN0537 that have been received.		
QUESTION 40: Should any shortlisted / rejected sites be allocated?	2236	Comment	NCC ecological comments: Rating for these sites - green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required.	These comments are noted. Should a review of sites in Bunwell result in alternative sites being considered for allocation the detailed comments of NCC ecology will need to be reviewed further.	117	No action required at this time.
QUESTION 40: Should any shortlisted / rejected sites be allocated?	2087, 2098, 2099	Comment	None of the shortlisted sites should be rejected.	These comments are noted.	116	No action required.
QUESTION 40: Should any shortlisted / rejected sites be allocated?	2010	Comment	Environment Agency comments relating to Forncett Foul Water Capacity: For sites SN0537, SN1057, SN0538REV, SN0539, SN2126 and SN0602, available information indicates there may be around 120 houses planned here in total. Forncett has some capacity for foul water flows (can accommodate the 'preferred' sites) but does not have capacity for all the houses planned in these developments. Discussions will need to be held with AWS if all development goes ahead, and development must be phased in line with Water Recycling Centre (WRC) treatment capacity being made available.	Note the comments of the Environment Agency in relation to these sites. Further discussions continue to be held with Anglian Water (AW) following the receipt of detailed AW comments on the site selection process however at this time the VCHAP is only seeking to allocate the preferred sites and therefore sufficient capacity should be available at the Forncett Waste Recycling Centre. This position will need to be reviewed further if the allocations and/ or numbers on these sites are amended. The Council is preparing a Water Cycle Study as part of the evidence base for the VCHAP which will assess the capacity and constraints within this infrastructure.	115	Schedule further follow-up discussions with Anglian Water to determine the availability of foul water capacity as well as any planned works to these treatment plants. Review of the WCS when prepared to determine any particular issues and/or potential policy wording that may be required for specific sites.

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QUESTION 40: Should any shortlisted / rejected sites be allocated?	948, 972, 996, 997, 1458, 1510	Mixed	A summary of the comments suggesting alternative options/ combinations on the current shortlisted sites: SN2126 - should be amended to a 'preferred' site, ideal site especially if additional numbers are subsequently required in Bunwell, a lower density development that retains at least some of the existing trees would be a preferable option; SN0539 - should be considered as a 'preferred' site, would require the demolition of barns which are currently used by 2 businesses, agree with the comments made in the assessment regarding Lilac Farm; SN0538REV - should be retained as a 'shortlisted' site, the break in housing along this stretch is considered desirable by some people in the village; SN0537 & SN2126 (combination) - suggest splitting the allocation across these two sites, would reflect the pattern of development and respect the character of the village, would retain the open fields around Lilac Farm as well as those opposite; SN0538REV & SN2126 (combination) - these are the sites preferred by the Bunwell Development Housing Group and Bunwell Parish Council, SN0538REV is a village centre location within walking distance to local facilities and the school,	All of the above sites have been subject to detailed site assessments with various constraints were identified at that stage on each site. The VCHAP process remains committed to identifying the most appropriate allocation site for Bunwell and the Council accepts that due to the number of sites promoted within the settlement an alternative approach to development could be achievable on a combination of sites.	113	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			has a newly constructed road access, is in keeping with the new Saffron development and is large enough to accommodate the total required, SN0538REV has a low surface water flood risk, these sites are not a gateway to the village and are not used by walkers; and General - Any new development in Bunwell should be characteristic of the surrounding area and existing housing development.			
QUESTION 40: Should any shortlisted / rejected sites be allocated?	1057, 1528	Comment	Objections to Question 40: current building work along Bunwell St has already proved detrimental to the appearance of the village, and the local wildlife.	The Council notes these comment however without a site reference it is unclear which site the respondent is referring to. The Council recognises that changes to the existing settlement can be unsettling however the growth of villages through new development is important to ensure support the vitality of the rural community, and support existing services and facilities.	111	No action required.
QUESTION 41: Should any shortlisted sites be rejected?	453, 512, 617, 1012, 1311, 1474	Object	Objections to SN0538REV and SN0539: SN0538REV - the assessment has not taken reasonable consideration of the impact that development would have on the neighbouring properties, development will run the length of existing gardens undermining privacy and blocking field views, property prices will be devalued, the site would not be in keeping with the existing pattern of linear development and would alter the character of the village, village traffic is already at an unacceptable level, proposed scale of development is out of proportion to other small scale	The Council notes the objections to both of these shortlisted sites. Detailed site assessments have been undertaken for both of these sites and should the allocation of these sites be subject to review these would be considered again. The final site layout and design of these sites (if allocated) would be the subject of subsequent planning applications however if appropriate the detailed policy text could set out site specific considerations which, for example, could include landscape buffer strips to protect the amenities of neighbouring properties. Similarly if allocated,	121	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			developments in rural villages, previous planning stated that Bunwell would not have infill development along The Street as the gap between existing properties should be maintained; and SN0539 - no consideration given to existing properties, development would destroy the linear layout and current views, over-population of this part of the village.	consideration could be given in the supporting policy text to the form of development appropriate on these sites. However, it is noted that whilst a linear form of development dominates the existing grain of the village there are examples of other forms of development in the village. Loss of the landscape gap in this part of the village and the resultant impact on the townscape would be a consideration if either (or both) of these sites were to be reconsidered as preferred sites for allocation.		
QUESTION 41: Should any shortlisted sites be rejected?	525	Object	Objection to an unreferenced shortlisted site: Already suffered from development of a new dwelling on a house on one side and this would result in development on the other side too; and New houses on this site will overlook our garden and conservatory resulting in loss of privacy; Settlement limit is drawn incorrectly and excludes part of our (and our neighbour's) garden.	Although it is unclear which shortlisted site these comments should be attributed to (possibly SN0538REV) in general terms it should be noted that detailed site design and layout would be a matter for a future planning application which would be determined in accordance with the relevant planning policies. It would be necessary to ensure that there was not an undue loss of residential amenity for existing properties. In terms of the settlement limit, the boundary is drawn to reflect the existing development boundary and in places is drawn tightly around existing development. In some instances (as in this case) this excludes part of residential gardens associated with existing dwellings.	120	No action required.
QUESTION 41: Should any	77	Object	Objection to shortlisted site SN2126: Large dwelling would not be in keeping with the settlement line;	The constraints on this site have been noted within the site assessment form, including the presence of trees within the site. It has been noted that if	119	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
shortlisted sites be rejected?			Removal of trees to the rear would harm the form and character of the village; and Small number of dwellings (2-4) would be more reasonable and sustainable.	development of this site were to occur the number of dwellings appropriate on this site could be restricted as a result. However, restricting development of this site to frontage development only may not be the most efficient use of the land and would be in conflict with the NPPF - with careful site design development on this site could complement existing development patterns within Bunwell whilst making the most efficient use of the land. The Council also notes that as the front section of this site falls within the existing settlement boundary an opportunity for small-scale development already exists.		
QUESTION 41: Should any shortlisted sites be rejected?	974, 998, 1529	Comment	None of the shortlisted sites should be rejected.	The Council notes these comments and the support for the shortlisted sites as expressed in response to Question 39. At this time the Council is not proposing any amendments to the sites selected as either preferred or shortlisted options within Bunwell. Concerns about the clarity of questions relating to the shortlisted and rejected sites have been noted.	118	No action required.

Burston, Shimpling and Gissing

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 42: Settlement Limit	2036	Comment	To be considered as part of the Diss and District Neighbourhood Plan.	Sites put forward within Burston and Shimpling are to be considered and allocated as part of the Diss & District Neighbourhood Plan (DDNP). Therefore the Council acknowledge that Historic England comments will be considered as part of the NP. Gissing is not included as part of the DDNP, therefore any sites promoted in Gissing have been assessed for suitability through the South Norfolk Village Clusters Housing Allocations Plan. However, out of the sites promoted for development in Gissing, none were considered suitable.	235	No action or change required.
QUESTION 42: Settlement Limit	1935	Comment	IDB comments were made via the Diss & District Neighbourhood Plan consultation.	Sites put forward within Burston and Shimpling are to be considered and allocated as part of the Diss & District Neighbourhood Plan. The Council acknowledge that the Water Management comments were made direct to the NP. Gissing is not included as part of the DDNP, therefore any sites promoted in Gissing have been assessed for suitability through the South Norfolk Village Clusters Housing Allocations Plan. However, out of the sites promoted for development in Gissing, none were considered suitable.	234	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 42: Settlement Limit	264, 1385, 1467	Object	Objections raised to development in villages and then more specifically on the proposed site of SN0349.	In the first instance, the Council would just like to confirm that this question specifically refers to any changes to the existing settlement limit, as part of the VCHAP review of all Settlement Limits. At the time of writing, there are no alterations proposed to the existing Settlement Limit. With regards to the objection to 'any' development within this cluster, sites promoted to SNC within Burston and Shimpling have been forwarded to the Neighbourhood Plan Steering Groups, as these areas fall within the Diss and District Neighbourhood Plan (DDNP). Therefore, decisions relating to the allocation of these sites will be undertaken through the DDNP. With regards to future development for these areas, the South Norfolk villages of Burston, Scole and Roydon have been provided with an indicative housing growth figure of at least 25 new homes each by South Norfolk Council, with the expectation that this will be met within the Neighbourhood Plan. However, Gissing is not included as part of the DDNP, therefore any sites promoted in Gissing have been assessed for suitability through the South Norfolk Village Clusters Housing Allocations Plan. It is noted that only 1 site was promoted for development in Gissing, however, was rejected and not considered suitable for development.	233	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 43: Should any of the rejected sites be allocated?	956, 1389, 1475	Comment	In summary, alternative rejected sites appear to be much more suitable. In keeping with the scale and character of the village, and minimal impact on existing residents. Request a review of other proposed site as more appropriate.	The Council acknowledge the comments raised in support of the rejected sites. However, there is insufficient evidence to suggest that the rejected sites are now more suitable for development, for example highways, landscape, heritage concerns have not been resolved.	236	No action or change required.

Carleton Rode

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 175: Settlement Limit	1515	Object	Settlement Limit should be extended to the east along Flaxlands Rd to include an additional parcel of land for up to 6 dwellings adjacent to 2017/2096. This would provide a further small site for housing to enable to continued growth of the settlement.	The Council notes these comments as well as a similar submission made by the same respondent to Question 44. This amendment to the previously promoted site is considered as a revised site submission and as such will be subject to a new site assessment. It is therefore not considered appropriate to comment further on this site here.	122	This site should be logged as a revised site submission and be subject to a new site assessment.
QUESTION 44: Should any rejected sites be allocated?	1612	Comment	Support for SN4009: Site should either be allocated or be included within the SL; Relates well to the existing SL to east and south; Would enable linear development matching the east side and extending to the crossroads; and Mitigation could address heritage, landscape and surface water flooding issues.	This site was subject to a detailed site assessment and was considered as both a potential allocation site and an extension to the existing settlement limit. A number of constraints to development on this site were identified, including the surface water flooding which covers an extensive area within the site. Additional evidence to support the allocation of this site or its inclusion within the Settlement Limit has not been submitted and it is not considered appropriate to recategorise this site.	126	No further action.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 44: Should any rejected sites be allocated?	1536	Comment	Support for site SN4068: A reduced version of this site should be considered for 5-6 dwellings on a site of 0.4ha would address the concerns raised in the site assessment for SN4068, adjacent land has planning permission and has been sold, the adjacent site would represent a logical extension to the village, the site is well connected and is deliverable immediately.	These comments have been noted and this site has been included as a revised site in the new site assessments.	124	This amended site will be subject to a detailed site assessment.
QUESTION 44: Should any rejected sites be allocated?	1936, 1937	Comment	Outside the IDD boundary and partially within the Norfolk Rivers watershed catchment; and If surface water discharges within the watershed catchment of the Board's IDD, discharge to be in line with the Non-statutory technical standards for SuDS.	The Council notes these comments but at this time no sites are proposed for allocation within Carleton Rode.	123	No action required.

Dickleburgh

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 45: Settlement Limit	1938, 2037	Comment	If consulted, IDB comments will be made via the Dickleburgh Neighbourhood Plan consultation. English Heritage will consider sites as part of the Dickleburgh Neighbourhood Plan.	Noted that comments will be made as part of the Dickleburgh Neighbourhood Plan.	34	No action or change required.
QUESTION 45: Settlement Limit	848, 1640	Comment	Consider that the sites at Harvey Lane and Land to the south of Harvey Lane / Langmere Road are suitable for development. Respondents disappointed to note that sites in Dickleburgh have not been assessed through this Plan, and are proposed to be assessed only through the Dickleburgh Neighbourhood Plan	There are two emerging Neighbourhood Plans within the South Norfolk District that are proposing to make their own housing allocations, one of which is Dickleburgh. These Neighbourhood Plan documents sit alongside the Local Plan and when adopted are also taken into account in determining planning applications. Most of these Neighbourhood Plans include more detailed Development Management policies that aim to shape development proposals to better reflect local circumstances. Decisions relating to the allocation of these sites will be undertaken through the relevant Neighbourhood Plan. Sites promoted to SNC within Dickleburgh have been forwarded to the Neighbourhood Plan Steering Groups for assessment and possible allocation as part of that document.	33	No action or change required.

Ditchingham, Broome, Hedenham and Thwaite

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 46: Settlement Limit	1404	Comment	No specific comments on the Settlement Limit but note proximity to East Suffolk and encourage engagement with infrastructure providers covering this area, in particular the Norfolk and Waveney Clinical Commissioning Group and Suffolk County Council as the Education Authority.	These comments are noted and it will be necessary initially to determine whether these third parties provided representations to the Regulation 18 consultation. However, specifically in terms of observations relating to the potential impact of site allocations on education facilities within adjacent settlements in the Suffolk area enrolment in primary schools would be managed through a combination of parental choice and alternative schools as many children now attend schools out of their catchment areas. Similarly, whilst many GPs can offer registrations for patients who reside outside their area these registration applications can be refused on appropriate grounds (including being closed to new patients) which can help to mitigate the impact of new development on these practices. The existing pressures on the NHS and GP practices within the area are however recognised.	128	Review whether the Norfolk and Waveney NHS Integrated Care Systems (ICS) and Suffolk County Council provided representations during the Reg 18 consultation and if not engage with these parties as appropriate.
QUESTION 46: Settlement Limit	477	Object	Disagree with proposed changes to Settlement Limit as this should include site SN0078 as a preferred site. Existing preferred allocations would end up included in the SL.	Throughout the VCHAP area all sites identified as preferred allocations will be incorporated within the settlement limits and it is unclear why the respondent objects to this approach. The Council acknowledges the support that has been submitted by the promoter of the site to the allocation of SN0078 but considers that it is more appropriate to respond fully to this against Question 49 of this document.	127	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 47: Preferred Site - SN0373, Land between Thwaite Road and Tunneys Lane	2238	Comment	No major ecological constraints identified, site in strategic GI corridor and green habitat for GCNs, site near Broom Heath Pits SSSI, LNR and county wildlife site.	These comments have been noted and the Council notes that sensitive landscape designations are in proximity to this preferred allocation site. In accordance with planning policy requirements future developers of the site would be required to address these matters within any subsequent planning applications submitted for the development of this site. This would include undertaking the appropriate ecological surveys, minimising the impact of new development and designing suitable mitigation measures into the site from the outset.	137	No action required.
QUESTION 47: Preferred Site - SN0373, Land between Thwaite Road and Tunneys Lane	1939, 2012, 2085, 2179	Comment	Comments relating to existing WRC infrastructure and surface water: Site is adjacent to the Waveney, Lower Yare and Lothingland IDD - if surface water discharges within this catchment area it should be in line with non-statutory technical standards for SuDS; on-site flood risk forms the start of a minor/ moderate flowpath in the 0.1% AEP event, flood risk concentrated to the centre/ west of the site, opportunity to mitigate flood risk leading off the site, large area is unaffected by flood risk and has development potential; and Ditchingham WRC has capacity for the planned growth from this site [& others] but capacity would be limited if these allocations are substantially increased.	Matters relating to surface water flooding were noted during the site assessment process and have been subject to further discussions with the LLFA. In its original form the promoted site was of significant size and the site assessment process found that a reduced site area would be the most appropriate option for allocation. Subsequent discussions with the LLFA have determined that the boundaries of this site could be amended further to avoid the identified areas of surface water flooding - the site boundaries should therefore be subject to review to determine the most appropriate areas for allocation. Comments relating to the foul water capacity at Ditchingham WRC have been noted and are subject to ongoing discussions with Anglian Water as part of the Water Cycle Study to ensure an appropriate solution would be	136	Review the proposed site boundaries following discussions with the LLFA about the identified areas of surface water flooding on site. Ongoing liaison with Anglian Water, via the production of the Water Cycle Study, to understand the existing and future capacity at Ditchingham WRC and the implications that this could have on new allocations in this settlement.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
				available to allow the delivery of additional development in this area.		
QUESTION 47: Preferred Site - SN0373, Land between Thwaite Road and Tunneys Lane	2264	Object	Objection to SN0373: Allocation of SN0373 would result in housing delivery in the area being controlled by a single party who could land bank or build at their own market absorption rates, SN0373 is not as well located as SN0078 and would result in landscape/ character harm, if allocated the site should be as a reserve site subject to the delivery of DIT1 within a 2 year period with failure to deliver resulting in removal of the allocation.	Assurances have been provided from the developers of the existing allocation DIT1 who have advised of the anticipated timescales for the delivery of this site, as well as the potential for linkages between these two sites. At this stage however the two parcels remain under separate control and this matter is to be explored further to ensure that delivery of SN0373 is achievable, as set out in the Council's response to Question 47. Notwithstanding this point, it is not uncommon for the delivery of a site to be within the control of a single party with benefits associated with a more coordinated and sustainable form of development arising. The Council does not consider the suggested 'reserve site' option to be appropriate or necessary.	134	No action required.
QUESTION 47: Preferred Site - SN0373, Land between Thwaite Road and Tunneys Lane	1519	Support	Support for SN0373: Confirmation from the landowner that adequate rights of access have been retained through DIT1 to access this site; and confirmation that the site is available and achievable with a commitment to bring the site forward in a timely manner.	The Council notes these comments of support and clarification from the landowner at this time, particularly those relating to the access arrangements to the preferred allocation site however whilst the evidence supplied acknowledges that the developer of the adjacent site is open to the option of working collaboratively with the landowner of the preferred allocation site it does not state that access rights to the site have been retained. Details confirming the	133	Contact the promoter of the site to clarify the legal position regarding access to the preferred allocation site from the existing DIT1 allocation.

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				access arrangements should be clarified prior to possible allocation of the site.		
QUESTION 48: Preferred Site - SN2011SL, Land off Lamberts Way, Ditchingham	1940, 2013, 2152	Comment	Comments on the infrastructure and surface water flooding for site SN2011SL: Site is immediately adjacent to the Waveney, Lower Yare and Lothingland IDD, minor development – no further comments; Ditchingham WRC has sufficient capacity for the planned growth but if the allocations are substantially increased then capacity will be limited; and LLFA rating - green with no additional comments.	The Council notes these comments. Ongoing discussions with Anglian Water about the capacity of Ditchingham WRC are taking place however it is not considered that the inclusion of this site within the settlement limit would result materially alter the existing capacity levels.	142	No action required.
QUESTION 48: Preferred Site - SN2011SL, Land off Lamberts Way, Ditchingham	2240	Comment	No major ecological constraints identified, land adjacent to a priority habitat, site in amber habitat zone for GCNs and strategic GI corridor, site within SSSI IRZ but this is not triggered by residential development.	These comments are noted. It would be for the site developer to address and provide appropriate mitigation measures for all relevant ecological matters at the planning application stage should the site be included within the revised settlement limit.	141	No action required.
QUESTION 48: Preferred Site - SN2011SL, Land off Lamberts Way, Ditchingham	478	Object	Objection to SN2011SL: This site is not being promoted for the allocation being offered and there is no evidence it would deliver the housing suggested; The site would have an adverse impact on the local landscape and amenity; and	The site has been promoted for development of a single dwelling but the site assessment recognises that this parcel of land has the potential to accommodate a larger number of dwellings should it be included within the adjacent settlement limit. As such the final number of dwellings to be brought forward on this site would be subject to site constraints with numbers, layout, design and site access amongst the matters to be determined via	140	No action required.

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			Inadequate access road if the site is developed to its full potential.	planning application and being informed by the relevant planning policies - at this time inclusion of the site within the settlement limit would provide an opportunity for future development within the village.		
QUESTION 48: Preferred Site - SN2011SL, Land off Lamberts Way, Ditchingham	31, 55, 1497	Support	Support for SN2011SL: Support for small scale sustainable development with a low environmental impact.	The site has been promoted for a single dwelling but has been assessed as being a suitable addition to the existing settlement boundary. As such, once included within the settlement boundary it would be possible for a larger scheme to be submitted on this site subject to on-site constraints. Therefore whilst the support for a single dwelling is recognised it should be noted that once included within the settlement boundary the site could potentially be developed for a greater number of dwellings than the promoter of the site has currently indicated.	138	No action required.
QUESTION 49: Should any shortlisted / rejected sites be allocated?	2273	Support	Comments submitted in support of SN0078: mature trees on the site are predominantly around the boundaries of the site which would be proposed for retention with additional compensatory planting also possible on site; the site is well located for services and facilities; site has the potential to accommodate up to 15 dwellings; all landowners support the submission of the site and are engaging with SME housebuilders; and	The Council acknowledges the comments that have been submitted by the site promoter supporting the allocation of this site. In doing so the promoter of the site has confirmed that all landowners support the promotion of the site and are currently engaged in active discussions with third party housebuilders. This provides some reassurance about the deliverability of the site. At the time of the initial assessment the Council also raised concerns about the landscape and ecological impact arising from developing this site. A further review of the site suggests that many of these	915	Review the classification of SN0078 following receipt of Regulation 18 representations, including further discussions with NCC Highways to confirm whether a suitable access is achievable into the site.

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			no known constraints - many of the mature trees on the site need to be managed/ removed, no significant landscape impact.	trees are no longer present and as such the Council considers it appropriate to reassess this site to see whether it would offer a preferable allocation option within this village cluster at this time.		
QUESTION 49: Should any shortlisted / rejected sites be allocated?	2083	Comment	LLFA comments: Green rating - no issues raised	The Council has received these comments from the LLFA and believes that they relate to site SN4020 however there was no site reference included and this attribution should be confirmed. The Council recognises that no surface water issues have been raised in this response.	914	Confirm with the LLFA that these comments relate to site SN4020
QUESTION 49: Should any shortlisted / rejected sites be allocated?	2244	Comment	Comments from NCC Ecology on shortlisted sites SN0345 and SN4020: SN0345 - Amber rating - site opposite Broom Heath SSSI, LNR, CWS and candidate county geodiversity site which is known to support reptiles and GCNs; site within strategic GI corridor; potential for impact on SSSI; planning application would be required to include an ecological appraisal; SN4020 - Amber rating - identified as good-quality semi-improved grassland; adjacent to Broom Heath SSSI, LNR, CWS and within the candidate county geodiversity site which is known to support reptiles and GCNs; site within strategic GI corridor; potential for direct and indirect impacts - buffer zone recommended between development and land to the north; planning application would be required to include an ecological	These comments are noted. At this time these sites have been shortlisted but not preferred for allocation. Should the sites be reviewed and this categorisation be amended the implications for the adjacent ecological areas will be considered as part of the site re-evaluation process. Possible mitigation measures have been identified within this technical consultee response and it could be appropriate to identify these within the background text to any allocation, or within site specific policy text, in order to inform the design and development of the site and ensure that these constraints are mitigated appropriately.	176	No further action at this time but should the allocation of either of these sites occur consideration will need to be given to policy specific text, including the background text, and the recommendation for identified mitigation strategies.

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			appraisal; and General - measures required			
QUESTION 49: Should any shortlisted / rejected sites be allocated?	1591	Comment	Support for SN4020: Should be considered as either a preferred site or an extension to the Settlement Limit as it continues the linear pattern of development from the previous allocation BRO1.	Whilst this site would be a continuation of the existing linear form of development it is considered that a further linear extension could result in a sub-optimal impact on both the landscape and the townscape. A continuation of the existing form of development in this location would extend significantly beyond the dwellings on the southern side of Old Yarmouth Road. Development in this location would be prominent and would also have the effect of reducing the separation between Broome and Ellingham. For these reasons, and due to the advantages of other promoted sites within this cluster, the site was not considered to be a preferred option. The Council did however recognise some benefits associated with this site and as such it was considered as a Reasonable Alternative (shortlisted) site within the initial site assessment.	174	No action required.
QUESTION 49: Should any shortlisted / rejected sites be allocated?	1403	Comment	Support for SN0346: Site is well connected to the local services and facilities; Landowner is seeking advice regarding the designation and ecological value of the of the adjacent CWS - subject to this work the site could present an opportunity for future growth; and an adjacent site has	The site has been subject to a detailed site assessment and it was concluded that development of this site at this time was not optimal for the reasons identified. At the time of preparing this response (January 2022) additional information confirming the landowner's ecological assertion has not been received for consideration by the Council. The Council remains committed to ensuring that the most	172	No action required.

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			been developed without ecological constraints preventing it coming forward.	appropriate sites are preferred for allocation taking into consideration the objectives of the Plan, the sites available for allocation and the constraints and/or opportunities that the different sites would provide. The Council maintains its original position regarding the allocation of this site.		
QUESTION 49: Should any shortlisted / rejected sites be allocated?	1400	Comment	Support for SN0345: Submission of a supporting 'Highways Suitability Technical Note' considering access opportunities for the site; and ecology report currently being prepared to assess the ecological impact of allocation of this site - initial positive findings submitted; and illustrative masterplan prepared and submitted to support allocation of the site - unclear which area of the site would be allocated so masterplan covers full site area.	The supporting information has been reviewed and addresses some of the issues that were noted as being potential constraints to the development of this site. It is noted that a full ecological report remains pending. In terms of the area noted as being shortlisted for allocation at the Regulation 18 stage of the VCHAP production, it is the striped area only that is shown on the published maps and the illustrative masterplan therefore includes an area not considered to be suitable for allocation however it is noted that this has been submitted for illustrative purposes only.	171	Review additional supporting information on receipt and consider whether there is an opportunity/ a need to allocate this site in addition to SN0373 if this is appropriate.
QUESTION 49: Should any shortlisted / rejected sites be allocated?	834	Comment	Support for SN3004SL: The site has been considered unacceptable as backland development - backland development is part of the grain of development in this area; no material harm to adjacent occupiers; no landscape harm - application to be accompanied by LIA; and	It is acknowledged that there are existing examples of backland development along Old Yarmouth Road however these properties developed over a significant period of time and do not represent current policies within the Local Plan which does not support new dwellings outside the development boundaries. Whilst an existing extension to the settlement boundary can be seen further to the south west along Old Yarmouth Road this was drawn around an existing tight cluster of	170	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			FZ1 location.	backland properties and consolidated an existing identifiable group rather than encouraging new development to come forward to the rear of those dwellings set along the road frontage. The same principles towards new development would also apply in these locations should these sites be promoted for further residential use. Furthermore the proposed site is of smaller dimension than those that have been previously been subject to previous development and it is therefore considered that an extension to the settlement limit in this location could result in a poor form of development arising to the east of Old Yarmouth Road. Reference to the impact of development in this location on the River Valley setting are noted however the amber score is in accordance with the agreed HELAA scoring methodology. Specific matters such as the impact of a new dwelling on the residential amenities of the occupiers of 130 Old Yarmouth Road would be a matter to be considered in detail during the planning application stage.		
QUESTION 50: Should any shortlisted sites be rejected?	85, 2049	Comment	Comments on shortlisted site SN0345: Poor bus services - will increase reliance on private vehicles; traffic speed along Loddon Road; poor visibility (due to tree shading) along Loddon Road; existing congestion along Loddon Road with roads unsuitable for increased traffic; pedestrian footways, a crossing point and additional	These concerns principally relate to highways matters and the accessibility of the site. It is acknowledged that the development of this site would result in the loss of existing vegetation along the site boundary to allow for the creation of the site access and visibility splays. A review of the significance of these features would be required before re-	178	No action required.

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			bus stops would be required along Loddon Road; and inadequate assessment made of the loss of existing vegetation along the road frontage.	classification of this site. NCC Highways have advised that both road widening and connecting footpaths would be required should this site be allocated. The additional requests for extra bus stops and crossing points could be reviewed however any additional requirements arising from the development of this site would need to be proportionate, necessary and viable. Comments relating to the existing public transport service are noted.		
QUESTION 50: Should any shortlisted sites be rejected?	1378	Object	Objection to SN0345: Detrimental impact of development on the adjacent Broome Heath; development of this site would reduce links between the heath and surrounding countryside; increase in indirect disturbance impacts such as noise and lighting; recommend removal as a shortlisted site.	The Council recognises these concerns. Mitigation measures have been identified within the technical consultation response which seek to address some of these concerns. Whilst the Council is not currently proposing an allocation on this site, should this site be reconsidered as a preferred option the ecological constraints of the site would be a key consideration and any allocation would consider the mitigation measures that may be required for the policy text.	177	No action required.

Earsham

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 52: Preferred Site - SN0218, Land north of The Street	2248	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Agricultural field bounded by hedges (priority habitats). No other priority habitats identified (see MAGIC). Site within strategic Green Infrastructure corridor, amber/green habitat zones for great crested newts, and SSSI IRZ but residential development does not trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy should inform the design. Consideration should be given to delivering Biodiversity Net Gain.	NCC Ecologist comments noted; no major ecological constraints identified from desk-top search – ecological requirements and mitigation measures would be assessed as part of the development management process.	327	No action required
QUESTION 52: Preferred Site - SN0218, Land north of The Street	1718, 1941, 2070, 2169	Comment	Local facilities e.g. doctors and primary school, are already at full capacity. Concerns raised with access to the site - speeding and safety concerns. Concerns with the sites location on the edge of a flood plain - raised issues over surface water flooding. Currently, the reasoned justification for the sites does not include reference to mineral resource safeguarding.	Most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems (ICS), Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are	7	Site allocation policy wording will include appropriate highway footway provision and other identified infrastructure requirements directly associated with the delivery of this site. Consultation with the Mineral Planning Authority will take place as part of the

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
				identified and understood as part of the plan making process. All of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.		planning application process, once the details of layout are known. The need for consultation will be contained in the site allocation policy/ supporting text, as appropriate.
QUESTION 52: Preferred Site - SN0218, Land north of The Street	1595	Support	We support the preferred site SN0218; The site is well related to Earsham village, facilities and services. Suitable access could be obtained to the south east as the site benefits from a long site frontage.	The support for SN0218 is noted. With regards to a suitable access, the Highway Authority (HA) have advised that the site can provide a suitable vehicular access with good visibility. In addition the site has the ability to set back development to provide a footway.	6	The detailed access point to be confirmed with the HA prior to development and any upgrade requirements will be incorporated within the site policy.
QUESTION 53: Preferred Site - SN0390, Land east of School Road	1719	Comment	Concerns raised with regards to local facilities e.g. doctors/primary school, already at full capacity. Substantial traffic increase in recent years, possibly due to schools being outside village with greater journey distances. Earsham floods in many locations - further building may increase this. Located on edge of flood plain, mostly to east - further improvements needed to drains and soakaways before further development occurs. Parish Council were not in favour of this site being developed due to constraints mentioned - easterly section of the site is approximately 40% in the Flood Zone.	The concerns about the capacity of the school and implications for further resources and facilities are acknowledged. This technical consultation has included discussions with NCC Children's Services, where information was shared on School capacity. However, it has been identified that as the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, therefore in many instances this type of development is unlikely to have a significant impact on school capacity and other facilities. It is noted that all of the planned developments will also need to	331	Policy wording to include highway mitigation measures.

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			Would exacerbate traffic on School Road, which sees speeding on a daily basis. Could add 100+ vehicles to confined area and, with narrow entrance, potential for accidents. Would cause major congestion, especially at school peak times.	contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth. With regards to Highways, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. Mitigation measures have been identified and would be incorporated into specific site allocation policy text. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority who have advised that with appropriate mitigation measures in place development of this site would be achievable.		
QUESTION 53: Preferred Site - SN0390, Land east of School Road	2250	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Agricultural field bounded along southern edge by a hedge (priority habitats). No other priority habitats identified (see MAGIC). Site within strategic Green Infrastructure corridor, amber/green habitat zones for great crested newts, and SSSI IRZ but residential development does not trigger consultation with Natural England. Applications for planning consent	NCC Ecologist comments noted.	328	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 53: Preferred Site - SN0390, Land east of School Road	2038	Comment	There are no designated heritage assets on site. The closest listed building lies to the south of the site but given the distance it is considered development would have limited impact of the setting of the heritage asset.	English Heritage comments are noted; there are no designated heritage assets on or near the site that would cause harm. A heritage impact assessment is not required by English Heritage however discussions with the Council's own Senior Conservation & Design Officer suggest that a HIA may be a useful assessment of the heritage impact arising from development on this site.	13	Consider whether a HIA is required for this site and undertake if appropriate.
QUESTION 53: Preferred Site - SN0390, Land east of School Road	1942, 2086	Comment	Water management comments: Within the Waveney, Lower Yare and Lothingland IDD. A Board Adopted Watercourse is located to the east of the proposed site boundary. Byelaw 3 applies to any proposed discharge of surface water from the proposed site. All other Board Byelaws will also apply to this development. Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised.	Water management comments noted.	12	No action required.
QUESTION 53: Preferred Site -	1575	Support	Owner of site supports proposed amendment of settlement limit to include their land. However, a slight amendment to site area (1.25ha) is proposed to enable	The Council acknowledge the support of the site. The representation provides a revised boundary which includes more land (same land owner) in order to	11	Consult with highways to confirm additional piece of land (including the existing dwelling)

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SN0390, Land east of School Road			better access. Third party land referenced by NCC Highways is within same ownership. The inclusion of the rectory land (north west) as part of wider site would provide a suitable access onto School Lane. This includes demolition of building. The site is of sufficient scale to enable replacement dwelling on same plot or as part of wider housing allocation.	provide a suitable access and to resolve highway concerns. The inclusion of this area of land has the potential to provide a suitable means of access to the site, however this is subject to the approval of the Highway Authority. It is also noted that this would also require the demolition on an existing dwelling.		would achieve a suitable access.
QUESTION 53: Preferred Site - SN0390, Land east of School Road	1414	Comment	East Suffolk comments; No specific comments on the increased settlement boundary. Recommended consideration towards infrastructure implications in East Suffolk.	East Suffolk comments noted. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems (ICS), Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. The development of certain sites will require some local infrastructure upgrades, for example an extension of a footway to link the site to the village.	8	Continue to engage with service providers.

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				All of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.		

Forncett St Mary and Forncett St Peter

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 54: Settlement Limit	106	Support	Forncett Parish Council agree with the extent of the existing settlement boundary for Forncett i.e. No alterations are proposed	The Council acknowledge that the Parish Council agree with the extent of the existing settlement boundary i.e. no proposed changes.	14	No action required.
QUESTION 55: Should any rejected sites be allocated?	97	Comment	Site Ref: SN2058 Despite there being a nearby listed building on the offside of Station Road, this site is at least one hundred metres away, with no direct sight line to the building. Besides this, the frontage of any development proposed would remain unchanged. Site has always been considered as a brownfield site by South Norfolk Council. There have been many efforts to maintain a viable business on this plot all of which have suffered the same fate of closure. Most recently, this has involved a holiday letting business. The impact of 2020 was tremendous on all sectors but as everybody knows the holiday business has been hit hard. It is not viable for this to remain as employment land. My site is approximately 2.2 acres of which I have suggested only five developments at the end of my land, with its own access. NCC Highways are happy with the roads and access to this site, following a visit over a year ago. My site has good clear vision of the road in both directions. You have previously agreed the entrance and the splay vision so I am confused why it is	The Council acknowledges the representation made with respect to rejected site SN2058. Whilst the applicant suggests that NCC Highways are happy with the access, the Council have received advice from NCC Highways as part of the site selection process and they have raised serious safety concerns due to the sites location on the north side of Station Road and the inside of an 'S' bend, with an existing access being located 45m to the east of the railway bridge. This part of Station Road is predominantly a national speed limit one with very few opportunities for pedestrians and cyclists to seek refuge on road verge. There is no evidence to suggest that the view of NCC highways has since changed. With regards to the holiday lets and the employment use, whilst the Council is sensitive to the current climate, no evidence has been presented to suggest that the holiday accommodation is not viable in this location. Therefore, the Council is still of the view that the site is unsuitable for additional residential development.	616	No action or change required.

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			now in question. Long Stratton has a good selection of shops and amenities and we are only 20 minutes away from Norwich Hospital and City Centre, making it an inviting location.			
QUESTION 55: Should any rejected sites be allocated?	107	Comment	Comment submitted on behalf of Fornsett Parish Council, who at their meeting on 17/06/21 agreed with the list of rejected sites and did not wish to suggest and amendments.	Comments noted.	334	No action or change required.
QUESTION 55: Should any rejected sites be allocated?	1943	Comment	Water management comments: Part of the Parishes are located within the Norfolk Rivers IDD. The Board's byelaws apply to any new developments within the IDD.	Comments noted.	333	No change or action required.

Gillingham, Geldeston, and Stockton

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 56: Settlement Limit	620	Object	Already too many cars for the size of village, anymore would just be completely hazardous and would lead to bottle neck situations. The Old Yarmouth Road already has a dangerous speed limit. Not enough facilities to support the amount of residents e.g schools, dentistry, doctors. Other problems include ruining green areas of natural beauty and habitat, not environmentally friendly, the houses are out of keeping in terms of modern architecture in amongst this beautiful village.	The Council acknowledges the concerns raised regarding a general increase in traffic volumes, however no site reference is given and therefore the Council is unable to give a site specific response. In general, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In addition, whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies. With regards to infrastructure, the Council is engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles in Education and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. With regards to	522	No action or change required.

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				environmental concerns, it is acknowledged that development sites can be home to wildlife, and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures. With regards to the design of the dwellings, these will be considered at the planning application stage where the materials etc can be specified in order to keep the development in keeping with the local character.		
QUESTION 56: Settlement Limit	1822	Comment	Broads Authority comments: 'with a further cluster of development at west Kings Dam' – do you mean along Kings Dam to the west? As written, it does not seem to read well. It is not clear if a settlement limit alteration is made for Gillingham. There is a question asking for views, but the text is not clear and a dashed red line is not obvious on the map. It does not say 'no alteration to the settlement limit is made' like in other places	The Council can confirm that no alterations are proposed to the existing settlement limits within this cluster, including Gillingham, as part of the settlement review undertaken by the Council. However, sites that are allocated within the plan will automatically be included within the settlement limit.	521	Council to clarify cluster introduction paragraph with regards to the development at Kings Dam.
QUESTION 56: Settlement Limit	1317	Object	I object to proposals to extend the development zones in Geldeston and Gillingham due to the limitations of the current road infrastructure. Access to the villages of Geldeston and Gillingham is very poor and proposals to increase the number of dwellings will undoubtedly make matters worse. Road safety is a major concern due to on-road parking on	The Council acknowledges the concerns raised regarding an increase in the traffic volumes, as well as the associated highway safety concerns. In general, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway	520	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			The Street at Gillingham and at Kells Way in Geldeston; in both locations road widths are reduced to a single lane as current dwellings do not have off-road parking.	network. In addition, whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies.		
QUESTION 56: Settlement Limit	1608, 1795	Comment	Geldeston is a small compact village (pop. 397, 2011 census) and as the representative of its residents the Parish Council is glad to see that no changes to the Settlement Limit are proposed. Geldeston's present population and spatial organisation enable it to preserve a strong sense of community that is much valued by old residents and newcomers alike. [This is part of the Geldeston Parish Council's collective response to preferred site SN0437]	Comments from Geldeston Parish Council are noted. Whilst no updates are proposed to the Settlement Limit resulting in windfall sites, the Council would note that any allocations made via this Plan will be incorporated into the Settlement Limit.	519	No action or change required.
QUESTION 56: Settlement Limit	1416	Comment	No comment on specific site but please consider infrastructure implications in East Suffolk.	Comments noted.	518	Council to engage with East Suffolk with regards to infrastructure implications
QUESTION 56: Settlement Limit	908, 1313	Object	Concerns are raised: 1. Roads, traffic and safety	The Council acknowledges the concerns raised.	517	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			2. The environment and nature 3. Pressures on local resources 4. Flooding and safety	1. In general, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In addition, whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies. 2. Comments about the environmental impact have also been noted however all development will be required to deliver net-gain on site and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site, as well as significant on-site features (e.g., trees and hedgerows). Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. 3. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in		

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				many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care System (ICS), Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process 4. With regards to the concerns raised regarding flooding, discussions have taken place with the Lead Local Flood Authority (LLFA) who have provided feedback on the proposed allocations and made recommendations where appropriate. In addition, further comments are also expected from the Environmental Agency and Anglian Water, who will help inform individual allocation policy wording.		
QUESTION 56: Settlement Limit	1243	Object	Gillingham Settlement Limit allocations are greater than 1 hectare, with one site being twice this size. This is not in line with the objectives of the NPPF. The plan states that the existing primary school at Gillingham is operating at capacity. However, the village clusters are defined on the basis of catchment areas to primary schools. Therefore, it is unclear	The Council acknowledges the concerns raised. With regards to the size of the sites and the NPPF; Paragraph 69a of the NPPF notes the importance of small and medium sized sites, up to 1 hectare in size, in contributing to meeting housing needs, particularly in terms of the ability to deliver those sites quickly. The NPPF also states that plans should contain policies to optimise the use of land in	516	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			how the limits of this Settlement Limit have been defined and justified. The FRA relied upon for the development at GIL 1, 2019/1013 needs to be updated in line with EA guidance to support the allocation of these sites.	their area and meet as much of the identified need for housing as possible. Therefore, the Council considered that whilst one of the sites is slightly over the 1ha threshold, the development of this site for up to 35 dwellings would be optimum and would go towards meeting the required housing requirement for the area, in accordance with the GNLP. With regards to the requirement of a Flood Risk Assessment (FRA), the Council will be guided by the Environment Agency, who have been consulted as part of the Regulation 18 and in this instance and have requested that an FRA will be required to support SN0478 (adjacent to GIL1), if allocated.		
QUESTION 56: Settlement Limit	702	Object	The village roads cannot cope with additional levels of traffic. We are a rural community with horses, people and other animals sharing the roads. We do not need streetlights and pavements as a rural community we should be allowed to remain rural. The addition of 20 properties plus 40 vehicles will destroy the rural nature of the community. As an historic village the nature of that history will be destroyed with another modern, unimaginative development of property which would be better suited to a suburban setting. Local flora and fauna would be devastated	The Council acknowledges the concerns raised; however, no site reference is given and therefore the Council is unable to give a site-specific response. In general, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In addition, whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the impact of alterations to the existing road, street lighting, ecology, layout design, as well as the increased	515	No action or change required.

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			by additional people, development and vehicles.	traffic movements would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies.		
QUESTION 56: Settlement Limit	1232	Object	Gillingham Settlement Limit allocations are greater than 1 hectare, with one site being twice this size. This is not in line with the objectives of the NPPF. The plan states that the existing primary school at Gillingham is operating at capacity. However, the village clusters are defined on the basis of catchment areas to primary schools. Therefore, it is unclear how the limits of this Settlement Limit have been defined and justified. The FRA relied upon for the development at GIL 1, 2019/1013 needs to be updated in line with EA guidance to support the allocation of these sites.	The Council acknowledges the concerns raised. With regards to the size of the sites and the NPPF; Paragraph 69a of the NPPF notes the importance of small and medium sized sites, up to 1 hectare in size, in contributing to meeting housing needs, particularly in terms of the ability to deliver those sites quickly. The NPPF also states that plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. Therefore, the Council considered that whilst one of the sites is slightly over the 1ha threshold, the development of this site for up to 35 dwellings would be optimum and would go towards meeting the required housing requirement for the area, in accordance with the GNLP. With regards to the requirement of a Flood Risk Assessment (FRA), the Council will be guided by the Environment Agency, who have been consulted as part of the Regulation 18 and in this instance and have requested that an FRA will be required to support SN0478 (adjacent to GIL1), if allocated.	514	No action or change required.
QUESTION 56: Settlement Limit	918	Object	I object to the size of the development due to the increase in the volume of traffic it will bring.	The Council acknowledges the concerns raised regarding an increase in the traffic volumes, however no site reference is given and therefore the	513	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
				Council is unable to give a site-specific response. In general, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In addition, whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies.		
QUESTION 56: Settlement Limit	717	Object	The more housing that is being built on the fields surrounding our homes, is making the risk of flooding even higher.	The Council acknowledges the concerns raised with regards to flood issues. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority (LLFA) who have provided comments on the preferred and shortlisted sites and where relevant advised whether with sites are suitable for development and whether any mitigation measures are required. These measures will be included within the site allocation policy to ensure compliance with the LLFA. A review of the boundaries of the preferred site SN4078 may be necessary reflecting identified flood risk.	512	Review of flood risk/ boundaries of preferred site SN4078

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QUESTION 56: Settlement Limit	932, 1725	Support	Agree with existing settlement limit for villages of Geldeston and Gillingham. It is considered that the line defining the settlement limits is appropriate and should not be extended.	Comments noted. Whilst no updates are proposed to the Settlement Limit resulting in windfall sites, the Council would note that any allocations made via this Plan will be incorporated into the Settlement Limit.	511	No action or change required.
QUESTION 57: Preferred Site - SN0437, Land off Kells Way, Geldeston	544, 883	Object	Concerns raised with regards to SN0437; concerns raised with Kells Way as a single-track road, not all properties along Kells Way have off-street parking, the road is busy now with all the traffic from Kells Meadow, would like to see a new access via Old Yarmouth Road; the infrastructure can not cope with more homes,	NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. Mitigation measures have been identified and would be incorporated into specific site allocation policy text. With regards to an alternative access via Great Yarmouth Road, NCC Highways have advised that they would not consider this to be suitable for a new access. The access to Kells Way will need to meet the standard Highway requirements with regards to visibility, this will be determined as part of the allocation. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies relating to the environment. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, including within this cluster. Therefore, in many	523	Confirm that highway standards can be met to the existing allocation

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				instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care System (ICS), Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.		
QUESTION 57: Preferred Site - SN0437, Land off Kells Way, Geldeston	1796	Comment	Parish Council comments/suggested requirements: [1] No houses should be built on the preferred site until the Anglian Water pumping station below the Kells Estate has been replaced or upgraded; [2] after requirement 1. is met, up to five -- certainly no more than 10 -- houses might be built on site No. SN0437, but only if effective measures are taken to reduce the hazards to all residents from vehicles passing through Kells Meadow and along Kells Way; [3] similar proposals for densely built-up housing were made under the Local Development Framework in 2003; concerns with infrastructure.	With regards to the proposed number of units on site, these are considered to be sustainable and would represent an efficient use of land (in accordance with Section 11 of the National Planning Policy Framework (NPPF)). The scale of development is consistent with the objectives of the VCHAP in promoting social sustainability by supporting rural life and services. The concerns about the implications for further resources and facilities are acknowledged. The Council is engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems (ICS), Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority. In addition, continued engagement with Anglian Water is taking place as part of the	153	Discussions with NCC Education regarding school capacity and facilities. Further discussions between developer and NCC Highways to confirm access. Review of the WCS to determine capacity and possible infrastructure constraints at Geldeston.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
				production of the Water Cycle Study which is being produced to support the site selection process. This work seeks to identify constraints and opportunities within the existing water infrastructure and will ensure that issues are identified and understood as part of the plan making process. The Council is aware that development of the site will be subject to achieving satisfactory access through the FW Properties development, this will be explored further prior to development.		
QUESTION 57: Preferred Site - SN0437, Land off Kells Way, Geldeston	2251	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Rough grassland bounded along northern and western edge by hedges (priority habitat). No other priority habitats identified (see MAGIC). Site within amber habitat zones for great crested newts, and SSSI IRZ but unlikely to require consultation with Natural England (residential development >50 units) Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy should inform the design. Consideration should be given to delivering Biodiversity Net Gain.	NCC Ecologists comments noted.	151	No action required
QUESTION 57: Preferred Site -	2039	Comment	There are no designated heritage assets on site. However, the site is adjacent to the	The Historic England comments are noted; an HIA is required to inform	150	HIA to be undertaken

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SN0437, Land off Kells Way, Geldeston			Geldeston Conservation Area. There is also a pair of grade II listed cottages to the west of the site at West End. Any development of the site has the potential to impact on the significance of these designated heritage assets. A Heritage Impact (HIA) Assessment of the site should be undertaken to assess the impact of the proposed development on the listed building and conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement. Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.	whether the site is allocated, and to include any identified mitigation measures.		
QUESTION 57: Preferred Site - SN0437, Land off Kells Way, Geldeston	965	Comment	Concerns about the impact of additional housing on existing drainage infrastructure (operated by Anglian Water) because of numerous previous incidents of effluent discharge affecting our and neighbouring properties in Station Road. Will there be any assessment of the local pumping stations and drainage system to ensure they will be sufficiently robust to cope with increased sewage and surface water from run off?	Comments relating to both on-site drainage and surface water, as well as wider drainage issues within the village are noted. Consultation responses have been received from the Lead Local Flood Authority (LLFA) who have advised that with appropriate mitigation measures in place development of this site would be achievable. Wider flooding events in December 2020 were experienced in a large number of localities and have been attributed to saturated catchment flooding due to prolonged rainfall however the comments received relating to the adequacy of the existing	149	Discussion with AW to determine any identified issues and impacts on possible site allocation. Also review as part of the WCS.

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				drainage network have been noted and will be explored further if appropriate. The Council continues to engage with Anglian Water as part of this process, both directly and as part of the production of the Water Cycle Study which will form part of the evidence base supporting this Plan. The WCS seeks to identify infrastructure capacity and constraints within the AW network and how these may impact on the selection of allocated sites.		
QUESTION 57: Preferred Site - SN0437, Land off Kells Way, Geldeston	1944, 2117	Comment	Comments relating to water management: Site is immediately adjacent to the Waveney, Lower Yare and Lothingland IDD; If surface water discharges within the watershed catchment of the Board's IDD, this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS); Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing but where possible surface water infiltration should be utilised; and Adjacent to a flow path and this must be considered in the site assessment. Site is affected by a Source Protection Zone 3 and developers will need to liaise with the Environment Agency to ensure that development / drainage does not adversely affect the water quality; however, Zone 3 is the lowest risk	The comments made in relation to water management are noted and with reference to the presence of the surface water flowpath and the requirement for geotechnical investigation these issues will be explored further with the LLFA.	148	Discussion with the LLFA to determine whether this testing forms part of the standard planning application process.
QUESTION 57: Preferred Site - SN0437, Land off	1722	Support	Support the increase in the number of properties to 20 dwellings. The site is capable of providing a range of house	The Council acknowledges the support for the development of the site. With regards to housing mix, the Council will	24	No action required.

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Kells Way, Geldeston			types including smaller two and three bedroomed properties and bungalows. Provided the layout is appropriately designed, the total number of dwellings could flex according to local housing demand and need. This appears an extended settlement boundary for the village. The site has good access to services and facilities, no flood risk concerns, no heritage assets will be affected. The landscape generally consists of large open arable fields defined by countryside hedging with belts and areas of woodland.	seek to provide new housing development to meet housing needs (using the most up to date Strategic Housing Market Assessment (SHMA)). This will ensure that allocated sites provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of their life cycle e.g. first-time buyers, affordable housing, upsizing/downsizing etc		
QUESTION 57: Preferred Site - SN0437, Land off Kells Way, Geldeston	416, 703, 860, 885, 909, 1043, 1104, 1200, 1318, 1726	Object	The topography of the site presents several problems with sewage/drainage, no mention of upgrading wastewater management. Concerns raised with existing insufficient infrastructure, more development will increase this pressure. Concerns with highway safety (visibility, traffic volume etc') and access of Kells Way; Kells Way is not considered to be suitable for an increased traffic flow/ There are infrequent bus services which will force the reliance of motorized vehicles Concerns with the impact on the local environment, effects on the Conservation Area, play area and wider Waveney Valley.	Topographical surveys will be a policy requirement for development where this is considered to be appropriate. As part of the evidence base for the VCHAP, a Greater Norwich Water Cycle Study (March 2021) and a Level 1 Strategic Flood Risk Assessment were prepared and will be used to guide development. As part of the next stage (Reg 19) there will be specific supplement to the Water Cycle Study and a stage 2 SFRA which will help inform areas where upgrades in services are required. With regards to access, the Highways Authority have been previously consulted and have advised that access via Great Yarmouth Road is not suitable/safe and access via Ketts Way is	20	Sites located within areas at risk of any flood will be expected to provide specialist reports, where necessary and policy wording will include any site-specific upgrades that are required to facilitate the development. Development of the site will be subject to achieving satisfactory highway requirements and therefore any requirements with be policy specific. Policy wording will contain landscape mitigation

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			If developed, the scheme should be reduced in scale (5 bungalows has been suggested to avoid overlooking). Requested access to the site via Old Yarmouth Road.	considered acceptable, subject to achieving satisfactory highway requirements i.e sufficient road widths and visibility splays. The effects on the wider landscape have been acknowledged, with specific regard to the north of the site, these will be considered at the detailed design stage, where mitigation measures will be proposed. A Heritage Impact Assessment (HIA) will be required to assess any impact on heritage assets arising, this includes the Conservation Area. With regards to a reduction in size, South Norfolk has a commitment of achieving 1200 and it has been considered that the site could accommodate up to 20 homes, which will also be in accordance with the National Planning Policy Framework (NPPF) in making best use of the land.		measures which will be guided by statutory bodies. The Council recognizes the concerns with the scale of development of the site; the site layout of the site will be developed to ensure there are no amenity impacts such as overlooking. Policy text to include requirement for topographical survey if appropriate. Production of a Heritage Impact Assessment.
QUESTION 58: Preferred Site - SN0478, Land south of GIL 1, Gillingham	777	Object	Summary; I object for multiple reasons. Concerns about the behaviour of contractors working on the existing site. Please see detailed representation for further information & objections.	The Council acknowledge the concerns raised and take these very serious. The Council has an expectation that the developer/contactors to act in a certain manor and will highlight this to the developer.	524	Contact Hopkins home to raise the concerns with the potential anti-social behaviour occurring on site.
QUESTION 58: Preferred Site - SN4078, Land south of GIL 1, Gillingham	263, 277, 349, 350, 352, 353, 420, 606, 680, 706, 855, 1059, 1076, 1236, 1244, 1270, 1319, 1337,	Object	1. Issues relating to: Flooding, site is located within Flood Zone 3, there is-existing surface water issues from Hopkins development. Further development will only make this worse. 2. Issues relating to Highways; that the site	1. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority who have advised that with appropriate mitigation measures in place development of this site would be achievable. The site will also be subject	157	Allocation Policy wording to include the requirement for a Flood Risk Assessment (SFA). Discussion with NCC

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	1727, 1731, 1745		is located on a blind double S bend on that part of Street is a safety concern, concerns with extra traffic, access road is inadequate. Concerns with infrastructure capacity; School is already at capacity. Doctors are full and are having to use Beccles GP Environmental concerns; negative impacts on Wildlife in the School Pond, damage Conservation area and Noise and light pollution concerns. Concerns with cost of housing.	to a Stage 2 Strategic Flood Risk Assessment at the Regulation 19 stage of the Plan production to assess in greater detail the flood risk on the site, as well as identify whether there are any suitable/ appropriate mitigation measures. Wider flooding events in December 2020 were experienced in a large number of localities and have been attributed to saturated catchment flooding due to prolonged rainfall however the comments received relating to the adequacy of the existing drainage network have been noted and will be explored further if appropriate. 2. Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. Mitigation measures have been identified and would be incorporated into specific site allocation policy text. 3. The concerns about the capacity of the school and implications for further resources and facilities are acknowledged. Discussions with NCC Education will include a review of the status of Gillingham Primary School. All of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure		Education about the capacity of Gillingham Primary School. Review of the Stage 2 SFRA when available.

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				effectively supports growth. 4. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, on the local ecology, noise and light pollution are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies relating to the environment. 5. The details of the housing mix on allocated sites will be determined at the planning application stage, where affordable homes will be sought in line with policy requirements.		
QUESTION 58: Preferred Site - SN0478, Land south of GIL 1, Gillingham	2019	Comment	Located within Flood Zone 3 - require site specific Flood Risk Assessments to be submitted at application stage for any proposed development.	Environment Agency comments noted. The Council notes the area of FZ3 that has been identified and, as the VCHAP progresses, has commissioned a Stage 2 SFRA that will include a more detailed assessment of this site and its constraints. This will inform the allocation of this site and, if allocated, identify mitigation measures to be explored at the planning application stage.	156	Allocation policy wording to include FRA requirement.
QUESTION 58: Preferred Site - SN0478, Land south of GIL 1, Gillingham	2252	Comment	NCC Ecologist comments: No major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required.	NCC Ecologist comments note.	155	Consultation required with Natural England (residential development >10 units), if allocated – note to be added to the

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			Agricultural field to south of existing consented site 2019/1013. Partly bounded along northern edge by hedge (priority habitat). No other priority habitats identified (see MAGIC). Site within amber habitat zones for great crested newts (large pond adjacent to school), and SSSI IRZ will likely require consultation with Natural England (residential development >10 units) if allocated. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, and the landscape strategy for 2019/1013, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			supporting text for the policy
QUESTION 58: Preferred Site - SN0478, Land south of GIL 1, Gillingham	933	Support	On behalf of the owners of the land, the preferred allocation site SN0478 is supported. The Council required that the land should be the subject of a Flood Risk Assessment and a Landscape Impact Assessment. The Flood Risk Assessment shows that it is possible to build on Flood Zone 1 and this provides a constraint on the eastern boundary of the allocation. The findings of the Landscape Impact Assessment are that the development of the land can take place without any 'material' harm to the landscape.	The Council acknowledges the support including the supporting documents. With regards to proposed numbers, these are indicative and will be subject to achieving satisfactory access/highways improvements through GIL1.	154	Further discussions with LLFA.
QUESTION 58: Preferred Site - SN0478, Land south of GIL 1, Gillingham	1945, 2121	Comment	Comments relating to water management: Adjacent to the Waveney, Lower Yare and Lothingland IDD; A riparian watercourse is located to the east of the proposed site which feeds into a Board Adopted Watercourse within the Waveney, Lower	The content of these representations are noted, with particular reference to the presence of the surface water flowpaths adjacent to the site. Discussions are continuing with the LLFA to understand the implications of these	152	Review with LLFA impact on surface water flowpath on site allocation

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			Yare and Lothingland IDD. If surface water discharges within the watershed catchment of the Board's IDD, this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing but where possible surface water infiltration should be utilised; and adjacent to a flow path and this must be considered in the site assessment. Site is affected by a Source Protection Zone 3 and developers will need to liaise with the Environment Agency to ensure that development / drainage does not adversely affect the water quality; however, Zone 3 is the lowest risk	however at the time of writing it is considered that the presence of the flowpath may be adequately addressed within the site layout and drainage strategy.		
QUESTION 59: Should any shortlisted / rejected sites be allocated?	792	Comment	Concerns in relation to lack of amenities and services, no capacity at schools, flooding and highway concerns.	These comments have been noted. The Village Cluster boundaries have been defined based on groups of villages that share a range of services and facilities, which new development could reasonably be expected to support. However, they have predominantly been defined on the basis of primary school catchment areas, which are considered to provide a consistent local point of reference for social sustainability. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care System (ICS)	164	No action or change required.

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				Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. The development of certain sites will require some local infrastructure upgrades, for example an extension of a footway to link the site to the village. The current consultation offers people the opportunity to indicate where there are specific requirements needed to enable the development of a particular site to happen. All of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.		
QUESTION 59: Should any shortlisted / rejected sites be allocated?	2253	Comment	NCC Ecology comments: SN0274 REVA or REVB No major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Agricultural field opposite road to application 2019/1013 (and south of 2020/0491 at the service station). Bounded on two sides by hedge (priority	NCC ecology comments noted.	163	Consultation will be required with Natural England (residential development >10 units) if allocated.

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			habitat). No other priority habitats identified (see MAGIC). Site within amber habitat zones for great crested newts (large pond adjacent to school), and SSSI IRZ will likely require consultation with Natural England (residential development >10 units) if allocated. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, and the landscape strategy for 2019/1013 and 2020/0491 should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 59: Should any shortlisted / rejected sites be allocated?	2020, 2180	Comment	Water management comments: Sites REV A and B are both located within Flood Zone 3 which would require a site specific Flood Risk Assessments to be submitted for at application stage for any proposed development. Both REV A and B; infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. REVA : The on-site flood risk forms a minor/moderate flow path in the 0.1% AEP event, contributing to a major flow path south of the site. Flood risk is concentrated to the eastern/southeastern site boundary with flow lines indicating water flow south off of the site. There is opportunity to mitigate the flood risk leading off of the site. A large area of the site is unaffected by flood risk and has potential to be	The content of the representations is noted and with reference to the presence of the surface water flow path and the requirement for geotechnical investigation. Further discussions with the LLFA have advised that for REVA access into this site could potentially be affected – access to the site should avoid the areas of flood risk. REVB would be the preferred site of the two shortlisted Gillingham sites as the site has only a very minor flood risk.	162	Council to review whether REV would be the more suitable location for development.

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			developed. REV B: Flooding on-site is very minor, concentrated to the southern boundary/road area. The site is immediately adjacent to another allocated site (Ref: SN0274REVA). Consideration of how each site may impact each other/off-site flood risk must be considered in the site assessment.			
QUESTION 59: Should any shortlisted / rejected sites be allocated?	607	Object	If access to the development could be gained from McDonalds roundabout the traffic/congestion problems surrounding The Street would be avoided. A buffer greenbelt could also be created between any homes potentially affected by the development and the new site. Gillingham school would need to be expanded to cope with the extra pupils and associated parent parking.	Whilst the respondent does not specify which site they are referring to, it is presumed reference is being made to shortlisted site SN0274 REVA or REVB and this being a more suitable site, if access could be achieved via the roundabout.	161	Council to review whether SN0274 REVA or REVB should be preferred.
QUESTION 59: Should any shortlisted / rejected sites be allocated?	1338	Comment	SN0274 REVA or REVB This site is on the edge of Gillingham village with potential better access, closer to the few amenities available and less impact on the already congested village roads.	The Council acknowledges the support for SN0274 REVA or REVB sites with potential preferred access, proximity to services and less impact on congestion.	160	Council to review all comments from consultation, in relation to SN0274 REVA or REVB and whether these sites should be allocated.
QUESTION 59: Should any shortlisted / rejected sites be allocated?	934	Support	It is requested that shortlisted sites SN0274 REV A and REV B should be allocated instead, and this should be in addition to the land to the south of GIL 1. The Flood Risk Assessment has shown that there is an area of land in Risk Zone 1 that	The Council acknowledge the request to allocate SN0274 REVA and B and as part of the review of sites post Regulation-18 will consider whether these sites should be allocated, as well as the best	159	The Council will review any additional shortlisted sites where necessary.

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			can accommodate the development. The Landscape Impact Assessment has demonstrated that the development of the land can take place without any 'material' harm to the landscape.	combination of sites for allocation within this cluster.		
QUESTION 59: Should any shortlisted / rejected sites be allocated?	1320	Support	Do not support development on the rejected sites.	Noted.	158	No action or change.
QUESTION 60: Should any shortlisted sites be rejected?	1238, 1246	Object	Shortlisted sites SN0274 REV A and REV B are located directly opposite preferred site SN0478 and should be rejected for the same flood risk and environmental concerns. However, it is noted that these sites could provide some benefits in terms of potential transport linkage to the existing service station to the north which could alleviate pressure on The Street through Gillingham. No such benefits would be provided through development of site SN0478	Comments relating to both on-site drainage and surface water, as well as wider drainage issues within the village have been noted. Consultation responses have been received the Lead Local Flood Authority (LLFA) who have advised that with appropriate mitigation measures in place development of this site would be achievable. Wider flooding events in December 2020 were experienced in a large number of localities and have been attributed to saturated catchment flooding due to prolonged rainfall however the comments received relating to the adequacy of the existing drainage network have been noted and will be explored further if appropriate. In addition, the Environmental Agency (EA) have confirmed that a Flood Risk Assessment will be required to support any future application.	169	Further discussion with water management consultees and to include suitable allocation policy wording regarding flood management if these sites are reclassified.
QUESTION 60: Should any	1079	Object	Ref. SN0274 - this site should be rejected on the grounds of flooding; the site here	Comments relating to both on-site drainage and surface water, as well as	168	Further discussion with water management

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shortlisted sites be rejected?			has already been waterlogged with run off collecting at this low point already.	wider drainage issues within the village have been noted. Consultation responses have been received the Lead Local Flood Authority (LLFA) who have advised that with appropriate mitigation measures in place development of this site would be achievable. Wider flooding events in December 2020 were experienced in a large number of localities and have been attributed to saturated catchment flooding due to prolonged rainfall however the comments received relating to the adequacy of the existing drainage network have been noted and will be explored further if appropriate. In addition, the Environmental Agency (EA) have confirmed that a Flood Risk Assessment will be required to support any future application.		consultees and to include suitable allocation policy wording regarding flood management as appropriate.
QUESTION 60: Should any shortlisted sites be rejected?	345	Object	SN0478 The current site is new and hasn't been given time to see the impact this will have on flooding, local environment etc. Residents of the new estate were informed that it would not be extended due to the risk of flooding and the site sitting on a flood plain so this would mean that have been lied to.	The site is partially located within Flood Zone 3 where full consideration will be required to flood risk on site. The site will be subject to a full Flood Risk Assessment (FRA), this will include any mitigation factors. In addition, the Council has commissioned a Level 2 Strategic Flood Risk Assessment (SFRA) which will provide an assessment of the areas at high risk as well as looking at the cumulative impacts of the sites across the Plan.	167	Further discussions required with the water management consultees in order to address flood risk concerns. Include the requirement of a FRA and any additional requirements set by the consultees within the allocation policy wording

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QUESTION 60: Should any shortlisted sites be rejected?	1728	Comment	SN0274 rev A and B Gillingham Both these should be rejected on similar grounds to SN 4078, but with greater impact. Reject other proposals in Gillingham as creeping suburbanisation with associated environmental implications.	The Council acknowledge the comments relating to the rejection of shortlisted site SN0247 (REVA and B) and rejection to all proposals in Gillingham. The Council acknowledge the fear in the urbanising of local areas. However, a key objective of the VCHAP is to distribute new development throughout the rural areas of the District, across the 48 clusters. In addition, each site has undergone a site assessment process where aspects such as landscape and townscape have been a key consideration, and as such development will seek to avoid harm on the local character.	166	No action or change required.
QUESTION 60: Should any shortlisted sites be rejected?	707	Comment	SN0437 - land in Geldeston should be rejected. A suburban appropriate development will destroy the historic character and rural community. Excessive traffic on rural roads will result in accidents, speeding is already a problem. The recently finished development has already caused severe traffic issues with traffic volume and speeding. Development will result in more people and vehicles creating pressure on the environment, wastewater management and surface flooding.	NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. Mitigation measures have been identified and would be incorporated into specific site allocation policy text. The site is located within a Flood Zone, where a full Flood Risk Assessment (FRA) will be required to support the development of the site; this will also include any mitigation measures. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, on the local ecology are also noted however these matters would be dealt	165	No action or change required.

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				with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies relating to the environment.		

Hales and Heckingham, Langley with Hardley, Carleton St Peter, Claxton, Raveningham and Sisland

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QUESTION 61: settlement Limit	1507	Object	Hales & Heckingham Parish Council does not support SN0308 allocation for housing at the current time due to the lack of amenities in the village and within a sustainable travel distance. The assessment form is incorrect in that the village no longer has a village hall. The only amenities within the village are an Indian restaurant, a small playing field, a mobility shop and the petrol station on the A146. Anecdotal evidence is that both primary schools in Loddon are full and having to make infrastructure adjustments to accommodate this year's intake of new pupils from the current number of new dwellings. If children were to walk to the schools, part of the footpath is along the side of the busy A146. All of the schools are over 2 miles from this site and the reality is this will increase the number of short car journeys. It is very difficult to get an appointment at the Chet Valley Medical Practice and the dentists are no longer accepting national health patients. The great majority of roads in the villages are single track which are not suitable to take the increased traffic associated with further development here. There are already problems on the narrow lanes for walkers and cyclists as the steep banks do not allow anywhere to get off the roadway	Hales has a basic range of basic services and the Council acknowledges the inaccuracy made with regards to the village shop now being closed. However, the Council also recognises that there are some inherent tensions linked to the relative accessibility of a range of higher order services and goods in several locations compared to other. However, the Plan aims to reflect the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages selection of employment opportunities etc. It is acknowledged that very few of the village clusters include a GP surgery, and are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity issue at the school for local children. The Council is also engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Education. This will ensure that infrastructure issues are identified and understood as part of the plan making process.	628	Review and update site assessment form - the assessment form is incorrect in that the village no longer has a village hall.

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			and there are limited unofficial passing places. The centre of the village lies in an area where there is no mobile signal and broadband is problematic for many houses. The countryside and views around the villages are greatly valued and the destruction of these by further encroachment of development without planning for the provision of local amenities is not supported by the Parish Council.	As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that given the location of the site and its existing relationship with the 2015 allocation, a suitable access could be achieved from the south through this site. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies.		
QUESTION 61: settlement Limit	1501	Object	Hales & Heckingham Parish Council do not agree with the changes proposed to the Settlement Limit. The JCS allocated 10 new houses - so far just under 70 dwellings built and 20 more approved. No investment has been made to improve village infrastructure. The amenities are extremely limited with no village hall. Further development without investment in the existing village infrastructure increases social problems.	No alterations are proposed to the existing settlement limits within this cluster. However, settlement boundaries will be amended to include any subsequent allocations, as a result of the Village Cluster Housing Plan. It is noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth	627	No action or change required.

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QUESTION 61: settlement Limit	1442	Object	The parish of Sisland should have either a small allocated site or a similarly appropriate settlement limit, in order for its community to benefit from the Village Clusters Plan and for the objectives of the Plan to be applied to this settlement.	The parish of Sisland is sparsely populated consisting of a few individual dwellings and therefore no alterations are proposed to the existing settlement limit. With regards to potential allocations within Sisland, none were presented to the Council for consideration and therefore the Council is unable to assess further land within the parish for suitable allocations.	626	No action or change required.
QUESTION 61: settlement Limit	355	Object	Access to the site is on a bend on the B1136. Despite a speed limit of 30mph through traffic regularly travels faster. There will be at least 55 more cars to add to the traffic through the village. There are no facilities in Hales except Masala Garden restaurant and the filling station. The nearest schools are in Loddon and they are already full. It is difficult to get medical appointments. Development would be detrimental to wildlife and the environment.	The representation made does not specify which site they are referring to, however the Council assumes that the comments are made in respect of SN0308, Land off Briar Lane, Hales. NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that given the location of the site and its existing relationship with the 2015 allocation, a suitable access could be achieved via this site to the south. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies. It is acknowledged that very few of the village clusters include a GP surgery, and	625	No action or change required.

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				are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity issue at the school for local children. The Council is also engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Education and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. It is acknowledged that development sites can be home to wildlife, and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures.		
QUESTION 62: Preferred Site - Part of SN0308, Land off Briar Lane, Hales	1473	Comment	Whilst not objecting to this site, it is noted that it would effectively form part of a large current housing development located in the largest village in this cluster (a village that has already undergone considerable residential expansion in recent years); it is posited that to truly achieve the stated aims of the Village Clusters Plan, particularly Objective 2, new housing opportunities should consist of deliverable & viable sites found across the cluster, and this site in Hales should therefore not preclude further	The Council noted the representation made in respect of SN0308, VCHAP Objective 2 and precluding other sites for consideration. The development of SN0308 has not precluded the allocation of other sites in this cluster. It is noted that 2 sites were promoted for consideration within the Hales Cluster, where both sites were subject to the same assessment. SN0308 was considered suitable whereas SN0530 was considered unsuitable (largely due	245	No action or change required.

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			consideration of other (smaller) sites across the range of settlements in this cluster.	to highways constraints and accessibility).		
QUESTION 62: Preferred Site - Part of SN0308, Land off Briar Lane, Hales	337, 340, 341	Comment	It has been requested that the development facilitates a village hall for the local community. Concerns with visibility, suggestion of a roundabout on Yarmouth Road to provide safe access. Concerns with capacity of existing infrastructure, privacy loss and overlooking and the damage to wildlife	The Council acknowledge the safety concerns regarding the access and the suitability of the Yarmouth Road. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that given the location of the site and its existing relationship with the 2015 allocation, a suitable access could be achieved via this site to the south. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements and amenity issues are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies. With regards to infrastructure, the Council is engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Highways and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.	244	A request for a village hall has been made – consider whether this would be reasonable and/or achievable

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				It is acknowledged that development sites can be home to wildlife, and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures. With regards to the request of a new village hall, this is something that would need to be investigated further to determine whether this is achievable.		
QUESTION 62: Preferred Site - Part of SN0308, Land off Briar Lane, Hales	1891	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	243	No action required

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			could be attached to any approval requiring its implementation.			
QUESTION 62: Preferred Site - Part of SN0308, Land off Briar Lane, Hales	1946, 2079	Comment	Water management comments: Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, the discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing but where possible surface water infiltration should be utilised The on-site flood risk is a moderate flow path in the 0.1% AEP event, dissecting the site south-north in the west of the site. Flow lines indicate this flood water flows north off of the site, contributing to a larger flow path west and north of the site. A large area of the site is unaffected by flood risk and has the potential to be developed.	The comments made in relation to water management are noted and the requirement for geotechnical investigation these issues will be explored further with the LLFA. The comments relating to the flood risk of this site are noted and the site assessment and technical comments will be reassessed to confirm the suitability of the site for allocation	242	Review the inclusion of the site based upon the identified flood risk.
QUESTION 62: Preferred Site - Part of SN0308, Land off Briar Lane, Hales	2254	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Agricultural field bounded on two sites bounded partly by hedges (priority habitat). No other priority habitats identified (see MAGIC). Site within green habitat zone for great crested newts, and	The NCC ecologist comments are noted.	241	No action required

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			in SSSI IRZ but residential development does trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 62: Preferred Site - Part of SN0308, Land off Briar Lane, Hales	2040	Comment	Whilst there are no designated heritage assets on the site, the former Hales Hospital (grade II listed) lies to the east of the site. Therefore, any development of this site has the potential to impact upon the setting (and significance) of this heritage asset. A Heritage Impact Assessment (HIA) of the site should be undertaken to assess the impact of the proposed development on the listed building and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement. Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.	The HE comments are noted; HIA required to inform whether the site is allocated, including any mitigation measures.	240	An HIA is required to inform the allocation of the site including any mitigation, enhancement and policy wording.
QUESTION 62: Preferred Site - Part of SN0308, Land off Briar Lane, Hales	49, 342	Object	Object to SN0308 due to poor access, the A146 is a busy road that is used as a rat run between Norwich and Lowestoft, limited services, infrastructure capacity concerns.	The Council acknowledge the safety concerns regarding the access and the suitability of the A146. As part of the site selection process, NCC Highways officers have provided technical advice relating	239	No action or change required.

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			Development will ruin the village of Hales and Heckingham and the lives of those residents who moved here for its tranquility and village and countryside feel. Wildlife concerns; agricultural field is home to hundreds of animals who will be homeless!	to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that given the location of the site and its existing relationship with the 2015 allocation, a suitable access could be achieved via this site to the south. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application and it would be necessary for all new development to adhere to existing Development Management policies. With regards to infrastructure, the Council is engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Highways and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. It is acknowledged that development sites can be home to wildlife and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures.		

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QUESTION 62: Preferred Site - Part of SN0308, Land off Briar Lane, Hales	338, 743	Support	Support for the allocation SN0308; good location for housing, no specific site constraints and is deliverable, good access, impact on the listed former Hales Hospital can be mitigated through appropriate design.	Support for SN0308 noted.	237	No action or change required.
QUESTION 63: Should any of the rejected sites be allocated?	1892	Comment	SN0530: Land west of Claxton Church Road, Claxton The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition could be attached to any approval requiring its implementation.	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	246	No action required

Hempnall, Topcroft Street, Morningthorpe, Fritton, Shelton and Hardwick

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QUESTION 65: Settlement Limit	1756	Comment	The notes state that no alterations are proposed to existing settlement limits. However if the 2 preferred sites identified in Hempnall were approved for housing the settlement limit would be enlarged to accommodate these sites and so this is misleading. We oppose new development outside the current settlement limit and oppose any changes to that boundary. Re. SN0220SL the PC is negotiating with Saffron Housing for this site to be used for social housing. However if progressed as a site for market housing the PC would oppose this because it contravenes our policy on the settlement limit.	As well as the sites being put forward to the Council, we have also been seeking views on the existing Settlement Limits themselves. Whilst no alterations are proposed to the existing settlement limits within this cluster, as part of the existing settlement review (reviewing existing permissions that may alter the settlement limit), new sites have been put forward through the Plan (allocations and/or settlement limit extension). If these site are successful then they will naturally be included with the settlement limit, The Council acknowledge the comments made with regards to negotiations with Saffron Housing for this site to be used for social housing and these will be further explored. However, the principle of residential development will also need to be considered as part of the site selection process.	629	Update required from Saffron Housing with regards to site being put forward for social housing; policy wording to reflect this if appropriate.
QUESTION 66: Preferred Site - SN0220SL, Land at Millfields	1757	Comment	We support provision of affordable social housing via Rural Exception Sites. The PC and Saffron Housing has plans to build affordable housing on this site. We are therefore surprised to see it being promoted as a preferred site in the VCHAP. If approved for market housing this would prevent its classification as an Exception Site and our affordable housing scheme will be lost. If it cannot be treated as a rural exception	The Council acknowledge the comments made with regards to negotiations with Saffron Housing for this site to be used for social housing and these will be further explored. The inclusion of smaller sites within Settlement Limit will enable windfall sites to be permitted, in accordance with the requirements of the National Planning Policy Framework.	630	Update required from Saffron Housing with regards to site being put forward for social housing; policy wording to reflect this if appropriate.

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			site for social housing, we would prefer that it be used for additional bungalows for elderly residents. The 'SL' classification should not mean even more houses are permitted on Greenfield sites. All new houses should contribute to targets.	In this instance, the 'SL' suffix has been used to denote sites below the 0.5ha threshold which is the minimum size site being sought for allocation through the VCHAP. However, due to the opportunities that this site presents it is also being considered as a possible allocation site.		
QUESTION 66: Preferred Site - SN0220SL, Land at Millfields	2255	Comment	NCC Ecologist comments: Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Agricultural field partly to the north by allotments. No priority habitats identified (see MAGIC). Site within amber habitat zone for great crested newts, and in SSSI IRZ but residential development does trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.	NCC Ecologist comments noted.	318	No action required
QUESTION 66: Preferred Site - SN0220SL, Land at Millfields	2041	Comment	Historic England comments: SN0220SL, Land at Millfields Whilst there are no designated heritage assets on the site, the disused windmill (grade II listed) lies to the east of the site. Therefore, any development of this site has the potential to impact upon the setting (and significance) of this heritage	The HE comments are noted; HIA required to inform whether the site is allocated, including any mitigation measures	317	Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.

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			asset. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed building and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement. Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.			
QUESTION 66: Preferred Site - SN0220SL, Land at Millfields	2001	Comment	Inaccuracy of the definition of this site within the 'Village Clusters' section of the 'Introduction and Background'. Here, the Settlement Limit Extension sites are defined as being "for sites smaller than 12 dwellings". On examination it is found that this site is not for fewer than 12 dwellings: SN0220SL Land at Millfields, Hempnall for up to 15 dwellings. It is stated this will now be an allocated site, yet is included in the SNVCHAP.	SN0220SL was initially submitted to the Council as a Settlement Limit extension given its 0.48ha site area. However, as part of the site assessment process it was then concluded that the site would be best utilised for a smaller allocation of up to 15 dwellings, given its very few identified constraints. Allocating the sites within the Plan ensures that enough land is available in appropriate locations to meet the growth targets, in accordance with the requirements of the GNLP. This includes, as appropriate, any onsite requirements developers will be expected to provide, for example greenspace and local infrastructure (roads, schools, and flood storage).	315	No action or change required,

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QUESTION 66: Preferred Site - SN0220SL, Land at Millfields	1947, 2071	Comment	Water management comments; Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. The site is also located within a Source Protection Zone 3.	The comments made in relation to water management are noted and the requirement for geotechnical investigation these issues will be explored further with the LLFA.	314	No action required
QUESTION 66: Preferred Site - SN0220SL, Land at Millfields	641	Comment	It is considered that any potential allocation should consider future housing needs and growth. Whilst we would not seek the policy wording to predetermine any future surrounding land as appropriate for development, equally no reference risks the design of an abrupt settlement edge that does not facilitate future growth.	Comments noted; The core aim of the VHCAP is to deliver a series of small allocations of up to 25 homes across the plan area. The site was initially submitted as a settlement limit, but has been considered suitable for a small allocation of up to 15 dwellings. At this stage, the site is not considered as a phased development for a larger scheme.	312	No action or change required.
QUESTION 66: Preferred Site - SN0220SL, Land at Millfields	553	Object	Object to Site SN0220SL - Land at Millfields site is at the edge of the village, has poor access and would result in a significant break out into the open countryside.	Objection to a SN0220SL, Land at Millfields noted. With regards to the site location, the site is located to the west of the village and would lend itself to a natural extension of existing development. With regards to access concerns, these have been discussed with Highways and any development of the site would be subject to Millfields (private road) being widened and other off-site highway upgrades.	311	Allocation wording to include Millfields (private road) being widened and other off-site highway upgrades.

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QUESTION 67: Preferred Site - SN1015, Land adjacent to the primary school, The Street	1758	Object	Hempnall Parish Council objects to the inclusion of this site as a preferred site in the South Norfolk Village Clusters Housing Allocations Preferred Sites Plan. Hempnall PC considers the amount of new housing currently projected for the village, resulting from the JCS site south of Bungay Road, the affordable housing scheme that the PC seeks to implement in conjunction with Saffron Housing at Millfields and from likely windfalls - totalling approximately 45-50 houses - is that the right amount for the village. We don't want any of the sites put forward by landowners for the inclusion in the GNLP to be allocated in the plan. We would also like our policy that all development be restricted to inside the current development boundary to be honored except in regard to the provision of a rural exception site for affordable housing. The addition of extra housing, via the introduction of the village cluster approach, is not wanted or needed in Hempnall.	Whilst these comments have been submitted in relation to preferred site SN1015 the Council considers that a number of the points raised relate to the principle of the Plan and its objectives and a detailed response is set out in Response ID 993. Site-specific reasons for the Parish Council's objection to this site have not been included here however the objection to the site has been noted.	878	No action required.
QUESTION 67: Preferred Site - SN1015, Land adjacent to the primary school, The Street	554	Object	Object to Site SN1015 - Land adjacent to the primary school, The Street would result in the loss of an important green space/gap in the street scene in Hempnall.	The Council acknowledge the objection and the concerns with a potential loss of an important green space/gap. As part of the site assessment process, the site has been identified as being relatively open and within close proximity to a PRoW. In order to maintain the character and some through views, the Council expects development to be lower density.	323	If allocated the policy will require layout and design of the scheme to be low density and take into account the open views.

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QUESTION 67: Preferred Site - SN1015, Land adjacent to the primary school, The Street	1948, 2132	Comment	Water management comments; Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Part of the on-site flood risk contributes to an adjacent flow path in the 0.1% AEP event. Flow lines indicate this flood water flows southwest off of the site, contributing to a larger flow path southwest and south of the site. There is some moderate ponding present in the 0.1% AEP event in the south of the site. We advise this must be considered in the site assessment. The site is adjacent to a flow path. This must be considered in the site assessment.	The comments made in relation to water management are noted, including the requirement for geotechnical investigation. With regards to the onside flow path, this has been discussed further with the LLFA; Significant concerns have been raised with achieving safe access and egress to this site due to a significant area of ponding on the road frontage of this site as well as the topography of the land. A safe access/egress to the adjacent primary school is provided by the pedestrian access further to the east. This site is an old quarry site (resulting in the unusual topography of the site) and whilst the on-site engineering could address the ponding there is also a significant flowpath adjacent to the north of the site. A review of the wider area shows a number of areas of ponding which suggests poor infiltration locally (possibly linked to the former quarrying activity removing local sand and gravel deposits). Management and mitigation would be key to the development of the site but it was noted as being particularly sensitive.	322	The comments relating to the flood risk of this site are noted and the inclusion of this site within the VCHAP will need to be reassessed.
QUESTION 67: Preferred Site - SN1015, Land adjacent to the primary school, The Street	2256	Comment	NCC Ecologist : Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Site comprises part of an agricultural field and a grassland area adjacent to the school. Hedges are priority habitat so	NCC Ecologist comments noted.	321	Consideration to be given to PROW Hempnall/H18/3 that passes through site.

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			losses should be minimised (use existing access), and as a last resort compensated for. No priority habitats identified (see MAGIC). Site within green/amber habitat zones for great crested newts, and in SSSI IRZ but residential development does not trigger consultation with Natural England. PROW Hempnall/H18/3 passes through site.			
QUESTION 67: Preferred Site - SN1015, Land adjacent to the primary school, The Street	2042	Comment	Historic England comments Site: SN1015, Land adjacent to the primary school, The Street The site is located almost entirely within the Hempnall Conservation Area. It lies opposite two grade II listed buildings, Lime Tree Cottage, and Pevensey House and close to a third grade II listed building, the Hollies. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement. Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.	The HE comments are noted; HIA required to inform whether the site is allocated, including any mitigation measures.	320	Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.

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QUESTION 67: Preferred Site - SN1015, Land adjacent to the primary school, The Street	642	Support	The allocation of this site for residential development is supported and these representations seek to highlight the benefits of such an allocation, whilst addressing points raised in the supporting Site Assessment prepared by the Council.	Support for SN1015 noted.	319	No action or change required.
QUESTION 68: Should any rejected sites be allocated?	1256	Object	Existing building is also on site and approval for additional building already in form of outbuildings, in regards Gardeners Cottage, there is already approval for building in front of Gardeners Cottage and also house has been already built close to the boundary on the other side. There is limited opportunity for self builders and infill plots in the area, especially for a eco home on character with keeping with the village, no need to consider the schools as not wanting to go back to school. In recent years council have let building outside village area. So object to rejection.	Whilst submitted in response to Question 68 the Council considers that this comment relates to the existing settlement limit at Topcroft Street and is therefore most relevant to Question 65. Although this plot lies outside the existing settlement limit the existing defined limits about the site to both the north and the south and also on the west side of The Street. In recognition of this the inclusion of this plot would appear to be a reasonable option for consideration; however, the Council has noted a number of constraints which may impact on the suitability of this site for inclusion within the settlement limit. Gardeners Cottage is a Grade II listed building and the associated plot may be considered to be the curtilage of the listed building. The extent of this would need to be confirmed, as development within this plot could impact on the significance of this listed building and its setting. There are also a number of TPOs in place affecting trees both within the plot and along the frontage of the site which would likely impact on the developable area. The Council notes that both the listed building and its spacious plot and the associated mature	632	No action required

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				trees form an important part of the existing streetscene, contributing to the verdant character of the street. Reference has been made in this submission to the recent planning history of the site. These applications relate to outbuildings which would be associated with Gardeners Cottage (2017/0094 and 2017/0987). These outbuildings were assessed for their impact on both the protected trees and the listed building and were considered to be acceptable. However, these outbuildings clearly have a subordinate relationship to the main dwelling and do not result in the subdivision of the plot therefore they are not considered to set a precedent for new residential development in this location. In determining whether or not the existing settlement limit could be extended around this plot the Council must have regard to all of these considerations and balance the opportunity for providing an infill plot against the impact that new development may have in this sensitive location. As such, at present the Council does not consider the site suitable for inclusion in the settlement limit. The submitted GNLP includes a Policy for small-scale residential sites outside, but adjacent to, settlement limits; should that policy remain in the adopted plan, an application for this plot would		

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				be able to consider the impact of a specific scheme in greater detail. However, there is no guarantee that an application made under any future Policy would be successful.		
QUESTION 68: Should any rejected sites be allocated?	643	Comment	The Council should consider the development of SN0220SL and SN1018 in combination. The site assessment for SN1018 does not identify any red constraints, although the local highways authority does raise concern over the existing access to Field Lane. It is noted that the Council's own site assessment identifies there are 'potential access constraints but these could be overcome through development'. When considering the two sites in combination this not only provides the delivery of much needed housing but is not considered disproportionate growth for a settlement of this nature and benefiting from a range of services including a primary school, convenience store, post office, garage, butcher, village hall and recreation ground. Whilst the site assessment does state there could be detrimental impacts on the river valley and character of the settlement, an immediate change in site character for a development of this scale is to be expected and somewhat inevitable. Some degree of change is to be supported as a way to sustain and evolve existing villages to meet the needs of future generations and needn't be considered detrimental. Whilst the site assessment says such impacts could be mitigated through a reduced site area, it is suggested that an alternative approach is the use of	The Council acknowledges these comments, as well as the potential merits of a combined site. However, as noted in the site assessments there are constraints that would need to be carefully considered as part of any reassessment of these sites as a combined allocation.	631	Council to review the combination of SN0220SL (preferred) and SN1018 (rejected) in combination.

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			considerate design. An allocation needn't develop the entirety of the site for a dense housing scheme. Instead it is proposed that the two sites in combination would facilitate the opportunity for a softer landscaped edge to the west and south and respect the wider context into which the site falls.			
QUESTION 68: Should any rejected sites be allocated?	1759	Comment	Hempnall Parish Council approves the rejection of all the other sites promoted for development i.e. SN0147, SN0178SL, SN0580, SN1016, SN1017, SN1018, SN2029SL, SN2046, SN2081, SN2146SL, SN4012, SN4083. In relation to the sites in this list that are located in Hempnall we thank the Place Shaping Team for taking on board the concerns we have expressed in previous consultations and for rejecting these sites for development .	Comments noted.	326	No change or action required.
QUESTION 68: Should any rejected sites be allocated?	724	Support	South Norfolk Village Clusters Housing Allocations Plan - Regulation 18 Consultation Councillors discussed and agreed unanimously with SNC's decision that sites SN2029SL (site 1) (assessed with SN2146) (over 3 sites) 0.6ha West of Topcroft Street is unreasonable for a SL Extension.	The Council acknowledge the objection to sites SN2029SL and SN2146 and continues to maintain its own objection to these sites.	325	No action or change required.
QUESTION 68: Should any rejected sites be allocated?	551	Support	Representation does not agree with the rejection of SN2081; site is located in a sustainable location with no physical or environmental constraints. The development can address concerns raised in the initial site assessment with regard to	The Council acknowledges the representation made in support of SN2081, including the proposal to reduce the site area to 0.8ha for approximately 15-20 dwellings. However, the Highways Authority have	324	No action or change.

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			scale, access and loss of the hedgerow and thus this site should be allocated for housing in the South Norfolk VCHAP. The site would form a natural extension to the existing settlement boundary and provide infill development between residential properties. The site has strong potential for housing development and would relate better to the village/village envelope than sites SN1015 and SN02220SL.	previously reviewed the site (including the possibility of a reduced scheme) and hold strong objections to this site. They have concerned with the suitability of Field Lane, including the high banks/hedging and no footway. Whilst the representation makes reference to the removal of the hedgerow to provide access, there is no further evidence to suggest that this would overcome the concerns of the highways, nor would this be supported by landscape officers.		

Heywood

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 70: Settlement Limit	1949	Comment	Water management comments: Part of the Parish is located within the Waveney, Lower Yare and Lothingland IDD. The Board's byelaws apply to any new developments within the IDD.	At this stage, no sites have been put forward for consideration within Heywood. However, the comments from the water management team are noted.	404	No action or change required.

Keswick & Intwood

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 72: Should any of the rejected sites be allocated?	1950	Comment	Water management comments: Part of the Parish is located within the Norfolk Rivers IDD. The Board's byelaws apply to any new developments within the IDD.	Water management comments noted.	633	No action or change required.

Ketteringham

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 74: Should any rejected sites be allocated?	1951	Comment	The Parish is outside the IDD boundary and within the Norfolk Rivers watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, it is requested that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).	Note the comments relating to surface water discharges. At this stage, there are no sites preferred within Ketteringham.	28	No action or change required.

Kirby Cane and Ellingham

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 75: Settlement Limit	1060	Comment	Existing roads within the villages are daily reaching their safe limits due to on street parking and lack of adequate footpaths. A considerable number of older properties do not have facilities for parking on their own land.	As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In general, concerns about the impact of alterations to the existing road, as well as the increased traffic movements, parking provision, are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies.	247	No action or change required.
QUESTION 76: Preferred Site - SN0305, Land South of Mill Road, Ellingham	944, 1064	Comment	Concerns raised in relation to highway safety around the School and Mill Road. Comments made in relating to affordable housing provision on site.	The Council acknowledge the safety concerns raised regarding the access and the suitability of Mill and Church Road. As part of the site selection process, NCC Highway officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highway officers consider that the site is suitable for development, subject to achieving satisfactory visibility, including a crossing point. It has also been noted that improvements at Mill Rd junction with Church Rd may be required. With regards to housing mix, the Council will seek to provide new housing development to meet housing needs (using the most up to date Strategic Housing Market Assessment (SHMA)).	265	Policy wording to include highway improvements/requirements in accordance with NCC highway standards.

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				This will ensure that allocated sites provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of their life cycle e.g. first-time buyers, affordable housing, upsizing/downsizing etc.		
QUESTION 76: Preferred Site - SN0305, Land South of Mill Road, Ellingham	1952, 2076	Comment	Comments relating to water management issues: Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, this discharge should be facilitated in line with the non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. The site is adjacent to a flow path.	Comments noted. The Council has since sought further advice from the LLFA with regards to the flowpath to the north (point of access) of the site, where the LLFA have raised no major concern. However, they have advised that consideration will need to be given to the access into the site – e.g., even minor alterations to the kerb heights could alter the existing flowpath and result in on-site flooding.	263	Supporting text/ policy to make reference to discussions with the LLFA about the flowpath along the road frontage
QUESTION 76: Preferred Site - SN0305, Land South of Mill Road, Ellingham	1823	Comment	Comments from Broads Authority: Ellingham is near to the Broads. The site would extend the edge of the settlement towards the BA area to approximately 400m from BA boundary. Visual receptors: Footpath leading from centre of village in a south-westerly direction connects to Lane almost on BA boundary. Site may be visible to users of this path. In addition, this National Cycle Route 1(NCR1) follows Geldeston Road to the south and Church Road west of the site	The Council acknowledge the comments from the Broads Authority (BA); noted that the site is located within 400m from the BA boundary and consideration is required to the impacts of this.	262	Allocation policy to include: Development of the site needs to include adequate screening to protect character. Reference to the proximity and sensitivity of the

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			- 200m at closest point. Due to a lack of screening vegetation the site is clearly visible from the road. There is some intervening vegetation between the site and the BA area but fields to south have little or no vegetation along boundaries. The immediate area is quite flat and open. The site is unlikely to be visible from River Waveney although it should be borne in mind that water-based recreation is popular in this character area, due to the existence of Waveney canoe access agreements which permit canoeing upstream of Ellingham Sluice to Diss. The valley here is fairly narrow and the southern side rises relatively high so there may be distant views of the site from the Shipmeadow/Mettingham area. When writing the policy, please add: - o development of the site needs to include adequate screening - o reference to the proximity and sensitivity of the Broads and NCR1 in the allocation policy.			Broads and NCR1 in the allocation policy.
QUESTION 76: Preferred Site - SN0305, Land South of Mill Road, Ellingham	2257	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Site comprises part of an agricultural field bounded on three sides by hedges which are priority habitat so losses should be minimised (use existing access?), and as a	Note the comments of the NCC ecologist. No major ecology constraints identified.	261	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			last resort compensated for. No priority habitats identified (see MAGIC). Site within green habitat zones for great crested newts, and in SSSI IRZ but residential development does not trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 76: Preferred Site - SN0305, Land South of Mill Road, Ellingham	662	Comment	Traffic from this site on exiting the village would have to negotiate a narrow, blind bend, where the road is very prone to flooding and large vehicles are required to mount the pavement to pass. The present new homes would lose their open aspect and view across fields and The Island could eventually be engulfed.	The Council acknowledge the concerns raised with regards to the suitability of Mill Road for additional traffic. As part of the site assessment process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority who have raised no major concerns with flooding. However, they have advised that consideration will need to be given to the access into the site in relation to the existing flow path along Mill Road. For example, minor alterations to the kerb heights for viability etc could alter the existing flowpath and result in on-site flooding. Access to this site will need to be considered in the design of the drainage	251	No action required

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QUESTION 76: Preferred Site - SN0305, Land South of Mill Road, Ellingham	589, 665	Object	Development of the site could cause some major issues along Mill Road; part of the road is narrow and dangerous, of poor condition, located alongside the entrance to the play area which is partly obstructed by trees and shrubs causing visual obstruction. With the primary school also being in close proximity, this creates a dangerous hot spot. This part of the road is also prone to serious flooding.	The Council acknowledge the safety concerns regarding the access along Mill Road. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, the Highway officers have advised that development would be subject to creating a satisfactory access with sufficient visibility improvement at Mill Rd junction with Church Rd may be required. In addition, the Highways Authority have also requested the provision of a 2m footway at the site frontage to connect existing pathway and crossing points. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority who have advised that with appropriate mitigation measures in place development of this site would be achievable. Wider flooding events in December 2020 were experienced in a large number of localities and have been attributed to saturated catchment flooding due to prolonged rainfall however the comments received relating to the adequacy of the existing drainage network have been noted and will be explored further if appropriate.	250	Ensure that safe access can be achieved - further discussion with the NCC Highways to confirm allocation policy wording.
QUESTION 76: Preferred Site - SN0305, Land	1508	Support	Support of the allocation of SN0305; the site is well related to the existing settlement, providing a logical and	The support for site SN0305 is noted. The representation makes reference to a 25 dwelling scheme on a larger piece of	249	Review revised boundary for the

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South of Mill Road, Ellingham			sustainable extension to the village. The representation includes information regarding the gas pipeline (from Cadent) and also includes additional land to the preferred site, to allow for a larger scheme. It has been advised that the site could be delivered as soon as possible within the Plan period; confirmed that a site of 25 dwellings with current policy level affordable housing would be well received by the local development market.	land (including land to the west of SN0305), whereas the site is currently preferred for up to 12 dwellings due to site constraints. The representation suggests that after exclusion of the gas pipeline and easement, the area of unconstrained land as originally promoted still equates to approximately 1.1 hectares, which could accommodate up to 25 dwellings.		inclusion of up to 25 dwellings.
QUESTION 76: Preferred Site - SN0305, Land South of Mill Road, Ellingham	275, 653	Support	Support for site; close to previous new properties, close to school, it wouldn't restrict or impact on the local village for building purposes. Some concerns with school capacity. I understand the need for new housing but it's a shame it has to be in Ellingham/Kirby Cane.	Support for SN0305 noted.	248	No action or change required.
QUESTION 77: Preferred Site - SN0348, Land to the South of Old Yarmouth Road, Kirby Row, Kirby Cane	395, 437, 654, 667, 797, 1372	Object	Issues raised relating to poor access onto Old Yarmouth Road and the blind junction with Church Road. Concerns with the detrimental effect on the bungalows on Yarmouth Road with regards to losing open view. Concerns also raised with existing flood issues on site, presence of barns own on field and historical interest, Roman artefacts have been found there.	The Council acknowledge the safety concerns regarding the access and the suitability of Old Yarmouth Road. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that development of the site is broadly acceptable in highways terms where the main concern would be visibility and the speed of traffic exiting	270	Subject to further discussions around site viability (if site area is reduced to avoid flood risk) then policy wording will need to include highway mitigation measures.

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				the bypass from the north. However, it has been noted that there appears to be scope to realign the carriageways within the existing highways. Comments about the environmental impact have also been noted, however all development will be required to deliver net-gain on site and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site, such as Barn owls. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. Whilst the historical impact concerns are noted by the Council. Historic England have been consulted and not raised any concerns. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, including those proposed at Kirby Kane. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority (LLFA) who have raised their concerns with the		

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				presence of a flowpath on site which may limit the developable area of land.		
QUESTION 77: Preferred Site - SN0348, Land to the South of Old Yarmouth Road, Kirby Row, Kirby Cane	1953, 2084	Comment	Comments relating to water management: Partly within the Waveney, Lower Yare and Lothingland IDD. Several riparian watercourses are located to the south of the proposed site which feeds into a Board Adopted Watercourse within the Waveney, Lower Yare and Lothingland IDD. Byelaw 3 applies to any proposed discharge of surface water from the proposed site. All other Board Byelaws will also apply to this development. Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. The eastern side of the site partially intersects the Geldeston 1 IDB. Identified as an 'Amber' site by the LLFA: Part of the on-site flood risk forms a moderate flow path in the 0.1% AEP event, dissecting the site west-south in the west, southwest and centre of the site. Flow lines indicate this flood water flows south off of the site, contributing to a larger flow path south of the site. The on-site flow path forms a curve shape. We advise this must be considered in the site assessment. A large area of the site is unaffected by	The comments made in relation to water management are noted. With regards to the concerns of the LLFA and the amber rating, further discussions have been had with the LLFA to further determine the suitability of the site. The LLFA have advised their preference to be total avoidance of the flowpath which would significantly reduce the developable area. It is also noted that a number of drainage ditches immediately to the south of the site, as well as the area being historical marshland. The LLFA have suggested that substantial evidence would be required to demonstrate that the site was suitable for development.	267	Review the inclusion of the site based upon the identified flood risk.

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			flood risk and has the potential to be developed.			
QUESTION 77: Preferred Site - SN0348, Land to the South of Old Yarmouth Road, Kirby Row, Kirby Cane	2258	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Site comprises part of an agricultural field. No priority habitats identified (see MAGIC) but deciduous woodland to north on opposite side of road. Site within green (edge of amber) habitat zones for great crested newts, and in SSSI IRZ but residential development does not trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain	NCC Ecologist comments noted.	266	No action required
QUESTION 77: Preferred Site - SN0348, Land to the South of Old Yarmouth Road, Kirby Row, Kirby Cane	1417	Support	From a traffic point of view if we are to have additional housing in the village it would make sense not to have it in the middle of the village. Also this site affords easy access to the A143.	Supportive comments noted - well located and site provides easy access to A143	264	No action or change required.
QUESTION 78: Preferred Site - SN3018, Florence Way, Ellingham	660	Comment	SN03018: Florence Way, Ellingham. The way to the village, Mill Lane, has no footway. The junction with Mill Road is hazardous if on foot due to cars turning into Mill Lane not being able to see pedestrians, who have to leap onto the	Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. It has previously been identified that there are access and	277	Confirmation of 3rd party land to determine highway improvements.

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			garden of the bungalow on the corner of Mill Close.	highway constraints with Mill Lane and Florence Way. These issues will need to be resolved prior to development of the site; this will include confirmation of 3rd party land.		
QUESTION 78: Preferred Site - SN3018, Florence Way, Ellingham	276, 655, 1062	Object	Not suitable due to existing drainage problems. Traffic/highways impact on Mill Lane and Florence Way - Development here has been previously refused due to road inadequacy. No adequate footpath, concerns with 3rd party land ownership. School is at capacity Overdevelopment of site; area is small for 12 houses TPO in place where path and road is to be widened.	Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. It has previously been identified that there are access and highway constraints with Mill Lane and Florence Way. These issues will need to be resolved prior to development. The concerns raised regarding the capacity of the school, GPs and other resources and facilities are acknowledged. However, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. Some services like shops and pubs may benefit from additional customers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making	276	Confirm 3rd party land ownership in order to determine highway upgrades. Further discussion with NCC highways to confirm policy wording.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
				process. All of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth. It is also acknowledged that development in some cases can involve the removal of trees and hedgerows (whilst not encouraged), where it will be necessary for any planning application on the site to be accompanied by an appropriate assessment, such as an arboricultural impact assessment, that would include an assessment of the site as well as appropriate and proportionate mitigation measures. With regards to the proposed number of dwellings, this is considered to be sustainable and development of this site would represent an efficient use of land, in accordance with the paragraph 124 of the NPPF. The scale of development proposed is in accordance with the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development.		
QUESTION 78: Preferred Site - SN3018, Florence Way, Ellingham	946	Comment	Councillors would support the development of SN3018, subject to road access arrangements being resolved, including immediate access and the corner of Mill Lane and Mill Road.	The support for the site is noted, subject to resolving access and road suitability concerns in the area.	275	Developer to confirm the status of Florence Way as it appears to be not adopted.

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			Reason for support is that there is an existing small development adjacent to this site, and it is more contiguous with the existing development of the village, although it is still outside the Settlement Limit. If site does go forward for development, councillors believe there should be a provision for affordable housing, including a requirement for access for local people.	Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. It has been identified that there are constraints with Mill Lane and Florence Way, of which will need to be resolved prior to development. With regards to the provision of affordable housing on site, the Council will seek to ensure that development meets the affordable housing and housing mix requirements of the most up to date SHMA. The Council will also only consider allocating sites that are capable of delivering the policy standard affordable housing requirements.		
QUESTION 78: Preferred Site - SN3018, Florence Way, Ellingham	1954, 2141	Comment	Water management comments: Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, then this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. The site is also located within Source Protection Zone 3.	The comments made in relation to water management are noted, including the requirement for geotechnical investigation work.	274	Background policy text could highlight Source Protection Zone 3 on the site but no requirements in terms of policy text as this would be covered by existing policies.
QUESTION 78: Preferred Site -	2259	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity	NCC ecology comments noted.	273	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
SN3018, Florence Way, Ellingham			enhancement in accordance with policy required. Field used /formerly used for grazing horses. PROW to site (Ellingham FP2 and FP3). other than hedges, no priority habitats identified (see MAGIC). Site within green habitat zone for great crested newts, and in SSSI IRZ but residential development does not trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 78: Preferred Site - SN3018, Florence Way, Ellingham	977	Support	The promoter of Preferred Site SN3018 - Florence Way, Ellingham continues to support its allocation. Confirmed that the site is available and developable. There are no known drainage constraints (contrary to another representation made). Consultation with NCC Highways has established requisite on and off-site work; the promoter confirms that survey work has been completed, and that all such work can be undertaken/secured.	Support of SN3018 noted.	272	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 78: Preferred Site - SN3018, Florence Way, Ellingham	669	Support	Of all the preferred sites SN3018 seems to have the least impact on the present village layout as would the two rejected sites SN0304 and SN0303SL. It has also been noted there is no longer a pre-school at the village hall and also the present school is running to capacity so any development is sure to make a significant impact on this.	Supports noted for SN3018. Comments related to pre-school and School also noted.	271	No action or change required.
QUESTION 79: Should any rejected sites be allocated?	1505	Comment	Whilst SN0303SL, SN0304 & SN0306 have been rejected, we note the Parish Council's support for development on these sites. It is confirmed that these sites remain available and deliverable within the Plan period, in addition to those already identified as preferred. Our client has previously made submissions that demonstrated the sites were suitable and achievable. We continue to support these previous submissions. In particular, we wish to re-provide the transport related evidence that demonstrates safe access is achievable from Mill Lane to sites SN0303SL & SN0304. Accordingly, our client considers these sites could be considered for some further development.	Comments are noted. However, the representation made in respect of SN0303SL & SN0304 do not change the opinion of the Council. Whilst the representation makes reference to overcoming the highways concerns as part of the summited technical note, the Council note that this was produced in 2013 and there is no further evidence to support this. In addition, these sites also provide attractive rural settings, within the River Valley. Overall, the Council consider these sites to be unsuitable for development.	284	No action or change required.
QUESTION 79: Should any rejected sites be allocated?	1410, 1635, 1665	Comment	Supports site SN0344 -The site assessment confirms that the site is well connected to local services and facilities and is in flood	Comments noted. However, the representation made in respect of SN0344 does not change the opinion of the Council. Whilst the	283	No action or change required.

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			zone1. It therefore performs well against a number of criteria.	representation makes reference to overcoming the highways and landscape concerns, there is no further evidence to support this. Overall, the Council consider this site to be unsuitable for development.		
QUESTION 79: Should any rejected sites be allocated?	949	Comment	SN0303SL & SN0304 Either could take traffic away from busy main village, provided appropriate traffic improvements for Mill Lane/Mill Road junction/corner - councillors couldn't understand why these sites rejected when Florence Way site preferred. SN0306 would support in principle, on existing building line, could make sensible extension to existing nearby development. Any successful site must have provision for affordable local housing SN0019SL (Cllr M Skipper declared interest, took no part in discussion) could see no reason why this site rejected as already has a large garage in regular use so proposed single dwelling would not add traffic to the village.	These comments are noted and whilst the Council welcomes the positive responses to these sites, it does not consider that these sites should be included in the VCHAP for the reasons previously set out in the site assessment forms (including identified highways constraints and landscape concerns).	281	No action or change required.
QUESTION 79: Should any rejected sites be allocated?	878	Comment	Object to "SN4002SL" being put forward as a development site. I cannot understand from an ecological viewpoint how a veteran woodland covered by a TPO could be allowed to be destroyed. There are various species of trees not to mention the wildlife dependant on them. From a modern standpoint, the woodland offers a buffer for noise pollution and also	The Council confirms that SN4002SL is rejected, as shown in the Regulation 18 consultation material.	280	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			between the bungalows and Ellingham house.			
QUESTION 79: Should any rejected sites be allocated?	661	Comment	Sites SN0304 and 0303SL would be preferable, especially if houses continued the present building line. Although the same highway issues apply. But traffic would not have to negotiate the narrow Florence Way, where children play.	Comments noted. However, the view of the Council is to still reject these sites due to unresolvable highways/access issues and landscape concerns.	279	No action required.

Little Melton and Great Melton

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 80: Settlement Limit	1409	Object	In 2014, South Norfolk Council published its local plan suggesting that 10 to 20 houses should be built in Little Melton over the following 10 years, however 110 houses have/will be built instead of the 20 max and local amenities and services are not there to support further development. SN4052 is inside the Southern Bypass Landscape Protection Zone, which should be conserved, not destroyed. Approval could set a precedent for further damage to the green infrastructure and biodiversity along the A47 contravening the priorities set in the Countryside Stewardship statement of priorities for South Norfolk and High Suffolk Claylands (NCA083).	The numbers proposed for the site are considered to be sustainable and development of this site would represent an efficient use of land. The scale of development proposed in Little Melton is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. With regards to existing services, many of the individual allocations proposed within the Village Cluster Housing Allocations Plan are of a relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care System (ICS) and Norfolk County Council in its role as Education Authority. Technical advice has been sought from the Council Landscape officer relating to the Southern Bypass Landscape Protection Zone, and whilst it is acknowledged that the site lies within this Landscape Protection Zone, current policy has its own requirement to retain openness and as such, any proposal will be assessed against this.	437	Allocation policy wording to include landscape mitigation measures.
QUESTION 80: Settlement Limit	1250, 1294	Object	The Settlement Limit for Little Melton should not be extended to accommodate	The Council acknowledges the comments from the Parish Council.	436	No action or change required.

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			any future planning applications either for the Village Cluster Local Plan or any individual developments. It has been a consistent approach by the Parish Council over recent years to object to planning applications outside of the current settlement limit. Approval of the 2 preferred & 2 shortlisted sites would go against this trend and would be in danger of setting a precedent for future larger development applications to be granted. It would result in over development of the village.	Locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services. The provision of several relatively small allocation sites as required by the National Planning Policy Framework means this approach also has the benefit of supporting small-scale builders, providing choice for the market and helping to ensure the delivery of housing in popular village locations. Smaller alterations to existing Settlement Limits reflect changes that have occurred since the last review took place, as well as providing an opportunity for windfall development to take place in accordance with the requirements of the NPPF.		
QUESTION 80: Settlement Limit	16, 59, 368, 383, 396, 405, 467, 696, 1207, 1430	Object	No changes should be made to the existing settlement. Concerns that Little Melton is already over developed, where there is already not enough GP surgeries, dental surgeries or schools and supporting facilities to support the area. In addition, the current shop is unlikely to be open for much longer. Several concerns with highway safety concerns; narrow roads, additional traffic through the village, limited footpaths. Existing issues with flooding along all roads Concerns with the impact on the	Concerns noted with regards to highway safety, local infrastructure pressures, existing flooding issues and the environmental impacts that development may cause.	37	Discussions with NCC Education to review school capacity and implications of housing growth for facilities, plus a review of NCC Highways recommendations for inclusion in policy allocation text.

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			environment i.e. Destruction of wildlife and hedgerows			
QUESTION 80: Settlement Limit	1123	Comment	Please note that 30 houses have been built at the 2015/1697 site, not 27 as stated. Several recent PAs have been turned down as being outside the Settlement Boundary and that has led to debate about the role of the Settlement Boundary. The PC would have preferred there to have been a consultation with parishioners before this current plan was issued.	Comments noted with regards to the total units built out at 2015/1697. This public consultation (under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.) has provided an opportunity for members of the public and stakeholder bodies to provide views on the sites that had been promoted to us, the assessments undertaken so far, our suggestions for overarching policies that would apply to the allocated sites and the supporting evidence that helped us to prepare the emerging plan. During this process we also took the opportunity to review the existing development boundaries (or 'settlement limits') throughout the district and invited comments on these proposed changes. The council is now reviewing the plan in light of the representations received. Once this process is complete the council will prepare the final, proposed submission (or Regulation 19) version of the plan.	36	Update and correct information relating to 2015/1697.
QUESTION 81: Preferred Site - SN1046REV, Glenhaven, Great Melton Road, Little Melton	2260	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required.	NCC Ecologist comments noted.	439	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			Site comprises an area of rough grassland bounded on all sides by hedges. Hedges are priority habitat so losses should be minimised (use existing access), and as a last resort compensated for. No priority habitats identified (see MAGIC). Site within amber habitat zones for great crested newts, and in SSSI IRZ but residential development does not trigger consultation with Natural England.			
QUESTION 81: Preferred Site - SN1046REV, Glenhaven, Great Melton Road, Little Melton	722	Object	This site would cause loss of wildlife area. Increase the surface water flooding in the immediate area There will be increased traffic to a narrow road that local population uses as a walking route.	It is acknowledged that development sites can be home to wildlife, and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures. In addition, all development will be required to consider biodiversity net-gain in their proposals. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority who have advised that with appropriate mitigation measures in place development of this site would be achievable. In addition it is considered that on-site drainage solutions can often help to address existing surface water issues and as such it is considered that this issue can be adequately addressed during the planning application stage. With regards to highways safety, the Council has previously met with the Highway Authority, who have raised	438	No action or change required.

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				some concerns whether a suitable access could be achieved. However, given the proposal is for a settlement limit extension, it is considered acceptable that the highways matters are addressed and mitigated through any planning application.		
QUESTION 81: Preferred Site - SN1046REV, Glenhaven, Great Melton Road, Little Melton	44, 1069, 1209, 1254, 1297	Object	Query over why the rear gardens of some neighbouring properties to the south of the site have been included within the 'settlement limit' extension'. Concerns that this land will be Compulsory Purchased.	The site adjoins the existing Settlement Limit (SL) in Little Melton where it has been considered appropriate to include this additional land within the SL, as a SL extension; this area of land includes Glenhaven, plus the northern ends of the three adjoining gardens. Through inclusion of this land within the SL, it will give this land the same status as the surrounding land, including the remainder of the curtilage of those three properties. If the land is included in the Settlement Limit that would mean that any future planning applications would be treated as being part of the settlement of Little Melton, rather than being treated as part of the open countryside. It would be up to the owner of any part of that land to submit a planning application, if they wished to. It is important to note there is no intention for the Council to actively promote development on the land, other than to bring the consideration of any future planning applications on that land in line with the surrounding land and properties (i.e. treating it as part of the settlement of Little Melton, rather	64	No action or change.

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				than the open countryside). There is also no intention to compulsorily purchase any of the land to facilitate development.		
QUESTION 81: Preferred Site - SN1046REV, Glenhaven, Great Melton Road, Little Melton	17, 46, 58, 365, 369, 384, 397, 406, 672, 849, 1151, 1173, 1248, 1432, 1622, 1641, 1643, 1645, 1656, 1688, 1692, 1695, 1700, 1708	Object	Issues relating to the over development of Little Melton, with the fear that the village will have a city feel and lose its village character. The housing being built is of poor quality housing be built in Little Melton. Concerns with the site's boundary including rear gardens of neighbouring properties. Concerns with proposed access off Great Melton Road which is a narrow lane with no footpath. The mini roundabout at the junction of GM Rd, School Lane, Mill Road and Burnthouse Lane is very dangerous with limited visibility. Increase of traffic by large developments surrounding the village. Great Melton Road is popular with locals for walking, but is becoming too dangerous for pedestrians. Limited bus services, lack of cycle lanes and routes. Amenities and facilities are already at capacity i.e. schools and surgery. The only shop is about to close due to owners retiring. Environmental concerns; loss of more open (green) space, Destruction of wildlife	The concerns about the inclusion of this area of land within the existing Settlement Limit are noted however the Council wishes to reiterate that the site is not being allocated for new development. Rather, the inclusion of this area of land within the Settlement Limit simply regularises the land designation and reflects the fact the surrounding areas all lie within the Settlement Limit. Inclusion of land within a Settlement Limit means that should an application be brought forward in the future, the Council will then be able to assess it against the existing Development Management policies that exist within that area. The Council remains of the opinion this area relates well to the existing Settlement Limit and as such should be included within these boundaries. As an extension to the Settlement Limit (as opposed to an allocated site) a site-specific policy would not be prepared and therefore site-specific issues would be addressed at the planning application stage should a proposal for the site be submitted in the future.	62	No further action required.

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			and hedgerow Backland development which creates overlooking concerns for existing properties. Flooding issues; increase in surface water flooding in the immediate area			
QUESTION 81: Preferred Site - SN1046REV, Glenhaven, Great Melton Road, Little Melton	2174	Comment	Officers at NCC Highways do not object to the inclusion of the site within the settlement limit. However, they do raise concerns with access to the site from Great Melton Road, where they are likely to object. NCC Highways consider that it does not seem feasible to provide at Great Melton Road, required carriageway widening and new footway, to ensure it could safely accommodate development traffic. NCC highways have suggested that an alternative access would need to be considered.	The Council acknowledge the concerns of the Highway Authority (HA) with regards to access via Great Melton Rd. It is expected that the HA will provide similar comments at any subsequent planning application and it will be down to the applicant to demonstrate that a suitable and safe access can be achieved.	61	No action or change required.
QUESTION 81: Preferred Site - SN1046REV, Glenhaven, Great Melton Road, Little Melton	1955, 2134	Comment	Comments relating to water management: The site is noted to be outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. Few or no constraints. Standard information required at a planning stage. Infiltration potential is dependent on a complete geotechnical investigation,	The content of the representations is noted and with reference to the requirement for geotechnical investigation will be explored further at the planning application stage.	60	No further action required.

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			including BRE365 Soakaway Testing but where possible surface water infiltration should be utilised.			
QUESTION 81: Preferred Site - SN1046REV, Glenhaven, Great Melton Road, Little Melton	429	Comment	Given the site's location within a residential area, it would be logical to include the site within the Settlement Limit. Development would provide only a limited number of dwellings. Raised concerns surrounding access and the amenity impact of overlooking.	The proposal would include the demolition of 'Glenhaven' dwelling to the south to allow access to the site. The Council has previously met with the Highway Authority, who have raised some concerns whether a suitable access could be achieved. The amenity of existing and future occupiers, with specific regards to overlooking, will be assessed at the planning application, where consideration will be given to the layout.	59	No further action required.
QUESTION 81: Preferred Site - SN1046REV, Glenhaven, Great Melton Road, Little Melton	446	Comment	Error raised; the plan is incorrect and should not include parts of the gardens of three adjoining properties.	The site adjoins the existing Settlement Limit (SL) in Little Melton where it has been considered appropriate to include this additional land within the SL, as a SL extension; this area of land includes Glenhaven, plus the northern ends of the three adjoining gardens. If the land is included in the Settlement Limit that would mean that any future planning applications would be treated as being part of the settlement of Little Melton, rather than being treated as part of the open countryside. It would be up to the owner of any part of that land to submit a planning application, if they wished to. It is important to note there is no intention for the Council to actively promote development on the land, other than to bring the consideration of any future planning	56	No action or change required.

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				applications on that land in line with the surrounding land and properties (i.e. treating it as part of the settlement of Little Melton, rather than the open countryside).		
QUESTION 81: Preferred Site - SN1046REV, Glenhaven, Great Melton Road, Little Melton	1381, 1406, 1742	Support	Development of the site would promote good use of land that would not change the character of the village. The site is located within an existing residential area which would benefit from existing services/infrastructure such as electricity and main drainage. It is considered that there are no issues with access and the noted lack of footpath and can be overcome.	Noted support for development of the site. As a Settlement Limit extension/ addition there would be no specific policy in the final Plan and detailed matters relating to the development of the site would be considered at the planning application stage.	54	No further action required.
QUESTION 82: Preferred Site - SN4052, Land south of School Lane and east of Manor Farm Barns, Little Melton	534, 726	Object	The Joint Core Strategy states small-scale housing growth in Little Melton, which has already been exceeded. South Norfolk Council is neither protecting the character of this village or it's setting, which it claims is one of its objectives. If this plan is allowed to go ahead it will give carte blanche to full-scale development because the Joint Core Strategy will have been rendered utterly meaningless. What is the point of having a Joint Core Strategy if it is then ignored? The Landscape Protection Zone is also being ignored and has already been extensively encroached upon in other areas. Two of the proposed sites in Little Melton are within this - alleged - protected zone. Why designate these areas as protected only to allow them to be densely built on? The Council is not only not protecting the landscape, and therefore the people and the environment in which they live, but contradicting itself.	The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan, which will replace existing requirements in the JCS. The proportion of new development in the Village Clusters is substantially lower than the proportion of the population that currently lives in those parishes. The numbers proposed for the site are considered to be sustainable and development of this site would represent an efficient use of land. The scale of development proposed in Little Melton is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development.	634	Policy wording to reflect Landscape Protection Zone

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			These actions completely erode trust in our elected Council and it's Councillors because of the disparity between what it claims and lays down are it's aims and objectives, and what it then actually does. If these proposals go ahead, coupled with the large scale development at Hethersett, Little Melton and Hethersett will soon be one ill-considered, urban housing sprawl, with few green spaces, an inadequate infrastructure, and unable to cope with a changing climate. Where little thought has been given to the long term effects on the people living there, their needs and the quality of the environment in which they are expected to live. Do you not think people deserve better? Do you ever consider the legacy the council and its councillors are leaving future generations?	Technical advice has been sought from the Council Landscape officer relating to the Southern Bypass Landscape Protection Zone, and whilst it is acknowledged that the site lies within this Landscape Protection Zone, current policy has its own requirement to retain openness and as such, any proposal will be assessed against this. The concerns about the capacity of the school and implications for further resources and facilities are acknowledged. This technical consultation has included discussions with NCC Children's Services, where information was shared on School capacity. It is noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.		
QUESTION 82: Preferred Site - SN4052, Land south of School Lane and east of Manor Farm Barns, Little Melton	2261	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Site comprises part of an agricultural field. Hedges are priority habitat so losses should be minimised (use existing access), and as a last resort compensated for. No priority habitats identified (see MAGIC).	NCC Ecologist comments noted; ecological preference would be for the re-use of the existing access however this may not correspond with the requirements of other technical consultees (e.g. LLFA) and therefore this needs to be carefully considered.	444	Confirm access point with both NCC Ecologist and LLFA.

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			Site within amber habitat zones for great crested newts, and in SSSI IRZ but residential development does not trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 82: Preferred Site - SN4052, Land south of School Lane and east of Manor Farm Barns, Little Melton	449, 964, 1126	Object	Nothing to stop future development coming forward along School Lane, once road has been upgraded. Site is located within Landscape Protection Zone. Increased noise and pollution Pedestrian access to the A47 would have to be reviewed. Other sites rejected for similar reasons. Highway safety concerns Existing Flood issues Impact on wildlife	Sites that are allocated within the Plan will automatically be included within the drawn Settlement Limit for Little Melton. Any future application that may come forward along School Lane, to the east of the site and No115 School Lane, will be outside the settlement limit and will be subject to current planning policies surrounding countryside development. Technical advice has been sought from the Council Landscape officer relating to the Southern Bypass Landscape Protection Zone, and whilst it is acknowledged that the site lies within this Landscape Protection Zone, current policy has its own requirement to retain openness and as such, any proposal will be assessed against this. With regards to amenity, noise, pollution etc., these would all be addressed in detail at the detailed planning application stage.	443	Allocation policy wording to ensure that access is located to the west and for access to be achieved via the area at lowest possible risk. Other site-specific policy matters to include; mitigation within the Landscape Protection Zone and technical highways requirements.

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				NCC Highways officers have been involved with the assessment of the sites prior to consultation and also provided technical advice as part of the Regulation 18. Advice has been sought relating to both site access and the impact of the proposed development on the wider highway network. Mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include carriageway widening to include footpaths. It would also need to be demonstrated that sufficient visibility splays can be achieved, prior to accepting development is acceptable and in allocating the site. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority (LLFA) and it is considered that on-site drainage solutions can often help to address existing surface water issues and as such it is considered that this issue can be adequately addressed during the planning application stage. It has been highlighted that access into this site would need to be to the west to avoid flood areas. Further to the concerns raised around destruction of wildlife, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site.		

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				Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 82: Preferred Site - SN4052, Land south of School Lane and east of Manor Farm Barns, Little Melton	18, 360, 374, 385, 398, 407, 430, 468, 592, 666, 676, 697, 719, 766, 830, 845, 861, 958, 978, 999, 1067, 1077, 1103, 1134, 1152, 1180, 1247, 1258, 1299, 1462, 1615, 1623, 1642, 1644, 1646, 1657, 1689, 1691, 1693, 1697, 1701, 1709, 1744, 1771, 1780	Mixed	Issues relating to highways: extremely busy roads, traffic travels too fast, pedestrian safety, Green Lane is hazardous, visibility is very poor at the School Lane junction. Concerns relating to the existing infrastructure capacity; GPS, schools. The future of Little Melton shop is uncertain. It is felt that Little Melton is already overdeveloped, concerns with out of character development, Little Melton will lose its character feel. Why develop outside settlement limit? Environmental concerns; why build in Norwich Southern Bypass Landscape Protection Zone?, loss of wildlife, noise and air pollution concerns. Concerns with drainage issues in the village; already existing flooding and sewerage issues. Health and Wellbeing concerns; fear that an increased population will dilute community spirit.	NCC Highways officers have been involved with the assessment of the sites prior to consultation and also provided technical advice as part of the Regulation 18. Advice has been sought relating to both site access and the impact of the proposed development on the wider highway network. Mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include carriageway widening to include footpaths. It would also need to be demonstrated that sufficient visibility splays can be achieved, prior to accepting development is acceptable. Whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, on the local ecology are also noted however these matters would be dealt with during the planning application stage. The numbers proposed for the site are considered to be sustainable and	70	Discussions with NCC Education to review school capacity and implications of housing growth for facilities plus a review of NCC Highways recommendations for inclusion in policy allocation text.

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				development of this site would represent an efficient use of land. The scale of development proposed in Little Melton is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. With regards to existing services, many of the individually allocations proposed within the Village Cluster Housing Allocations Plan are of a relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems (ICS) and Norfolk County Council in its role as Education. This will ensure that infrastructure issues are identified and understood as part of the plan making process. It is acknowledged that development sites can be home to wildlife and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures. NCC ecologists and NWT have been invited to make representations on the VCHAP and		

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				the selected sites. These responses will be included in the final site selection process. Technical advice has been sought from the Council Landscape Officer relating to the Southern Bypass Landscape Protection Zone, and whilst it is acknowledged that the site lies within this Landscape Protection Zone, current policy has its own requirement to retain openness and as such, any proposal will be assessed against this. The concerns that have been raised by both local residents regarding the flood risk associated with this site are recognised and will be explored further. Any development on this site would be required to include appropriate mitigation measures and avoid exacerbating the current situation.		
QUESTION 82: Preferred Site - SN4052, Land south of School Lane and east of Manor Farm Barns, Little Melton	2016	Comment	Site is located within 250 metres of an existing landfill that could result in the nearby community being exposed to impacts including odour, noise, dust and pests. The severity of these impacts will depend on the size of the landfill, the nature of the waste it takes and prevailing weather conditions. Planning policy requirements state that new development should integrate effectively with existing businesses and not place unreasonable restrictions upon them. Where the operation of an existing landfill could have significant adverse	The requirements of the NPPF are noted with regard to existing landfill operation and the impact on new development /integrating with existing businesses. If the site remains as a preferred option within the VCHAP the Council should consider further the relationship between the landfill site and residential development. It should be noted however that there are existing sensitive receptors (residential development) in close proximity to this site and it would be useful to understand whether tensions currently exist between these land uses.	69	Prior to allocation confirm with Environmental Protection whether there are any recorded incidents arising from the relationship between the existing residential properties and the landfill site.

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			effects on new development, the applicant should be required to provide suitable mitigation for these effects. Mitigation can be provided through the design of the new development to minimise exposure to the neighbouring landfill and/or through financial contributions to the operator of the landfill to support measures that minimise impacts. Environmental Permitting Regulations require operators to demonstrate that they have taken all reasonable precautions to mitigate impacts of their operations. This is unlikely to eliminate all emissions and there is likely to be residual impacts. In some cases, these residual impacts may cause local residents concern. There are limits to the measures that the operator can take to prevent impacts to residents. Consequently, it is important that planning decisions take full account of paragraph 182 of the NPPF. When a new development is built near to an existing landfill this does not automatically trigger a review of the permit.	Where necessary, a permit will be required.		
QUESTION 82: Preferred Site - SN4052, Land south of School Lane and east of Manor Farm Barns, Little Melton	2043	Comment	Comments from Historic England: Whilst there are no designated heritage assets on the site, the Manor House (grade II listed) lies to the south-west of the site. Therefore, any development of this site has the potential to impact upon the significance of this heritage asset. A Heritage Impact Assessment (HIA) of the site should be undertaken to assess the impact of the proposed development on	The comments from Historic England are noted. An HIA will inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	68	Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.

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			the listed building and determine if allocation of this site is appropriate, and if it is what mitigation may be required.			
QUESTION 82: Preferred Site - SN4052, Land south of School Lane and east of Manor Farm Barns, Little Melton	1956, 2116	Comment	Comments relating to water management issues: Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, this discharge should be facilitated in line with the non-statutory technical standards for sustainable drainage systems (SuDS). The site is adjacent to a flow path, and within a Source Protection Zone 3. The on-site flood risk contributes to an off-site flow path. Flow lines indicate this flood water flows east off of the site.	The comments relating to the flood risk of this site, the flowpath and Source Protection are noted, and these constraints will need to be considered further. As site is located within a Source Protection Zone, any development would need to make sure water is impeccably clean and there would need to consultation with environment agency .	67	Further discussions to be held with the LLFA regarding the identified flood risk.
QUESTION 82: Preferred Site - SN4052, Land south of School Lane and east of Manor Farm Barns, Little Melton	1384, 1407, 1669, 1804	Support	The support for the site is noted: located to major routes, village amenities, not considered to impact on village landscape and flood issue have been assessed. Site is also considered to be readily available. It would be preferred that a small number of houses (25 or below) would be allocated. It has also been noted that action needed towards infrastructure.	The support for this site is noted and the Council confirms that at this time the site is being promoted for up to 25 dwellings.	65	No action or change.
QUESTION 83: Should any shortlisted/rejected sites be allocated?	1633	Comment	Online responses to questions 83/84/85. The Little Melton (LM) Parish Council: offers two proposals for additional housing in Little Melton. I support either. With caveats. At the risk of repeating the views of online	With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale	458	No action or change required.

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			responders I feel LM Village is on the precipice of losing quality of life. Exactly that which 'incomers' are looking for ... • 'Yes' I feel privileged to be living here. • 'Yes' I would like to welcome those who want the same experience. • However, the basic facilities, infrastructure, roads, safe pavements, drains/water supplies, substation, are already under strain. • Increase in traffic flow: popular village school, roadside parking to take/collect children, inevitably there are peak uses of roads/pathways. Online shopping - increase in delivery vehicles - parcels and food. Often large transport delivery vehicles 'get lost negotiating the narrow lanes' trying to find the Industrial Park. 'Local sport' is 'directing' /watching Cars: Speeding I 'rat run'. Particularly parents late in delivering/collecting children from school. And The Environment? Reduction in agricultural land. Higher levels of vehicle fumes? Summary: Little Melton. Too many properties, fractured infrastructure - now. The future - reduction in quality of life?	of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process It is noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth. NCC Highways officers have been involved with the assessment of the sites prior to consultation and also provided technical advice as part of the Regulation 18. Advice has been sought relating to both site access and the impact of the proposed development on the wider highway network. Where appropriate, mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include carriageway widening to include footpaths. It would also need to be demonstrated that sufficient visibility		

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				splays can be achieved, prior to accepting development is acceptable and in allocating sites. With regards to loss of agricultural land, the site is considered as Grade 3 - Good to Moderate (DEFRA). As part of the site assessment process, the Council has taken into consideration the best most versatile land (BMV) by identifying the ALC of all sites submitted. Where possible, the Council will avoid allocating and preferring sites that are of a high grade. Where higher grade land may be present, the Council will need to consider whether the social, economic or environmental benefit outweighs the agricultural and that there is no suitable or available site for the development on land of poorer quality. Further to the concerns raised around destruction of wildlife, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 83: Should any shortlisted/rejected sites be allocated?	1670	Comment	If Little Melton does have to be the subject of further development then it would be preferable to have a site with a small number of houses 25 or below rather than a massive development such as at Hethersett and Cringleford	Comments noted. With regards to the proposed number, at present only one site is preferred for an allocation of up to 25 units (SN4052). The other preferred site (SN1046REV) is for a settlement limit extension, which is not proposed for any exact numbers and	456	No action or change required.

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			As stated earlier if any development does have to be done in Little Melton despite the number of houses already being built is over the agreed number already then our preferred sites would be SN0488, SN4052 and SN3007SL, provided the number of houses was kept to 25 and below on each site. Urgent action needs to be taken with regard to the infrastructure in order for these small sites to proceed i.e. Medical practice, traffic calming, drains etc	would be available for windfall development. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems (ICS), Norfolk County Council in its role as Education, Highway and Lead Local Flood Authorities and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process It is noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.		
QUESTION 83: Should any shortlisted/rejected sites be allocated?	1487	Comment	Our client, who is the owner of site considers that SN0397 could present an option for future growth in Little Melton.	The Council acknowledges the representation made in relation to SN0397. However, as it stands no further information has been submitted	455	No action or change required.

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			As the assessment notes, the site itself has few constraints and it is considered that an appropriate design could be explored that would reflect this edge of settlement location. There is potential for screening and softening this edge of the village through any development scheme. In relation to access, investigations are ongoing to establish whether there is an opportunity for an improved route into the site.	to the Council in relation to the access and the requirement of 3rd party land. Therefore, the Council is still of the opinion that the site is unsuitable for development.		
QUESTION 83: Should any shortlisted/rejected sites be allocated?	1402	Comment	Agree that developments need to go ahead, however do not agree with shortlisted site SN2044. This lane is treacherous at the best of times without further vehicle traffic. It also has poorer access to the major routes and has no street lighting or gas supply. It is one of the few areas in the village that is still left to nature with the views across the fields of the farm. Development here would spoil what little countryside there is left.	Concerns related to SN2044 are noted. Access via Braymeadow Lane will need to be demonstrated achievable prior to allocation. Technical advice has been sought from the Council Landscape officer relating to the Southern Bypass Landscape Protection Zone, and whilst It is acknowledged that the site lies within this Landscape Protection Zone, current policy has its own requirement to retain openness and as such, any proposal will be assessed against this.	454	Further discussions with NCC highways to help inform allocation policy wording.
QUESTION 83: Should any shortlisted/rejected sites be allocated?	364	Object	It is the proposal to the north of Braymeadow Lane that I would particularly object to. Spreading housing outside of the perimeter of the existing village is completely unacceptable. Braymeadow Lane has frequently been used as a diversion route when either the Watton Road or Hethersett Lane have been closed due to accidents or roadworks. Having buses, lorries, emergency vehicles and large numbers of cars along a single track road is dangerous.	Concerns with development off Braymeadow Lane is noted. NCC Highways officers have been involved with the assessment of the sites prior to consultation and also provided technical advice as part of the Regulation 18. Advice has been sought relating to both site access and the impact of the proposed development on the wider highway network. Officers have advised that whilst Braymeadow Lane is narrow with no footways,	452	Further discussions with Highways to inform allocation.

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				improvements to site frontages appears relatively easy Highway issues are to be resolved prior to allocation.		
QUESTION 83: Should any shortlisted/rejected sites be allocated?	2100	Comment	SN0488 Few or no constraints. Standard information required at a planning stage. Source Protection Zone 3. Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. A flow path is present on-site for all AEP events. This is concentrated to the southern boundary. The on-site flood risk contributes to an off-site flow path with flow lines indicating this flood water flows east off of the site. We advise this must be considered in the site assessment. The site is adjacent to a flow path. A large area of the site is not at risk of flooding and has potential to be developed.	The comments made in relation to water management are noted. Further discussions have been had with the LLFA and particular issues are noted with access/ egress to this site due to the extent of the identified flooding. This is likely to be in partly a result of the topography created by the A47. Development of this site would likely require significant road engineering works to create a safe access/ egress point.	450	Discuss with the land owner the potential issues with viability due to the LLFA comments if the site is considered suitable for recategorising.
QUESTION 83: Should any shortlisted/rejected sites be allocated?	2095	Comment	SN2044 Few or no constraints; Standard information required at a planning stage. Infiltration potential is dependent on a	The comments made in relation to water management are noted however at this time the site is not being considered as either a reasonable /	449	No action required.

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			complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised Assessment: Green	reasonable alternative site in the VCHAP.		
QUESTION 83: Should any shortlisted/rejected sites be allocated?	2262	Comment	SN0488 Land north of School Lane (between No115 and No117), Little Melton Site comprises part of an agricultural field adjacent to the A47. Hedges are priority habitat so losses should be minimised (use existing access), and as a last resort compensated for. No priority habitats identified (see MAGIC). Site within amber habitat zones for great crested newts, and in SSSI IRZ but residential development does not trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain. SN2044 Land north of Braymeadow Lane, Little Melton Site comprises part of an agricultural field. Hedges are priority habitat so losses should be minimised (use existing access), and as a last resort compensated for. No priority habitats identified (see MAGIC). Site within amber habitat zones for great crested newts, and in SSSI IRZ but residential development does not trigger	NCC Ecologist comments noted both sites; SN0488 and SN2044. Both sites have hedges that are priority habitat so losses should be minimised (use existing access) Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.	447	Policy wording to require minimal loss of hedgerow along the site frontage should the site be allocated.

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			consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain. Rating for these sites: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required.			
QUESTION 83: Should any shortlisted/rejected sites be allocated?	1137	Comment	Some logic in using part of SN0488 to continue the line of existing houses with sympathetic development. However, the site suffers even worse noise and air pollution than SN4052. Both sites suffer the same problems with drainage and road junction. SN2044 is at least outside the Landscape Protection zone and development there would not set such a dangerous precedent for further development. However, an estate of 25 houses would be overdevelopment and out of character with the neighbouring buildings. Development of SN2044 should require provision of a cycle path to connect to the Hethersett Lane path.	These comments are noted. At this time the Council has considered a small area of SN0488 as being a reasonable alternative site. Should the site be reclassified further discussions should take place with technical consultees regarding the concerns raised, specifically relating to flood risk and highways concerns. SN0244 is currently a rejected site, and the Council does not consider that this assessment should be altered.	446	No action or change required.

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QUESTION 83: Should any shortlisted/rejected sites be allocated?	361, 375, 431, 1071, 1080, 1154, 1463, 1668	Comment	No more development within Little Melton; will destroy local wildlife and the community; the village does not have the infrastructure to cope with significant further development; highway safety concerns; detrimental effect on the village's character and quality of life, increase in flooding; impact on Landscape Protection Zone.	The comments in these representations do not refer to any particular site; however, they appear as overall objections to development within Little Melton. NCC Highways officers have been involved with the assessment of the sites prior to consultation and also provided technical advice as part of the Regulation 18. Advice has been sought relating to both site access and the impact of the proposed development on the wider highway network. Where appropriate, mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include carriageway widening to include footpaths. It would also need to be demonstrated that sufficient visibility splays can be achieved, prior to accepting development is acceptable and in allocating sites. With regards to the concerns raised regarding flooding, discussions have taken place with the Lead Local Flood Authority (LLFA) who have provided feedback on the proposed allocations and made recommendations where appropriate. In addition, further comments are also expected from the Environmental Agency and Anglian Water, who will help inform individual allocation policy wording. Technical consultation has also included discussions with NCC Children's Services,	445	No action or change required.

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				where information was shared on School capacity. However, it has been identified that given that allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, therefore in many instances this type of development is unlikely to have a significant impact on school capacity and other facilities. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems (ICS), Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process It is noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local		

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				infrastructure effectively supports growth. Technical advice has been sought from the Council Landscape officer relating to the Southern Bypass Landscape Protection Zone, and whilst It is acknowledged that the site lies within this Landscape Protection Zone, current policy has its own requirement to retain openness and as such, any proposal will be assessed against this.		
QUESTION 83: Should any shortlisted/rejected sites be allocated?	19, 386, 399, 408, 469, 533, 720, 846, 862, 1105, 1184, 1216, 1275, 1300, 1411, 1619	Object	Objection to all shortlisted sites; no more development within Little Melton. Concerns raised with regards to overdevelopment, sites should be in Settlement Limit, flooding issues, Highway concerns and infrastructure capacity.	NCC Highways officers have been involved with the assessment of the sites prior to consultation, and also provided technical advice as part of the Regulation 18. Advice has been sought relating to both site access and the impact of the proposed development on the wider highway network. Mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include carriageway widening and to include footpaths. It would also need to be demonstrated that sufficient visibility splays can be achieved, prior to accepting development is acceptable. Whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the impact of alterations to the existing	72	No further action required.

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				road, as well as the increased traffic movements, on the local ecology are also noted however these matters would be dealt with during the planning application stage. The numbers proposed for the site are considered to be sustainable and development of this site would represent an efficient use of land. The scale of development proposed in Little Melton is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. With regards to existing services, many of the individually allocations proposed within the Village Cluster Housing Allocations Plan are of a relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems (ICS) and Norfolk County Council in its role as Education. This will ensure that infrastructure issues are identified and understood as part of the plan making process. It is acknowledged that development sites can be home to wildlife and it will		

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				be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures. NCC ecologists and NWT have been invited to make representations on the VCHAP and the selected sites. These responses will be included in the final site selection process. Technical advice has been sought from the Council Landscape officer relating to the Southern Bypass Landscape Protection Zone, and whilst It is acknowledged that the site lies within this Landscape Protection Zone, current policy has its own requirement to retain openness and as such, any proposal will be assessed against this. The concerns that have been raised by both local residents and technical consultees regarding the flood risk associated with this site are recognised and will be explored further. Any development on this site would be required to include appropriate mitigation measures and avoid exacerbating the current situation.		
QUESTION 84: Should any shortlisted sites be rejected?	1634	Comment	At the risk of repeating the views of online responders I feel LM Village is on the precipice of losing quality of life. Exactly that which 'incomers' are looking for ... • 'Yes' I feel privileged to be living here.	With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a	635	No action or change required.

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			• 'Yes' I would like to welcome those who want the same experience. • However, the basic facilities, infrastructure, roads, safe pavements, drains/water supplies, substation, are already under strain. • Increase in traffic flow: popular village school, roadside parking to take/collect children, inevitably there are peak uses of roads/pathways. Online shopping - increase in delivery vehicles - parcels and food. Often large transport delivery vehicles 'get lost negotiating the narrow lanes' trying to find the Industrial Park. 'Local sport' is 'directing' /watching Cars: Speeding I 'rat run'. Particularly parents late in delivering/collecting children from school. And The Environment? Reduction in agricultural land. Higher levels of vehicle fumes? Summary: Little Melton. Too many properties, fractured infrastructure - now. The future - reduction in quality of life?	material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems (ICS), Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process it is noted that the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth. NCC Highways officers have been involved with the assessment of the sites prior to consultation and have also provided technical advice as part of the Regulation 18. Advice has been sought relating to both site access and the impact of the proposed development on the wider highway network. Where appropriate, mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include carriageway widening to include footpaths. It would also need to be demonstrated that sufficient visibility		

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				splays can be achieved, prior to accepting development is acceptable and in allocating sites. With regards to loss of agricultural land, the site is considered as Grade 3 - Good to Moderate (DEFRA). As part of the site assessment process, the Council has taken into consideration the best most versatile land (BMV) by identifying the ALC of all sites submitted. Where possible, the Council will avoid allocating and preferring sites that are of a high grade. Where higher grade land may be present, the Council will need to consider whether the social, economic or environmental benefit outweighs the agricultural and that there is no suitable or available site for the development on land of poorer quality. Further to the concerns raised around destruction of wildlife, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys		
QUESTION 84: Should any shortlisted sites be rejected?	535	Object	The Joint Core Strategy states small-scale housing growth in Little Melton, which has already been exceeded. South Norfolk Council is neither protecting the character of this village or it's setting, which it claims is one of its objectives. If this plan is	The Council recognises the concerns made within the representations. With regards to the distribution of housing, the approach within the South Norfolk VCHAP (to allocate a series of	461	No action or change required.

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			allowed to go ahead it will give carte blanche to full-scale development because the Joint Core Strategy will have been rendered utterly meaningless. What is the point of having a Joint Core Strategy if it is then ignored? The Landscape Protection Zone is also being ignored and has already been extensively encroached upon in other areas. These actions completely erode trust in our elected Council and it's Councillors because of the disparity between what it claims and lays down are it's aims and objectives, and what it then actually does If these proposals go ahead, coupled with the large-scale development at Hethersett, Little Melton and Hethersett will soon be one ill-considered, urban housing sprawl, with few green spaces, an inadequate infrastructure, and unable to cope with a changing climate. Where little thought has been given to the long-term effects on the people living there, their needs and the quality of the environment in which they are expected to live. Do you not think people deserve better? Do you ever consider the legacy the council and its councillors are leaving future generations?	smaller sites, typically within the range of 12 to 50 dwellings) enables as many village clusters as possible to contribute to meeting general and local housing needs, reflected in the Greater Norwich Local Plan (GNLP) housing target, whilst also helping to support and sustain the local services that are essential to securing sustainable futures for rural communities. When adopted the GNLP will supersede the JCS and many of the undeveloped sites previously identified within the JCS and associated Site Allocation documents will be carried forward, either in the GNLP or within the VCHAP. The GNLP sets out the longer-term strategy for the area, keeping policies up-to-date and providing a framework for economic growth in the Greater Norwich area; this is in accordance with the requirements set out in the National Planning Policy Framework (NPPF).		
QUESTION 84: Should any shortlisted sites be rejected?	432	Comment	Object to SN0488 and SN2044; limited development of SN0488 with a single layer of housing along the north side of School	Comments related to shortlisted sites noted. Preference for SN0488 to be frontage development. With regards to the layout of the site, this will be put forward at detailed planning stage.	459	No action or change required.

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			Lane might be acceptable to “fill the gap”, but no more than that.	However, the proposed land will need to be used efficiently making best use of the land available.		
QUESTION 84: Should any shortlisted sites be rejected?	376	Comment	Would like the Council to reject all proposed sites in the village of Little Melton at present, and only consider ones in the future when all other options have been explored. We have already seen developments over and above our allocation and I sincerely doubt that the same can be said for every other village in the county, why not spread development across all villages but in less disruptive way?	Comments noted. With regards to distribution of sites, the main aim of the Plan is to allocate a series of smaller sites, typically within the range of 12 to 50 homes, across the 48 Village Clusters in South Norfolk, to accommodate at least 1,200 new homes in total, which will towards meeting the housing requirements in the GNLP. Therefore, housing distribution throughout the village clusters is a key objective. The scale of development proposed through the VCHAP is considered to be reasonable and appropriate for the village locations.	457	No action or change required.
QUESTION 84: Should any shortlisted sites be rejected?	20, 362, 370, 387, 388, 409, 470, 561, 563, 668, 725, 828, 829, 847, 1070, 1081, 1106, 1127, 1153, 1155, 1213, 1424, 1621, 1624, 1658, 1666, 1690, 1694, 1698, 1710, 1743, 1772, 1773, 1781	Mixed	Shortlisted sites should be rejected; development within Landscape Protection Zone and impact on village character; Impact on wildlife and environment; Over development and concerns with scale and density proposed; Highway safety concerns, limited visibility; Facilities available for Little Melton residents already at capacity; Poor drainage; Noise and air pollution concerns.	Technical advice has been sought from the Council Landscape officer relating to the Southern Bypass Landscape Protection Zone, and whilst it is acknowledged that the site lies within this Landscape Protection Zone, current policy has its own requirement to retain openness and as such, any proposal will be assessed against this. It is acknowledged that development sites can be home to wildlife, and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures. With regards to the proposed number of	451	No action or change required.

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				dwellings for the site, this is considered to be sustainable, and development of this site would represent an efficient use of land, in accordance with the paragraph 124 of the NPPF. The scale of development proposed is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. However, with regards to the design and layout of the site, this will be dealt with at the planning application stage, where consideration will also be had to neighbouring uses and any overlooking issues. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. Highway offices have provided feedback on sites suitability and advised where highway upgrades would be required, including the provision of footpath. These requirements will be included within the site allocation wording. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, including those proposed at Little Melton. Therefore, in many instances this type of development is unlikely to have a		

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				material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems (ICS), Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. With regards to the increased traffic movements, noise and pollution concerns, these concerns are noted and would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies.		
QUESTION 84: Should any shortlisted sites be rejected?	863, 1284, 1301, 1413	Support	The rejection of the sites is supported	Comments noted.	440	No action or change required.
QUESTION 84: Should any shortlisted sites be rejected?	363	Support	Reject all sites within Little Melton; concerns with the loss of character and care for the value of life in smaller communities.	The concerns relating to the loss of existing character within smaller communities is noted and it is recognised that new development can be unsettling for existing residents. However, the scale of growth proposed by cluster as part of the VCHAP is limited, reflecting the objectives of the Plan and the Council's preference to distribute new growth throughout the	73	No further action required.

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				villages to support their vitality, as well as existing services and facilities.		

Morley and Deopham

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QUESTION 86: Should any rejected sites be allocated?	969	Support	Support for site SN4042: Supporting evidence prepared to address matters raised in the site assessment - LVIA Technical Note, Transport Note, Flood Risk Screening and Scoping, Masterplan; well related to Morley, Deopham and Besthorpe; limited and localised landscape impact only demonstrated; pedestrian link between the village and the village hall proposed; access demonstrated as being achievable without loss of trees along site boundaries; and junction improvements at Gold Links Road and Norwich Road and possible additional footway links proposed.	This site is noted as being in good proximity to a number of settlements with existing facilities and services, including Besthorpe, which falls within the neighbouring Breckland District Council area. As a result of the site assessment this site was considered to be subject to a number of constraints which made it an unfavourable option for development and it is acknowledged that the evidence submitted seeks to address these concerns, particularly those relating to highways matters, the landscape impact of development in this location and the on-site and off-site surface water issues. The illustrative masterplan that accompanies this submission indicates that the site would be suitable for up to 49 dwellings. Whilst a scheme of this scale would make efficient use of the land in accordance with national planning policy requirements, the number of units proposed would exceed the objectives set out for the VCHAP. However, the proposal includes a new pedestrian linkage between the main centre of the village and the existing village hall and sports hall which would be a wider benefit to the local community arising from the development of this site. It is also noted that a number of other highway safety improvement measures are suggested for exploration and/or inclusion as part of any planning application should the site be allocated.	194	No action required.

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				At this time the Council has not discussed these additional improvements with the site promoter and there has not been any viability evidence submitted to support the offer of these additional works. Following the submission of the supporting evidence the Council engaged in further discussions with the LLFA regarding the possible allocation of this site. These discussions revealed serious concerns on the part of the LLFA about the allocation of this site due to the existence of an active flowpath that has resulted in both reported internal and external flood events locally. Whilst it was acknowledged that areas of the site fall outside the flowpath the LLFA have advised that all development on this site should be avoided as serious concerns exist about the technical solutions that would be suitable for managing the situation on-site without impacting on, or worsening, existing problems in the wider area. Groundwater floodrisk was also noted as being of concern in this area. For these reasons the Council does not consider allocation of this site to be a suitable option.		
QUESTION 86: Should any rejected sites be allocated?	1957	Comment	Parishes outside the IDD boundary and within the Norfolk Rivers watershed catchment; and if surface water discharges within the catchment area it should be in lines with non-statutory technical standards for SuDS.	These comments are noted however at this time there are no sites currently proposed either for shortlisting or preferred for allocation within these parishes or watershed catchment areas.	184	No action required.

Mulbarton, Bracon Ash, Swardeston and East Carleton

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QUESTION 87: Settlement Limit	1677	Comment	The description of the form and character of Mulbarton is inadequate, wrong, and contains factual errors which should be corrected, including the map on page 347. Services and Community Facilities: This section of the VCHAP also contains errors which should be corrected. The text states “The cluster possesses a good range of facilities which includes infant and junior schools”, where there is only one primary school serving the cluster. Settlement Limit and Constraints: Whilst the settlement limit may be appropriate, with no changes proposed for the village of Mulbarton, the full range of constraints has not been properly identified. The answers already given to Question 2 also apply here.	The Council acknowledges that the descriptive introductory text for Mulbarton requires updating, to reflect the single Primary School, the completion of the previously allocated development and a clearer portrayal of the development of the village. However, the Conservation Area Character Appraisal for Mulbarton does state that 'Mulbarton is a classic example of a settlement around a large green or common'. Also, the level of detail suggested by the Parish Council is not necessarily appropriate in the VCHAP, particularly as there is a Neighbourhood Plan and Conservation Area Character Appraisal in place. In terms of the cross-reference to Q2, the Council would note that there is ongoing dialogue with the County Council in terms of Highways infrastructure and school capacity, and with the local NHS Integrated Care System, regarding Primary Care. Specifically, taking into account falling rolls and out of catchment pupils, there is not considered to be a capacity issue with Mulbarton Primary School. In terms of open space provision, new development is not expected to rectify any previous deficiencies; however, new sites of 15+ dwellings are expected deliver new provision in line with the Council's current open space standards.	828	Update the supporting text for Mulbarton to address any errors/inconsistencies.

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				The Parish Council's response appears to refer to the June 2021 Cabinet Report which signed off the consultation process, rather than the consultation material itself; several constraints referred to by the Parish Council as missing from the maps, such as the Conservation Area and County Wildlife Site, are shown on the Mulbarton Settlement Map in the consultation material.		
QUESTION 87: Settlement Limit	1794	Comment	Hopkins Homes continues to submit that Mulbarton is suitable location to accommodate up to 325 dwellings, however, in order to present various options to the Council, these representations are also supported by a Concept Masterplan which identifies an alternative site area that could accommodate up to 200 dwellings, together with up to 2.35Ha of associated public open space. Mulbarton is wholly sustainable as a location for new development. It has a population in excess of 3,500 residents and approaching 1,500 dwellings. The village is well served by local education, sports and community facilities with good transport links to the nearby city of Norwich, approximately 7 miles to the north-east. The current local plan, together with the adopted Mulbarton Neighbourhood Plan, would see only 20 or so further homes added to the housing stock over a 15-year period, a paltry figure which must be regarded as	The settlement hierarchy and overall housing numbers for growth to 2038 are set out the GNLP. This categorises Mulbarton as part of the Village Clusters in South Norfolk, with allocations for 1,200 new homes under that part of the hierarchy. As such the respondent's suggestion of 200 dwellings at Mulbarton equates to 1/6 of all of the proposed growth in the South Norfolk Village Clusters, not only focused in one of the 48 clusters, but within one village. The approach set in the Village Clusters aims to achieve a number of goals, including supporting services and facilities across a wide range of rural settlements, including those that have not benefited from the support of new development in the recent past. This approach helps to achieve the Government's aim (NPPF para 69) of a proportion of housing on smaller sites. The aim being to diversify the housing market and housing delivery, with the consequent benefit this has to smaller-	822	Confirm with the Highway Authority the maximum acceptable level of development accessed from Bluebell Road. Confirm with Norfolk County Council Children's services the ability to accommodate 200 dwellings in the local school.

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			disproportionately low in the context of the growth aspirations of South Norfolk and the wider Greater Norwich area. In conclusion, Hopkins Homes Ltd therefore requests that the level of growth in Mulbarton is increased to at least 200 and in turn, the residential allocation boundary is amended to accord with the site plan included, with the settlement limit for the village extended to likewise encompass the totality of this site.	scale local builders and supply chains. Whilst the Council does not dispute that Mulbarton is a sustainable settlement, a similar range of services/facilities can be found other larger villages within the South Norfolk Village Clusters; however, the approach advocated by the respondent would limit development to a focused group of clusters. This undermines the ability to support local services and facilities (schools, village/community halls, local shops and pubs, rural bus services, local employment etc.) across a wider rural area. The representation wrongly suggests that only 20 dwellings were allocated through the 2015 Local Plan, whereas an allocation on 180 dwellings was made. However, the Council does not agree that past levels of development, or the size of the settlement per se, should be seen as a primary indicator for future levels of growth. Under the GNLP, other settlements in higher tiers of the hierarchy, such as Wymondham (a Main Town), and Poringland/Framingham Earl (a Key Service Centre) are receiving allocations of fewer than 200 homes, despite having substantially larger allocations over the past two local Plans. Indeed, an allocation of 200 homes at Mulbarton, would be larger than the majority of settlements in the Main Town and Key Service Centre tiers of the GNLP hierarchy, which include a broader		

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				range of facilities, variously including rail connections, secondary schools, libraries, a range of retail services and employment opportunities. Three broad approaches to the distribution of development in the VCHAP are tested in the Sustainability Appraisal, which concluded that the approach being taken is a reasonable option. The respondents have questioned the viability of smaller sites of 15-50 dwellings to deliver affordable housing and other infrastructure, but have not substantiated this with any reference to the many current (2015) Local Plan allocations which fall into this category, or to the viability evidence that supports the GNLP. Indeed, this argument runs counter to the NPPF, which set the level at which affordable housing can be sought at 10 dwellings and also seeks a proportion of sites to be less than 1 hectare, specifically to aid delivery, which in most rural locations will equate to sites of less than 35 dwellings. The fact that the site can only be accessed via Bluebell Road does not appear to be disputed by the respondents, however the appropriateness of adding 200+ dwellings to a single point of access that already serves approximately 200 dwellings is disputed by the Highways Authority, which had initially proposed		

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				that the site be limited to less than 35 units.		
QUESTION 87: Settlement Limit	658, 1504	Object	Comments relating to boundary changes at Bracon Ash: SL includes BRA1 - this should be removed in response to the independent SA report by AECOM which recommended its removal; the SL should include edge of village gardens and small parcels of land to provide opportunities for modest housing growth; Bracon Ash is a sustainable location with good highway and travel standards; and extension of the SL would not result in an erosion of the gap between Bracon Ash and Mulbarton but would provide definition and maintain the gap through appropriate landscaping and development layout.	In response to the comments of Bracon Ash and Hethel Parish Council the Council notes that the comments made in the earlier AECOM SA addendum as part of the 2015 site allocations did not recommend the removal of BRA1 as suggested in this response. Rather, the SA addendum sought to identify alternative options when reviewing the additional 1,800 dwellings target for the South Norfolk part of the Norwich Policy Area. The omission of site BRA1 was considered in the report as one of a number of options that could be taken due to the level of commitment already identified at that time. It was not, however, recommended that BRA1 be removed from the settlement limit and the Council does not consider it to be an appropriate course of action at this time either. At the time of preparing this response BRA1 is the subject to planning application that is pending determination (2021/2579). Additional comments supporting an expansion of the SL at Bracon Ash to include edge of village gardens and parcels of land are acknowledged, as are the site specific representations made in the same representation. These comments relate to existing site SN2087 which has been subject to revision during the Regulation 18 process and will be subject to a new site assessment. As such the Council does not consider it	789	No action required.

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				appropriate to respond further to these comments at this stage but will instead undertake a new assessment to assess the merits of this parcel of land.		
QUESTION 87: Settlement Limit	1114	Comment	Comments relating to sites at Swardeston: Concerns raised at the time of the Bobbins Way development, to which the new allocation would be an extension, have not been addressed.	These comments from Swardeston Parish Council relate specifically to an earlier planning permission adjacent to the preferred allocation site, that was approved in 2014 (2014/1642). This planning application was determined following due consideration and consultation and the scheme was considered to be an acceptable development. Preferred site allocation SN0204 is sited on a former nursery site.	787	No action required.
QUESTION 87: Settlement Limit	2044	Comment	See attachments for full response. Although we understand that changes are proposed to the settlement limits, these are not clearly shown on the maps.	Comments noted.	733	Confirm changes to settlement limits.
QUESTION 87: Settlement Limit	447	Object	School, Preschools and nursery are full - Newton Flotman is not practical as would have to drive there. are full Gp is stretched as it is Pharmacy is stretched as it is Locals sports teams and clubs are at capacity Ruin view subjected to more noise than there	With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority	729	No action or change required.

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			already is. Impact to local wildlife.	and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. With regards to amenity, noise, pollution etc., these will all be addressed at the detailed planning application stage. Further to the concerns raised around destruction of wildlife, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 87: Settlement Limit	445	Object	The village of Mulbarton has already been developed to a point where the local facilities are no longer able to cope with the number of residents. Any new development will only worsen the situation whilst at the same time, the essential nature of the village is being lost as more and more new developments are added. In addition, Bluebell Road was not designed to be as major a route as this development would demand, Rectory Road access would be much more appropriate and less disturbing to the many young families who are currently residents of the Bluebell estate.	Mulbarton is considered to have a good range of basic services, including primary school, surgery, Budgen/post office, village hall, pubs, regular bus service to larger settlements etc. In addition, the scale of development proposed in is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within parish. Whilst it is recognised that rural settlements offer fewer services and facilities than their urban counterparts, a continued concentration of development in these locations will result in the inevitable decline of existing services and facilities within the	728	Further discussion with highways regarding Bluebell Lane.

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				rural areas. Therefore, locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services. With specific regard to school pressures, the County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity issue at the school for local children. With regard to the access and highway safety concerns, officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that access via Rectory Road is not viable and have suggested that access via Bluebell Road should be possible. This will be confirmed prior to allocation.		
QUESTION 87: Settlement Limit	13	Comment	Support the general thrust for the village of East Carleton. Potential concerns would have been raised by grouping Mulbarton and Bracon Ash with EC, as this might attract more potential development. However, it is clear that the proposals have generally been rejected on the basis of lack of amenity, access and impact on rural setting.	Comments noted.	708	No action or change required.
QUESTION 88: Preferred Site -	1678	Object	Object. Where will the children from the new houses on this preferred site go to school? Where will the families access medical facilities? Development on this	The Village Cluster approach is set out in the GNLP, and is based around development within the catchment of Primary Schools, and is designed to	840	Update as necessary following ongoing dialogue with Norfolk County Council

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SN0204, Bobbins Way, Swardeston			site will simply add to the cumulative impacts on the village of Mulbarton, already unacceptable. Our comments on this site include the answers given above for Questions 1 to 4, and 87.	reflect the fact that more than one village will share services and facilities. In relation to the cross-reference to Q1 to 4 and Q87, those issues of principle regarding the Plan Objectives and Core Policies are dealt within the responses to those questions. In terms of the cross-references to specific concerns about the impact of developing this site, the Council would note that there is ongoing dialogue with the County Council in terms of Highways infrastructure and school capacity, and with the local NHS Integrated Care System, regarding Primary Care. Specifically, taking into account falling rolls and out of catchment pupils, there is not considered to be a capacity issue with Mulbarton Primary School. Similarly, the scale of development proposed on this site is considered acceptable in Highways terms, particularly given the improvements to the site access being created by the adjoining development (currently under construction at Feb 2022). In terms of open space provision, new development is not expected to rectify previous deficiencies; however, new sites of 15+ dwellings are expected deliver new provision in line with the Council's current open space standards.		Highways and Children's Services and the NHS Integrated Care Services team.
QUESTION 88: Preferred Site -	1517	Object	This site neither represents the type of new site that the Village Clusters Plan is aiming to deliver, nor would it appear from	It is not clear from the representation why this site would not meet the requirements of the VCHAP. The site is	831	No action required.

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SN0204, Bobbins Way, Swardeston			the reasoned justification to be preferable to other potential sites in this cluster in respect to its viability or deliverability. Objective 2 of the Plan will only be met if residential sites are found across the settlements within a cluster, rather than continuing to expand existing development sites and villages that have undergone considerable recent expansion.	of the scale proposed, is reusing a site previously occupied by buildings related to the former nursery and farm shop, and is adjacent to a 'windfall' site which is already delivering an improved access onto the main B1113. It is also not clear why this site is any less viable/deliverable than other sites in the cluster. At present there are four main settlements in the Mulbarton cluster, with proposed allocations in two of them; Mulbarton and Swardeston. Of the remaining two settlements, Bracon Ash has seen recent development of 15 self-build properties, plus has an undeveloped allocation from the existing (2015) Local Plan, on which there is a current planning application (at February 2022). East Carleton is the smallest settlement, with few facilities and limited opportunities to walk and cycle for everyday journeys.		
QUESTION 88: Preferred Site - SN0204, Bobbins Way, Swardeston	1429	Support	Comments in support of SN0204: Support the allocation but should be worded to accommodate up to 40 dwellings at 25dph; reference to flood risk and associated landscape concerns on this site are incorrect and should be removed from the site assessment; justification for highway improvements to Mulbarton Primary School should be provided - if required they must be	The comments submitted on behalf of Bennett Homes are noted and following a review of this representation the Council considers it appropriate to review the site boundaries for this preferred allocation site. As shown at the Regulation 18 stage of the VCHAP process the preferred allocation site extended beyond the eastern boundaries of the adjacent sites (2014/1642 and SWA1). This could result in an unfortunate relationship between the sites and it may prove to be more appropriate to reduce the	790	The boundaries of the preferred site should be reviewed to ensure the most appropriate alignment with the adjacent sites (SWA1 and 2014/1642) is achieved. The site assessment should be updated to reflect the correct surface water flooding and flood zone data relating to this site and consideration

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			proportionate to the scale of the development; and adjacent land is available if required.	extent of the proposed allocation site. Due to the relatively low density form of development currently proposed on the site it is unlikely that reduction in the site size would impact on the number of dwellings deliverable on this site however overall site numbers should be considered as part of any review of the preferred allocation. Concerns have been raised about both comments made in the conclusion of the site assessment about flood risk and the suggested off-site highway works associated with the development of this site. The respondent has submitted supporting evidence relating to the surface water flood risk on the site and having reviewed this the Council concurs with the comments submitted. The site assessment should be reviewed and updated accordingly to reflect this information. A concern has also been raised about the suggested off-site highway works. As part of a review of the mitigation measures proposed for this site the Council also consider that a review of the current policy requirements and wording for SWA1 is appropriate. Connectivity between these two adjacent sites should also be considered in any site specific policy text.		given to the implications of this update. Existing policy requirements for SWA1 (particularly in relation to highways requirements) should be reviewed as part of the consideration of policy requirements for SN0204. Consideration also to be given to connectivity between the preferred allocation and SWA1.
QUESTION 88: Preferred Site - SN0204, Bobbins Way, Swardeston	1115	Comment	***	These comments from Swardeston Parish Council relate specifically to an earlier planning permission adjacent to the preferred allocation site, that was approved in 2014 (2014/1642). This	788	No action required.

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				planning application was determined following due consideration and consultation and the scheme was considered to be an acceptable development. Preferred site allocation SN0204 is sited on a former nursery site.		
QUESTION 88: Preferred Site - SN0204, Bobbins Way, Swardeston	1958	Comment	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. Major development - If surface water discharges within the watershed catchment of the Board's IDD, this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems.	Comments noted	727	No action required.
QUESTION 88: Preferred Site - SN0204, Bobbins Way, Swardeston	2069	Comment	Few or no constraints. Standard information required at a planning stage. Assessment: Green	Water management comments are noted.	726	No action required.
QUESTION 88: Preferred Site - SN0204, Bobbins Way, Swardeston	2198	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Site comprises a former plant nursery site including grassland, buildings, and glasshouses. MAGIC identifies the presence of priority habitat along the southern boundary (traditional orchard), but this will need to be verified. Hedges are priority habitat so losses should be minimised (use existing access), and as a last resort compensated for. Site within green habitat zones for great crested newts, and in SSSI IRZ but residential	NCC Comments noted; no major ecological constraints identified from desk-top search. It is noted that surveys, and biodiversity enhancement in accordance with policy required.	725	Verify the presence of priority habitat along the southern boundary (traditional orchard). This could impact on design Policy wording required to minimise the loss of the priority habitat hedges.

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			development does not trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 89: Preferred Site - SN2038, South of Rectory Lane, Mulbarton	2149	Comment	Few or no constraints. Standard information required at a planning stage. Assessment: Green	Consider the need to standard requirements regarding flood risk in the Core Policies.	846	No action required.
QUESTION 89: Preferred Site - SN2038, South of Rectory Lane, Mulbarton	1793	Comment	Whilst we support the proposed allocation and welcome the fact the Council has recognised that this site is suitable for development, we nevertheless object to the limited level of growth in Mulbarton, given that this is a sustainable location where additional development should be located. Mulbarton is wholly sustainable as a location for new development. It has a population in excess of 3,500 residents and approaching 1,500 dwellings. The village is well served by local education, sports and community facilities with good transport links to the nearby city of Norwich, approximately 7 miles to the north-east. There are no drainage or physical infrastructure issues which cannot be overcome by standard engineering	The settlement hierarchy and overall housing numbers for growth to 2038 are set out the GNL. This categorises Mulbarton as part of the Village Clusters in South Norfolk, with allocations for 1,200 new homes under that part of the hierarchy. As such the respondents suggestion of 200 dwellings at Mulbarton equates to 1/6 of all of the proposed growth in the South Norfolk Village Clusters, not only focused in one of the 48 clusters, but within one village. The approach set in the Village Clusters aims to achieve a number of goals, including supporting services and facilities across a wide range of rural settlements, including those that have not benefited from the support of new development in the recent past. This approach helps to achieve the Government's aim (NPPF para 69) of a	845	Confirm with the Highway Authority the maximum acceptable level of development accessed from Bluebell Road. Confirm with Norfolk County Council Children's services the ability to accommodate 200 dwellings in the local school.

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			solutions, thus the site is demonstrably deliverable in a sustainable and technically appropriate manner. Hopkins Homes Ltd therefore requests that the level of growth in Mulbarton is increased to at least 200 and in turn, the residential allocation boundary is amended.	proportion of housing on smaller sites. The aim being to diversify the housing market and housing delivery, with the consequent benefit this has to smaller-scale local builders and supply chains. Whilst the Council does not dispute that Mulbarton is a sustainable settlement, a similar range of services/facilities can be found other larger villages within the South Norfolk Village Clusters; however, the approach advocated by the respondent would limit development to a focused group of clusters. This undermines the ability to support local services and facilities (schools, village/community halls, local shops and pubs, rural bus services, local employment etc.) across a wider rural area. The representation wrongly suggests that only 20 dwellings were allocated through the 2015 Local Plan, whereas an allocation on 180 dwellings was made. However, the Council does not agree that past levels of development, or the size of the settlement per se, should be seen as a primary indicator for future levels of growth. Under the GNLP, other settlements in higher tiers of the hierarchy, such as Wymondham (a Main Town), and Poringland/Framingham Earl (a Key Service Centre) are receiving allocations of fewer than 200 homes, despite having substantially larger allocations over the past two local Plans. Indeed, an allocation of 200 homes at		

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				Mulbarton, would be larger than the majority of settlements in the Main Town and Key Service Centre tiers of the GNLP hierarchy, which include a broader range of facilities, variously including rail connections, secondary schools, libraries, a range of retail services and employment opportunities. Three broad approaches to the distribution of development in the VCHAP are tested in the Sustainability Appraisal, which concluded that the approach being taken is a reasonable option. The respondents have questioned the viability of smaller sites of 15-50 dwellings to deliver affordable housing and other infrastructure, but have not substantiated this with any reference to the many current (2015) Local Plan allocations which fall into this category, or to the viability evidence that supports the GNLP. Indeed, this argument runs counter to the NPPF, which set the level at which affordable housing can be sought at 10 dwellings and also seeks a proportion of sites to be less than 1 hectare, specifically to aid delivery, which in most rural locations will equate to sites of less than 35 dwellings. The fact that the site can only be accessed via Bluebell Road does not appear to be disputed by the respondents, however the appropriateness of adding 200+		

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				dwelling to a single point of access that already serves approximately 200 dwellings is disputed by the Highways Authority, which had initially proposed that the site be limited to less than 35 units.		
QUESTION 89: Preferred Site - SN2038, South of Rectory Lane, Mulbarton	1679	Object	Where will the children from the new houses on this preferred site go to school? Where will the families access medical facilities? Development on this site will simply add to the cumulative impacts on the village of Mulbarton, already unacceptable. Having drawn the settlement boundary, why is this proposed development outside of it? • The site extends into the countryside, outside the built area, adding yet more cumulative impact onto the fast disappearing but highly valued rural area surrounding Mulbarton. • It is contrary to the adopted Mulbarton Neighbourhood Plan - not well located in terms of access to services and facilities. Access would be via a narrow road through an existing estate Extra traffic generated would need to exit the site through the existing estate onto Long Lane, and joining the 20mph restricted zone around the primary school. There is already a deficit of amenity land on the Bluebell Road estate. The proposed	Regarding the cross-reference to the Parish Council representations on Q1 to Q4, the strategic issues are dealt with in the responses to those questions. In terms of the elements of the Parish Council's representations that deal with the specific impacts of particular sites, the Council would note that there is ongoing dialogue with Norfolk County Council in terms of Highways infrastructure and school capacity, and with the local NHS Integrated Care System team, regarding Primary Care. Specifically, taking into account falling rolls and out of catchment pupils, there is not considered to be a capacity issue with Mulbarton Primary School. In addition, planned improvements are in place for Hethersett High School, as part of the strategic level growth happening there. In terms of open space provision, new development is not expected to rectify previous deficiencies; however, new sites of 15+ dwellings are expected to deliver new provision in line with the Council's current open space standards. Regarding the current Development	844	Consider the need for the allocation policy to require a design which prevents further development accessed from the Bluebell Road, and consequently further encroachment east.

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			housing density of 23 units per hectare would not reduce the overall density of the estate. The design of the site should be laid out to prevent any further expansion eastward. Mulbarton School is FULL The local secondary school at Hethersett is at present oversubscribed Medical facilities with the village are already overwhelmed Traffic pressures on B1113.	Boundary/ Settlement Limit, this was defined in the 2015 South Norfolk Site Specific Allocations and Policies Document, which covers the period to 2026. Part of the process of preparing the VCHAP is reviewing the Settlement Limits, making amendment to reflect any changes since that boundary was last defined and to accommodate allocations necessary for the additional development requirements across Greater Norwich to 2038. It is acknowledged that this site extends into the countryside; however this is true (to a greater or lesser degree) of all of the sites put forward for consideration around Mulbarton, and across the Village Clusters more generally. Whilst the GNLP aims to maximise the (re)use of brownfield sites in Norwich (and other settlements, where they exist), the scale of development required cannot be accommodated without the use of greenfield land. However, under the GNLP the level of growth proposed in the Village Clusters (9%) is significantly lower than the percentage of the population that already lives in those parishes (25%). The Council is aware that Mulbarton Neighbourhood Plan (Policy HOU1: Location of New Residential Development) seeks sites of 5+ dwellings to be located in the 'Heart of the Village' around The Common.		

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				However, the assessment of the sites that might meet this requirement raised a number of other concerns which are detailed in the site assessments, including heritage, landscape and access/accessibility concerns. The site assessment for this site shows that it is within walking/cycling distance of a number of local services/facilities, with the primary school, GP surgery, village hall and recreation ground, local supermarket and bus services to Norwich within 1km. The Highway authority is satisfied that limited development can be safely accessed via Bluebell Road; however consideration will be given to requiring a layout which prevents further development from this access/encroachment further east. Similarly, the scale of development across the cluster and the impacts on the B1113 have not been raised as a concern by the County Council. In terms of the density of development, it is noted that Mulbarton Neighbourhood Plan (Policy HOU3: Density), seeks development which 'should reflect the overall character of Mulbarton and take account of its rural setting', but also 'on any given site should be consistent and compatible with the existing and prevailing density in that local context'. As the prevailing density and local context includes the		

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				Bluebell Road estate as well as lower density development on The Rosery, the net density of this site is considered to be broadly in keeping with the policy.		
QUESTION 89: Preferred Site - SN2038, South of Rectory Lane, Mulbarton	1523	Object	Providing the necessary access and associated pavement infrastructure, visibility splays, etc, would require removal of hedgerow and probably tree(s) that form important habitat and edge-of-village landscape feature. This is a constraint that needs to be considered with regard to the viability and deliverability of this site, as well as its acceptability in material planning terms. Further, the development outlined would represent a form and density of development that is not in-character with that along The Rosery. These concerns are further to any concern regarding impact on the highway network in the locality.	The respondent appears to be assuming the site will be accessed from The Rosery, when the Regulation 18 document states that the site will need to be accessed from Bluebell Road. As such, this will require the removal of a short length of hedge, the width of the current carriageway and footways, at the end of Bluebell Road, which are not considered to raise the landscape, habitat and deliverability issues suggested by the respondent. The allocation would be a modest extension of the existing Bluebell Road estate, likely to be at a similar or lower density to that development. The size of the site gives the scope to consider lower densities at southern (The Rosery) end of the site.	843	Consider the need for the allocation policy to specify lower densities at the southern end of the site.
QUESTION 89: Preferred Site - SN2038, South of Rectory Lane, Mulbarton	448	Object	This development area is poorly accessible, out of keeping with the area and on land already prone to flooding. The local services are already at capacity and the Bluebell road is often already obstructed by parked traffic causing hazards. The local wildlife and flora would be severely disrupted. As SN0315 has already been excluded as	The assessment of the site has determined that it is within reasonable walking/cycling distance of a variety of local services and facilities, with the primary school, GP surgery, village hall and playing fields, local supermarket and bus services to Norwich all within 1km of the site. The site is of a modest scale compared other estate-scale development in the immediate vicinity and abuts the Bluebell Road estate, which is of a similar (if not higher) density to the proposed allocation.	842	Update as necessary to reflect any ongoing dialogue with service providers, including Norfolk County Council Highways and Children's Services and the NHS Integrated Care Systems team. Allocation Policy for the site to include retention of the trees

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			suitable, how can this small part of SN0315 be annexed off it and classed as viable? This just sounds like some underhanded scheme and the thin end of the wedge to force poorly planned developments forward.	Whilst parts of SN2038 are at flood risk, these are at the northern end of the site, and outside of the proposed allocation; no concerns have been raised by the LLFA or the Environment Agency. In any event, the VCHAP will be supported by a Stage 2 SFRA to identify any potentially vulnerable sites. There has been ongoing dialogue with service providers and no objections have been raised to the allocation of 35 homes at this sites; this has included Norfolk County Council Highways, who do not object to a modest level of further development accessed from Bluebell Road. The site is currently an agricultural field, although there are a number of trees on The Rosery boundary. The site is not considered to be of particular wildlife/biodiversity importance, although appropriate surveys and 'net gain' will be required and the Council will require retention/protection of the trees through the allocation policy. Site SN0315 is a new settlement/urban extension-scale site of 130+ hectares. Development of such a scale would need to be considered through the GNLP or any successor strategic document. It should be noted, in this location SN0315 is actually separated from Mulbarton by the remainder of SN2038, which has		on The Rosery boundary.

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				also been rejected through the VCHAP process.		
QUESTION 89: Preferred Site - SN2038, South of Rectory Lane, Mulbarton	76	Object	Firstly, this would mean more development to the south of the village, further development should aim to address the imbalance and put the common at the centre of the village again. Secondly, the naming of the proposal is misleading. This development would be better named north of The Rosery, as it will not attach to Rectory Lane. Thirdly, the field and footpath around the field is used by many, including local walking groups, development would prevent use of the whole path. Finally, Bluebell Road is poorly lit for further traffic.	The assessment of sites in Mulbarton reflects the land put forward for consideration by site promoters, to ensure sites are deliverable. Those sites to the north of the village have been rejected for a variety of reasons set out in the detailed site assessments, including heritage, landscape and accessibility issues. The wider SN2038 site covers an area of land from The Rosery to the south to Rectory Lane to the north; however, the Council acknowledges that the site title would be better amended to reflect the part of the site which is proposed for allocation, east of Bluebell Road and north of The Rosery. Whilst the current field margins may be used informally for walking, the only Public Right of Way on the County Council's definitive map runs further north, from the northern end of Stile Close, and is not affected by this site. The Highways authority has confirmed that a modest extension to Bluebell Road is acceptable.	841	Update the site name to reflect the part of the site which is considered suitable for allocation.
QUESTION 89: Preferred Site - SN2038, South of Rectory Lane, Mulbarton	1959	Comment	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. Major development - If surface water discharges within the watershed catchment of the Board's IDD, this	Comments noted.	731	No action required.

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			discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuD			
QUESTION 89: Preferred Site - SN2038, South of Rectory Lane, Mulbarton	169	Object	Outside the settlement boundary. Access from Bluebell Road is directly on to Long Lane which is absolute chaos and extremely dangerous on any school day. Doctors can't cope with their existing residents, let alone any more - see statement on their social media page.	The Highway authority has raised no objection in principle to access from Bluebell Road, subject to restriction on numbers of dwellings. Clarification on the specific highways requirements for the site(s) will be sought and taken into account as part of the finalised policy. With regards to infrastructures, the Council is engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process It is noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.	730	No action or change required.
QUESTION 89: Preferred Site - SN2038, South of	2199	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required.	NCC Ecologist comments noted; Green no major ecological constraints identified from desk-top search.	724	Policy wording to ensure that the loss of priority hedges are avoided, minimised and

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Rectory Lane, Mulbarton			Site comprises part of an agricultural field on the edge of the village. Hedges are a priority habitat so losses should be avoided, minimised and as a last resort, compensated for. No other priority habitats are identified (see MAGIC). Site within amber habitat zones for great crested newts, and in SSSI IRZ but residential development does not trigger consultation with Natural England.			as a last resort, compensated for.
QUESTION 90: Should any rejected sites be allocated?	1685	Comment	Agree with the reasons given for rejection, and: • Outside the development area and settlement boundary for the parish • Contrary to the Mulbarton Neighbourhood Plan • Further impact on medical and educational provision in Mulbarton. • Added traffic to the already congested B1113 to access Norwich. • Limited access to area due to single track road, which has a width of 2.8 metres, has a weight limit of 7.5T and has dwellings either side. • Access to either B1113 or A140 is poor and both roads running at capacity levels without taking into consideration extra housing at Long Stratton, Hempnall and Swainsthorpe.	Comments noted. The Council would note that Norfolk County Council Highways and Childrens' Services have not raised 'in principle' objections to development in the Mulbarton cluster in terms of the impact on the B1113 and school capacity (although objections may have been raised to specific sites re site access and access to services). The Council is also in ongoing discussions with the NHS Integrated Care Systems team. Issues around the suitability of Rectory Lane are covered in the site assessment.	852	No action required.

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QUESTION 90: Should any rejected sites be allocated?	1684	Comment	Agree with the reasons given for rejection, and: • Diocese objected to the previous planning application re the footpath though the church yard and the possible tarmac and lighting being added which are totally out of context for the village and would be detrimental to Mulbarton Common and the conservation area. • Over 650 residents signed a petition opposing the previous development on this site. • Doctors Surgery was not backed by the Humbleyard Practice for Oakley Park this will probably be no different as the issue is a shortage of doctors, not facilities, at present. • Application SN2020/1499 for three dwellings was recently refused. NCC commented: "there is a possibility that human burials may be present within the development area. In addition, churches were normally located within or adjacent to medieval or earlier settlements and manorial centres, the remains of which may lie within the development area. Likewise, common edges were popular settlement sites from the late Anglo-Saxon period onwards. Consequently there is potential that heritage assets with archaeological interest (buried archaeological remains) will be present at the site and that their significance will be adversely affected by the proposed	Comments noted. The Council would note that Norfolk County Council Highways and Childrens' Services have not raised 'in principle' objections to development in the Mulbarton cluster in terms of the impact on the B1113 and school capacity (although objections may have been raised to specific sites re site access and access to services). The Council is also in ongoing discussions with the NHS Integrated Care Systems team. A number of the other issues relating to the previous application (including access via the churchyard and deliverability of the GP surgery site) are acknowledged in the site assessment and/or in response to the site promoters representation on this site.	851	Consider whether the site assessment for this site needs to be reinforced re. the impact on archaeology.

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			development.” • Unacceptable impact of another road junction onto the B1113 near Catbridge Lane. • Cumulative impact on medical and educational provision in Mulbarton. • Added traffic to the already congested B1113 to access Norwich. • Lack of access to local amenities.			
QUESTION 90: Should any rejected sites be allocated?	1683	Comment	Agree with the reasons given for rejection, and: • Totally inappropriate in the context of the Village Clusters Plan objectives. • Cumulative impact on medical and educational provision in Mulbarton. • Added traffic to the already congested B1113 to access Norwich. • Lack of access to local amenities	Comments noted. The Council would note that Norfolk County Council Highways and Childrens' Services have not raised 'in principle' objections to development in the Mulbarton cluster in terms of the impact on the B1113 and school capacity (although objections may have been raised to specific sites re site access and access to services). The Council is also in ongoing discussions with the NHS Integrated Care Systems team. The issue of scale is already noted in the site assessment.	850	No action required.
QUESTION 90: Should any rejected sites be allocated?	1682	Comment	Agree with the reasons given for rejection, and: • This site is amenity land adjacent to the Lark Rise estate, and should not be considered as available, suitable, or deliverable.	Comments noted. The Council would note that Norfolk County Council Highways and Childrens' Services have not raised 'in principle' objections to development in the Mulbarton cluster in terms of the impact on the B1113 and school capacity	849	No action required.

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			• Cumulative impact on medical and educational provision in Mulbarton. • Added traffic to the already congested B1113 to access Norwich. • Lack of access to local amenities. • No access to south of plot and north access/egress not to Highways standards. • No access to existing infrastructure. • Flood risk.	(although objections may have been raised to specific sites re site access and access to services). The Council is also in ongoing discussions with the NHS Integrated Care Systems team. Issues of site access, flood risk, townscape etc. are already noted in the site assessment.		
QUESTION 90: Should any rejected sites be allocated?	1680, 1681, 1686, 1687	Comment	Mulbarton PC agrees with the Council's decision to reject the listed sites for the reasons given in answer to Questions 1 to 4, Question 88, and the following reasons: Impact on the already full Mulbarton Primary School and on the local secondary school. Medical facilities with the village are already overwhelmed. Current transport infrastructure cannot support more cars using the already congested B1113 with its bottleneck at the Harford Bridge junction.	Comments noted. Strategic issues are dealt with in the responses to Q1 to Q4. The Council would note that Norfolk County Council Highways and Childrens' Services have not raised 'in principle' objections to development in the Mulbarton cluster in terms of the impact on the B1113 and school capacity (although objections may have been raised to specific sites re access to services). With regard to the B1113/A140 junction at Harford Bridge, the current KES 2 employment allocation (which is proposed to be carried forward into the GNLP, taking into account the planning permission for the site), has planned improvements for this junction. The Council is also in ongoing discussions with the NHS Integrated Care Systems team.	848	No action required.

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QUESTION 90: Should any rejected sites be allocated?	1348	Object	We wish to see SN0496REV allocated within the VCHAP. The site provides a suitable, available and deliverable opportunity to supplement housing supply within a sustainably-located settlement. It can accommodate approximately 60 dwellings, including bungalows, a care home for elderly care and a doctors' surgery. Alternatively, up to 95 dwellings could be provided without the care home and doctor's surgery sites. Social benefits of site will outweigh any harm to local heritage. Site is well contained and will be well screened from public view. Not considered that landscape/heritage impacts are so significant that they should preclude development of site. It is otherwise accessible, well located in proximity to services and has no other technical constraints that would prevent its development.	The site of SN0496REV has previously been part of a refused planning application of a more substantial 135 unit scheme. Whilst the site has been reduced in scale, approximately 50% of the land removed was shown as parkland and orchards on the indicative masterplan that accompanied the application. The part of the site that has been retained is the area closest to the Grade II* listed Church and the conservation area. The site access is also opposite the Grade II listed Paddock Farmhouse, at the northern extent of the Conservation Area. The impact on the identified heritage assets was considered in detail in determining the planning application. Whilst the harms were considered to be less than substantial, and the impact on each asset individually was moderate, the cumulative impact was given greater weight in the planning balance and resulted in this being a primary reason for refusal. Other than reducing the northern extent of the site, the site promoters have not indicated why they consider the revised site to overcome the heritage concerns. Indeed, one of the site promoter's options introduces a care home on the southern border of the site, potentially increasing the scale and bulk of development. It should be noted that the care home itself would count as new dwellings, at a ratio of 1 dwelling for every 1.8 care	847	No action required.

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				units. Consequently, a relatively modest new build care home of 25 bedrooms would equate to 14 dwellings. As such, both of the site promoter's scenarios are likely to be above the 12 to 50 dwellings sought in the VCHAP. Those sites at the higher end of the scale of VCHAP allocations have been made where they can provide an additional public benefit that cannot be delivered by a smaller scale site. In view of this, the site promoters have included a potential new GP surgery site within their proposals; however, this element was withdrawn from the 2018 planning application, due to lack of support from the NHS and the local GP Practice to deliver a new surgery. The site promoter's do not appear to have addressed this issue in their Regulation 18 submission, or included a delivery mechanism for a surgery. As a purely housing scheme of 95 units, the site would be delivered at 13 dwellings/hectare, which raises concerns in terms of the efficient use of greenfield land. There are also concerns over how well integrated the site would be with the village. The Highway authority would require improvements at the main site access and to the footways leading back to the village (which has implications in terms of impacts on the conservation area). However the most direct		

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				pedestrian access would be from the south of the site, using the Public Right of Way that runs via the churchyard. This does shorten the walking distances to many local facilities, however at the time of the planning application there was considerable doubt as to whether any upgrades to the width and surfacing of the path could be achieved, or the removal of a stile, that would make the route more attractive for regular use and this issue does not appear to have been resolved in the current submissions. For the reasons set out in the site assessment, the Council considers the preferred site in Mulbarton to have less impact in terms heritage and landscape, have better connectivity to local services/facilities, as well as retaining the other benefits listed by the promoter of this site, such as housebuilder interest, ability to achieve a mix of dwellings and location within the Cambridge-Norwich Tech Corridor.		
QUESTION 90: Should any rejected sites be allocated?	1576	Object	Comments in support of rejected site SN2087: Should be reconsidered as a preferred site to deliver 14 dwellings; and amendments offer improved access and landscaping via inclusion of additional land to the east of the previously promoted site.	The Council notes the additional land that has been promoted in response to the comments made in the site assessment. The Council considers this to be a revision to the original area that was promoted and the most appropriate course of action is to undertake a new site assessment of the site.	786	A new site assessment, including technical consultation, should be completed for the revised site area.

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QUESTION 90: Should any rejected sites be allocated?	1431	Comment	Comments in support of rejected site SN4082: Connects to the existing settlement boundary; proposed reduction in scale of site to 1-3 dwellings - minimise landscape impacts, the rural character and the Norwich Southern Bypass Landscape Protection Zone; site within 1.8km of more than 3 core services and 3km of school and employment areas; and site is located on two popular walking and cycling routes.	The Council notes the proposed reduction in the scale of SN4082 in order to address concerns raised in the original site assessment. The reduction in scale would result in a significantly lower number of dwellings (1-3) and would form an extension to the settlement limit rather than an allocation. Whilst this would address in part the previous landscape concerns the Council maintains that development of this site would have an adverse landscape impact and the site would not represent a suitable addition to the settlement limit in this location. The reduction in site area also fails to address a number of other concerns highlighted in the site assessment including the concerns about the local highway network and the connectivity to local services and facilities. The reduced site area also lies immediately above the approved Orsted Hornsea 3 cable route. For all of these reasons the Council remains of the opinion that this site is not a suitable extension to the settlement limit.	785	No action required.
QUESTION 90: Should any rejected sites be allocated?	651	Comment	Considers that 'rejected' site (SN4086) should be allocated in addition to currently preferred sites SN0204, Swaderston & SN2038, Mulbarton. This site is suitable (sustainable) for allocation within the VCHAP for the reasons outlined within the Supporting Statement that accompanies this	The Council acknowledges the comments made within the representation however the Council is still of the opinion that SN4086 is unsuitable due to highway safety and distance to facilities//services.	709	No action or change required.

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			submission and certainly when assessed against 'Objective 3' of the VCHAP.			

Needham, Brockdish, Starston and Wortwell

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QUESTION 91: Settlement Limit	1133	Support	Starston's limit is appropriate. Starston's heavily trafficked, narrow roads, most of which have no pavement, are used by HGVs and others travelling between A143 and A140. Up to 600 vehicles an hour enter the village (traffic count, village centre 2018). expressed road safety concerns. (Q1 what do you want for Starston? Neighbourhood Plan consultation/ analysis 17/11/18) Only agile adults capable of using PROW / Permissive Paths can walk to Harleston.	Council acknowledges the comments made in relation to Starston; agree that no alterations are proposed to the existing Settlement Limit. The Council acknowledges the highway safety concerns within the Parish. In response to this, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. These comments will help inform the plan and provide any mitigation measures. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies.	711	No action or change required.
QUESTION 91: Settlement Limit	813	Support	Agreed.	Support and agreement to SL extension noted.	710	No action or change required.
QUESTION 92: Preferred Site - SN2036, Land at the junction of High Road and Low Road, Wortwell	2200	Comment	Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. The site is in a SSSI IRZ and development of 10 units or more would require consultation with Natural England. Applications for planning consent should	Comments noted.	858	Given the constraints on the site, consider reverting to the existing Local Plan (allocation WOR 1) wording, for 'approximately 5', which would give scope for a limited increase in numbers, should a

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			be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			suitable proposal come forward, but would remove the requirement to consult directly with Natural England re the SSSI IRZ.
QUESTION 92: Preferred Site - SN2036, Land at the junction of High Road and Low Road, Wortwell	2176	Comment	The existing highway arrangement in vicinity of the site presents with narrow carriageway and footway at Low Road. The Low Road junction with High Road does not conform to current safety standards. Improvements would be required to enable the Highway Authority to support development at this location. The Highway Authority is satisfied that appropriate access can be achieved and would require the following: • Improvement of the Low Road junction with High Road to provide visibility splays within public highway, of 2.4m x 59m in both directions. Note: The give way line will need to be moved forwards to achieve this and kerb realignment will be required at both sides of the junction. • The site shall be accessed at Low Road, which shall be widened to 5.5m between the access(es) and the junction with High Road. • Visibility from the site access(es) at Low Road shall be provided in accordance with the requirements of Manual for Streets. • Forward visibility to the site access(es) at Low Road shall be provided in accordance	Comments noted. Concerns have been raised about the suitability of this site for 10 dwellings, particularly in terms of the character of the area and the impact on nearby heritage assets. It is possible that the required highways works could exacerbate these concerns in terms of urbanising this part of the village. As such, it may be more appropriate to retain a smaller allocation for the site, and ascertain whether the highways requirements would be different for a site of 'approximately 5 dwellings'.	857	Consider reverting to the existing Local Plan (allocation WOR 1) wording, for 'approximately 5', which would give scope for a limited increase in numbers, should a suitable proposal come forward; confirm with the Highway Authority what improvements/standards would be required for development below 10 dwellings.

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			with the requirements of Manual for Streets. • The footway at the Low Road frontage of the site shall be widened to a minimum of 1.8m. Please note the highway requirements will necessitate removal of a mature tree. Subject to inclusion of the above requirements in the draft policy, the Highway Authority would support allocation of 10 dwellings.			
QUESTION 92: Preferred Site - SN2036, Land at the junction of High Road and Low Road, Wortwell	2151	Comment	Few or no constraints. Standard information required at a planning stage. The site is adjacent to a flow path. This must be considered in the site assessment. Assessment: Green	Comments noted.	856	Ensure the site assessment adequately reflects the adjacent flow path.
QUESTION 92: Preferred Site - SN2036, Land at the junction of High Road and Low Road, Wortwell	2045	Comment	Whilst there are no designated heritage assets within this site, the grade II listed Bell Inn lies opposite this site. Another grade II listed property, known as Premises of Mr Brown, lies to the north of the site. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and determine if allocation of	Comments noted. The site is currently allocated in the 2015 Local Plan. A Heritage Assessment will be undertaken for the site, taking into account the listed buildings in the vicinity and the role the site plays in the gap between High Road and Low Road.	855	Undertake a Heritage Assessment for the site and reflect any relevant outcomes in the allocation policy for the site.

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			this site is appropriate, and if it is what mitigation may be required. This is an important rural gap site in the village and consideration should be given to that role in combination with the setting of the heritage assets.			
QUESTION 92: Preferred Site - SN2036, Land at the junction of High Road and Low Road, Wortwell	1960	Comment	Within the Waveney, Lower Yare and Lothingland IDD. A Board Adopted Watercourse is located to the east of the proposed site boundary. Byelaw 3 applies to any proposed discharge of surface water from the proposed site. All other Board Byelaws will also apply to this development.	Comments noted.	854	Requirements to be taken into account in any subsequent planning application.
QUESTION 92: Preferred Site - SN2036, Land at the junction of High Road and Low Road, Wortwell	818, 1457, 1659	Mixed	Concerns raised in relation to the increase in numbers from the 'approximately 5' dwellings in the current Local Plan allocation (WOR1) to 'up to 10 dwellings' in the Regulation 18 consultation. Issues raised include: 1. Impact on the character of the area at the heart of the village, including on the Grade II listed Wortwell Bell opposite, taking into account how development has historically evolved in the vicinity (density, plot size, informal layout), and the rural gap between development in Low Road and High Road. 2. Flood risk on the site and the	1. The Council acknowledges that the site is in a sensitive location in the centre of the village, with the Grade II listed Wortwell Bell opposite and additional listed properties both north on High Road and further south on Low Road. However, a development of 5 dwellings on the site would equate to 12.5 dwellings/hectare, half the density of other sites promoted in the Regulation 18 VCHAP. The site is an irregular shape (to avoid those areas identified as being at flood risk), with the potential access offset to south and a Public Right of Way bisecting the site. Development in the immediate vicinity is of mixed densities, ages and styles, and there is a clear gap south of the site,	853	Given the constraints on the site, consider reverting to the existing Local Plan (allocation WOR 1) wording, for 'approximately 5', which would give scope for a limited increase in numbers, should a suitable proposal come forward.

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			surrounding area, including the adjoining highway. 3. Deliverability of the site, which has not been developed since it was included in the 2015 Local Plan.	separating the housing in Low Road. 2. The site itself is currently outside of the areas of identified flood risk, however any planning application would need to demonstrate that it will not worsen the situation on- or -off-site. 3. Whilst the site has not been delivered to date, it is a modest sized site which could realistically be developed within the timescale of the current allocation (to March 2026). In addition, the site promoters have clearly delayed progressing a site, awaiting the outcome of the current Local Plan process.		
QUESTION 93: Preferred Site - SN2065REV, Land north of High Road and Harmans Lane, Needham	327	Object	Summary of comments submitted in relation to SN4069SL in Brockdish: Site has been submitted without reference to flooding; and site lies 6km from primary school therefore outside walking distance.	The Council notes these comments and believes that they relate specifically to Question 94. The Council acknowledges the concerns raised about this site and following receipt of the technical consultee comments further discussions have taken place with the Lead Local Flood Authority to determine the suitability of this site for inclusion in the VCHAP. It was noted that there is a significant active surface water flow path within close proximity of this site and whilst it may not directly impact on the site itself as a result of its proximity the LLFA considers this site unfavourable for development. The Council has also been made aware that active flooding of properties within proximity of this site occurs. As such it is considered appropriate for the Council to review	782	Review of the site to determine whether this site is an appropriate addition to the settlement limit following discussions with the Lead Local Flood Authority. This should also consider the distance of the site to the local primary school.

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				the inclusion of this site within the VCHAP. Concerns about the distance to the local primary school are noted, as are the reasons this was considered to be acceptable at the initial site selection stage of the VCHAP process. However, on balance the Council considers that this should also be reconsidered as part of the overall review of the site.		
QUESTION 93: Preferred Site - SN2065REV, Land north of High Road and Harmans Lane, Needham	2017, 2046, 2201	Comment	Technical comments relating to environmental matters for SN2065REV: This site is within 250m of an existing landfill which could impact on the amenities of residents - odour, noise, dust, pests - regard should be had to para 182 of the NPPF; Potential impact of development upon the significance of identified heritage assets (Grade I Church of St Peter, Grade II boundary wall and Grade II Ivy Farmhouse); HIA required to assess the impact of development on the listed buildings and if appropriate identify mitigation measures - this should inform policy requirements; Green ecological rating based on desktop research - surveys and biodiversity enhancement required in accordance with policy; Loss of priority habitat (hedgerows) should be avoided;	The Council notes the comments of the technical consultees. With regards to the comments relating to the proximity of the site to an existing landfill site the Council should seek further assurances from the Environmental Protection Team regarding any reported incidences from local residential properties. The preferred allocation site lies between existing residential developments therefore it may be reasonably assumed that impacts arising from new development would be similar to those already in existence. The identification of these heritage assets by Historic England is noted. As requested by HE the Council will need to undertake a Heritage Impact Assessment to assess the impact of development on the significance of these heritage assets however the Council does note the intervening development between the heritage assets and the preferred allocation site and considers the impact of development on this site is likely to be	777	Liaison with Environmental Protection to establish whether the landfill site has resulted in issues for existing residents in close proximity to SN2065REV. Undertake a HIA to assess the impact of development on the identified heritage assets, possible mitigation measures and inform policy wording.

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			Site within amber/green zone for GCNs; and site within SSSI IRZ but residential development does not trigger NE consultation.	minimal. The comments of the County Ecologist are welcomed and provide reassurance that development on the site would be achievable without an adverse ecological impact arising. Any future planning application on the site would be required to be accompanied by the appropriate surveys and mitigation strategies that have informed the detailed design of the site, and consideration should also be given to the inclusion of Biodiversity Net Gain in accordance with emerging legislation.		
QUESTION 93: Preferred Site - SN2065REV, Land north of High Road and Harmans Lane, Needham	1961, 2021, 2147	Comment	Technical comments relating to water management submitted in response to Question 93 (SN2065REV): Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment; a riparian watercourse is located to the north of the proposed site and feeds into a Main River; any surface water discharge into the watershed catchment of the Board's IDD should be in accordance with the non-statutory technical standards for SuDS; Site is within FZ3 and would require a site specific FRA at the planning application stage; and LLFA - green rating - the site is adjacent to	The Council notes the technical comments that have been submitted regarding water management issues on site SN2065REV, including those of the Environment Agency concerning an area of the site falling within an area identified as being within FZ3. The promoter of the SN2065REV has previously reduced the scale of the site in order to address the concerns raised about the presence of FZ3 however a small area of FZ3 remains within the northern section of the site. The preferred allocation site forms part of a larger landholding with the current boundaries drawn to reflect the depth of the existing plots immediately adjacent to the north east of the site. However, the site lies between two small existing areas of development with those dwellings to the south west currently included within a shallower settlement limit - it may therefore be	776	Review proposed modified site boundaries to determine whether it is possible/necessary to remove the area of FZ3 from the preferred allocation site in its entirety. Consideration of policy text to include reference to the modelling required by the LLFA.

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			a flowpath and this should be considered in the site assessment.	appropriate to reduce the proposed boundaries of the site and exclude the identified areas of FZ to the north of the site and align the site with the existing settlement limit. This may impact on the number of dwellings that could be accommodated on SN2065REV. The Council has also noted the presence of the surface water flowpath to the north of the site (identified as a watercourse) however this does not significantly affect the site and it is considered that a suitable drainage strategy could be designed to address on-site drainage. The LLFA has not raised an objection to the development of this site in subsequent discussions however the LLFA have advised that modelling would be required for the nearby watercourse to ensure that discharge into this would not increase flood risk downstream. Consideration to the inclusion of this requirement within site specific policy text should be made.		
QUESTION 94: Preferred Site - SN4069SL, Land south of Scole Road, Brockdish	2047	Comment	Heritage comment submitted for SN4069SL: Site lies entirely within Brockdish Conservation Area and opposite Grade II listed White House Farmhouse; and a HIA is required to assess the impact of the proposed development on these heritage assets, identify mitigation and enhancement measures where appropriate and inform policy text.	Previously the site was located within the Brockdish Conservation Area however a review of the boundaries in 2018 led to the removal of this site from within the Conservation Area. However the site lies adjacent to the Conservation Area and the impact of development on the significance of the CA should be included within the HIA for this site.	781	Consider undertaking a Heritage Impact Assessment to determine the impact of development on both the identified listed building and Brockdish Conservation Area, identify mitigation measures (if appropriate) and

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						inform specific policy text where relevant.
QUESTION 94: Preferred Site - SN4069SL, Land south of Scole Road, Brockdish	1962, 2112	Comment	Technical comments relating to surface water management for SN4069SL: Within the Waveney, Lower Yare and Lothingland IDD; There are a series of riparian watercourses to the south of the proposed site; Byelaw 3 applies to any proposed discharge of surface water from the proposed site - all other Board Byelaws will also apply to this development; LLFA green rating; In proximity to a large number of internal flood events associated with Grove Road - this must be considered within the site assessment; On-site flood risk contributes to an adjacent major off-site flowpath - this must be considered within the site assessment; and a large proportion of the site is not at risk of flooding and has the potential to be developed.	These comments are noted. It would be the responsibility of the developer to ensure liaison with the appropriate third party to ensure that an appropriate drainage strategy is incorporated into any forthcoming scheme on the site. The proximity of the site to a significant off-site flow path is acknowledged, as are the comments of the Lead Local Flood Authority, which highlight the proximity of this site to a significant off-site flow path. Subsequent discussions with the LLFA have raised concerns about the development of this site due to the number of reported off-site internal flood events that have occurred in close proximity to the site. Whilst a technical drainage solution may be achievable on the site the Council will need to consider whether this site remains a suitable extension to the existing settlement limit following these discussions.	780	Review whether this site is suitable for a settlement limit extension following continued discussions with the LLFA about the local off-site flood events.
QUESTION 94: Preferred Site - SN4069SL, Land south of Scole Road, Brockdish	328	Object	Support for the rejection of promoted sites SN0385 and SN0464 in Brockdish.	The Council acknowledges that the Parish Council supports the rejection of these sites within the VCHAP process. The Council does not consider it	779	No action required.

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				necessary to review the inclusion of these sites for allocation.		
QUESTION 94: Preferred Site - SN4069SL, Land south of Scole Road, Brockdish	2202	Comment	Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Site comprises small field at edge of settlement. Hedges are a priority habitat so losses should be avoided, minimised and as a last resort, compensated for. No other priority habitats are identified (see MAGIC). Site within amber habitat zones for great crested newts (pond adjacent). Site not within a SSSI IRZ. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain	NCC Ecologist comments noted.	717	Policy wording to include: Hedges are a priority habitat so losses should be avoided, minimised and as a last resort, compensated for. Site is within amber habitat zones for great crested newts (pond adjacent).
QUESTION 95: Should any rejected sites be allocated?	820, 1660	Comment	Rejected site SN4063SL. Support for the site based on: - Providing family homes which are needed in the village on a site with good access to the village hall and playing fields. - a site on the frontage, shielded by the existing trees would be preferable (and is now promoted) and would provide a deliverable and logical complement to the existing pattern of development with direct access onto High Road.	The reasons for rejecting SN4063SL remain valid, in that the site has a poor relationship to the existing linear pattern of development on High Road, sits noticeably higher than the frontage development (with consequent landscape concerns) and appeared to be accessed via a relatively narrow track between existing dwellings. The site was also linked to the provision of a dedicated 'dog walking area' on adjacent land; however the scale of the development proposed would not be sufficient to have an allocation policy	860	Consider the revised proposal (Ref SN5029) to bring this site forward in conjunction with land south of High Road (frontage of SN2121REVA), for an allocation-scale development of 12 dwellings.

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			- provision of a dedicated 'dog walking area' for the village (supported by local consultation).	which would link housing provision with the public open space. During the Regulation 18 consultation the site promoter submitted an alternative proposal for the housing to be developed on the High Road frontage, Ref SN5029, to achieve the benefits listed in the submission.		
QUESTION 95: Should any rejected sites be allocated?	800, 1661	Comment	Rejected site SN2121REVA Support for the site on the basis of: - The western boundary forms a natural extension to the village. - The site will increase the choice and location of sites within the village and is being proposed for four bungalows which would suit local needs. - It is considered that the highways requirements can be met. - No sewer crosses the site as previously suggested by AWA. - The majority of the site is not affected by flood risk.	This site has also been the subject of a recently refused planning application for four dwellings (2021/2140), the main reasons for refusal being that the site is outside the current Settlement Limit would be an extension of linear development along High Road, which is recognised as a vulnerability in South Norfolk Landscape Character Assessment. Prior to the Regulation 18 consultation the site was assessed as a 1 hectare plot for up to 25 dwellings. As such, it was considered to: introduce uncharacteristic estate-scale development on the edge of the settlement; extend development into an area of flood risk; and require significant highways visibility splays at the site entrance, with the consequent loss of hedging/trees. Following discussions between the site promoter and Wortwell PC, the proposal has been reduced to frontage development only, for approximately four dwellings, similar to the recent planning application (2021/2140).	859	Consider the revised proposal to bring the frontage only of this site forward in conjunction with land north of High Road (submitted during the Regulation 18 Consultation Ref SN5029), for an allocation-scale development of 12 dwellings. Confirm with the Highways Authority whether a crossing point is still required for the level of development now proposed.

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				Consideration of the planning application did not raise any fundamental concerns from a highways perspective (and the site could potentially share an access with the three recently constructed dwellings immediately to the east). Frontage only development also removes the area at flood risk from the site. The site would still create linear development on the south side of High Road; however a new site has been submitted on the north side of High Road during the Regulation 18 consultation (Ref. SN5029) and a combined proposal would not extend any further west than the Old School, Wortwell, which represents the last building within the parish, before the open countryside gap to the neighbouring hamlet of Redenhall.		
QUESTION 95: Should any rejected sites be allocated?	510, 1662	Comment	Representations submitted in support of SN2006SL: Infill site for small scale development of 3-4 dwellings; River valley setting (but the entire village is within a RV designation); Development would not impact on- or detract from the meadows opposite the site; Site is set above the road and not liable to flooding;	The Council recognises the support that has been expressed for the development of this site, as well as the planning history of the site which includes the recent dismissal of an outline planning application at Appeal (2019/0911). The current defined settlement limit does not extend as far as SN2006SL and inclusion of this site within the VCHAP would require the introduction of a new area of settlement limit to the north of the existing boundary. The Council maintains that the sporadic housing located in this location is not suitable for a settlement limit and that new development in this	778	No action required.

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			Pedestrian footpath extends into Harleston; Good bus links and on school bus route; Local support including District Member and Wortwell Parish Council; and Suitable location for purchasers seeking a rural setting in close proximity to main road links to larger centres.	location would have an adverse landscape impact, eroding the existing gap which is a characteristic of the rural setting. The Council also notes that although the site was originally promoted for a single dwelling subsequent representations (in addition to the planning application) have indicated that the site would be capable of accommodating in the region of 4 dwellings. Whilst this would represent a more efficient use of land (as required by the NPPF) it would significantly alter the approach into the village from the north. Whilst the Council accepts that the site benefits from reasonable connectivity to the public transport routes and benefits from being located alongside a pedestrian footpath into the centre of village this is not considered to be sufficient to overcome the landscape harm that would arise from the introduction of new development in this location.		
QUESTION 95: Should any rejected sites be allocated?	1632	Comment	Comments relating to development in Starston submitted in response to Question 95: Important to retain a gap between Harleston and Starston; Harleston and Starston complement each other; Support the rejection of SN2001SL; and	The Council recognises the concerns about erosion of the gap between these settlements, as well as the relationship between the settlements in terms of services, facilities and amenities for residents. The Council maintains that SN2001SL is not suitable for allocation for the reasons set out in the initial site assessment. The Council also notes the comments relating to Starston Neighbourhood Plan	775	No action required

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			Concern about the development proposals in Starston NP.	and the support for emerging GNLP Policy 7.5. Starston NP is currently subject to a Regulation 16 consultation and comments relating to the growth of the village as intended by the NP should also be submitted to that consultation for consideration by the Neighbourhood Plan Group.		
QUESTION 95: Should any rejected sites be allocated?	1136	Support	SN2001SL Rejection is appropriate; Cross Road joins Starston's designated HGV route at Railway Hill Due to high traffic volumes and narrow single track roads, (largely without pavements) walking and cycling around the village, amongst large vehicles, can be difficult and dangerous. Lack of agility is more common as we age. 30% of Starston residents are over 65. Just under 10% are aged 0 to 9 (ONS population estimates 2019)	The Council acknowledges the support to reject site SN2001SL .	716	No action or change required,

Newton Flotman and Swainsthorpe

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QUESTION 96: Settlement limit	47, 79, 293, 558, 593, 595, 603, 612, 628, 636, 640, 690, 695, 710, 715, 742, 749, 779, 824, 866, 880, 1052, 1068, 1078, 1097, 1107, 1150, 1165, 1190, 1218, 1229, 1525, 1577, 1586, 1603	Mixed	The following issues have been identified as being of concern in response to Question 96 (changes to the SL): HIGHWAY ISSUES: additional traffic on a very small road (Alan Avenue), the A140 is already a busy and dangerous road, no pedestrian route on Flordan Rd; A140 should not be referred to as a by-pass in the form and character contextual information; SCALE: Not every village needs to be made into a town; the proposed allocation should be considered cumulatively with NEW1 and not in isolation; impact of NEW1 is currently known and needs consideration before further allocations are made; ENVIRONMENTAL ISSUES: impact on countryside; air quality concerns - noise and disturbance resulting from use; nature conservation, wildlife, loss of vegetation; GENERAL AMENITIES: pressure on existing infrastructure (School, Dr surgery, drainage, sewage, waste removal, electricity and communication network): PC object to any further development until the infrastructure is put in place to support it; nearest shops are in Mulbarton or Harford (excluding a corner shop in the village); and concerns about the drainage of rainwater.	The Council considers that these responses to Question 96 (proposed changes to settlement limit boundaries) relate to the principle of new development within the settlement, rather than specific amendments to the existing boundaries. With the exception of the inclusion of any new allocation site the Council is not proposing any additional boundary changes within the Newton Flotman and Swainsthorpe cluster. Having reviewed these comments the Council responds as follows: HIGHWAY ISSUES: The Council has proactively engaged with the Highways Authority about the proposed allocation site (SN4024). In accordance with the agreed site assessment criteria these discussions focused on both the immediate access to the site and the impact of the proposed development on the wider road network. Initial concerns about the feasibility of creating an access into the site have been raised with the promoter of the site who has indicated that third party land would be available to achieve an appropriate second access point to both NEW1 and SN4024 from Alan Avenue. The Council will need to be assured prior to allocation that this proposed solution is both achievable and acceptable in highway terms. The Highways Authority have not raised any concerns about the	527	Confirmation/ evidence to be obtained from the site promoter demonstrating that access into the site(s) can be achieved (via third party land) prior to site allocation; Confirmation from NCC Highways that a proposed second access point from Alan Avenue is an acceptable option in principle prior to site allocation. Consideration to be given in the policy text to the relationship between NEW1 and SN4024, including matters such as connectivity, landscaping and the management of surface water management. Review of existing policy wording for NEW1 to determine whether any amendments are required to this allocation.

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				additional traffic movements on the A140 that would be associated with this development in their responses and whilst the Council recognises the concerns raised it should be noted that the A140 is a main road and the additional number of dwellings proposed will not significantly impact on the flow of traffic on this route. Comments relating to the lack of footway provision along Flordon Road are noted however this is not considered to be a significant consideration in the proposed allocation of the preferred site at Alan Avenue as Flordon Road is not connected to the site and leads in the opposite direction to the key services and facilities within the village. The comments of Newton Flotman Parish Council relating to the A140 being described as a 'bypass' are noted and may be reviewed in future iterations of the contextual information; however, the Council considers that the A140 forms a boundary to the settlement and therefore avoids traffic travelling through the village, thus 'bypassing' the settlement and it is in this context this terminology has been applied. SCALE: The existing allocation NEW1 and the proposed allocation site SN4024 are adjacent to one another and opportunities to explore appropriate connectivity and linkages between the sites should be explored. The relationship between the sites is an		Review of wording of the contextual information for Newton Flotman in relation to the text describing the A140. Liaison with NCC Education to confirm on-school roll numbers and capacity at local primary school.

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				important consideration and the site specific policy text should ensure this is maintained as far as possible. The sites are not being considered in isolation however it should be noted that NEW1 remains an allocation under the preceding 2015 Plan and is therefore not included in the housing numbers proposed for the cluster as part of the VCHAP. The Council understands the concerns of local residents to additional growth in settlements throughout the District and is seeking to distribute the required housing numbers in a balanced manner. This approach is intended to support local communities and the local economy and allow for small scale growth in a sustainable manner. Newton Flotman was previously recognised as a Service Village in the Joint Core Strategy and falls within the Norwich Policy Area. The settlement benefits from a number of key services and facilities as well as good transportation links. The development proposed as part of the VCHAP process is modest in scale reflecting the aspirations of the Plan and is considered appropriate for the village, delivering the required growth whilst protecting the character of the settlement. ENVIRONMENTAL ISSUES: Sustainable development is a key consideration of the VCHAP and an assessment of the environmental impact of the proposed development has been included in the site selection process. This supporting		

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				evidence includes the Sustainability Appraisal and a Habitat Regulations Assessment. Both of these documents have been undertaken by independent consultants and have been key components of the evidence base when selecting sites. Furthermore each shortlisted and preferred allocation site has been subject to technical consultation and has been assessed by the Norfolk County Council Ecologist with subsequent comments and recommendations included in the site selection and emerging policy text as appropriate. Natural England and the Norfolk Wildlife Trust have also been invited to engage with the VCHAP production and have done so in varying degrees. The Council is keen to ensure that wherever possible existing ecological features are retained and maintained and losses are minimised. In accordance with emerging policy and legislation developers will also be encouraged to give serious consideration to Biodiversity Net Gain when developing sites. GENERAL AMENITIES: Concerns about the pressure of new development on existing services and facilities as expressed in response to this question are recognised and are a recurrent concern throughout the Regulation 18 consultation responses. The Council is sympathetic to the concerns of local residents and has actively engaged with the relevant infrastructure and service		

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				providers to ensure that constraints on any local facilities are recognised and development occurs in the most sustainable locations taking into account these discussions. These discussions have not highlighted any particular issues at this time that could not be addressed through appropriate mitigation measures.		
QUESTION 96: Settlement limit	1655	Comment	SN0594 should be allocated for up to 30 residential dwellings and the limit of the main built form of the settlement should at least be extended to include the site. Furthermore, the A140 should not form the settlement limit to the east of the village but rather the limit should be extended to include the existing development to the east of the A140. Residential properties in this location clearly form part of the settlement pattern of the village and would form a logical extension to the settlement limit.	The purpose of the settlement limit is not to define the physical boundaries of the settlement but rather is a planning policy tool that differentiates between those areas in which the principle of development is considered to be acceptable and those in which more restrictive planning policies apply. In this instance the site being promoted falls outside the settlement limit and is separated from the main area of the village by the A140. The Council acknowledges the suggestion that this site, as well as other existing developments to the east of the A140 should be included within a revised settlement limit however for the same reasons set out in the site assessment for SN0594 the Council does not consider that this would be an appropriate amendment to the existing settlement limit. No changes are therefore proposed in response to this representation. (The Council notes that additional evidence has been submitted in support of SN0594 as part of this representation, as well as in response to Question 98. The site specific evidence	84	No action required

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				will be considered more fully in response to Question 98).		
QUESTION 96: Settlement limit	72	Comment	Suggestion to amend settlement land limit towards the railway line to include houses, the field that backs the playing field.	Settlement boundaries are a policy tool to delineate in plan form coherent and established built up areas within which further development will, in principle, be permitted. The land suggested forms an open field where existing development is sporadic and does not follow the existing settlement limit pattern for Swainsthorpe and Newton Flotman. For the purposes of planning policy the areas outside the settlement limit are classified as open countryside and in these areas development is subject to more restrictive planning policies. The Council does not consider that the area proposed for inclusion within the defined settlement limit is suitable for development and as such the existing limits of the boundary are to be maintained.	81	No action required.
QUESTION 97: Preferred Site - SN4024, Land off Alan Avenue, Newton Flotman	2203	Comment	Green no major ecological constraints identified from desk-top search. Site comprises field at edge of Newton Flotman, adjacent to NEW 1 (existing allocation). Bounded by hedges, which are a priority habitat so losses should be avoided, minimised and as a last resort, compensated for. No other priority habitats are identified (see MAGIC). Site within amber/green habitat zones for	Council acknowledge NCC ecologist comments. Development proposals will be required to minimise the loss of priority habitat (hedging) in accordance with policy and legislation. Consideration should be given to including this within the Core Policies/ policy text applicable to all allocated sites in order to avoid unnecessary repetition throughout the final document.	645	Note Priority Habitat (hedgerow) on site which is to be protected/ retained wherever possible. Consideration to be given to including this requirement within Core Policies to avoid repetition throughout the VCHAP.

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			great crested newts. Site not within a SSSI IRZ.			
QUESTION 97: Preferred Site - SN4024, Land off Alan Avenue, Newton Flotman	33, 80, 215, 237, 241, 373, 377, 559, 594, 604, 613, 629, 637, 644, 657, 691, 693, 698, 699, 701, 704, 705, 708, 709, 716, 744, 750, 760, 780, 838, 869, 873, 882, 935, 1053, 1073, 1075, 1096, 1098, 1108, 1146, 1147, 1160, 1188, 1220, 1231, 1286, 1327, 1546, 1553, 1578	Object	Objections submitted in response to preferred allocation SN4024: HIGHWAYS ISSUES: concerns about the suitability of Alan Avenue for additional traffic (narrow width and cars parking on the side of the road); existing congestion problem and any additional traffic entering/exiting Flordon Road/Ipswich Road is a hazard/safety concern; concerns how construction traffic will affect the area; ENVIRONMENTAL ISSUES: Concerns about air quality resulting from increased traffic, noise and disturbance; impact on nature conservation and wildlife; proposals not in accordance with Norfolk Environment Policy/DEFRA 25 year plan to preserve nature/wildlife/quality of life/community; GENERAL AMENITIES: Pressures on existing infrastructure (school, GP surgery, drainage, sewage, waste removal, electricity and communication network); SCALE AND DESIGN: Concerns on the combined impact of NEW 1 and the proposed site; impact on outlook of existing residents as well as impact on skyline.	The Council has considered the representations received in response to Question 97 and has provided a response by topic area (as set out above): HIGHWAYS ISSUES: Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. It has been identified that the estate road serving NEW1 is not suitable to also be the sole means of access to SN4024. A second point of access is required and will require third party land, this will be explored and confirmed as part of the final site selection and the Council will need to be assured that this is an appropriate solution in principle prior to final allocation. It is anticipated that the provision of a second access into NEW1 and SN4024 would address this concern and may also alleviate some of the existing congestion currently experienced by existing residents. With regards to construction traffic, whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage.	88	Discussions with NCC Education regarding school capacity. Consideration to be given to the need to require topographical surveys to support site design due to the topography of the site and its relationship to existing dwellings.

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				ENVIRONMENTAL ISSUES: Concerns about the impact of alterations to the existing road as well as the increased traffic movements on the local ecology and amenity (noise and air pollution) are recognised, as are associated impacts on local wildlife, which the Council accepts can arise from new development. However, in order to minimise the ecological impact of these site allocations the site selection process has been informed by discussions with technical consultees and environmental organisations, as well as the production of a Habitat Regulations Assessment. The County Ecologist was engaged to undertake a desktop assessment on all shortlisted and preferred sites and as such has identified those sites and/or site features considered to be of ecological interest. Where appropriate recommendations and mitigation measures identified at the site selection stage of the VCHAP process will be incorporated into site specific policy text. In addition, developers of sites will be required to have regard to existing and emerging policy and legislation, including the requirement for Biodiversity Net Gain. Detailed ecological surveys would be assessed as part of the assessment of any planning application for the site. GENERAL AMENITIES: The concerns raised regarding the capacity of the school, GPs and other resources and facilities are acknowledged. However,		

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				most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale and therefore in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. Some services like shops and pubs may benefit from additional customers. To address specific local concerns the Council is engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education Authority, Highways and Lead Local Flood Authority, as well as Anglian Water regarding local wastewater infrastructure capacity and constraints. This will ensure that infrastructure issues are identified and understood as part of the plan making process and, where appropriate, may be addressed on specific sites in the individual site allocation policy text. At this time no significant issues have been identified in association with the allocation of SN4024 either on its own or in combination with the existing allocated site NEW1. As such the Council considers that the impacts of any new development in this location may be successfully mitigated via the site specific policy text and the planning application process.		

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				SCALE AND DESIGN: As noted in the response above consideration has been given to the relationship between the existing and preferred allocation site, as well as the resultant quantum of development that would arise on these sites. NEW1 was allocated as part of an earlier Plan and whilst this site has not yet been developed the numbers proposed on this allocation do not contribute towards the numbers of dwellings currently being allocated as part of the VCHAP. Whilst the majority of the 2015 site allocations have now been completed the longer timescale for the delivery of NEW1 has afforded the Council an opportunity to consider the potential relationship and combined impact of these sites. The Council also has an opportunity to consider site specific policy wording to enhance the linkages between these sites. Whilst concerns about the impact of development on existing residents in terms of outlook and existing amenities are noted, these are detailed matters that would be subject to assessment at the planning application stage. Developers will be required to prepare schemes that accord with local and national planning policies which seek to protect the amenities of existing residents. Although the Council is sympathetic to concerns relating to loss of existing views this is not a planning matter and it is not appropriate to prevent development for this reason		

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				unless the landscape impact is significant.		
QUESTION 97: Preferred Site - SN4024, Land off Alan Avenue, Newton Flotman	73, 765, 2163	Mixed	Concerns have been raised about access and highways; only one access road at present and is already serving NEW1 which is not suitable. A second point of access is required and will require 3rd party land. It has been asked that the proposed numbers allocated on the 'NEW 1' site are clarified and whether the development would result in 'planning gain' such as footpaths. It has been noted that the development would support local facilities.	Officers at NCC Highways have provided technical advice relating to both the site access and the impact of the proposed development on the wider highway network. It has been identified that the estate road serving NEW1 is not suitable to also be the sole means of access to SN4024. A second point of access is required and will require 3rd party land. Confirmation that this is both achievable and acceptable in highways terms will be necessary prior to site allocation. The relationship between the preferred allocation site and NEW1 is recognised and that Council is keen to ensure that this is reflected in any site designs/ layouts that may be submitted for development across these sites. This includes connectivity between the sites, landscaping, drainage schemes etc. If appropriate these matters may be incorporated into the site specific policy text of both sites to secure these details (however it should be noted that a planning application on NEW1 may be submitted prior to the adoption of the VCHAP). With regards to NEW 1, under the current South Norfolk Allocations Plan, this site is allocated for approximately 30 dwellings.	87	Review the site specific policy text for NEW1 to determine whether this requires any amendments due to its proximity to SN4024. Consider the relationship between SN4024 and NEW1 to ensure that linkages between the sites are included in site specific policy text (eg, connectivity, landscaping, drainage).

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QUESTION 97: Preferred Site - SN4024, Land off Alan Avenue, Newton Flotman	105	Comment	Please ensure that the sewers on Flordon Road can cope with the additional housing when or if the new developments at the top of Alan Avenue go ahead.	The Council acknowledge the concerns raised with existing sewage capacity and recognise the need to ensure existing services can accommodate additional housing. As such, is engaging with a number of service providers as part of the production of the plan, this includes Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.	86	No action or change required.
QUESTION 97: Preferred Site - SN4024, Land off Alan Avenue, Newton Flotman	679	Support	The development has no specific site constraints and is entirely deliverable. The land will be accessed from Alan Avenue through the development of the adjoining allocated site shown as NEW1 which is being developed by FW Properties. A high quality scheme will be progressed for this land comprising a wide range of house types and sizes. The early scheme plan prepared for the site confirms 25 dwellings can be accommodated together with appropriate access and public open space. FW Properties believe that this development is a viable proposition.	The Council notes that the promoter of the site continues to support its allocation in the VCHAP. It is noted that this representation advises that the site is deliverable and accessible from Alan Avenue via the adjoining existing allocation, NEW1. Following technical discussions with the Highways Authority the Council understands that this route into the site could not be supported for highway safety reasons. Subsequent discussions have suggested a further option for a second access into the site from Alan Avenue. This would utilise third party land and the Council will need to be assured that this is both an appropriate and achievable solution prior to allocation of the preferred site.	85	Confirmation/ evidence to be obtained from the site promoter demonstrating that access into the site(s) can be achieved (via third party land) prior to allocation. Confirmation from NCC Highways in principle that a proposed second access point from Alan Avenue provides an acceptable solution prior to allocation of the site.
QUESTION 97: Preferred Site - SN4024, Land off Alan Avenue, Newton Flotman	1963, 2136	Comment	Comments relating to water management issues: Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD,	The comments relating to the flood risk of this site are noted and the Council is reassured that no significant issues have been identified as part of the technical consultation. It will be the responsibility of the developer of the site to ensure liaison with all relevant third parties	82	No action required

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			we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing.	when preparing a drainage scheme for the site.		
QUESTION 98: Should any shortlisted / rejected sites be allocated?	842	Object	Object to shortlisted site SN4025. Church Road, which leads to Grove Road, is narrow, unlit and without pavements. It is already a busy road, with speeding cars and a hazard to pedestrians, cyclists and general access. It is also a wild meadow which attracts much wildlife and nature.	The Council acknowledge the safety concerns regarding the access and the suitability of Church Road. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that access via Church Road is not suitable, therefore development of the site would be subject to achieving a suitable and safe access via Alan Avenue.	659	If site becomes preferred, the access requirements will need to be confirmed with NCC highways.
QUESTION 98: Should any shortlisted / rejected sites be allocated?	1654	Comment	Support for SN5094: There are no highway or access constraints to the development of the site and the proposed access solution would bring highway improvements [Transport Technical note submitted as supporting evidence]; NCC Highways have confirmed that the proposed access is acceptable in principle and the site assessment should be updated from red to green to reflect this; submission of Landscape and Visual Appraisal and Illustrative Sketch Layout to	The Council acknowledges the additional evidence that has been prepared and submitted in support of SN0594 and this will be reviewed in due course by the relevant consultees. The promoter of the site has indicated support in principle for access to the site has been obtained from the Highways Authority. However this does not correspond with the Council's understanding of the Highways Authority position and therefore this information should be clarified with NCC Highways. Following receipt of updated technical comments	658	Review technical note with NCC highways authority to confirm access strategy - confirm whether access to sites to the east of the A140 is acceptable in principle. In the event the site is reclassified as part of the VCHAP process confirmation of third party agreement to the

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			support site promotion; no other site constraints to development - site could accommodate up to 30 dwellings with development shown on the illustrative plan lying outside areas identified as flood zone 3; inconsistency noted on site assessment form between landscape assessment and final site recommendation/ conclusion; development of the site would have would have a very limited effect on the landscape or visual amenity beyond the site itself; parts of the site represent brownfield land - residential buildings, disused swimming pool and shed structures; benefits of this site could include assisting with provision of pedestrian access through to Smockmill Common and this should be updated/ reflected on the site assessment form; and note that both the Preferred Site Reference SN4024 and Shortlisted Site Refence SN4025 for Newton Flotman are noted as being subject to achieving safe and suitable access in the Council's Site Assessment Forms, whereas access to our client's site is readily available with an access solution which is considered to be acceptable in principle by the County Highways Authority.	a review of the NCC Highways site assessment rating may be required however the Council notes that additional information is still required to demonstrate acceptability of the proposed access arrangements (stage 1 safety audit and detailed design), as well confirmation of third party agreement to the highway alterations that would affect the garage opposite the site. Should the inclusion of the site in the VCHAP be considered acceptable following a review of the additional evidence submitted then confirmation of this third party agreement would be required prior to site allocation. Similarly, the Landscape and Visual Appraisal should be reviewed as supporting evidence for the site submission. It is noted that the promoter of the site has referred to the site as being, in part, a brownfield site however in accordance with the Annex 2: Glossary the residential gardens/ land is not considered to be brownfield land. SN0594 is therefore considered by the Council to be a greenfield site. The Council has noted the comments relating to the landscape impact in the site assessment form and this should be reviewed and updated if necessary.		proposed highway solution would be required prior to allocation. Review of Landscape and Visual Appraisal to assess landscape impact. Review consistency of landscape comments and conclusion in the site assessment form and update if appropriate. Update of the site assessment form to reflect public benefit now offered - pedestrian connectivity to Smockmill Common.

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QUESTION 98: Should any shortlisted / rejected sites be allocated?	1109	Object	We acknowledge we need more homes but this village simply doesn't have the infrastructure for current capacity. This need in place before plans are agreed	The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. The Council acknowledges that there are some inherent tensions linked to the relative accessibility of a range of higher order services and goods in several locations compared to other. However, the Plan aims to reflect the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages selection of employment opportunities etc. In addition, the Council is engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Highways and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.	657	No action or change required.
QUESTION 98: Should any shortlisted / rejected sites be allocated?	1054	Object	No longer feel safe walking due to current traffic and people parking on the paths. Didn't agree with the Alan Avenue construction. The roads are too narrow, people park on the path, dangerous. A140 / Flordon Road junction is dangerous with the added hazard of cars on the streets. There are no facilities in the village. We don't need any more houses	The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. It has been identified that the estate road serving NEW1 is not suitable	656	No action or change required.

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				to also be the sole means of access to SN4024. A second point of access is required and will require 3rd party land, this will be explored and confirmed as part of the final site selection. With regards to construction traffic, whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements are also noted however these matters would be dealt with during the planning application and it would be necessary for all new development to adhere to existing. Newton Flotman has a basic range of basic services, the parish does have a primary school, village hall, recreation ground, post office and a bus service during peak hours, linking surrounding villages and larger centres. The Council acknowledges that there are some inherent tensions linked to the relative accessibility of a range of higher order services and goods in several locations compared to other. However, the Plan aims to reflect the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of		

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				the villages selection of employment opportunities etc.		
QUESTION 98: Should any shortlisted / rejected sites be allocated?	936	Object	Build on brownfield site - conserve the countryside. There is building going on throughout South Norfolk on green field sites. The demand on housing will reduce as the population is decreasing yet the effects of your insistence on building is putting pressure on the environment.	The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. With regards to the use of Brownfield land, the GNLP priorities the allocation of Brownfield sites in Norwich and other larger settlements; however, the housing requirements of the GNLP cannot be met without the use of Greenfield land.	655	No action or change required,
QUESTION 98: Should any shortlisted / rejected sites be allocated?	74	Comment	Some development has already been permitted on the other side of the A140 SNO594...the road has to be crossed by bus users to the main part of the village. It may secure access to recreation across the river to Smockmill which would be a boon to the village as access on foot to Smock Mill is dangerous along Cargate Lane.	SN0594 is considered to be unreasonable as an allocated site. No evidence has been presented to the Council to change the view of the Council,	654	No action or change required.
QUESTION 98: Should any shortlisted / rejected sites be allocated?	751	Object	None of the sites seem suitable for this type of development. All seem to have serious issues especially around the A140.	The Council acknowledge the safety concerns regarding the impact upon of the A140. However, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. These comments will help inform the plan and provide any mitigation measures. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application, and it	649	No action or change required.

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				would be necessary for all new development to adhere to existing Development Management policies.		
QUESTION 98: Should any shortlisted / rejected sites be allocated?	1583	Object	Village is overdeveloped without the necessary underlying structure, i.e. post office, school, transport, shops - the roads are packed. It is at a critical level the village is not coping.	The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. It is acknowledged that very few of the village clusters include a GP surgery, and are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity issue at the school for local children. The Council is also engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Education and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies. The Plan aims to reflect the way people access services in rural areas and	647	No action or change required,

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				enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages selection of employment opportunities etc.		
QUESTION 98: Should any shortlisted / rejected sites be allocated?	2204	Comment	Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Site comprises field at edge of Newton Flotman., adjacent to village hall. some hedges around perimeter and a small copse onsite. Hedges are a priority habitat so losses should be avoided, minimised and as a last resort, compensated for. No other priority habitats are identified (see MAGIC). Site within green habitat zones for great crested newts and within strategic green infrastructure corridor. Site within a SSSI IRZ but residential development not a trigger for Natural England consultation.	NCC ecologist comments noted.	646	Policy wording to incorporate; hedges are a priority habitat so losses should be avoided, minimised and as a last resort, compensated for. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.
QUESTION 98: Should any shortlisted / rejected sites be allocated?	2081	Comment	Comments relating to water management issues: Few or no constraints. However, located within a Source Protection Zone 3 . Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water	Site is affected by a Source Protection Zone 3 and developers will need to liaise with the Environment Agency to ensure that development / drainage does not adversely affect the water quality.	89	Where relevant, details of the required on-site ground investigation work and liaison with the Environment Agency will form part

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			infiltration should be utilised. The site predominantly has superficial deposits of DIAMICTON.	Detailed on-site ground investigation works will be required to determine whether infiltration is a suitable/ viable option on a site and if necessary to explore alternative solutions. With regards to Diamicton, this means that the ground condition is of a variable quality that can frequently provide poor infiltration opportunities.		of the site allocation policy text.
QUESTION 99: Should any shortlisted sites be rejected?	881	Comment	I think the council ought to be looking at brownfield sites on the edges of busier towns with better infrastructure rather than tagging houses onto areas where there is already a dearth of decent services. These shortlisted sites will just end up full of houses where residents need to drive to local amenities, leisure activities, schools, dentists, doctors, shops.	With regards to the use of Brownfield land, the GNLP priorities the allocation of Brownfield sites in Norwich and other larger settlements; however, the housing requirements of the GNLP cannot be met without the use of Greenfield land. Newton Flotman has a basic range of basic services, the parish does have a primary school, village hall, recreation ground, post office and a bus service during peak hours, linking surrounding villages and larger centres. The Council acknowledges that there are some inherent tensions linked to the relative accessibility of a range of higher order services and goods in several locations compared to other. However, the Plan aims to reflect the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages selection of employment opportunities etc.	667	No action or change required.

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QUESTION 99: Should any shortlisted sites be rejected?	1055, 1092, 1093, 1110	Object	SN4025; the site is unsuitable because access to the site would be via Church Road, which is a narrow one-car-at-a-time road, no foreseeable ability to widen the road or even add a footpath. Limited services, school and the GP Surgery is full.	The Council acknowledge the safety concerns regarding the access and the suitability of Church Road. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that access via Church Road is not suitable, therefore development of the site would be subject to achieving a suitable and safe access via Alan Avenue. Newton Flotman has a range of services including a primary school, village hall, recreation ground, post office, shop and a bus service during peak hours that links to surrounding villages and larger centres. The Council acknowledges that there are some inherent tensions linked to the relative accessibility of a range of higher order services and goods in several locations compared to others. However, the Plan aims to reflect the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages selection of employment opportunities etc. It is also noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions	666	No action or change required.

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				can be used to help ensure local infrastructure effectively supports growth.		
QUESTION 99: Should any shortlisted sites be rejected?	781	Comment	SN4025 The Parish Council agree that this would be an unsuitable site for all the reasons listed for site SN4024. SN0594 The Parish Council would not support this site unless the A140/Flordon Road junction was improved.	Comments noted. At this stage SN4025 is a shortlisted site. Development of the site is subject to achieving a suitable and safe access via Alan Avenue. At this stage SN0594 is considered to be unreasonable as an allocated site.	665	No action or change required,
QUESTION 99: Should any shortlisted sites be rejected?	1580	Support	Village is overdeveloped without the necessary underlying structure, i.e. post office, school, transport, shops - the roads are packed. It is at a critical level the village is not coping.	Newton Flotman has a basic range of basic services, the parish does have a primary school, village hall, recreation ground, post office and a bus service during peak hours, linking surrounding villages and larger centres. The Council acknowledges that there are some inherent tensions linked to the relative accessibility of a range of higher order services and goods in several locations compared to other. However, the Plan aims to reflect the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages selection of employment opportunities etc. It is also noted that all of the planned developments will also need to	664	No action or change required.

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				contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.		
QUESTION 99: Should any shortlisted sites be rejected?	937	Support	Unless it is on brown field sites they should all be rejected. You are not preserving the community and environment for future generations with this form of environmental vandalism.	Comments noted. With regards to the use of brownfield land, the GNLP priorities the allocation of brownfield sites in Norwich and other larger settlements; however, the housing requirements of the GNLP cannot be met without the use of Greenfield land.	663	No action or change required.
QUESTION 99: Should any shortlisted sites be rejected?	752, 870	Object	SN4025 Should be rejected. The village cannot cope with any more housing. The access to Alan Avenue is already hard due to off road parking. Concerns with Health provisions, schooling, air pollution, the environment, lack of services, drainage is poor and sewer system already struggles to cope.	The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. It is acknowledged that very few of the village clusters include a GP surgery, and are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity issue at the school for local children. The Council is also engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Education and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. The Council acknowledge the safety concerns	662	No action or change required.

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				regarding the access and the suitability of Church Road. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that access via Church Road is not suitable, therefore development of the site would be subject to achieving a suitable and safe access via Alan Avenue.		
QUESTION 99: Should any shortlisted sites be rejected?	605	Support	Both SN4024 and SN4025 should be rejected based upon lack of detail regarding access and impact upon the existing infrastructure and wildlife of the village. The village already lacks some key services (shop, full time GP, pub) and has narrow roads unsuitable for extra traffic. It is a quiet village providing a, much needed, contrast between Norwich and Long Stratton and any major growth will dilute the relatively tranquil nature of Newton Flotman	The Council acknowledge the safety concerns regarding the access and the suitability of both SN4024 and SN4025. However, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In both cases, NCC Highways have advised that safe access will need to be demonstrated prior to development and further discussions will be help prior to allocation.	660	Further discussions with NCC highways with regards to highway requirements.
QUESTION 99: Should any shortlisted sites be rejected?	560	Object	There is no adequate access. Alan Avenue is not suitable and was never designed for an additional volume of traffic. Church Road is not suitable either. Concerns with sewerage capability and drainage from the site. There are already issues in the village which will be exacerbated by any new developments.	The highways safety concerns are noted with specific regard to Alan Avenue and Church Road. Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. It has been identified that the estate road serving NEW1 is not suitable	653	No action or change required.

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			Concerns about the safety of pedestrians as the area around SN4025 is used by most residents in the village to exercise, walk to the mobile library, walk to the Village Centre and Playgroup, cycle, walk dogs, and visit the children's play area.	to also be the sole means of access to SN4024. A second point of access is required and will require 3rd party land, this will be explored and confirmed as part of the final site selection. With regards to construction traffic, whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, sewage and drainage capacity are also noted however these matters would be dealt with during the planning application and it would be necessary for all new development to adhere to existing.		
QUESTION 99: Should any shortlisted sites be rejected?	692	Support	Alan Avenue - Newton Flotman Inferior GP provision with Newton Flotman closed, operating only as a dispensary. Long Stratton struggling and already at capacity. Mulbarton practice has publicly admitted to struggling. Concerns with sewerage, the pumping station regularly needs pumping out. Drainage is a common issue during heavy rain. Dangerous Flordon Road/A140 junction unable to cope with current traffic volume. No engagement with Highways and Parish Council since 2019. School is already at	The Council acknowledge the safety concerns regarding the impact upon of the A140. However, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. These comments will help inform the plan and provide any mitigation measures. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing	652	No action or change required.

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			capacity with temporary classrooms. The infrastructure needs to be in place first.	Development Management policies. It is acknowledged that very few of the village clusters include a GP surgery, and are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity issue at the school for local children. The Council is also engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Education and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.		
QUESTION 99: Should any shortlisted sites be rejected?	75	Comment	Requirement for well planned development; access does and on street parking of existing residents will cause issues, down the road so this needs addressing/managing. Another access road via the playing field and Grove Way could be considered - not through the playing field - drainage issues. Also drainage needs to be looked at carefully- needs to be separate to the exiting drainage running 'under' Alan Avenue.	Comments relate to SN4024, Land off Alan Avenue, Newton Flotman. Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. It has been identified that the estate road serving NEW1 is not suitable to also be the sole means of access to SN4024. A second point of access is required and will require 3rd party land, this will be explored and confirmed as part of the final site selection. With regards to construction traffic, whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the	651	No action or change required.

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				planning application stage. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority who have advised that with appropriate mitigation measures in place development of this site would be achievable.		
QUESTION 99: Should any shortlisted sites be rejected?	242	Support	The shortlisted sites should be rejected. Newton Flotman has already been developed (current Alan Avenue development) which adversely affects my home. The additional traffic joining/exiting the A140 has caused the junction to become extremely dangerous. More pollution, increased traffic generation and noise, increased risk of accident, loss of greenspace and agricultural land, loss of biodiversity/wildlife/trees/hedging. Reduced safety for pedestrians in the village. Increased pressure on already pressurised facilities (doctors/sewers/communications etc).	The Council acknowledge the safety concerns regarding the impact upon of the A140. However, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. These comments will help inform the plan and provide any mitigation measures. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, pollution etc are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies. With regards to pressure on existing facilities, the Council is also engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Education and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.	650	No action or change required.

Pulham Market and Pulham St Mary

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QUESTION 100: Settlement limit	599, 671, 1162	Mixed	Comments on the proposed changes to the settlement limit: support the proposed alterations; and support the extent of the SL as shown but no further extension of the SL to the southern boundary towards Guildhall Lane (beyond the gardens of Copperfield Court).	The concerns about the potential landscape impact of further southerly extension of the SL, as well as the possible pressures on Guildhall Lane, are recognised and noted by the Council. At this time the Council is not proposing any additions to the existing settlement limits (with the exception of allocations made in the VCHAP).	229	No action required.
QUESTION 101: Preferred Site - SN1024, Ladbrookes, Tattlepot Lane, Pulham Market	2205	Comment	Comments on the ecology of SN1024: NCC Ecology rating - green with no major ecological constraints identified; surveys and enhancement in accordance with policy requirements; some priority hedgerows identified around the site and the loss of these should be avoided; and green habitat zone for GCN and within a strategic green infrastructure corridor.	All applications for development on allocated sites will be required to submit appropriate surveys and enhancement in accordance with policy requirements. The ecological features within the site should be identified within this evidence base at an early stage in the site design in order to ensure that appropriate enhancement and mitigation measures are included within the development of the site. These measures would then be subject to assessment and review as part of the detailed planning application.	255	No action required
QUESTION 101: Preferred Site - SN1024, Ladbrookes, Tattlepot Lane, Pulham Market	2048	Comment	Heritage (HE) comments relating to SN1024: Development of this site has potential for impact on the significance of the CA; and HIA is required to assess this impact, determine whether allocation is appropriate and possible mitigation and/or enhancement measures, as well as possible policy criterion wording.	The site assessment for the site fails to make reference to the proximity of the site to the Conservation Area although the relationship with a listed building to the east is noted. The potential impact of the allocation of this site on the significance of the Conservation Area will be assessed via the Heritage Impact Assessment with any mitigation or enhancement measures noted. It is noted that the adjacent parcel of land which lies within the Conservation Area	254	Preparation of a Heritage Impact Assessment to determine the scale of the impact proposed development may have on the significance of the Conservation Area.

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				was previously an allocated site in the 2015 Site Specific Allocations and Policies Document and has subsequently been developed for residential use. It is anticipated that with suitable design an appropriate scheme could come forward on this site without resulting in a significant impact on the adjacent Conservation Area.		
QUESTION 101: Preferred Site - SN1024, Ladbrookes, Tattlepot Lane, Pulham Market	1964, 2133	Comment	Comments relating to surface water and water discharge for SN1024: Outside the IDD boundary but within the Waveney, Lower Yare and Lothingland IDB watershed catchment; any surface water discharges within the watershed catchment should be line within the non-technical standards for SuDS; and LLFA rating - green.	These comments are noted and it will be for the developer of the site to engage with the appropriate organisations when developing their drainage strategy for the site. For this site, this would require engagement with both the Lead Local Flood Authority and the IDB.	253	No action required.
QUESTION 101: Preferred Site - SN1024, Ladbrookes, Tattlepot Lane, Pulham Market	1790	Comment	Comments for SN1024: Do not support the name 'Ladbrookes' for the preferred site and hope that a new name will be considered; and would like to see a high percentage of affordable housing on the site.	The emerging GNLP includes a policy setting out the minimum requirements for affordable housing on each development site. Any subsequent applications for development will need to be policy compliant unless robust viability evidence clearly illustrates that the site would not be viable. The name 'Ladbrookes' refers to the existing site identifier and is not indicative of the name of any future development on the site. The marketing name for a site may also differ from the final site name and/or road names	252	No action required

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				within a development; these are typically determined by either the site developer or the Parish Council.		
QUESTION 101: Preferred Site - SN1024, Ladbrookes, Tattlepot Lane, Pulham Market	673, 1167	Support	Support for SN1024: PC support the preferred site but request no southerly extension of the boundary towards Guildhall Lane due to the landscape impact this would have as well as this potentially encouraging applications for access onto Guildhall Lane; Guildhall Lane is a safe place to walk for all ages; the site should include a high percentage of affordable housing that the younger generation can afford to buy; the village needs young families to ensure it's future development; and any new development should ensure the integrity of the open space in the village.	The preferred allocation extends in a southerly direction as far as the adjacent development. It is not considered appropriate to extend the allocation site beyond this line for the reasons set out above in these representations. Additional development to the south of this site would result in encroachment into the landscape whilst the current proposed allocation effectively forms a 'rounding off' of the settlement. Any future application for access onto Guildhall Lane would be subject to detailed consideration by NCC Highways however these concerns are recognised.	231	No action required
QUESTION 102: Preferred Site - SN1052REV, Land at Norwich Road, Pulham St Mary	1965, 2135	Comment	Comments relating to surface water for site SN1052REV: Site is adjacent to the Waveney, Lower Yare and Lothingland IDD - if surface water discharges within the watershed catchment of the IDD then this discharge should be in accordance with the non-technical standards for SuDS; and LLFA rating - green - a large area of the site	Subsequent technical discussions have taken place between the Council and the LLFA relating to the possible allocation of this site, reflecting the technical comments received during the Regulation 18 consultation. The flow path located to the south of the site is noted, as is the policy requirement to ensure that development of the site does not result in off-site surface water issues. Discussions with NCC Highways regarding access to this site have indicated that associated highway	258	Review of site boundaries in response to the comments of the LLFA (and the NCC Highways comments) to consider whether site-specific policy text is required regarding the form and location of development on this site, as well as the

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			is unaffected by flood risk and has the potential to be developed.	improvement works could include drainage solutions to improve the existing off-site situation. Recognising the identified constraints of the site, as well as the wider area, the Council remains of the opinion that this site is suitable for allocation however further consideration should be given to the areas of the site to be avoided by development and whether any site specific policy text is required to secure this.		location of the access point(s) into the site.
QUESTION 102: Preferred Site - SN1052REV, Land at Norwich Road, Pulham St Mary	1394, 2050, 2206	Comment	Landscape and ecological comments relating to SN1052REV: support the recommendation for development to be focussed to the east of the site to maintain distance from the adjacent woodland to reduce impacts caused by noise and landscape, as well as damage to the tree root structure; no major ecological constraints identified - surveys and enhancements in accordance with policy will be required; amber site for GCNs and some priority hedgerows around the site; and Grade II listed building Hill House lies to the north of the site but is screened by the intervening woodland and therefore no impact would be had on the significance of this woodland.	The reference to the impact of development on the adjacent woodland is noted, as are the comments of the NCC ecologist. The site assessment recognised the proximity of this site to the woodland to the north of the site and these additional comments have highlighted the impact residential development could have on this woodland if development is sited in close proximity to this area. As noted in the site assessment, and as a result of subsequent technical discussions, it is anticipated that development on this site would be focussed to the south east of the site and a buffer between the housing and woodland would remain. However, should the boundaries of this preferred allocation site be subject to amendment further consideration would need to be given to the impact of the development on the woodland to ensure a site layout with appropriate mitigation measures is achieved. In terms of the impact of development	257	No action required.

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				on local heritage assets the comments of Historic England are noted. It is not considered necessary to undertake a Heritage Impact Assessment to inform this site selection, and a report has not been requested by Historic England either.		
QUESTION 102: Preferred Site - SN1052REV, Land at Norwich Road, Pulham St Mary	600, 1557	Support	Support for SN1052REV: PC support this site but request provision be made to manage surface/ drainage water through the creation of an alternative drainage route; historic problems with drainage route via Norwich Road/ Mill Lane with flooding still occurring at Mill Lane despite recent improvements; the current drainage route adds pressure to flooding around the crossing at the beck; and site is well related to the existing settlement and the facilities and services within it.	These comments and concerns are noted. Technical discussions have taken place with the LLFA who have advised that the site is situated at the head of a 0.1% AEP (formerly referred to as a 1 in 1000 year flood event). Discussions with the LLFA have indicated that vehicular access into the site via the existing Poppy's Lane/ Norwich Road access could be affected by this flowpath however it is also noted that highways engineering works proposed to improve this junction could include a water management scheme which may result in betterment locally. Consideration should be given however to an alternative access point into the site. Notwithstanding this point, in accordance with current policy and legislation it will be necessary for the drainage scheme to ensure that this does not discharge off-site and add to existing flowpaths. Discussions with the LLFA have noted that ground conditions may not be suitable for infiltration and it would be for the site developer to ensure that site-wide infiltration testing is undertaken to inform the design of an appropriately robust design strategy.	256	Possible further discussions with NCC Highways about an alternative access point into the site and the implications this could have junction improvement works followed by consideration of the site specific policy wording relating to the access to the site (if appropriate).

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QUESTION 103: Should any shortlisted / rejected sites be allocated?	2096, 2267	Comment	Comments relating to SN1027: Hedges around field are a priority habitat so losses should be avoided; Amber habitat zone for GCNs; Site within SSSI IRZ but residential development not a trigger for consultation with NE; Ecological surveys and mitigation measures should inform site design; and Site rated green by LLFA.	These comments are noted but it is not considered that any further action is required at this time.	330	No action required.
QUESTION 103: Should any shortlisted / rejected sites be allocated?	2207	Comment	Comments relating to SN0417: Hedges around perimeter are priority habitats and loss should be avoided; Amber habitat zone for GCNs; Strategic GI corridor; Site within SSSI IRZ but residential development not a trigger for development; and Ecological surveys and mitigation required in site design.	These comments are noted however it is considered that these comments should relate to site SN0418 rather than SN0417. Clarification should be sought from the technical consultee.	329	Confirm with NCC Ecologist that the site reference for these comments should in fact be SN0418.
QUESTION 103: Should any shortlisted / rejected sites be allocated?	1540, 1602	Comment	Comments in support of SN2095: This site should be reconsidered - consider there to be an inconsistency in the assessment of the impact and mitigation of development on heritage assets when compared with alternative site SN1024;	The key issues identified in this representation are the consistency of site assessments, the impact of development in this location on the significance of heritage assets in proximity to the site, the townscape impact of development, the presence of	316	No action required

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			LBs are already compromised by existing development that has been approved - additional sympathetic development cannot detrimentally impact the setting; linear infill plot is a sympathetic form of development in SN; dispute the identification of surface water flow paths on site; footpath linkages could be provided to the rear of the site or in the frontage carriageway; and this site falls into the opportunity for limited infill development as identified in the wider village cluster commentary.	surface water flow paths on the site and the opportunities for highways improvements associated with the delivery of this site. In relation to the impact of development on the significance of heritage assets in proximity to potential allocation sites the Senior Heritage & Design Officer has commented as follows: "the two sites [SN1024 and SN2095] have different contexts and the harm to the setting of the listed buildings/conservation areas depends on the character of heritage assets and how the setting contributes to that character in terms of significance. Mitigation can vary and there will be instances where mitigation can overcome or substantially reduce the harm, whereas in other cases mitigation is not able to overcome the resulting level of harm". A further review of these two sites has concluded that the site referred to within this representation (SN1024) was considered as a brownfield site with the setting of a LB on site being a consideration in the design approach during the redevelopment of this site. In contrast, promoted site SN2095 has a number of listed buildings within close proximity with the open countryside forming an important element of their rural character. It is not considered that it would be possible to mitigate the loss of the rural setting, spacious character and views that form part of the significance of these heritage assets therefore the		

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				Council does not consider it necessary to amend this part of the initial site assessment. The Council recognises that a linear form of development is a key feature of development within many villages in South Norfolk. In this setting however it is considered that ribbon development would have a detrimental impact on the landscape and townscape, resulting in the loss of the open views and rural character that form an important feature of the approach and views into the Conservation Area, as well as in the setting of the identified listed buildings. Surface water flowpaths throughout the VCHAP area have been identified during the technical consultation with the Lead Local Flood Authority. The identified surface water flowpath is part of a larger flowpath and wider discussions with the LLFA have noted that the preference would be to avoid development occurring within a flowpath, although there could be design and technical solutions to address this constraint. Due to the relatively small area on site affected by the surface water flowpath it is considered likely that a suitable design solution would be possible to overcome this constraint. Notwithstanding this point, the surface water flow path is present on the site and therefore remains as part of the site assessment. Comments relating to the provision of a		

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				footpath are noted with site connectivity and highways improvement works being an important consideration in the site selection process. There would be a clear preference for a footway along the site frontage to improve wider connectivity in the village (rather than to the rear of the site) however it is suggested that in order to facilitate this part of the existing carriageway could be utilised. This has not been subject to discussions with the highways authority and as such it is unclear whether this would be an appropriate solution. Despite a careful review of the comments submitted in support of the site the Council considers that the issues identified as part of the initial assessment remain valid and as such the site remains unsuitable for allocation.		
QUESTION 103: Should any shortlisted / rejected sites be allocated?	746	Comment	Support for rejected site SN0363SL: Do not agree with the rejection of this site; access is not problematic as there are two established accesses off Station Road which enable parking for the Maltings and other on site car parking; two dwellings were recently constructed opposite the Maltings with no mention of detrimental impact on the Maltings or the townscape.	Whilst these comments are noted the Council remains of the opinion that this site is not suitable either for shortlisting, as a preferred site or as an extension to the existing settlement limit. Access to site has not been demonstrated with the access points referred to in this representation being either private accesses to the Maltings or constrained by protected trees. It is noted that this site is included within a wider area that is covered by a group Tree Preservation Order. Reference has been made to two recently constructed dwellings to the	291	No action required.

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				north of the promoted site however the circumstances relating to these properties were unusual and do not set a precedent for further development in this location. For the purposes of clarification, these dwellings were originally granted approval in 1973 as part of a larger planning permission for 5 dwellings (DE\10130). Three of the five units were constructed, and the planning consent remained extant. Following redevelopment of the Maltings planning permission was granted in 2008 to allow for the final two dwellings to be constructed on site following an updated design and layout that was considered to be more appropriate to their context than the earlier approved and implemented scheme (2008/0157). This planning application was noted at the time as being contrary to planning policy, but approval of an enhanced and updated design was considered to be justified in these circumstances. It does not however set a precedent for further development in this location.		
QUESTION 103: Should any shortlisted / rejected sites be allocated?	639, 2101	Comment	Comments relating to SN0418: Site is suitable for residential development - it is in a sustainable location and would support the social sustainability of the village; Acknowledge 'pinch point' north of junction with Jocelyn Close but landowner controls land to the west of Mill Lane which would allow for highway works to	The additional comments and evidence submitted in support of this shortlisted site are acknowledged. The earlier site assessment recognised that a small area of this site could be developed sensitively to avoid a detrimental impact to the wider landscape, setting of the settlement or significance to nearby heritage assets. This representation makes reference to the detailed design and layout of the site and whilst the	290	No action required at this time.

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			be delivered; Submitted illustrative masterplan demonstrates highways works as well as provision of a connecting footway along Mill Lane; New residents would support the local economy due to the accessibility of the site; Existing hedging to the wider site constrains views in and out of the site, additional hedging would enhance the screening; Sensitive site design could create a 'feathered' edge to the village; A 2018 Preliminary Ecological Assessment required further surveys on site but indicated the site is unlikely to support protected species. Boundary hedgerows recognised as habitat of importance on site; Proposed development would not result in harm to the significance of the closest listed building or its setting due to the separation and careful design; Development would respect nearby listed buildings and the CA through the design, materials and landscaping; and LLFA rating 'green'.	importance of this is recognised these details would be considered at the planning application stage unless site specific requirements required specific policy text. Similarly an updated ecological assessment and arboricultural report would be required at the planning application stage. The reasonable connectivity of this site to the wider settlement was noted in the site assessment and the provision of a connecting footway as shown on the illustrative masterplan would address a current constraint to the development of this site, as would the proposed highway works. However whilst these suggestions have been acknowledged it is also noted that these options have not been discussed with NCC Highways at this stage. Furthermore, no viability information has been received at this time confirming that a policy compliant site could be delivered alongside these highways works. Should the site subsequently be considered as a preferred site a review of the additional supporting evidence submitted will be undertaken by the relevant technical consultees however at this time the Council remains of the opinion that this site should continue to be considered as a shortlisted site and not a preferred site.		
QUESTION 103: Should any	601, 674	Comment	Pulham St Mary PC support preferred site SN1052REV and do not think any of the	The support of the Parish Council's for the preferred sites within Pulham St	289	No action required.

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shortlisted / rejected sites be allocated?			shortlisted or preferred sites should be allocated in addition to or instead of the preferred site. Pulham Market PC support preferred site SN1024 and do not think any of the shortlisted or preferred sites should be allocated in addition to or instead of the preferred site.	Mary and Pulham Market are noted. It is acknowledged that no additional sites are supported instead of SN1052REV and SN1024.		
QUESTION 104: Should any shortlisted sites be rejected?	602	Object	Comments on shortlisted site SN1027: Site should be rejected due to the unsuitability of Poppy Lane and Goldsmith Way to provide a suitable access; and detrimental impact on the current townscape arising from carrying out the required improvements.	The site has been shortlisted, but it is recognised that the current highway network does not afford appropriate access to the site via Poppy Lane. It is anticipated that junction improvement works identified as being necessary for the development of preferred site SN1052REV would improve the access to this site. However, it is recognised that this site could not be achieved without improvements to Poppy Lane therefore this site could not come forward in advance of these improvements.	260	No action required
QUESTION 104: Should any shortlisted sites be rejected?	78, 675	Object	Comments relating to sites SN0418 and SN2096 (Pulham Market): SN0418 - although a small development is proposed this would put more pressure on Mill Lane and Grays Lane; also concerns raised by NCC Highways about the creation of an appropriate access into this site and the unsuitability of the local road network. SN2096 - support for the rejection of this site due to highway safety reasons (Mill Lane, Grays Lane and the junction at Grays Lane and Tivetshall Road).	SN0418 is currently considered as a shortlisted site and potential highways issues were identified at the time of the site assessment. Further detailed technical discussions took place with NCC Highways but did not include this particular site. Therefore, this site will need to be subject to further discussion with NCC Highways should it be considered as a preferred allocations site in the future. The concerns raised within these representations are noted.	259	Site SN0418 should be referred back to NCC Highways for a further technical review if its status is amended to a preferred allocation site during the ongoing site selection process.

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				The comments relating to SN2096 are acknowledged.		

Rockland St Mary, Hellington and Holverston

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QUESTION 105: Settlement Limit	1149, 1371	Object	Concerns with impacts on listed buildings; Eel Catcher Close isn't a precedent future development, highway safety concerns, distant from village amenities.	Whilst the historical impact concerns are noted by the Council. Historic England have been consulted on the and not raised any concerns. Where appropriate, a Heritage Impact Assessment (HIA) will be required to inform the allocation of the site including any mitigation, enhancement and policy wording. Whilst the Council understands the concerns with regards to a further exception scheme being proposed (due to a revised boundary), this is beyond the scope of what is being proposed. The Council will deal with any subsequent planning applications in the context of their own merits and relevant planning policy and legislation. With regards to village amenities, whilst it is recognised that rural settlements offer fewer services and facilities than their urban counterparts, a continued concentration of development in these locations will result in the inevitable decline of existing services and facilities within the rural areas. Therefore, locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services.	435	No action or change.
QUESTION 105: Settlement Limit	926	Object	This is outside the revised settlement limit. If granted planning permission it may set a precedent for further development on agricultural land, destroying the rural village charm. The Parish Council supports brownfield sites being developed before	The Council acknowledges the concerns of the Parish Council. If site preferred sites were to be allocated and adopted as part of the Village Clusters Plan, the settlement limit will only include land that has been allocated. Whilst the	434	No action or change required.

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			greenfield. Parishioners are against large commuter-type executive housing. The Orchids is not a precedent to accept more linear or back development. Parishioners feel strongly that Rockland St Mary has had its fair share of growth in Eel Catcher Close and the completion of The Orchids as part of Bee Orchid Way. The Parish Council does not accept any further revision to adopt site SN2064REV.	Council understands the concerns with regards to future schemes coming forward, this is beyond the scope of what is being proposed and as such, any future application will be dealt with in the context of current planning policy.		
QUESTION 105: Settlement Limit	1139	Object	The proposed sites (SN2007 and SN0531) are unsuitable, at every level, for development. They would be contravening the National Planning Policy Framework as well as the South Norfolk Place-Making Guide. The developments would have a total and unnecessary catastrophic impact on adjacent significant listed buildings and heritage assets, integral to the history of the village, as well as on the landscape, utilities, highways, ecology and biodiversity of the area. The sites are outside the historic settlement boundary and there is nothing to be gained, and all to be lost, by their development.	Whilst the historical impact concerns are noted by the Council. Historic England have been consulted on the preferred and shortlisted site and have not raised any concerns. Where appropriate, sites will be required to submit a Heritage Impact Assessment (HIA) to inform the allocation of the site including any mitigation, enhancement and policy wording. Comments about the environmental impact have also been noted, however all development will be required to deliver net-gain on site and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site, such as Barn OWLS. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. Whilst the historical impact concerns are noted by the Council. Historic England have been consulted and not raised any concerns. The scale of development proposed in is	433	No action or change required.

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				within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, including those proposed at Rockland St Mary. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Service, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.		
QUESTION 105: Settlement Limit	591	Object	• Development of the sites would cause harm to designated heritage assets by disrupting their setting and the ability to understand their historical significance. • There is inadequate evidence that the council have given this issue the 'considerable weight or importance' national policy demands for decision making in the plan thus far. • Legal precedent for rejecting such proposals citing Paragraph 185 of the	Whilst the historical impact concerns are noted by the Council. Historic England have been consulted on the preferred and shortlisted site and have not raised any concerns. Where appropriate, sites will be required to submit a Heritage Impact Assessment (HIA) to inform the allocation of the site including any mitigation, enhancement and policy wording.	432	No action or change required.

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			National Planning Policy Framework has been set.			
QUESTION 105: Settlement Limit	119	Object	Strongly object to this planning application as it detracts from the linear design of the village and If agreed it will create a precedent for further developments nearby. This development involves the removal of pasture and is detrimental to the rural nature of the village. The increase in population, vehicle movements etc will add to the already busy road and impact on the infrastructure, GP surgery, school etc. This development is a contradiction of the Prime Minister's statement that there should not be developments on agricultural land, developing brownfield sites first.	The Council acknowledges the comments made within these representations. With regards to the existing landscape, whilst Rockland is characterised by mostly linear development, there are existing examples of small development clusters to the east and west, including the current development to the east of the village, The Orchard, which is at the time of preparing this response is being developed for 21 houses. The Council therefore considers that a well-designed scheme would not be inappropriate in this location. A landscape plan will help mitigate any impact that the proposed development may have on the surrounding area, including any designated areas. With regards to infrastructure, the Council is engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Highways and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. The Council notes the concerns regarding the loss of good quality agricultural land. According to the DEFRA Provisional Agricultural Land Classification (ALC) (England), the site is	431	No action or change required.

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				considered as Grade 3 - Good to Moderate. As part of the site assessment process, the Council has taken into consideration the best most versatile land (BMV) by identifying the ALC of all sites submitted. Where possible, the Council will avoid allocating and preferring sites that are of a high grade. Where higher grade land may be present, the Council will need to consider whether the social, economic or environmental benefit outweighs the agricultural and that there is no suitable or available site for the development on land of poorer quality.		
QUESTION 105: Settlement Limit	121, 143, 172, 685, 711, 831, 1028, 1312, 1336, 1459, 1556, 1573, 1574, 1594, 1598	Object	Summary of comments relating to the SL and further development; do not want to see the settlement limit extended or any further development within the cluster; development would detracts from the linear design of the village which would have an affect on the small village feel and character, as well as imposing on the countryside. Concerns have also been raised with regards to the impact development would have the increase in vehicle movement, on an already dangerous roads with narrow pavements and the impact on infrastructure capacity. Concerns also raised with the impacts on heritage assets, ensuring affordable housing, no plans for green offset and endangering environment of local wildlife.	The Council acknowledges the concerns raised within these representations, In the first instance, with regards to the potential negative affect on small villages, locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services. The provision of several relatively small allocation sites as required by the National Planning Policy Framework means this approach also has the benefit of supporting small-scale builders, providing choice for the market and helping to ensure the delivery of housing in popular village locations. With regards to the safety concerns regarding the access and the suitability of surrounding road networks. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the wider highway network. Where highway	363	No action required.

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				improvements are required, these will be required as part of the allocation and in certain circumstances some sites will need to demonstrate safe access can be achieved and the necessary road upgrades are viable, prior to allocation. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, including those proposed at Rockland St Mary. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. With regards to overlooking and amenity concerns, these will be addressed at the detailed design stage and any planning application would be subject to planning policies surrounding amenity etc. The technical design details relating drainage schemes would be assessed through the detailed planning application stage. Affordable housing:		

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				concerns about the cost of affordable housing are noted. Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time. In addition, with regards to heritage asset concern, English Heritage have been consulted and where appropriate have advised that Heritage Impact Assessments will be required to inform whether a site should be allocated or not. Comments raised about the environmental impact have also been noted, however all development will be required to deliver biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site.		
QUESTION 105: Settlement Limit	94	Object	Concerns that the new housing would not be for affordable rent and there is no guarantee it would bring families even to benefit schools.	With regards to housing mix, the Council will seek to provide new housing development to meet housing needs (using the most up to date Strategic Housing Market Assessment (SHMA)). This will ensure that allocated sites provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of their life cycle e.g. first-time buyers, affordable	362	Policy wording to include tenure mix in accordance with SHMA.

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				housing, upsizing/downsizing etc. In addition, the Council will only consider allocating sites that are capable of delivering the policy standard affordable housing requirements.		
QUESTION 105: Settlement Limit	41	Object	Suggested that the settlement boundary should be extended to include the proposed site 'SN2007 & SN0531' and also the cluster of houses that are close to the New Inn Pub and staithe.	If the preferred site SN2007 & SN0531 were to be allocated and as such adapted, as part of the VCHAP, then the settlement limit would be extended to include the boundary of the allocated site. With regards to any further proposed amendments, a settlement boundary review has already taken place and at this stage no further alterations are proposed.	361	No action or change required.
QUESTION 105: Settlement Limit	104	Comment	The development on SN2064REV should not be seriously considered given the size of access, proximity of said access road to current housing . The road opposite the proposed development is home to the village shop as such regularly has cars parked on the road outside directly opposite the proposed access. This leaving one side blocked; development here would be unsuitable. However the proposal for SN2007 should be considered, subject to access and road upgrades.	The representation makes reference to two sites; SN2064REV and SN2007. Specific concerns and comments have been raised with regards to the sites access points. It should be noted that NCC Highways officers have provided technical advice on both these sites, relating to both site access and the impact of the proposed development on the wider highway network. Highway officers have advised that for both sites, it would need to be demonstrated to the satisfaction of the Highways Officer that appropriate access into the sites access with adequate visibility, can be achieved.	343	Evidence to demonstrate access is achievable. SNC to contact FW Properties to see what arrangements they have re accessing the SN2064REV.

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QUESTION 105: Settlement Limit	64	Comment	Object; already far too many houses in this tiny village, do not have the infrastructure to support more, resulting in over crowding and road use would be unacceptable, Increase in noise and pollution from more dwellings, possible crime & anti-social behavior levels will increase.	The concerns have been noted with regards to any further development with the area.	342	No action or change required.
QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary &(Part of) SN0531, Land west of Lower Road, Rockland St Mary	5, 53, 54, 70, 88, 126, 135, 145, 173, 232, 236, 278, 300, 315, 371, 389, 392, 417, 428, 443, 471, 476, 481, 509, 528, 549, 569, 574, 622, 650, 652, 678, 682, 686, 694, 712, 721, 733, 827, 837, 877, 930, 993, 1131, 1135, 1234, 1235, 1237, 1251, 1260, 1265, 1266, 1292, 1298, 1333, 1369, 1374, 1415, 1460, 1470, 1503, 1513, 1526, 1551, 1565, 1570, 1572, 1599, 1600, 1702, 1749	Mixed	Summary of objects to SN2007 and (part of) SN053; development of this site would result in highway safety issues; development in this location would endanger the environmental and local wildlife, including impacting upon the surrounding Broads Park and Conservation Area; development in this location would result in an urbanised character and not be in keeping with the character of the settlement; detrimental impact on the landscape given (2017/0638/0 was refused) its location on an open agricultural field; there is not enough services and infrastructure to support further development; any additional local housing needs were met by recent developments; development of the site would cause potential overlooking issues, increased noise and pollution for existing residents; development of the site would have a detrimental impact on listed buildings; and affordable housing needs to be actually be affordable for first time buyers or families with a lower income.	The Council acknowledge the safety concerns regarding the access and the suitability of The Street and New Inn Hill. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that development of the site is broadly acceptable in highways terms and that the combination of both sites has the potential to offer for an additional footway access back to the main village. However, development will be subject to subject to achieving a suitable and safe access, including the provision of a second pedestrian access point. This will be determined prior to allocation. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements are also noted however these matters would be dealt with during the planning application and it would be necessary for all new development to adhere to existing Development Management policies relating to the environment, as well as emerging Policy 2 of the GNLP.	367	Further discussion with NCC Highways. Council to confirm secondary pedestrian access. Consideration to be given to the inclusion of site specific landscaping requirements for this site in the site allocation policy text due to the open nature of the allocation site.

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				Concerns regarding the impact upon the local environmental have also been noted, however all development will be required to consider biodiversity net-gain (as advised by NCC ecologists) and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site, as well as significant on-site features (e.g., trees and hedgerows). Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. These will be dealt with during the planning application stage. Further to the impact upon the wider landscape, it is considered that a landscaping scheme would provide some screening of the site and would help mitigate impact on the surrounding open countryside. These details would need to be considered in detail during the subsequent planning application stage. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the		

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				NHS Integrates Care System, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. The technical design details relating drainage schemes would be assessed through the detailed planning application stage. The concerns about the cost of housing are noted and whether these homes will be affordable. Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time. In addition, the Council will only look to consider allocating sites that are capable of delivering the policy standard affordable housing requirements. With regards to overlooking and amenity concerns, pollution (noise and air) and impact on surrounding uses, these factors will be addressed at the detailed design stage and any planning application would be subject to planning policies surrounding amenity etc. Further to the impact upon heritage		

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				assets, Historic England have been consulted with and provided their comments; Whilst there are no designated heritage assets within the site boundary, three grade II listed buildings (Old Hall and two barns) lie around the western end of the site. As part of their response, they have requested that an Heritage Impact Assessment is undertaken to inform the allocation of the site including any mitigation, enhancement and policy wording. Finally, the Council note that many of the representations refer to a recent planning approval and that this site provides enough housing for the area. In response to this, there is an overall need and government requirement for more housing and the principal aim of the Village Cluster Housing Allocation Plan (VCHAP) is to allocate a series of smaller sites to accommodate a minimum of 1,200 new homes across the villages within the South Norfolk District, in accordance with the requirements of the GNLP. The GNLP requirements derive from the Government's method for calculating Local Housing Need for the area. If the site is allocated and adopted as part of the Villages Clusters plan, then the settlement limit would be amended to include the land of the allocated site. If any further schemes were to come forward in the future, they would be dealt with in the context of the current planning policies. With		

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				regards to previously refused application, 2017/0638/0, located opposite the site, this site is situated outside any development boundary where the presumption is against new residential dwellings under policy DM1.3. Therefore, this proposal was contrary to housing policy and the aims of the NPPF meaning the principle of the development is unacceptable.		
QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary &(Part of) SN0531, Land west of Lower Road, Rockland St Mary	2271	Comment	LLFA comments: Infiltration potential will be dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised.	The comments made in relation to water management are noted and the requirement for geotechnical investigation these issues will be explored further with the LLFA	365	Policy wording to include requirement for geotechnical investigation.
QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary &(Part of) SN0531, Land west of Lower Road, Rockland St Mary	92	Comment	As a potential site for further development, site SN2007 would be slightly better than proposed SN2064REV. However, object to this site as the access is not suitable either. The road is on a bend, at the top of a hill and at the end of the village where majority of passing vehicles do not adhere to the speed limit and it could create potential accidents. Object to SN0531, as a huge development will create a precedent to bung hundreds of houses in to our village which we do not have facilities or infrastructure for.	The Council acknowledges the concerns raised with site access for SN2007 and SN0531 and the impact that development would have on local facilities and infrastructure. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that development of the site is broadly acceptable in highways terms. However, this will be subject to achieving a suitable and safe access. This will be determined prior to development.	356	No action or change required.

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				With regards to infrastructure, a key objective of the VCHAP is the distribution of new development throughout the rural areas of the District to support the existing facilities and services within existing communities. Whilst it is recognised that rural settlements offer fewer services and facilities than their urban counterparts, a continued concentration of development in these locations will result in the inevitable decline of existing services and facilities within the rural areas. This Plan seeks to address this issue and also offer an opportunity for new services and facilities to emerge within local communities. As part of the Plan preparation infrastructure providers have been invited to review the proposals and make representations. These comments are also important in shaping the site selection process.		
QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary & (Part of) SN0531, Land west of Lower Road, Rockland St Mary	63, 144, 219, 807, 1811	Comment	Comments and concerns have been raised to the number of houses proposed on site and that this would result in overcrowding and place greater pressure on existing infrastructure and local amenities. The representation also makes reference to the provision of affordable homes and ensuring that this is enforced. As a result increased numbers, concerns have also been raised to the include in pollution, crime and anti-social behavior and overlooking.	The Council acknowledges the concerns and comments raised within these representations. With regards to the proposed number of dwellings for the site, this is considered to be sustainable and development of this site would represent an efficient use of land, in accordance with the paragraph 124 of the NPPF. The scale of development proposed in is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and	355	Development of the site will be subject to achieving a suitable access.

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			There is also concerns with the the road capacity and increased traffic; the road narrows at Bramerton, and it is an awkward place for buses to pass any oncoming traffic. More cyclists and there's no provision for pedestrians either leaving the village.	services within the development. With regards to housing mix, the Council will seek to provide new housing development to meet housing needs (using the most up to date Strategic Housing Market Assessment (SHMA)). This will ensure that allocated sites provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of their life cycle e.g. first-time buyers, affordable housing, upsizing/downsizing etc. In addition, the Council will only consider allocating sites that are capable of delivering the policy standard affordable housing requirements. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, including those proposed at Rockland St Mary. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making		

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				process. With regards to overlooking and amenity concerns, these will be addressed at the detailed design stage and any planning application would be subject to planning policies surrounding amenity etc. The Council acknowledge the safety concerns regarding the access and the suitability of The Street for further development. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that development of the site is broadly acceptable in highways terms. However, this will be subject to achieving a suitable and safe access. This will be determined prior to development.		
QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary & (Part of) SN0531, Land west of Lower Road, Rockland St Mary	1412	Comment	Notwithstanding concerns raised by other respondents regarding wildlife present on the site, given the site's proximity to the Broads Special Area for Conservation and Broadland Special Protection Area, the Village Cluster Plan will need to demonstrate that adverse effects on these sites (for example due to increased water demand and demand on waste water disposal capacity at the nearest waste water treatment works) can be avoided in order to ensure compliance with the Habitats Regulations.	The comments from Norfolk Wildlife Trust are noted and reference to proximity to the Broads Special Area for Conservation and Broadland Special Protection Area.	354	The Plan will need to demonstrate that adverse effects on these sites can be avoided in order to ensure compliance with the Habitats Regulations.

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QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary &(Part of) SN0531, Land west of Lower Road, Rockland St Mary	1826	Comment	Site: SN2007 & (Part of) SN0531 The site extends beyond the eastern extent of the main village and is fairly prominent being on a ridge, and is only approx. 150m from BA boundary. Also close by are RSPB Rockland Marshes, Rockland Staithe and visitor car park. Wherrymans Way runs close to the site (closest point 10- 20m). National Cycle Route 1 follows New Inn Hill Rd and Green lane close to the site, and a footpath runs through the field to the east. There is a possibility the development could break the skyline in views from the Broads area - the skylines in views out of the area are remarkably free of development of any form adding to the sense of isolation. Much of the land within this area is subject to many nature conservation designations covering most of the area. Comments on this site: - o Taking these factors together suggests that this site has some potential to adversely affect the local landscape character and the setting of the Broads. Therefore we ask that the allocation policy includes a requirement for Landscape & Visual Impact Assessment and that the Broads Authority are consulted on the selection of viewpoints. - o SN2007 says 'Whilst the site extends beyond the eastern extent of the main village and is fairly prominent as it is on a ridge, the precedent for development has	The comments made by the Broads Authority are noted. A number of the issues raised by the Broads Authority in terms of landscape impact are reflected and responded to in the public comments above. As is the possibility of a second access for pedestrians and cyclists.	352	Allocation policy to include a requirement for Landscape & Visual Impact Assessment and that the Broads Authority are consulted on the selection of viewpoints.

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			been established by the adjoining Eel Catcher Close development'. I don't think that conclusion can be reached. You could say that about any settlement fringe site – that because there is development there already, and a site may be adding onto that, development is ok. The proposed site is further east and further south than the existing development. o The policy is called SN2007, but the text refers to SN0531 and the map shows the sites joined. This could do with being a bit clearer. Either call the policy both site numbers or delineate the two sites and say that they will be considered as one. o Says 'appears to offer the potential for an additional footway access back to the main village' – so will it or won't it? Will that requirement be part of the policy wording?			
QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary & (Part of) SN0531, Land west of Lower Road, Rockland St Mary	1914	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application	351	A Phase One Land Contamination Report (Desk Study) should be required as part of any planning application

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			approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, then an alternative condition could be attached to any approval requiring its implementation.			
QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary & (Part of) SN0531, Land west of Lower Road, Rockland St Mary	2051	Comment	Site: SN2007 & (Part of) SN0531, Land west of Lower Road, Rockland St Mary Whilst there are no designated heritage assets within the site boundary, three grade II listed buildings (Old Hall and two barns) lie around the western end of the site. We therefore have concerns about built development of the western end of the site. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	Historic England comments noted,	350	Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.
QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary & (Part of) SN0531, Land west of Lower	1966, 2154	Comment	Water management comments: Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, then this discharge should be facilitated in line with the Non-statutory	Water management comments noted.	349	The comments made in relation to water management are noted and the requirement for geotechnical investigation these issues will be explored

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Road, Rockland St Mary			technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised.			further with the LLFA. The comments relating to the flood risk of this site are noted and the inclusion of this site within the VCHAP will need to be reassessed. Site is affected by a Source Protection Zone 3 and developers will need to liaise with the Environment Agency to ensure that development / drainage does not adversely affect the water quality; however Zone 3 is the lowest risk. Background policy text could highlight this identified constraint on the site but no requirements in terms of policy text as this would be covered by existing policies.
QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary &(Part of) SN0531, Land west of Lower Road, Rockland St Mary	1593	Support	Support site SN2007 and agree that this site should be considered suitable for allocation. Suitable access can be achieved and the site is well related to the services and facilities in the village. The landowners of site SN2007 and SN0531 have agreed to work in collaboration to allow the development of the allocated site to take place as preferred.	Support for site SN2007 and SN053 noted.	348	No action or change required.

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QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary &(Part of) SN0531, Land west of Lower Road, Rockland St Mary	42	Support	Support site SN2007 and SN0531; Logic location. Suggestion to include more of SN0531. Building more homes in Rockland St Mary we will increase the viability of our local shop and post office as well as our primary school.	The support of the site is noted. With regards to a larger part of SN0531 being included, this was considered as part of the site assessment process, but concerns were raised with the impact upon landscape and townscape. The proposal for 25 dwellings on a site of 1ha is consistent with the aim of the VCHAP.	340	No action or change required.
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	687	Object	Objections: 1. Significant and detrimental impact on Bio and Geo diversity including pondlife and protected species 2. Insurmountable 'Access to Site' issues 3. Flood Risk 4. Conflict with keeping a Linear Pattern development 5. Conflict with an 'Area of High Landscape quality' as per Local plan 1997 5. Site visit observation omissions/inaccuracies 6. Townscape-losing rural scale 7. Proposed alternative site-Oaks->RSM centre	Comments regarding the environmental impact have been noted, however all development will be required to deliver net-gain on site and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site, as well as significant on-site features (e.g., trees and hedgerows). Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. In addition, the NCC Ecologist has raised no major concerns. NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have raised awareness with the access and advised that if 3rd party land is needed for appropriate visibility splays, then this will need to be demonstrated prior to allocation as this affects the ability to create a safe access. With regards to the increased traffic movements, these concerns are noted and would be dealt	668	Policy wording to ensure appropriate landscape measures.

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				with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority who have advised that with appropriate mitigation measures in place development of this site would be achievable. Rockland St Mary is made up a variety of development densities and styles, and new development does not necessarily need to repeat what is adjacent. Local Plan policies, including those on design, landscaping and amenity, are in place to guide the from of development.		
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	511, 713, 826, 923, 931, 979, 1239, 1240, 1273, 1281, 1302, 1303, 1334, 1368, 1461, 1558, 1568, 1571, 1581, 1597, 1607, 1613, 1748, 1778, 1805	Object	Development of the site would raise highway safety concerns with particular concerns for footpath provision. The central area of the village is linear, where development would impact on historic features and would impact on the long views to the south and overall landscape. Such a site will set a precedent in this village for further backland development. Negative impact on climate and wildlife which would also take out arable Grade 2 agricultural land. Impact of the amenity of current and future residents Impact on infrastructure and concerns	The Council acknowledges the objections made within these representations. With regards to site access, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, highways have advised that if 3rd party land is needed for appropriate visibility splays, then this will need to be demonstrated prior to allocation as this is affects the ability to create a safe access. With regards to increased traffic movements, these concerns are noted and would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development	419	Confirm access and third party issue for visibility.

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			whether the site will deliver any affordable housing provision.	Management policies. With regards to the existing landscape, whilst Rockland is characterised by mostly linear development, there are existing examples of small development clusters to the east and west, including the current development to the east of the village, The Orchard, which is currently developing 21 houses. The Council therefore considers that a well-designed scheme would not be inappropriate in this location. A landscape plan will help mitigate any impact that the proposed development may have on the surrounding area, particular to the south. Further to the concerns raised around destruction of the environment, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. The Council notes the concerns regarding the loss of good quality agricultural land. According to the DEFRA Provisional Agricultural Land Classification (ALC) (England), the site is considered as Grade 3 - Good to Moderate. As part of the site assessment process, the Council has taken into consideration the best most versatile land (BMV) by identifying the ALC of all sites submitted. Where		

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				possible, the Council will avoid allocating and preferring sites that are of a high grade. Where higher grade land may be present, the Council will need to consider whether the social, economic or environmental benefit outweighs the agricultural and that there is no suitable or available site for the development on land of poorer quality. With regards amenity concerns, these will be addressed through the detailed planning application stage. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. With regards to the provision of affordable housing on site, the Council will seek to ensure that development		

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				meets the affordable housing mix requirements of the most up to date Strategic Housing Market Assessment (SHMA). The Council will also only seek to consider allocating sites that are capable of delivering the policy standard affordable housing requirements;(Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.		

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				Further to the concerns raised around destruction of the environment, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. With regards to the proposed number of units to be allocated, it is considered that this number demonstrates a sustainable use of land that would also represent an efficient use of land, which in accordance with the National Planning Policy Framework (NPPF). In addition, the scale of development proposed in is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. Whilst it is recognised that rural settlements offer fewer services and facilities than their urban counterparts, a continued concentration of development in these locations will result in the inevitable decline of existing services and facilities within the rural areas. Therefore, locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services.		

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				With regards to the provision of affordable housing on site, the Council will seek to ensure that development meets the affordable housing mix requirements of the most up to date Strategic Housing Market Assessment (SHMA). The Council will also only seek to consider allocating sites that are capable of delivering the policy standard affordable housing requirements;(Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time.		
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	550	Object	Should not be building on the farmland in Norfolk and Suffolk. This land is prime farmland and usually provides us with two crops a year. Concerns over where food will be cropped when this important land is gone. Concerns over greed and careless decisions could destroy our potential to feed ourselves in the future. Wildlife will also disappear as a result of this development, including adders, blue holly butterflies, dragonflies, damselflies. Field mice and honey bees are getting very scarce, although there are many types of bird (including red kites). These and many	The Council notes the concerns regarding the loss of good quality agricultural land. According to the DEFRA Provisional Agricultural Land Classification (ALC) (England), the site is considered as Grade 3 - Good to Moderate. As part of the site assessment process, the Council has taken into consideration the best most versatile land (BMV) by identifying the ALC of all sites submitted. Where possible, the Council will avoided allocating and preferring sites that are of a high grade. Where higher grade land may be present, the Council will need to consider whether the social, economic or environmental benefit outweighs the agricultural and that there is no suitable	416	No action or change required.

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			more are all at risk due to their habitats potentially being destroyed.	or available site for the development on land of poorer quality. Further to the concerns raised around destruction of wildlife, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	218, 372, 808, 1812	Comment	The representations raised concerns with the existing water management and drainage issues within the area. Concerns that more development would cause highway safety concerns with increased volume of traffic. Development would overload existing village amenities; water, sewage, electricity etc. Concerns with the capacity of existing infrastructure to serve more housing. Destruction of environment; countryside needs to be protected; the area is outside the development boundary Development of 50 houses is too many; could this be reduced. Concerns that the dwellings wouldn't be affordable.	With regards to the concerns raised regarding flooding, discussions have taken place with the Lead Local Flood Authority (LLFA) and it is considered that on-site drainage solutions can often help to address existing surface water issues and as such it is considered that this issue can be adequately addressed during the planning application stage. In addition, further comments are also expected from the Environmental Agency and Anglian Water, who will help inform individual allocation policy wording. With regards to site access, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have raised awareness with the access and advised that if 3rd party land is needed for appropriate visibility splays, then this	415	SNC to contact FW Properties to see what arrangements they have re accessing the SN2064REV.

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				will need to be demonstrated prior to allocation as this affects the ability to create a safe access. With regards to the increased traffic movements, these concerns are noted and would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. Further to the concerns raised around destruction of the environment, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected		

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				species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. With regards to the proposed number of units to be allocated, it is considered that this number demonstrates a sustainable use of land that would also represent an efficient use of land, which in accordance with the National Planning Policy Framework (NPPF). In addition, the scale of development proposed in is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. Whilst it is recognised that rural settlements offer fewer services and facilities than their urban counterparts, a continued concentration of development in these locations will result in the inevitable decline of existing services and facilities within the rural areas. Therefore, locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services. With regards to the provision of affordable housing on site, the Council will seek to ensure that development meets the affordable housing mix requirements of the most up to date Strategic Housing Market Assessment (SHMA). The Council will also only seek to consider allocating sites that are		

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				capable of delivering the policy standard affordable housing requirements;(Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time.		
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	301	Object	Access from the road is difficult. There are already lots of cars parked around the post office and with a junction joining the road immediately opposite Highway safety concerns for the safety of pedestrians, cyclists and vehicles. Building behind the surgery creates a precedent for development away from the road in the village. There were reasons to reject other development applications in the village based on the fact they altered the character of the village. How is a development behind the surgery any different?	With regards to access, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that if 3rd party land is needed for the access visibility splay, then this should be demonstrated prior to allocation. The principal aim of the Village Cluster Housing Allocation Plan (VCHAP) is to allocate a series of smaller sites to accommodate a minimum of 1,200 new homes across the villages within the South Norfolk District, in accordance with the requirements of the GNLP. The GNLP requirements derive from the Government's method for calculating Local Housing Need for the area. Locating this level of growth in village clusters aims to promote social	385	No action or change required.

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				sustainability by supporting rural life and services. With regards to future applications within Rockland, these will be assessed individually and against current planning policies and legislation at such time.		
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	393	Object	Development of this site detracts from the linear nature of the village and could create a precedent for further build. Access is tight and dangerous given current on street parking for the shop. On street parking is likely to increase for the school, shop and surgery with no scope for alternative parking. There will be increased pressure on utilities and services including the school and surgery.	Whilst Rockland is characterised by mostly linear development, there are existing examples of small development clusters to the east and west, including the current development to the east of the village, The Orchard which is currently developing 21 houses. The Council therefore considers that a well designed scheme would not be inappropriate in this location. With regards to access, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that if 3rd party land is required for the access and sufficient visibility splay, then this should be demonstrated prior to allocation. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue	375	Developer/landowner to demonstrate that a safe access is achievable i.e. confirm 3rd party land ownership.

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				for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. It is noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.		
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	52, 56, 60, 61, 71, 89, 90, 100, 122, 136, 147, 174, 229, 348, 444, 564, 683, 688, 689, 732, 835, 994, 1007, 1027, 1206	Mixed	Summary of concerns raised; the development would intrude on open landscape, affect the character of the village and significantly affect the landscape of the Hellington valley; development will have an impact on local wildlife; concerns raised with highway safety and the proposed narrow access; development would increase traffic (increased pollution and congestion); further development would impact on the already stretched infrastructure; the local area already has existing flood issues flood area; concerns that the proposed houses will not be affordable.	The Council acknowledges the comments made within these representations. With regards to the existing landscape, whilst Rockland is characterised by mostly linear development, there are existing examples of small development clusters to the east and west, including the current development to the east of the village, The Orchard, which is currently developing 21 houses. The Council therefore considers that a well designed scheme would not be inappropriate in this location. A landscape plan will to help mitigate any impact that the proposed development may have on the surrounding area, including any	374	Confirm that access and visibility can be achieved in accordance with NCC highway requirements. Site allocation policy to include landscape mitigation plan.

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				designated areas. With regards to infrastructure, the Council is engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Highways and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. It is acknowledged that development sites can be home to wildlife, and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures. With regards to access, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that if 3rd party land is required for the access and sufficient visibility splay, then this will need to be demonstrated prior to allocation. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority (LLFA) and it is considered that on-site drainage solutions can often help to address existing surface water issues and as such it is considered that this issue can be adequately addressed during the planning application stage.		

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				With regards to the provision of affordable housing on site, the Council will seek to ensure that development meets the affordable housing and housing mix requirements of the most up to date SHMA. The Council will also only seek to consider allocating sites that are capable of delivering the policy standard affordable housing requirements;(Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time.		
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	43, 48	Object	Summary of concerns: Takes away from the linear nature of the village allocation could set a precedent of building more properties behind the existing row of houses along the street. Highway safety: The proposed access through the Doctors surgery is at the most congested part of The Street with the Post office and shop directly opposite.	Whilst Rockland is characterised by mostly linear development, there are existing examples of small development clusters to the east and west, including the current development to the east of the village, The Orchard which is currently developing 21 houses. The Council therefore considers that a well designed scheme would not be inappropriate in this location. With regards to access, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that if 3rd party land is required for the access and	373	Access to be confirmed suitable and achievable.

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				sufficient visibility splay, then this should be demonstrated prior to allocation.		
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	230	Comment	This proposed housing development should reflect the local need, affordable housing to allow families to stay connected in their own communities. South Norfolk should be ambitious in this development, using interesting architecture to build passive houses that are cheap to run. It would also be good to see some housing that would be suitable for the needs of older people in the community. Executive boxes are not needed. Access would be an issue, as the proposed access would be 'tight' especially if the site was to have further development in the future.	The Council acknowledges the comments made within the representation. The provision of affordable housing and the concerns about the cost of affordable housing are noted. Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time. With regards to type of houses, including passive housing, emerging GNLP Policy 5: 'Homes' has a specific requirement for development proposals (for major housing development) to provide at least 20% of homes to the Building Regulation M4(2)[1] standard or any successor. The Council will also ensure that the need for specialist housing for the elderly and other needs is considered on all housing schemes and advise applicants on the most up-to-date evidence of need. With regards to access, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on	372	To confirm 3rd party land and the ability to achieve satisfactory access and visibility.

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				the wider highway network. In this instance, Highways have advised that if 3rd party land is needed for the access visibility splay, then this should be demonstrated prior to allocation.		
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	1915	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, then an alternative condition could be attached to any approval requiring its implementation. I would offer the following comments in respect of question 108 to Chapter 43 of the VCHAP relating to the Rejected Sites in Rockland St Mary, Hellington and Holverston in the event that one or more of them be allocated instead of, or in	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	371	A Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.

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			addition to, the preferred sites as a result of the consultation process.			
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	1967, 2148	Comment	Water management comments; outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, then this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Only the northwest corner of the site is within a SPZ 3.	The comments made in relation to water management are noted and the requirement for geotechnical investigation these issues will be explored further with the LLFA.	370	Allocation policy wording to include LLFA requirement. With regards to the Source Protection Zone 3, developers will need to liaise with the Environment Agency to ensure that development / drainage does not adversely affect the water quality; however Zone 3 is the lowest risk. The LLFA have advised that background policy text could highlight this identified constraint on the site but no requirements in terms of policy text as this would be covered by existing policies.
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	2211	Comment	NCC Ecologist comments: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Site comprises field south of village, behind dwellings. Hedges are a priority	NCC Ecologist comments noted.	369	Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together

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			habitat so losses should be avoided, minimised and as a last resort, compensated for. No other priority habitats are identified onsite although deciduous woodland to east of site (see MAGIC). Site within amber habitat zones for great crested newts. Site within a SSSI IRZ 0 allocation of 25 dwellings would fall below the trigger for consultation with Natural England if allocated (trigger is 50 units plus). Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	2164	Comment	NCC Highways comments: It is believed that 3rd party land is needed for the visibility splay to the west of the proposed site access. Particularly as the highway requirements relate to the ability to provide a safe access, the ability for them to be met should be demonstrated prior to allocation.	NCC highway comments noted.	368	Developer to demonstrate that safe access can be achieved. As such, allocation policy wording to reflect highway requirements.
QUESTION 108: Should any rejected sites be allocated?	734	Comment	Regarding site SN2063 I find it hard to understand that the reasons for rejecting are obviously the same reasons that the site to the south side should be rejected also. The comment regarding school lane taking the line back for the south makes not sense, when the same could be said for large development behind Broadfields Way?	The alternative location suggested is not considered suitable for various reasons; Development to the north of the Street would intrude into the open landscape to the north, this is considered to be detrimental to the character and appearance of the area, access concerns.	669	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 108: Should any rejected sites be allocated?	1919	Comment	SN2070 - West of the Oaks, Rockland St Mary The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval.	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application	430	A Phase One Land Contamination Report (Desk Study) should be required as part of any planning application
QUESTION 108: Should any rejected sites be allocated?	1918	Comment	SN2063 - Land north of The Street (behind Post Office), Rockland St Mary The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	429	A Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.

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			Management Plan be attached to any approval.			
QUESTION 108: Should any rejected sites be allocated?	1917	Comment	SN2061REV - North of The Street, Rockland St Mary (access between No101 and 103 The Street) The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	428	A Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.
QUESTION 108: Should any rejected sites be allocated?	1916	Comment	SN0165 - Land north of Bramerton Lane & Rookery Hill, Rockland St Mary The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application	427	A Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.
QUESTION 108: Should any rejected sites be allocated?	427	Object	There is no footpath between The Oaks and the Village Shop or School. The road is narrow and bends. Dangerous to those people who walk and to others who use the road	No site reference is given within this representation. However, the Council acknowledges the concerns made in relation to highway safety in the village.	426	No action or change required.

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QUESTION 108: Should any rejected sites be allocated?	231	Comment	The rejected sites should be reviewed again. It seems illogical to be considering site reference SN2064REV, which has access issues and would change the linear nature of The Street, which has been used as a reason for rejecting these sites. If sites were considered on both sides of The Street it would make for more balance through the village.	The Council notes the concerns regarding the allocation of SN2064REV. Whilst Rockland is characterised by mostly linear development, there are existing examples of small development clusters to the east and west, including the current development to the east of the village, The Orchard which is currently developing 21 houses. Whilst other sites were rejected due to their impact on this linear character, this was not a stand alone impact and other factors have also been assessed to determine whether the sites were suitable. On balance, the council consider that the development of SN2064REV is favorable and the pros outweighed cons.	425	No action or change required.
QUESTION 108: Should any rejected sites be allocated?	302, 714, 928, 1466, 1567, 1569, 1590, 1609	Mixed	Support the rejection of the sites.	Comments noted.	424	No action or change required.
QUESTION 108: Should any rejected sites be allocated?	575	Support	This is the only sensible site, being close to the shop, post office and school. The site would not intrude on present housing at all. The other proposal at Eel Catcher Close is almost a mile from the village amenities.	The representation doesn't reference a particular site or road name, however reference to the proximity of the school is made so it is assumed the representation is made in regard of SN0165. The Council acknowledges the support for this site.	423	No action or change required.
QUESTION 108: Should any rejected sites be allocated?	464, 466, 472, 723, 1419	Support	Support for SN0165 (land north of Rookery Hill); closer to village amenities, no overlooking issues.	Support for SN0165 noted.	422	No action or change required.

Roydon

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 109: Settlement Limit	2052	Comment	English Heritage will consider sites as part of the Diss & District Neighbourhood Plan.	Noted that comments will be made as part of the Diss & District Neighbourhood Plan.	403	No action or change required.
QUESTION 109: Settlement Limit	1968	Comment	IDB comments will be made via the Diss and District Neighbourhood Plan consultation.	Noted that comments will be made as part of the Diss and District Neighbourhood Plan.	402	No action or change required.
QUESTION 109: Settlement Limit	1194, 1226, 1230, 1332, 1469, 1509, 1543, 1554, 1610	Mixed	Concerns with why SN0526 has been promoted.	Site SN0526 falls within the Diss and District Neighbourhood Plan area which includes the following settlements that are, or form part of, a South Norfolk Village Cluster: Burston, Shimpling, Diss, Roydon and Scole. These Neighbourhood Plan documents sit alongside the Local Plan and when adopted are also taken into account in determining planning applications. Most of these Neighbourhood Plans include more detailed Development Management policies that aim to shape development proposals to better reflect local circumstances. Decisions relating to the allocation of these sites will be undertaken through the relevant Neighbourhood Plan. Sites promoted to SNC within Roydon have been forwarded to the Neighbourhood Plan Steering Groups Please note that to ensure transparency, the Council has identified, within this document, the sites in Roydon that have been promoted to the Council for consideration.	401	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 109: Settlement Limit	1210	Comment	This site had been rejected on several occasions but still gets put forward which is wrong on all levels of democracy.	Decisions relating to the allocation any sites within these areas, will be undertaken through the Diss and District Neighbourhood Plan (DDNP). However, to ensure transparency, the Council has identified the sites in Roydon, that have been promoted to the Council for consideration.	400	No action or change required.
QUESTION 109: Settlement Limit	8	Comment	The blue hatched area (not labelled SN0526, formerly GNLP0526?) is outside the Roydon development boundary and unsuitable for residential housing. It encroaches into the Waveney Valley with difficult highway access, infrastructure loading, negative environmental effects on Roydon Fen, destroying amenity assets for Roydon Village and location. The site has received many disapproving comments from the Roydon Community during DDNP surveys, and was also rejected from earlier GNLP consultations, involving public bodies representing both Suffolk and Norfolk. Any need to allocate housing development beyond 1-2 per year in Roydon over the next 15 years needs serious re-appraisal.	The blue colouring of SN0526 on the plan indicated that the site is located within a Neighbourhood Plan area; the Diss and District Neighbourhood Plan covers an area that includes the following settlements that are, or form part of, a South Norfolk Village Cluster: Burston, Shimpling, Diss, Roydon and Scole. Decisions relating to the allocation any sites within these areas, will be undertaken through the Diss and District Neighbourhood Plan (DDNP). However, to ensure transparency, the Council have identified the sites in Roydon that have been promoted to the Council for consideration.	396	No action or change required.

Saxlingham Nethergate

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 111: Should any rejected sites be allocated?	1969	Comment	Water Management comments: Part of the Parish is located within the Norfolk Rivers IDD. The Board's byelaws apply to any new developments within the IDD.	The comments from the Water Management Alliance have been noted. However, at this stage no sites within Saxlingham Nethergate have been identified as preferred or shortlisted site.	97	No change or action required at this stage.
QUESTION 111: Should any rejected sites be allocated?	1601	Object	It has been suggested that site SN4005 should be allocated or an allowance for a settlement limit extension to the north of the village. The site would allow for an extension of the linear development pattern of Norwich Road and would match the development to the south of the road. Mitigation to allow for a safe walking route to the centre of the village could be included and the site appears to be a clear extension to the village to round off the settlement limits. The landowner would look at a smaller scale development if a settlement limit extension was preferred.	At this stage the site has been rejected. The site has been reviewed by the Highway Authority who have advised that they would not be supportive of an allocation in this location; there is a lack of contiguous footpath where there is no opportunity to link into existing. This would result in no safe walking route to the school, which is problematic as the School is located some distance from the site at the opposite end of the village. The Highways issues are considered to not be resolvable in this instance. In addition, the site has been assessed by the Councils Landscape officer, who has identified that development of the site would not be acceptable due to the open nature of the site to the north. Significant hedgerow would also need to be removed in order to create a safe access, this is also not considered to be acceptable.	96	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 111: Should any rejected sites be allocated?	1766	Comment	Site SN4034SL: Wish to see this as a preferred site. The site is not in a conservation area, is not opposite any listed buildings and is within close range of a pub and other services (shops in Newton). It is situated in the school catchment for Saxlingham Nethergate and Newton Flotman. The site has been listed as garden/amenity - this should be amended to garden land only. Also note that there is an access to the front of the plot as originally submitted. Please consider for an allocation for affordable housing of 2 units.	Given the small scale size of the site, the site has been considered by the council for inclusion in the existing settlement limit, as a settlement limit extension. However, the site is located a considerable distance from the existing settlement limit and is considered detached from the village. In addition, the site is considered to be very rural in character with large open views of agricultural fields and paddock surrounding the site, where development of the site would have a negative impact on these views and would be out of character. Further to this, there is mature boundary hedging surrounding the site where if development was to occur, significant parts of these hedges would need to be removed in order to achieve access. This would have an impact on the surrounding rural character as these contribute positively to the area. In addition to the landscape issues, the site has also been assessed by the Highway Authority who have considered the site to be unacceptable due to the inability to creating a suitable access or safe walking route. Therefore, the proposed site is not considered suitable for an extension to the settlement limit.	90	No action or change required.

Scole

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 112: Settlement Limit	1723	Comment	It is acknowledged that the proposed site allocations for Scole are suggested to be deferred to the emerging Diss & District Neighbourhood Plan, and whilst in dialogue with both Scole Parish Council and the Neighbourhood Plan Steering Group regarding potential development options, the Plan is considered to be unsound on the basis that it does not contribute towards the achievement of sustainable development. Nor is it positively prepared in a way which is aspirational but deliverable. Object to the limited level of development being proposed. It is unclear as to why only 25 dwellings are being proposed for allocation. Scole has previously been classified as a Service Village but more readily functions as a 'Key Service Centre' village, whereby day to day services and facilities are close at hand. Development here would be in tune with the Core Planning Principles of the NPPF. Hopkins Homes Ltd therefore requests that the site is proposed as a residential allocation within the emerging South Norfolk Village Clusters Housing Allocations Document, with the settlement limit for the village extended to encompass the totality of this site.	In the first instance, Sites promoted to SNC within Scole have been forwarded to the Neighbourhood Plan Steering Groups. Decisions relating to the allocation of these sites will be undertaken through the Diss and District Neighbourhood Plan (DDNP). With regards to the housing requirement identified for Scole, this is indicative, and 25 homes has been set by South Norfolk Council as a minimum in accordance with the aims of the Village Clusters Plan. In some areas the new allocations will deliver in excess of the quantum of development required, though only marginally. This 'over-allocation' provides a useful buffer to ensure delivery of new housing remains on track, and also helps to meet specific local need for housing. Scole has decided to allocate for more than its 25 dwellings to help meet the local housing need and enable younger residents to remain in the village. In addition, housing over and above this is likely to be delivered as part of unplanned or windfall developments across the Neighbourhood Plan area. Policy 1: Scale and Location of Growth of the current Reg 14 Pre-Submission DRAFT version of the DDNP sets out the spatial distribution of growth across the DDNP.	99	No action or change required.

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QUESTION 112: Settlement Limit	1970	Comment	Water Management comments: IDB comments were made via the Diss & District Neighbourhood Plan consultation.	At present, sites put forward within Scole are to be considered and allocated as part of the Diss & District Neighbourhood Plan. The Council acknowledge that the Water Management Comments were made direct to the NP.	98	No action or change required.

Seething and Mundham

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 113: Settlement Limit	458	Comment	Seething Parish Council are reassured that the settlement limit does not extend west along Wheelers Lane beyond Barn Cottage (see comments regarding SN1035). We are however opposed to the proposed settlement limit including SN0406SL (see below). Otherwise no major issues - in keeping with linear character of Seething village.	Comments noted. The Council will review the comments made by the Parish Council on specific site allocations and respond accordingly.	740	No action or change required.
QUESTION 113: Settlement Limit	541	Support	Otley Properties Ltd support the proposed Seething Settlement Limit extensions. However, some parts of the existing Settlement Limit do not appear to follow logical boundaries (i.e. areas of domestic gardens; half of the primary school; and certain properties within the village (such as properties on Wheelers Lane) are excluded. Consideration should be given to a thorough review of Settlement Limits to properly encompass and reflect the 'built up' areas of the village (including, properties, domestic gardens etc.) and follow logical and defensible boundaries. More detailed comments are provided on specific Settlement Limit extensions in the preferred and shortlisted sites section.	The Council acknowledges the comments made in relation to the Settlement Limit extensions. With regards to the comments made on 'logical boundaries', the Council considers that the proposed Settlement Limit extensions to be well related to the existing pattern of development and would form a natural extension to the existing Settlement Limits. The proposed extension to north is drawn around existing linear development, this would not necessary include the rear gardens of the properties included, as this could have impact on the countryside. It should be noted that any land that is included in the Settlement Limit that would mean that any future planning applications would be treated as being part of the settlement of Seething, rather than being treated as part of the open countryside.	739	No action or change required.
QUESTION 114: Preferred Site - SN0405, Land to North and South of	542	Support	The proposed allocation is supported. However, the suggested site area (1.25 hectares) is incorrect. The actual proposed area of land available for residential	Comments noted. In the first instance, the VCHAP is looking at a 25 dwellings per hectare ratio which is not considered inappropriate in a rural	766	Review developable area of land; agent has

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Brooke Road, Seething			development (north of Brooke Road) is approximately 0.75 hectares. It is unlikely that 20 dwellings can be accommodated on the proposed allocation and the number of units will be significantly less. If 20 dwellings are required, the allocation should revert to the original 'call for sites' submission and include land to north of the Cart Shed/Church Farm House. A sensitive scheme incorporated this land that respects the non-designated heritage asset and Conservation Area setting is considered possible.	context. It is noted that the developable area of land may change due to site constraint's		suggested that only 0.75ha is suitable.
QUESTION 114: Preferred Site - SN0405, Land to North and South of Brooke Road, Seething	700, 856, 1111, 1672	Object	1. The site adjoins conservation land and any development runs counter to SNDC's own planning policy in respect conservation area and historic setting. 2. Dwellings on this site would be hugely detrimental to the character of Seething village and would significantly impair views across open farmland. 3. There are significant traffic issues concerning a very busy corner on which the proposal would sit. 4. NCC Highways department have expressed related concerns in respect of traffic (shown in the site assessment document). Specific local concerns regarding Brooke Road. 5. The proposal would run counter to and take away from the current linear nature of dwellings in the village SN0405	1. Conservation and Heritage assets were considered as part of the site selection process. In addition, a Heritage Assessment will be undertaken to a format agreed with Historic England, this will inform the site allocation and any subsequent mitigation measures. 2. Technical advice has been sought from the Council Landscape officer relating to the wider landscape and potential impact. Whilst landscape concerns are noted, the Council considers that a well-designed scheme would not be inappropriate in this location. A landscape plan will also help mitigate any impact that the proposed development may have on the surrounding area, including any designated areas. 3/4. NCC Highways officers have been involved with the assessment of the sites prior to consultation and also provided technical advice as part of the Regulation 18. Advice has been sought	747	Further landscape input required to help mitigate concerns.

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			6. Furthermore, the basis on which the application is submitted is to create homes for those in greatest need, but there are no policies or measures which will ensure that those most in housing need will actually have access to the houses built.	relating to both site access and the impact of the proposed development on the wider highway network. To ensure that a suitable and safe access can be achieved, the Highways Authority require confirmation that a safe access and sufficient visibility splays can be achieved, prior to accepting development is acceptable and in allocating the site. 5. Whilst Seething is characterised by linear development there are existing examples of small development pockets to the north of the village. The council considers that a well designed scheme would not be considered to be inappropriate in this location. 6. With regards to housing mix, the Council will seek to provide new housing development to meet housing needs (using the most up to date Strategic Housing Market Assessment (SHMA)). This will ensure that allocated sites provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of their life cycle e.g. first-time buyers, affordable housing, upsizing/downsizing etc. In addition, the Council will only consider allocating sites that are capable of delivering the policy standard affordable housing requirements		
QUESTION 114: Preferred Site - SN0405, Land to North and South of	459	Comment	Development of the green field site north of Brooke Road with 20 or more dwellings would be hugely detrimental to the character of Seething village and impair	The Council acknowledges the concerns of the Parish Council. With regards to the proposed numbers, at this stage the proposed allocation is for up to 20	746	Consider landscaping and mitigation; further conversations required with SNC landscape

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Brooke Road, Seething			views across open farmland. Furthermore, a 20+ dwelling development at this site necessitates that this would not be linear single property depth and does not therefore meet our previously agreed criteria for any further village development. We also express significant concern regarding highways/traffic impact on a dangerous corner. Finally, such a development would not strictly be infill; Seething Old Hall Park is not acknowledged within the settlement limit.	dwellings on a site of 1.25 hectares and this is not considered inappropriate in a rural context. However careful consideration will be given to the landscaping and further conversations with SNC landscape officers will be required. A Heritage Assessment will also be undertaken to a format agreed with Historic England. With regards to highway safety concerns, the Highways Authority have advised that access arrangements and any mitigation measures will need to be confirmed prior to allocation.		officer. Further discussions with highways required prior to allocation.
QUESTION 114: Preferred Site - SN0405, Land to North and South of Brooke Road, Seething	2213	Comment	Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Allocation split between two agricultural fields, northern edge of village. (Prow offsite site through Church Farm yard). Site in amber habitat zone for great crested newts and residential development not identified as a trigger for consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.	Comments noted. A number of the requirements will be standard across all developments, and can be reflected in the core policies as necessary.	745	Consider the need to reflect the protection of Prow in any Policy for the site.
QUESTION 114: Preferred Site - SN0405, Land to North and South of	2165	Comment	NCC Highways: An off-carriageway pedestrian route between the site and	Comments noted	744	Further Highway discussion required; Discussions regarding the required highway

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Brooke Road, Seething			pedestrian access at the school would be required for the site to be acceptable.			mitigations should be concluded and the necessary land / agreements secured prior to allocation of the site.
QUESTION 114: Preferred Site - SN0405, Land to North and South of Brooke Road, Seething	2091	Comment	LLFA: Few or no constraints. Standard information required at a planning stage. Infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised Assessment: Green	Comments noted.	743	No action required.
QUESTION 114: Preferred Site - SN0405, Land to North and South of Brooke Road, Seething	2053	Comment	Historic England: A significant portion of this site lies within the Seething Conservation Area. Therefore, any development of this site has the potential to impact upon the significance of the Conservation Area. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	Heritage assets were considered as part of the assessment of sites; however a Heritage Assessment of the site will be undertaken, to a format agreed with Historic England, which will document how these issues have been considered.	742	Complete the Heritage Assessment of the site, and reflect the outcomes in the Regulation 19 version of the VCHAP.
QUESTION 114: Preferred Site - SN0405, Land to	1971	Comment	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment.	Comments noted.	741	No action required.

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North and South of Brooke Road, Seething			Major development - If surface water discharges within the watershed catchment of the Board's IDD, if this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).			
QUESTION 115: Preferred Site - SN2148, Land to the west of Mill Lane, Seething	460	Comment	Although this site extends beyond the existing development boundary and is not therefore in keeping with the principle of infill, Seething Parish Council do not think that this would detrimentally affect the character of the village; indeed, it may be an ideal location for further development at a density equivalent to existing properties in Mill Lane. We do not identify any obvious major traffic or highway issues. The site is however, quite distant from the village centre.	Parish Council comments noted. With regards to the distance from the village centre, the Highways Authority would require that a frontage footway is provided as part of any development, this will help to connect the site to the village.	753	No action required.
QUESTION 115: Preferred Site - SN2148, Land to the west of Mill Lane, Seething	543	Support	Confirmation that Site SN2148 Land to the west of Mill Lane, Seething remains available for development and the proposed allocation can be supported.	Comments noted	752	No action required.
QUESTION 115: Preferred Site - SN2148, Land to the west of Mill Lane, Seething	2214	Comment	Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Allocation to left of road, in agricultural field. No priority habitat identified e.g. hedges) (and see MAGIC). Site in amber risk zone for great crested newts. Site in SSSI IRZ but residential development does not trigger NE consultation.	Comments noted.	751	Consider the need to reflect the protection of great crested newts in any Policy for the site.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 115: Preferred Site - SN2148, Land to the west of Mill Lane, Seething	2166	Comment	NCC Highways - Frontage footway along with carriageway widening would be required.	Comments noted.	750	Include the need for site frontage footway along with carriageway widening in any Policy for the site.
QUESTION 115: Preferred Site - SN2148, Land to the west of Mill Lane, Seething	2144	Comment	Few or no constraints. Standard information required at a planning stage. Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Assessment: Green	Comments noted.	749	No action required.
QUESTION 115: Preferred Site - SN2148, Land to the west of Mill Lane, Seething	1972	Comment	Water Alliance comments: Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. Major development - If surface water discharges within the watershed catchment of the Board's IDD, this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).	These comments are noted.	748	No action required.
QUESTION 116: Preferred Site - SN0406SL, Land to the west of Seething Street, Seething	461, 465	Comment	Although this would be infill, this site has a variety of mature trees and a pond: these were noted to be significant and in need of restoration in TPO survey (see email to PC 14.07.2020 from Imogen Mole; Conservation and Tree Officer). We think the development would be detrimental to the character and ecology of Seething village. This area of the village, extending north to Well Cottage has unique wooded	Comments noted. With regards to the impacts upon ecology and trees, it is acknowledged that development sites can be home to wildlife, and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures. Similarly with tree	758	No action required.

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			character (noted in “form and character”) that would be adversely affected by development. The northern limit of this “southern component” of proposed new settlement boundary should be at Orchard Cottages.	impacts, any future application will be subject to a arboricultural tree assessment to assess and determine the quantum of development on site. It is anticipated that development will be restricted to 1 or 2 dwellings.		
QUESTION 116: Preferred Site - SN0406SL, Land to the west of Seething Street, Seething	2054	Comment	Historic England comments: This site lies within the Seething Conservation Area. Therefore, any development of this site has the potential to impact upon the significance of the Conservation Area. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	Heritage assets were considered as part of the assessment of sites; however a Heritage Assessment of the site will be undertaken, to a format agreed with Historic England, which will document how these issues have been considered.	757	Complete the Heritage Assessment of the site, and reflect the outcomes in the Regulation 19 version of the VCHAP.
QUESTION 116: Preferred Site - SN0406SL, Land to the west of Seething Street, Seething	1973	Comment	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. Minor development - No further comments	Comments noted.	756	No action required.
QUESTION 116: Preferred Site - SN0406SL, Land to the west of Seething Street, Seething	2092	Comment	See attachments for full response. Few or no constraints. Standard information required at a planning stage. Infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing.	LLFA comments noted.	755	No action required.

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			Where possible, surface water infiltration should be utilised. Assessment: Green			
QUESTION 116: Preferred Site - SN0406SL, Land to the west of Seething Street, Seething	545	Support	Confirmation that Site: SN0406SL, Land to the west of Seething Street can be supported and agree that any development is likely to be small scale (up to 5) and linear in form to reflect the character and appearance of the area. The intention remains to bring forward the site within 5 years of the Plan's adoption. It is suggested that the Settlement Limit is extend around the site (identified brown in the Plan) to enable future garden land associated with new properties to be included within the Settlement Limit.	Comments noted.	754	No action or change.
QUESTION 117: Preferred Site - SN0587SL, Land to the west of Seething Street, Seething	462	Comment	Seething Parish Council agree this would be infill equivalent to development on the East side of Street (Hawthorne House, Portelet, Mallards, Fieldfare and Fallowfield) and West side of Street between Holmlea and The Cottage. We have no major objection provided that the large, healthy mature Oak within hedge midway along site is wholly protected; the Little Mere should be similarly protected.	Comments noted. Any subsequent application/development will be subject to specialist reports/surveys such as arboricultural assessment. This will ensure appropriate development and any mitigation measures are in place.	765	No action required.
QUESTION 117: Preferred Site - SN0587SL, Land to the west of Seething Street, Seething	546	Support	Seething can be supported, and agree that any development is likely to be small scale (up to 5 dwellings) and linear in form to reflect the character and appearance of the neighbouring area. The intention remains to bring forward the site within 5 years of the adoption of the plan.	Support noted.	764	No action required.

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QUESTION 117: Preferred Site - SN0587SL, Land to the west of Seething Street, Seething	2217	Comment	Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Allocation to left of road, in agricultural field (wide field margin). hedge along eastern boundary (priority habitat), but no priority habitat identified see MAGIC). Site in amber risk zone for great crested newts (pond adjacent). Site in SSSI IRZ but residential development does not trigger NE consultation. Consideration should be given to delivering Biodiversity Net Gain. PROW along southern boundary.	Comments noted. A number of the requirements will be standard across all developments, and can be reflected in the core policies as necessary.	763	Consider the need to reflect the protection of hedgerows, great crested newts and PROW in any Policy for the site.
QUESTION 117: Preferred Site - SN0587SL, Land to the west of Seething Street, Seething	2055	Comment	This site is adjacent to the Seething Conservation Area and close to the grade II listed Breydon Cottage and The Walnuts. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	Heritage assets were considered as part of the assessment of sites; however a Heritage Assessment of the site will be undertaken, to a format agreed with Historic England, which will document how these issues have been considered.	762	Complete the Heritage Assessment of the site, and reflect the outcomes in the Regulation 19 version of the VCHAP.
QUESTION 117: Preferred Site - SN0587SL, Land to the west of	2131	Comment	See attachments for full response. Few or no constraints. Standard information required at a planning stage.	LLFA comments noted.	761	No action required.

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Seething Street, Seething			Infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised.. Assessment: Green			
QUESTION 117: Preferred Site - SN0587SL, Land to the west of Seething Street, Seething	1974	Comment	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. Minor development - No further comments	Comments noted.	760	No action required.
QUESTION 117: Preferred Site - SN0587SL, Land to the west of Seething Street, Seething	1550	Support	Supported on the basis of any development being linear in form to reflect the character and appearance of the neighbouring area.	Support noted. With regards to the design, layout and appearance of the site, this will be dealt with at the planning application stage and in accordance with current local planning policies.	759	No action required.
QUESTION 118: Should any rejected sites be allocated?	547	Object	SN1035: Development of two frontage 'infill' properties on this site would not erode the rural character of Wheelers Lane. The site, along with the recently constructed houses to the west already reflects the character and appearance of the village and appears more related to the village than it does the open countryside and should be included within the Settlement Limit. The three properties to the west of the proposed site were considered acceptable in highways terms, and a further two frontage dwellings would not cause a severe impact on the operation or safety of the public highway.	Support for the allocation of rejected site SN1035 is noted. However, no evidence has been submitted to alter the opinion of the Council that the site is suitable for development.	768	No action required.

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QUESTION 118: Should any rejected sites be allocated?	463	Comment	This site must not be developed. The three existing new properties were approved solely on the basis of development limited specifically to the brown field component of the Seething Motors site. This brown field development was acknowledged to be outside the development boundary and therefore the greenfield SN1035 site cannot be considered as infill.	Comments noted.	767	No action required.

Spooner Row and Sutton

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QUESTION 119: Settlement Limit	2269	Object	Comments on alterations to the Spooner Row settlement limits: Do not consider an extension to SLs to allow for future housing - without proposing a specific number of units on these sites - to be a sound approach; the NPPF does not advocate the use of development limits and sets out that a windfall allowance should only be allowed where there is compelling evidence; the Council's current approach shows insufficient land to meet the housing need - this document proposes the allocation of 1,178 dwellings of the 1,200 dwellings required; windfall allowance cannot make up for the shortfall in dwellings and the Council should allocate housing sites rather than make room for new housing in the settlement limits; by extending settlement limits the Council are effectively allocating land for housing without undertaking the necessary tests to ensure that the land is suitable; to ensure the plan is found sound the options are (1) allocate at least 1,200 homes in the VCHAP; or (2) amend the approach to allow development in or adjacent to settlement boundaries provided there are no adverse impacts (as	This representation is concerned largely with the principle of extensions to settlement limits throughout the VCHAP area although it does also refer to site specific alterations in the Spooner Row settlement. Whilst a number of objections are put forward there are a number of inaccuracies within this commentary that indicate a misunderstanding of the Council's proposals. To clarify, the VCHAP is not proposing to include the dwellings on sites proposed as Settlement Limit extensions towards the 1,200 dwelling total. The VCHAP does not include a windfall assumption to reinforce the number of dwellings allocated within the document. Extensions to settlement limits have only been suggested where either (a) the proposed site is too small to allocate, but which would form a 'rounding off' to an existing boundary or logical small extension, or (b) where these rationalise existing planning consents. For Spooner Row, a review of the existing settlement limit concluded that no amendments to the settlement limit were required at this time and the Council remains of this opinion. Notwithstanding the fact that sites proposed as Settlement Limit extensions do not count towards the 1,200 dwelling target, contrary to the respondent's assertion, they have been through the same site assessment and consultation process as the allocation-scale sites.	357	No action required

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			introduced by a number of authorities); notwithstanding the above, if the Council pursues its current approach, the settlement boundary around Spooner Row should be amended as shown on the submitted plan - this would allow for an appropriate windfall allowance within Spooner Row on smaller sites and linear development could be brought forward on sites SN0446 and SN0448 in the future.	The respondent has also suggested that the VCHAP fails to make provision for the 1,200 dwellings identified for delivery in the South Norfolk village clusters by the GNLP. For clarification purposes, the VCHAP is intending to make provision for at least 1,200 dwellings across the plan area including those site allocations identified by those Neighbourhood Plans currently seeking to make their own housing allocations in parallel with the VCHAP. These NPs are considered to be progressing well and once completed would form part of the Development Plan. In accordance with guidance the NP groups have been provided with housing numbers for allocations within their Plan areas and with the addition of these sites the VCHAP is expected to exceed the 1,200 dwelling target. Notwithstanding this point, in the eventuality the VCHAP failed to meet this housing requirement figure, the village clusters remain part of the GNLP and any shortfall in delivery would be met elsewhere within the GNLP area. As such, the Council considers that its approach to both the extension of the existing settlement limits throughout the VCHAP area, as well as the number of dwellings proposed throughout the plan area, are correct. Furthermore, it is not considered appropriate to extend the settlement limits around the sites suggested above as these extensions would not be in accordance with the		

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				approach to settlement limit extensions identified by the Council. Lastly, a policy for allowing small scale development adjacent to Settlement Limits is being proposed for inclusion in the GNLP, currently at Examination, and would cover the settlements in the VCHAP area; therefore it is not necessary to repeat that in this document.		
QUESTION 119: Settlement Limit	1370	Object	Summary of comments relating to the SL: Do not support the extent of the SL - the JCS stated SR could accommodate 15-20 dwellings but due to the lack of 5-year land supply approximately 60 new dwellings have been granted planning permission. What improvements have been made to address inadequate infrastructure (particularly highways and flooding) to enable a further 40 dwellings?; Station Rd can get very busy with HGVs and has no significant footpath for a significant stretch and no pathway across to the nearest bus stop in Sutton; SR rail station has been incorrectly described as a halt (as in the previous plan) but has not operated as such for decades - the station provides an extremely limited public transport service and there is no bus service serving the village; and more houses will increase the car usage	Spooner Row was classified in the JCS as a Service Village but was also noted as being a settlement within the Norwich Policy Area that could accommodate additional development to help meet identified growth requirements as necessary within the JCS Plan area. Consideration of these earlier planning applications will have included an assessment of the impact of these developments on the form, character, infrastructure and services within the village. Similarly, as part of the site selection process for the VCHAP all sites have undergone a site assessment which, for preferred and shortlisted sites, has also included technical consultation with a range of technical consultees. These discussions have focused on both the specific sites as well as the wider area as appropriate. For example, highways discussions have included consideration of the connectivity of the site to the wider settlement, immediate access considerations and the impact of	332	Update the supporting text for Spooner Row in the main VCHAP document to note that the rail station is no longer operates as a 'halt' and supports a sparse service only. Review bus service links through the Spooner Row and Sutton cluster and update if appropriate.

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			and contradicts the Council's transport policies.	additional development on the wider highway network. Similarly discussions with the Lead Local Flood Authority have reviewed on site flood risk as well as the impact new development could have on existing off-site flowpaths. In terms of flood risk, all new development is required to accommodate it's own surface water on site and neither contribute to or exacerbate existing off-site risks. In many instances new development provides an opportunity for 'betterment' of existing conditions (subject to the scale of development proposed). The site assessment for SN0567 and SN2082 noted that should these sites be preferred for allocation highway improvement works would be required, including both widening of the carriageway and the provision of the footpath link to connect with the existing footpath to the east. Comments relating to a public transport service within the cluster are noted and details relating to the services at the railway station will be updated in the policy text as appropriate. A Parish Services Audit was undertaken prior to completion of the site assessments and it was noted at that time that there was a limited rail service only and no bus service. It is recognised that the VCHAP objectives, most specifically allocation of smaller sites dispersed widely throughout the Plan area, will result in		

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				new homes in settlements with limited or no- public transport links. This is acknowledged as an inherent tension arising from supporting new development within rural areas rather than in established urban settings but has been balanced against maintaining and supporting existing smaller settlements and their facilities and services.		
QUESTION 120: Preferred Site - SN0444, Land west of Bunwell Road, Spooner Row	1648	Support	Comments in support of SN0444: The Council's assessment does not take into account all of the services and facilities within SR; Support partial allocation of SN0444 but the full parcel should be allocated for either up to 65 dwellings or up to 40 dwellings (illustrative layouts submitted); Site is more enclosed by existing development than preferred site SN0567/SN2082; Unnecessary to exclude the areas of flood risk from allocation as the indicative masterplan shows these areas reserved for flood attenuation measures and open space - these areas would be retained as non-developable areas but would be landscaped to improve the integration of the site within the wider area and provide open space for the village; a large area within flood zone 1 has been excluded from the allocation and this should be included given it is not subject	Comments relating to the services and facilities within SR are noted however these have been included within the Parish Services and Facilities Audit record (with the exception of the public house which has subsequently been updated but was included in the initial site assessments). Additional comments relating to the public transport services within SR were submitted during the Regulation 18 consultation highlighting the infrequency of stopping services at SR and the infrequent bus services. Reference to the services within the site assessment forms was only made where these facilities were within the distance set out within the HELAA however in light of the comments received during the Regulation 18 consultation a review of the site assessment forms will be undertaken to ensure the accuracy of these scores. The promotion of SN0444 for an increased number of dwellings on a site area exceeding 1ha fails to meet the key objectives of the VCHAP for allocating smaller sites with lower numbers of	338	A review of the site assessment forms for sites within the Spooner Row and Sutton cluster with particular emphasis on the access to existing services and facilities section. The Parish Council Audit record of local services and facilities has been updated to include the public house (although this had been included in the initial site assessments).

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			to flood risk constraints; landscape impacts have been cited as a justification for excluding the area to the north however this is adjacent to existing housing and there is a landscape buffer along the western boundary which would reduce the impact; the site is largely enclosed by development and development of SN0444 would not result in the merging of the significant settlement groupings in SR; logical infill site in the village that can accommodate more numbers than those proposed - the SN0567/SN2082 allocation should be redistributed to this site; and an increased allocation on this site would allow for a number of benefits - provision of open space, including a play area, retention and enhancement of the majority of hedgerows and the planting of wildflower and trees to contribute to biodiversity net gain and an increase in the number of affordable homes on site.	dwellings. In addition the assertion that SR should accommodate in the region of 90 dwellings has not been supported by evidence and is in conflict with the identified VCHAP strategy. It is suggested that this site should be allocated for both a larger number of dwellings and to include areas that would support flood attenuation measures and public open space for the village. No evidence has been submitted to support a local requirement for open space, or to suggest that this would be an appropriate location. The smaller scheme that is preferred for allocation by the Council would not necessitate the significant area of flood attenuation measures proposed and it is not considered either appropriate or necessary on the basis of the preferred site area to allocate these additional areas as non-developable areas for these suggested purposes. The Council's preferred option for development on this site has been identified in order to avoid a significant landscape impact arising from substantial development in this location. A linear form of development on this site would reflect the existing linear pattern of development that is in evidence in SR without resulting in the loss of a significant area of agricultural land to the north and west, and the subsequent loss of the gap between Bunwell Road to the east and Queen's		

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				Street to the west. The Council considers that the scale of development that continues to be promoted on this site would have a greater landscape impact than the current preferred allocation (and the additional preferred site at SN0567/SN2082). Those benefits that have been noted as arising from the development of this site are not considered to be so overriding as to justify the significant proposed increase in numbers on this site.		
QUESTION 120: Preferred Site - SN0444, Land west of Bunwell Road, Spooner Row	1711, 1746	Object	Summary of objections to SN0444: Surface water concerns: site is uphill from areas that have suffered recent flooding and would either drain into the water table or the river and contribute to further drainage/ flood issues; surrounding fields and ditches suffered significant flooding in Dec 2020 resulting in significant damage to neighbouring properties. Affordable Housing: ah should be suitable for purchase by housing associations and be affordable at a cost appropriate for first time buyers or families with lower incomes. Highways: development would be within a 40mph zone and be incompatible with road safety; development in this location would result in additional traffic through the village and past the school. Landscape impact: the proposed site contributes to the character of the village	In response to the objections raised to SN0444: Surface water concerns: the LLFA have provided comment on the reduced parcel currently preferred for allocation and has not raised an objection to development in this location. It is understood that recent off-site flood events during the Dec 2020 resulted from a combination of a 'saturated catchment flooding' event and poor ditch maintenance within the local area. All development is required to address surface water flooding on-site without adversely impacting on the local area. Wherever possible 'betterment' of existing scenarios is also required and this could include ditch management. The technical design details relating drainage schemes would be assessed through the detailed planning application stage. Affordable housing: concerns about the	337	Discussion with the LLFA to obtain an understanding of flood events mentioned in the comments; Completion of a Heritage Impact Assessment to determine the impact of development on the significance of The Orchards.

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			by providing a clear separation between the existing linear developments along the east side of Bunwell Rd and Queen's St; loss of this open space would have an adverse impact on form and character; access to the site would require loss of most or all of the roadside hedgerow; potential for impact on the nearby heritage asset The Orchards.	cost of affordable housing are noted. Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time. On the majority of sites SNC secures affordable housing affordable housing at 75%, below the 80% definition set out in Annex 2 of the NPPF. Local house prices will determine the market cost of affordable housing products in individual areas. Highways: Technical advice has been obtained from officers at NCC Highways and a number of highway improvement works have been identified, including an amendment to the existing speed restrictions along the site frontage. Landscape: Concerns about the landscape impact of development in this location are acknowledged however as noted in the initial assessment it is considered that with careful design the development of this site could complement the existing pattern of development that has emerged in Spooner Row. A significant area of open space between the existing form of development, this proposed allocation site and the new development on approved site 2016/2424.		

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QUESTION 120: Preferred Site - SN0444, Land west of Bunwell Road, Spooners Row	2056, 2219	Comment	Summary of technical heritage and ecology comments for site SN0444: No designated heritage assets within the site but the site lies immediately n-e of Grade II listed The Orchards; development of this site has the potential to impact on the significance of this heritage asset; appreciate that the property is well screened by existing landscaping; a HIA should be undertaken to assess potential impact of development, suitability of an allocation and appropriate mitigation measures; no major ecological constraints identified; and surveys and biodiversity enhancement to be in accordance with policy requirements.	The proximity of The Orchards to the site was noted in the initial site assessment but no further assessment was considered to be necessary at that time. The comments of Historic England have been noted - including reference to the established landscaping between the listed building and proposed allocation site - and a Heritage Impact Assessment will be prepared accordingly to determine the impact of development on the significance of this heritage asset and whether the preferred status of the site should be reviewed as a result. The comments of the NCC Ecologist have also been noted.	336	Preparation of a Heritage Impact Assessment to determine the possible impact of development on this site on the significance of The Orchards. If the site remains appropriate to allocate, consideration of possible mitigation measures to be included in the site specific policy text.
QUESTION 120: Preferred Site - SN0444, Land west of Bunwell Road, Spooners Row	1975, 2119	Comment	Technical comments relating to water issues on SN0444: Site lies outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment; if surface water discharges within the watershed catchment of the Board's IDD, request that this is in line with non-statutory technical standards for SuDS; and	The comments of the IDB are noted, as are the detailed comments of the LLFA. Should the site be allocated it will be the responsibility of the developer to liaise with the relevant water management body in order to ensure an appropriate site design and drainage strategy are developed.	335	No action required.

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			LLFA rating green.			
QUESTION 121: Preferred Site - SN0567, Land south of Station Road and west of Queensland, Spooner Row & (Part) SN2082, Land south of Station Road and east of Top Common	1480, 1559, 1765	Mixed	Comments in support of SN0567 and SN2082 (part): GENERAL: the identified site area measures approximately 1.6ha (not 1ha as referred to in the document) - 1.6ha is considered to be the minimum site area required to accommodate 25 dwellings on this particular site allowing for development at 16dph; an area of the site has previously been granted planning permission which demonstrates no insurmountable physical or material constraints; principle of frontage development was established by the lapsed planning permission; FORM, CHARACTER & DESIGN: The site has a good relationship with the existing settlement with a linear form of development along the frontage complementing the existing pattern of development; site is immediately adjacent to the settlement and is a logical extension in keeping with the locality; LOCATION: sustainable location with excellent accessibility to rural services and facilities and public transport links; the village does not have all services to	The planning history of the site is acknowledged however it is also noted that the approved scheme was at a reduced scale being for 8 dwellings only. This site was identified during the assessment process as a preferred site within Spooner Row and as suggested in these representations a linear form of development in this location would complement the existing form of development in the settlement. Two alternative design solutions have been submitted for the site by two different respondents and whilst these should be considered as illustrative schemes only they do demonstrate that a design solution to accommodate the number of dwellings proposed on this site would be achievable. A detailed assessment of these illustrative schemes has not been undertaken but it is acknowledged that the indicative plans address the issues identified during both the VCHAP site assessment process, as well as during the previous planning application discussions. A scheme that minimises the loss of the existing landscaping along the site frontage would be welcomed and whilst both representations refer to replacement planting as mitigation it should be noted that retention of existing trees and hedgerows is always preferable. Finally, a number of references have been made throughout these representations to work previously undertaken to support the	353	No action required

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			meet the day-to-day needs of future residents but these are only a short distance away in Wymondham; HOUSING MIX: the landowner has sought advice and believes a scheme of 2, 3,4 and 5- bed dwellings would be the most desirable and viable; housing mix would broadly be in accordance with the current SHMA with any updates to this reviewed; anticipate delivery of 8 affordable housing units in accordance with the emerging requirement in the GNLP with tenure and mix to be agreed; HIGHWAYS: principle of access to the site from Station Road already established by previous planning permission; some hedgerow and tree removal along the frontage will be necessary to facilitate the visibility splays however the arboricultural impact of this could be mitigated by replacement planting; CONNECTIVITY: site has access to more services and facilities than usually available for a village of this scale; new footpath connections resulting would improve access for future residents; UTILITIES: no issues emerged for consented scheme in terms of Anglian Water and foul sewer capacity;	earlier planning applications on this site and whilst this is recognised it is also worth noting that this was for a smaller number of dwellings on a site of a reduced scale therefore should the site be allocated any subsequent planning application would need to be fully supported by up-to-date surveys and supporting evidence in accordance with planning policy requirements.		

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			FLOOD RISK: previous SFRA to support the planning application found that the risk of surface water flooding can be managed by setting the scheme slightly back from Station Road thereby avoiding any changes to the existing ditch being required; previous scheme also demonstrated site access could be achieved whilst managing the surface water flood risk; LANDSCAPING (IW MASTERPLAN): design principles shown to be similar to the previously approved scheme which had assumed the removal of the majority of the frontage hedgerow; opportunities to address the minor landscape impacts arising from development through a landscaping scheme; HERITAGE: development would not impact on the significance of the closest heritage assets; INDICATIVE MASTERPLAN (SUBMITTED BY INGLETON WOOD): no absolute on-site constraints; to achieve frontage development along this site a deeper site is required than may otherwise be necessary; masterplan shows a footpath along Station Road with dwellings set slightly back behind private drives to reduce the number of individual access points onto Station Road; the set back softens the impact of development and allows for landscaping along the frontage; potential for two adoptable accesses into the site from Station Rd, subject to discussions with NCC Highways; footpath			

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			improvements are recognised and shown connecting to the primary school and the existing footway to the east; INDICATIVE MASTERPLAN (SUBMITTED BY BROWN & CO.): a single centralised road access would be provided - this was previously acceptable in the approved scheme; footpath with crossing point included to allow for connection to the existing footpath network; development would incorporate SuDS and would reduce the risk of flooding in this location; proposed design would seek to conserve and enhance the character of the neighbourhood; there would be a loss of uninterrupted views across the countryside from Station Road but this would balance with other such development in SR; retention of trees and hedgerows as far as practicable with additional landscaping introduced; overall a limited impact on the landscape setting of the village arising; development material to be complementary and a range of dwelling types and scales and orientated to remain in keeping with the character of the village.			
QUESTION 121: Preferred Site - SN0567, Land south of Station Road and west of Queensland, Spooner Row & (Part) SN2082, Land south of Station	2220	Comment	Summary of technical ecological comments for SN0567: Green - no major constraints identified; surveys and enhancement to be in accordance with policy requirements; loss of hedgerow (priority habitat) should be avoided, (possibly through the use of	The comments of the NCC Ecology Officer are noted. Any applications coming forward on this site would be required to be policy compliant and accompanied by the appropriate ecological surveys and identified mitigation measures. A query relating to the possible relationship between the identified site and a traditional orchard priority habitat is noted and further	347	Contact NCC Ecology to determine whether the site is next to a traditional orchard priority habitat and determine whether this would have any site specific policy implications.

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Road and east of Top Common			the existing access), minimised or as a last resort compensated; possibly adjacent to traditional orchard habitat but this would need to be confirmed; site located within a SSSI IRZ but residential development would not require consultation with NE; and amber and green zone location for Great Crested Newts.	clarification should be sought regarding any site specific policy requirements arising.		
QUESTION 121: Preferred Site - SN0567, Land south of Station Road and west of Queensland, Spooner Row & (Part) SN2082, Land south of Station Road and east of Top Common	1976, 2129	Comment	Summary of technical surface water management comments on SN0567 and SN2080 (part): LLFA - green rating; and Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment - if surface water discharges within the watershed catchment of the Board's IDD it is requested that this is facilitated in line with the non-statutory technical standards for SuDS.	These comments are noted, including the detailed technical comments of the Lead Local Flood Authority. It will be for the developer of the site to liaise with the appropriate water management body to ensure an appropriate drainage solution is incorporated into the design of the site.	346	No action required.
QUESTION 121: Preferred Site - SN0567, Land south of Station Road and west of Queensland, Spooner Row & (Part) SN2082, Land south of Station	1379, 1647, 1712	Object	Summary of objections to SN0567 & SN2082 (part): this site was only granted pp due to the Council's lack of 5-year housing land supply; the Council's preference for linear development and the provision of 25 dwellings can not be achieved on this site.	The principle of residential development along the road frontage in this location has been established. Whilst the representations correctly note the number of units previously approved along the site frontage is significantly lower than the proposed allocation, the preferred allocation site is of greater depth than the current approved site and the layout plan for 2017/1321 indicated large detached dwellings in	339	Consideration to be given to the inclusion of site specific landscaping requirements for this site in the site allocation policy text due to the open nature of the allocation site.

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Road and east of Top Common			development of this site would result in highway safety issues; development in this location would result in an urbanised character when approaching from the A11 and not be in keeping with the character of the settlement; detrimental impact on the landscape given its location on an open agricultural field; this site is at the elevated end of Spooner Row and would likely result in an increased flood risk to the lower parts of Station Road and beyond; ditches and drains are insufficient and frequently flood, as evidenced by serious flooding of fields and properties in recent months - the site would drain into the water table or river and contribute to further issues; and affordable housing needs to be actually be affordable for first time buyers or families with a lower income.	plots of significant size. With an appropriate design solution it is considered that this site would be capable of accommodating a greater number of dwellings whilst incorporating a linear form of development along Station Road. A landscaping scheme would provide screening of the site in wider views and would careful design of the site would allow for the transition between the settlement and the surrounding open countryside. These details would need to be considered in detail during the subsequent planning application stage. Consideration has been given to the management of surface water and the impact development in this location could have through technical consultation with the LLFA. The presence of an existing surface water flowpath within the settlement is noted however this site is not considered to be significantly affected by identified surface water issues and all new development will be required to manage all surface water on-site and, wherever possible, result in improve the existing off-site scenarios. Technical drainage solutions are considered to be available to mitigate any on-site risks. These details would be explored in detail during the site design and application process. Maintenance of the existing ditch network in and around SR has been identified as a reason for recent flood events within the wider village.		

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				concerns about the cost of affordable housing are noted. Emerging Policy 5 of the GNLPP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time. On the majority of sites SNC secures affordable housing affordable housing at 75%, below the 80% definition set out in Annex 2 of the NPPF. Local house prices will determine the market cost of affordable housing products in individual areas.		
QUESTION 122: Should any rejected sites be allocated?	2270	Object	Summary of comments objecting to the omission of sites SN0445 and SN0447: SN0445 - the main constraint identified is the location of FZs 2 and 3 but this only covers a small area in the northeastern corner of the site; the submitted illustrative masterplan and updated layout show this area as being retained for open space and the proposed housing located in FZ1; landscaping could create a green infrastructure corridor through the village allowing public access where currently none exists; the Council concludes a detrimental landscape impact associated with the development of the site however the indicative masterplan shows a green buffer along the western part of the site to prevent the merging of the settlement groupings in keeping with the character of	This support for SN0445 is noted, as well as the comments that have been made about the Council's assessment of the site, however despite a review of the site the Council remains of the opinion that this site is not suitable for allocation. The submission of an illustrative masterplan to demonstrate the design / layout solution for the site is acknowledged. The respondent has suggested that development would be sited outside the FZ2 and 3 areas within the site and that these areas comprise a small area of the site only. Whilst this is an accurate representation of the areas of identified flood zone these comments fail to make reference to the significant surface water flowpath that also runs through the site. The illustrative layout however suggests that development has	366	No actions required

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			the village; this could be a community orchard if required; significant off-site highway works have been noted but it is unclear what it meant by this - vehicular access is proposed off Station Road and the provision of the access is not considered to involve any significant off-site highway works; we object to the omission of SN0445 and the Council's assessment of the site. SN0447 - we do not consider the location of the flood risk areas to be a significant constraint that would prevent development on the site; housing could still be accommodated through an appropriate layout, landscaping and drainage solution; the Council confirm that locating the development in the northern part of the site would lessen the erosion of the gap between the two distinct areas of the settlement; the illustrative masterplan shows POS on the southern half of the site with a vehicular access off Chapel Lane - with a suitable design and appropriate materials the impact of development of the setting of the identified heritage assets can be suitably managed; the location of these buildings is therefore not considered to overly constrain the development potential of the site and should not be used as a reason to discount the site as a housing allocation; the Council also identified a requirement for off-site highway works but other than an access off Chapel Lane no further highway works will be required; object to the omission of SN0447.	been concentrated outside of this area, reducing the developable area of the site and resulting in a site layout that does not reflect the existing linear frontage form of development that is characteristic of the development pattern in Spooner Row. This representation suggests that an area of public open space would be incorporated into the site layout for the benefit of the whole village. The illustrative masterplan also includes a multi-purpose building within the area that cannot be utilised for residential development however no supporting evidence has been submitted to indicate either a requirement for, or a support of, these site features by the residents and/or Spooner Row Community Council. It is also unclear how/what the proposed green infrastructure corridor would connect to beyond the boundaries of the site as the site is constrained on three sides by residential development, Station Road and a railway line. These benefits are therefore afforded limited weight only when considering the allocation of this site for residential development. This representation suggests that the addition of a green buffer to the western edge of the site would address the landscape concerns previously identified in the site assessment. The Council acknowledges the presence of this landscape mitigation but does not		

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				consider that this addresses the concerns raised. Furthermore, even taking into account the recognised constraints and the reduced developable site area, the illustrative masterplan submitted to support the site indicates that development in this location would in fact result in a coalescence of two distinct parts of the settlement. Whilst an alternative site layout may be possible the Council considers that development on this site would result in an uncomfortable relationship arising with the existing linear patterns of development in evidence in Spooner Row. We therefore remain of the opinion the landscape impact arising from the allocation of this site would be significant. Comments relating to the site access are noted however the Council asserts that the Amber score reflects the comments of NCC Highways Officers who identified a number of highway improvements that would likely be required to facilitate the delivery of this site. The Amber score reflects that until such time a detailed consideration of the works considered to be likely is undertaken access to the site is not confirmed. It is accepted however that whilst there may be potential constraints to access these could be overcome through development. This is the basis for the Amber score. The site also continues to be promoted		

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				for housing numbers in excess of the objectives of the VCHAP. Following the preferred distribution strategy for allocating residential sites the VCHAP identifies allocations for 1,200 dwellings in accordance with the identified targets in the GNLP. The Council does not therefore consider it either necessary or appropriate to allocate sites larger than those identified without substantial justification. For all of the reasons set out above the Council remains of the opinion that site SN0445 is not suitable for allocation. The comments submitted in support of the allocation of SN0447 are noted as are the mitigation measures that have been identified as being possible design solutions to reduce the impact of development on the identified constraints. Notwithstanding this the Council remains of the opinion that this site is not the optimal location for new residential development in Spooner Row and that alternative sites within the settlement offer preferable options for allocation. For this reason it is not considered either appropriate or necessary to allocate site SN0447.		
QUESTION 122: Should any rejected sites be allocated?	1747	Support	Comments submitted in support of SN0404: Strongly disagree with the conclusions of the site assessment and some of those included on the site assessment;	The Council has reviewed the original site assessment form and as a result has updated the Historic Environment and Flood Risk scores to 'Green' and the Site Access score to 'Amber'. In terms of the Historic Environment it is recognised that development of the site would not	360	Corrections made to the HELAA to reflect a 'Green' score for the impact of development in this location on heritage assets, an 'Amber' score for

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			One of the reasons for rejection of the site would be that it comprises backland development and would have an adverse impact on the form and character of the existing linear pattern of development; The site sits behind allocation SPO1 which was granted planning permission for 13 dwellings – development is expected to commence on this site in late 2021; It is acknowledged that there is a single row of frontage development opposite the site but there are examples of backland sites in this part of the village – Chapel Loke immediately to the southwest is a classic backland site and Pilgrim’s Farm to the south comprises a cluster of buildings set well back from Chapel Road; The depth of the proposed site resulting from SN0404 and SPO1 would mirror the depth of development on the opposite side of the road; The landowner owns the surrounding farmland and it would be possible to plant a substantial landscape buffer along the northeastern boundary of the site to ensure views are suitably screened and reduce the landscape impact of the development; A landscape buffer could also be provided along the southeastern boundary to soften views from Guiler’s Lane to the south; Access would be provided through the	have an impact on any nearby designated or non-designated heritage assets. The Site Access score has been amended to 'Amber' to reflect the evidence submitted by the respondent however it is not considered appropriate to amend this to a 'Green' rating as suggested in this submission as the access and footpath connections referred to in association with SPO1 have not yet been delivered. The Flood Risk score has been amended to 'Green' to reflect that the area of surface water flooding identified within the site assessment form lies outside the boundaries of the promoted site. It should be noted however that the area of surface water flooding referred to on the site assessment forms includes the potential access point to the site and this would need to be considered in any subsequent proposal for the site. Turning to the comments relating to the backland form of development proposed the Council considers that the original conclusions remain of key relevance to the final assessment of this site. Two separate areas of development have been referred to in this representation - dwellings at Chapel Loke and the development at Pilgrim's Farm - however the Council contends that neither of these are comparable to the development that would arise from a further allocation in this location. Chapel Loke is well screened by existing mature vegetation and as a result is not		access to the site and a 'Green' score for Flood Risk.

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			existing allocation and it is not understood why this would be unreasonable – transport evidence has been prepared which outlines that the access consented for the approved scheme would be suitable to cater for the additional 12-15 dwellings on this site and the minor increase in traffic from an additional 15 dwellings in not seen as severe in highway terms; There would be no additional hedgerow loss required over and above that needed for access to the consented development; The red rating in the site assessment is disingenuous as it indicates no possibility of creating an access and this is not correct – it has been made clear in previous representations that access would be via SPO1; The consented scheme for SPO1 includes the provision of a footway, including tactile crossing across Chapel Road, which links to the existing footpath provision leading to the village centre; It is therefore considered that the access rating should be corrected to green as access by all means is possible; Also disagree with the amber flood risk - the site is on flood zone 1 and is not at risk of surface water flooding; The site has been given an amber rating relating to the Historic Environment – the	visible on the approach into the village. It also comprises significantly fewer dwellings than proposed on this site and has developed incrementally reflecting the scale of development in this location. With regards to Pilgrims Farm, this cluster of dwellings comprises barn conversions - a common form of development in evidence throughout the South Norfolk countryside – is reflective of the heritage of the site and maintains a strong relationship with Pilgrim's Farmhouse. Neither of these examples are therefore considered to be comparable to a new site allocation on SN0404. For transparency the Council recognises that the preferred allocation site SN0567 and SN2082 on Station Road could result in a tandem form of development however the Council considers that there are key differences arising between the sites. Of key importance is the allocation of the preferred site as a single site which will enable the evolution of a design/ layout scheme that reflects the site specific policy requirement. Site SN0404 has been promoted entirely separately to SPO1, which as clearly stated in the representation already benefits from planning permission, and as such the relationship (in terms of design and layout) between these sites on a key approach into the settlement could prove difficult to deliver in harmony. Comments relating to the depth of the proposed site (in-combination with		

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			site abuts Grade II Listed Pilgrim's Farmhouse but there is extensive mature boundary screening and the site does not contribute in anyway to the setting of the Listed Building; An archaeological desk based assessment was undertaken on the adjacent land and concluded there were no features of archaeological interest and it is assumed that it would be the same for this site – there are no likely impacts on the Historic Environment and this score should be amended to green; The site is in single ownership and is available for immediate development and there are no constraints that would threaten delivery of the site – the landowner has a proven track record of delivering new homes in the village.	SPO1) and the possibility of the creation of a landscape buffer on land outside the promoted area are noted but do not alter the Council's position. A requirement for substantial landscape mitigation measures to screen the development in views along both Chapel Road and Guiler's Lane, as promoted in this representation, indicate that the form of tandem development proposed on this site is not appropriate in this location. For clarity, whilst a consideration of the landscaping mitigation is likely to be included in any site allocation for SN0567/SN2082 this is considered to be less critical than a requirement for significant landscaping on SN0404 would be. Finally, it is suggested that site SN0404 is viable, free of constraints and deliverable however the Council has concerns about this arising from the issues that currently remain outstanding on SPO1. This specifically relates to the viability of SPO1 and the significant reduction in affordable housing below current planning policy requirements that has been sought. This reduction in affordable housing arises from on-site gas pipe constraints not previously identified that may also affect the viability and deliverability of SN0404. It is currently unclear how the promoted site could be a viable option and deliver affordable housing in accordance with the required planning policy when these other sites have failed to do so and no		

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				supporting evidence has been submitted on this matter in support of SN0404.		
QUESTION 122: Should any rejected sites be allocated?	2268	Comment	Support for the rejected part of site SN0282: PRINCIPLE OF DEVELOPMENT: the remainder of SN0282 is located immediately to the south of preferred development site SN0567 and SN2082 and remains available for development, either in full or part; the identification of the combined site to the north, as well as the planning history on the land to the north, demonstrates that the site is technically capable of development; based on the remaining site area the site could deliver 52 dwellings at 25dph or 35 dwellings at 16dph - whilst this exceeds the objectives of the VCHAP the site has clear capacity to allow a sustainable extension to the preferred site; this site could either be included as an extension to the existing preferred site, or as a second allocation site for up to 35 dwellings which would be in accordance with the objectives of the VCHAP; the village provides an opportunity to expand upon the 40 dwellings already identified to compensate for there being no suitable sites identified in other nearby settlements; Spooner Row has the existing local services to facilitate development and provides an opportunity for additional growth - the village has a range of services not available in villages elsewhere in the District and is accessible to nearby Wymondham and Attleborough and the services found there;	During the initial site assessment consideration was given to the suitability of the larger site area for allocation but it was considered most appropriate to allocate a smaller parcel to the north of the site in combination with the adjacent site SN0567. The Council remains of the opinion that this is the most appropriate area of land to allocate for development. The respondent has stated within this representation that the site is technically capable of development as has been demonstrated by both the planning history for the frontage site to the north of the preferred allocation and the Council's choice of preferred allocation site immediately to the north. The approved scheme however was for a significantly lower number of dwellings and on a much smaller parcel of land therefore whilst the supporting documentation for the earlier planning application may provide an indication of issues that could be encountered on the site it should not be assumed that the extended site would not result in additional constraints being identified. In terms of the housing numbers on the site the Council would not wish to see a phased approach to development across the preferred site and the remainder of SN2082 - a coherent and integrated scheme to enable the appropriate	359	No action required

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			HOUSING MIX: site considered viable to provide 33% affordable housing; LOCATION: the site is in a sustainable location with good access to rural services and facilities - no absolute on-site constraints have been identified; HIGHWAYS: new footpath connections through the preferred site could connect dwellings to Station Road and the existing footpath; the highways infrastructure required to serve the extended site would already be delivered through the preferred site thereby avoiding additional access from the existing highway and minimising the impact on the local road network; no anticipated reason to create any further accesses via either Station Road or Top Common; NCC Highways have not identified any capacity issues that would limit the ability of more than 15 dwellings to be served from a new access road from Station Road; ACCESSIBILITY: sustainable location with access to more services than would usually be available for a village of this scale; development of the site would be result in improved footpath connectivity; UTILITIES: the work for planning applications on site SN0567 indicated sufficient AW capacity for foul sewer; if any issues are subsequently identified an increased site allocation has the potential to improve viability of the overall scheme and offer opportunities to provide	delivery of infrastructure across the site would be expected. Notwithstanding this point, the delivery of the entire site (including the preferred site) would exceed the objectives of the VCHAP. Whilst the accessibility of services and facilities within Spooner Row and the wider area is recognised, it is not considered necessary to allocate numbers in excess of the Plan's objectives to meet the overall allocation target because sufficient sites have been identified within the VCHAP area to meet the 1,200 dwelling target. Throughout this process a small number of sites that exceed the identified threshold for either site size or housing numbers have been considered as preferred allocation sites however these sites have been limited to those that are able to deliver additional identified infrastructure or benefit to the wider community. No such infrastructure has been identified as being either necessary or appropriate via the delivery of this extended site therefore there is no sound justification for the allocation of a larger site area. The respondent has provided comments on those issues assessed as being 'Amber' within the site assessment process. Whilst these representations are acknowledged they do not alter the opinion of the Council about the allocation of this expanded site. Notwithstanding this point, should the site be considered for further allocation,		

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			additional infrastructure to contribute towards enhancing utilities capacity; FLOOD RISK: site is within FZ1; small isolated area of surface water flooding have been identified along the western boundary with Top Common - the site area provides an opportunity to avoid these areas; an acceptable drainage scheme can be prepared incorporating the principles of the previous planning permissions on SN0567; LANDSCAPE: development of this site would only come forward with, or after, the preferred site to the north and at that stage development would be adjacent to a built-up settlement and form a logical extension to the village; existing development to the east extends as far south as this proposal therefore development would be consistent with the neighbouring pattern of development; any changes to existing hedgerow and tree loss along the site frontage would be addressed by development on the preferred site; there is no requirement or expectation for access from Top Common therefore the existing hedgerow along the western boundary of the site can be retained; development of the whole site may provide opportunities to improve the landscaping scheme associated with the delivery of the site as a whole; ample opportunities for landscape mitigation; HERITAGE ASSETS: there would be no	it would need to be subject to further technical consultation including on matters such as highways to consider in more detail the impact of a site of larger scale in this location. In terms of the site layout the comments above note that due to the size of the site a suitable design solution could be achieved that would avoid development in those areas identified as being at risk of surface water flooding and this is considered to be a reasonable assumption. With regards to the landscape impact of residential development on the extended site, this support for the site suggests that an extended development site would be consistent with the development to the east of the site that extends further south than the current preferred allocation. The Council disputes this and considers that the development to the east is a more open/spacious layout that results in an effective transition between the open countryside and the settlement. The development at The Ridings also respects the linear form of development that prevails in Spooner Row and allocation of SN2082 in its entirety would not be consistent with this established development pattern. For these reasons the Council does not consider it appropriate to allocate a larger site area within SN2082.		

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			additional heritage impact other than that assessed for the preferred site;			
QUESTION 122: Should any rejected sites be allocated?	1380, 1420	Support	Support for the rejection of sites SN0448 and SN2181: current allocation SPO2 cannot deliver the required footpath due to the narrowness of the lane and current flooding issues are unlikely to be resolved to meet the planning conditions and allocation of SN0448 would have exacerbated this situation further; and Site SN2181 is an unsuitable site which has previously been subject to a refused planning permission and a dismissed Appeal.	These comments are noted. The issues identified in these responses were noted within the initial site assessments and the sites have not been considered suitable for allocation at this time. Comments relating to the existing allocation SPO2 relate to the associated planning permissions on that site but are acknowledged for the purposes of the VCHAP site assessment process.	358	No action required

Stoke Holy Cross, Shotesham and Caistor St Edmund & Bixley

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QUESTION 123: Settlement Limit	1518	Comment	Support for SN2091 as an extension to the settlement limit: seek an extension to the SL to include an additional 0.7ha along Norwich Rd to the south of the existing settlement; the subject site forms part of a wider land parcel submitted for allocation but rejected; in response to the Council's reasons for rejection a much reduced site is promoted as a minor extension to the existing settlement limit; extension of the settlement in the manner shown will reinforce the traditional linear form of development along the eastern banks of the River Tas; propose that the wider land ownership be safeguarded or designated for public accessible habitat improvement area; and small scale residential development - up to 3 dwellings - would include the potential for self-build dwellings.	These comments relate directly to the submission of existing site SN2092 and the promotion of a revised site area for consideration in response to the Council's assessment of the original submission. It is considered most appropriate to consider this representation as an amended site submission. The merits of this site will therefore be considered in detail during the site assessment process and no further comment is considered to be necessary in response to Question 123. The suggestion the SL should be extended further to the south along Norwich Road is noted however.	378	No action required
QUESTION 123: Settlement Limit	986	Object	Comments relating to Harrold Place, Stoke Holy Cross: Entrance to Harrold Place is owned by the residents of Harrold Place and not the Council; the entrance to Harrold Place and Long	These comments appear to relate more generally to sites that have been considered during the VCHAP process as opposed to a specific response to an extension to the settlement limit at Stoke Holy Cross (Question 123). Harrold Place is a recent development	377	Review the comments received from Anglian Water in relation to water supplies to determine whether there are any identified issues in this location.

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			Lane become very congested at school drop-off and pick-up times and further development would exacerbate this; existing problems with effluent and fresh water supplies; and suggested site is frequented by grey partridges and newts in the area adjacent to Harrold Place which tends to be wet and has had historic flood problems.	and is in close proximity to 3 sites promoted to the VCHAP - one of these sites lies to the north of Harrold Place (SN0197), one adjacent to the east (SN0202) and the third is located on the opposite side of Long Lane (SN0524). As SN0202 is the Council's preferred allocation site it is assumed that these comments relate primarily to this site although they are noted as a general concern about further development in this location. In terms of the site specific issues raised about Harrold Place it would be important to ensure that any new development did not exacerbate existing issues that may have arisen. Concerns about the water supplies are noted and the response of Anglian Water will be reviewed to determine whether any further actions/ mitigation measures would be required for development in this location. Comments relating to the congestion relating specifically to the school are acknowledged however as any development on the sites referenced above would be in very close proximity to the school it would be reasonable to assume that additional housing in this location would not worsen the situation and may result in an improvement as an increased number of local children attend the school (as opposed to travelling from out of catchment). Technical consultations have involved a review of the promoted sites by colleagues in the		

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				Lead Local Flood Authority and NCC Ecology - these comments have addressed matters such as flooding and ecological mitigation and have informed the site selection process as well as any appropriate site specific policy text to be included in the final document.		
QUESTION 123: Settlement Limit	630	Comment	SN0202 is outside the existing SL - if this is was drawn up for valid reasons why are these now being ignored?; Stoke Holy Cross is an attractive village which already has a high proportion of new housing development, much of which has been completed recently; more new houses would lead to an imbalance, the village losing its character and suburban sprawl; and it may be said that it is only a few houses but the settlement limit can be easily changed.	These concerns are recognised, as is the level of growth that has taken place in recent years within Stoke Holy Cross which has been in part attributable to the sustainable location of the village and its position within the Norwich Policy Area. The Council is required to maintain a supply of sites identified as being suitable and available for residential development in order to meet its obligations. The overall housing target figure of 1,200 dwellings was provided by the GNLP and the VCHAP seeks to distribute these new sites in the most appropriate locations throughout the District having regard to matters such as sustainability and on-site constraints. Settlement limits are drawn around existing development in order to protect the character of an area whilst allowing limited growth to occur within the boundaries. Periodically it is necessary to review these boundaries in order to rationalise them and include any planning permissions that may have been granted and/or to allow a settlement to expand as appropriate. In this instance no additional alterations	376	No action required

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				are proposed to be made to the settlement limit aside from the inclusion of any site allocated via the current VCHAP process. Alterations to settlement limits are subject to scrutiny through the current process. A relatively small number of sites were promoted for development in Stoke Holy Cross and the current preferred allocation site is considered to be the most appropriate location having regard to its impact on the historic core of the settlement, the existing townscape and the landscape.		
QUESTION 124: Preferred Site - SN0202, Land north of and adjoining Long Lane, Stoke Holy Cross	483	Object	Comments of Stoke Holy Cross Parish Council: The PC considers that the village has had more than its fair share of development over the last few years; development has greatly exceeded that set out in the JCS; the PC feels let down that insufficient provision was made in relation to these developments; this is particularly the case regarding a replacement village pavilion which is totally inadequate for the size of village as it is now; the PC would support a limited amount of development if it facilitated the provision of a fit for purpose community hall that	The comments of the Parish Council are acknowledged, including the support for SN0202 as the most logical site for the modest growth proposed. However, in accordance with the objectives of the VCHAP the site is currently preferred for an allocation of 25 dwellings and it is unlikely that a development of this scale would fund the provision of a new village hall, as suggested by the Parish Council. The recent growth in Stoke Holy Cross is recognised, as are the concerns raised by the Parish Council about the scale of the development and the provision of infrastructure to support this. The Joint Core Strategy identified Stoke Holy Cross as being a service village and as such it would typically be allocated small-scale housing. However, the JCS also identified the settlement as being within the Norwich Policy Area (NPA) and	384	No action required

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			could accommodate the pre-school; and SN0202 appears to be a logical choice - it is accessible by foot to the main services, has potentially good highway and services connections and would represent a 'squaring off' of the settlement.	therefore suitable for consideration as a location for additional growth to deliver the housing in the NPA allowance. Reflecting this the allocation to the south of Long Lane, adjacent to the school, was identified for approximately 100 dwellings. In association with the development that has occurred within Stoke Holy Cross the Parish Council has received both S106 and CIL funding payments which are intended to fund/ contribute towards the provision of infrastructure identified by the Parish Council as being required in the village. The Council has been engaged in discussions with the Parish Council regarding this, as well as exploring opportunities for other grant funding opportunities, and continues to be able to offer advice and support as required.		
QUESTION 124: Preferred Site - SN0202, Land north of and adjoining Long Lane, Stoke Holy Cross	633, 1063, 1072	Object	Objections to SN0202: RELATIONSHIP TO EXISTING DEVELOPMENT - Site is not well related to the form and character of the existing village; local facilities score amber, not green; SURFACE WATER ISSUES - surface water run-off would significantly increase with the potential to exacerbate an existing problem; no flood risk has been identified but surface water flooding was a frequent occurrence to some of the gardens of Harrold Place until the developer undertook significant works to address it; the field's natural slope channels surface water run-off towards 2 - 12 Harrold Place	The objections and concerns raised by local residents to the allocation of SN0202 are recognised and the Council has sought to respond to the concerns raised by subject area below. The site would represent a continuation of the existing form of development that has emerged in recent years to the east of the settlement. The site would not extend beyond either the northern boundary of the adjacent site or the eastern boundary of the developments on the opposite side of Long Lane and is well connected to the existing services and facilities within the village. The Council considers that this location has	383	Review of the comments of Anglian Water in light of the concerns raised about the sewerage at Harrold Place; confirm the details of the additional drainage measures required at Harrold Place and any implications for a drainage strategy on SN0202; contact the site promoter for clarification regarding a possible ransom strip between SN0202 and Harrold Place;

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			resulting in flooded gardens whenever there was meaningful rain; FOUL WATER ISSUES - sewerage would need to be addressed; frequent noxious smell when sewerage is being pumped and increased housing numbers would exacerbate this; Long Lane is frequently closed due to maintenance/ repairs required by Anglian Water suggesting significant issues for the current housing; SITE ACCESS - visibility at the 's' bend at Harrold Place is blind and the addition of a side road here would make this even more dangerous; too little room to accommodate a new road access in this location; the site assessment score is amber and not green; HIGHWAYS - cars frequently parked along Long Lane and the entrance to Harrold Place, particularly during school drop-off and pick-up times, making it dangerous; village access is via narrow lanes and roads which have frequent congestion; no cycle paths in the village; dangerous situation along Long Lane is compounded by the junction at Broomefield Road; LAND OWNERSHIP - a strip of land required for access is in the ownership of the residents of Harrold Place who would not allow access; road widening of Harrold Place would require resident's consent which would not be given; LANDSCAPE IMPACT - the site is prominent	the strongest relationship to the main settlement of all the sites promoted for allocation. Comments relating to both surface water and foul sewerage issues are acknowledged and if appropriate discussions will take place with the developer of the adjacent site to understand the issues that occurred on that site and identify any potential implications for SN0202. In more general terms, in accordance with current guidance and legislation new development should not exacerbate any existing issues off-site, should not result in an increase in off-site flood issues and should, where possible, result in a 'betterment' of the existing position. The detailed technical comments received from the Lead Local Flood Authority have not identified any issues on the preferred allocation site. The comments of Anglian Water are anticipated shortly and will be considered in light of the above representations with further discussions taking place with the relevant consultees if appropriate. Detailed discussions have taken place with NCC Highways Officers who are of the opinion a technical solution is available for the creation of a suitable access to the site, without endangering highway safety, and that the local highway network can accommodate the modest increase in traffic movements		consideration to be given to site specific policy wording relating to measures to minimise the landscape impact of the allocation; undertake a landscape review of the impact of this allocation site.

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			and would spoil overall views in the valley in both directions as it is elevated; the last 16months have demonstrated the importance of the countryside for wellbeing; overall landscape score is red which is at odds with the preferred status of the site; ECOLOGY - noted as being a 'habitat risk zone' for newts which is at odds with its preferred status; and OVERALL ASSESSMENT - do not understand how the site is scored as reasonable and then preferred; the conclusion does not stack up with the identified amber and red scores.	that would be associated with this development. As set out in the site assessment NCC Highways considered that an improvement in the existing situation along Long Lane could be achieved through the creation of a small number of accesses from this site, resulting in a reduction in traffic speeds within this area. However, comments relating to the land ownership and the possibility of a ransom strip existing between SN0202 and Harrold Place will be explored with the promoter of the site as the Council will need to be confident that there is achievable for development. A number of comments have been received about the existing situation regarding local traffic congestion and parking issues during school drop-off/collection periods. Due to the close proximity of the preferred allocation site to the local primary school it is not anticipated that housing in this location would have an adverse impact on this situation and may in fact improve the current position as an increase in the number of local children attending the school would reduce the number of places for pupils attending from outside the catchment area. The landscape concerns about development in this location are recognised and have been clearly set out in the site assessment form however on balance it is considered that a modest amount of additional development in this location would be seen in the		

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				context of the existing developments adjacent to and opposite the site and as such with appropriate landscape mitigation measures in place development in this location would be acceptable. These measures could include landscape planting as well as the scale and form of development on the site, details of which could be included as part of the specific site allocation policy. Notwithstanding this conclusion, the Council considers that it may be appropriate to undertake a review of the landscape impact of this site allocation. A desktop ecological assessment of the site has been undertaken and has not identified any significant issues that would prevent development in this location. Any subsequent planning application on this site would need to be supported by the appropriate detailed surveys and assessments, as well as any mitigation measures identified. Reference is made to the site being within a green and amber zone for Great Crested Newts. This means that the site could be developed in accordance with the District Level Licensing scheme operated by Natural England. Finally, it is noted in these representations that SN0202 has been identified as being a preferred site for allocation despite scoring amber in a number of the site assessment criteria, as well as red in landscape impact. For		

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				clarity, in accordance with the site assessment criteria an amber score indicates that some issues/ constraints may have been identified either on/ in proximity to the site but that either they are not so significant as to prevent development or that mitigation measures are considered achievable to address the matters raised. The red score for landscape impact has been considered as part of the overall site assessment, as well as the availability of suitable alternative sites for development, and the Council remains of the opinion that on balance the allocation of this site for residential use can be justified in the context of the existing developments.		
QUESTION 124: Preferred Site - SN0202, Land north of and adjoining Long Lane, Stoke Holy Cross	1354	Comment	Support the allocation of the preferred site; impact on landscape setting can be mitigated by planting; the site falls away to the north and is at a considerably lower level than development on the south side of Long Lane; the housing mix would contain a significant number of single storey dwellings; and the north boundary of SN0202 should align with the northern boundary of the recently completed development adjacent to the site but is shown south of this.	The agent comments in support of this site are noted, including those specifically relating to the change in land levels both within and opposite the site and reference to mitigation landscape planting. Whilst it is acknowledged that both the changes in ground levels and planting will partially mitigate the landscape impact arising from the development of this site the Council remains of the opinion that there will still be some landscape impact arising. However this is not considered to be so severe as to preclude the development of this site. Comments relating to the housing mix are also noted and it is recognised that single storey dwellings would also reduce the landscape impact of development, particularly in longer views of the site. The overall housing	382	The northern boundary of the preferred allocation site to be checked and corrected if necessary.

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				mix would be expected to accord with the latest evidence and the site design/ layout would need to reflect the setting and constraints of the site. Finally, the northern site boundary will need to be reviewed to ensure that the correct site boundaries are drawn as the VCHAP progresses.		
QUESTION 124: Preferred Site - SN0202, Land north of and adjoining Long Lane, Stoke Holy Cross	2221	Comment	Ecological comments on SN0202: No major ecological constraints identified from desk-top research; bounded on several sides by hedgerows (priority habitat); no other priority habitats identified; sites in amber and green habitat zones for GCNs; Site is SSSI IRZ but residential development does not trigger development with NE; and Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA).	These ecological comments are noted. Any application submitted for development on the site would be expected to address the ecological issues identified on the site and the site design should be informed by appropriate assessment, guidelines and identified mitigation measures	381	No action required.
QUESTION 124: Preferred Site - SN0202, Land north of and adjoining Long Lane, Stoke Holy Cross	1977, 2068	Comment	Technical comments relating to surface water matters on SN0202: Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment; If surface water discharges within the watershed catchment of the Board's IDD	These comments are noted. If the site is allocated for development it will be the developer's responsibility to ensure that the surface water drainage scheme is agreed with the appropriate third party and in accordance with current guidance and legislation.	380	No action required

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			the discharge should be facilitated in line with non-statutory technical standards for SuDS; and LLFA rating - Green.			
QUESTION 124: Preferred Site - SN0202, Land north of and adjoining Long Lane, Stoke Holy Cross	789	Support	Comments in support of SN0202: Consider that this site would provide much needed bungalows for the village and the area; the proposed builder is a high quality small developer; the site would provide mainly smallish bungalows for retired people so would not put pressure on the local schools; and villages like Stoke Holy Cross need small scale quality developments by smaller housebuilders rather than larger scheme by national builders.	The support for this site is noted, as is the general support for small scale developments constructed by smaller developers. These form some of the key objectives of the VCHAP. However at this stage it should be noted that the developer of the site is unknown, as is the proposed mix of dwellings on the site which would be expected to be in accordance with the latest housing mix requirements, unless strong evidence suggested otherwise. As such the assumption that the site would comprise small bungalows only is not correct.	379	No action required
QUESTION 125: Should any sites be rejected?	1521	Comment	Support for SN2091: Proposed revision to promoted site SN2091 to reduce the site to 0.7ha and request inclusion within the settlement limit instead of as an allocation.	The Council recognises that the promoter of the site has sought to address the concerns identified in the site assessment form and has revised their aspirations for the site accordingly. This representation significantly amends the scheme promoted for the original site and as such will be considered in detail within the next tranche of site assessments as a revised site. The merits of this site as included in this representation will therefore be considered separately in due course and it is not considered appropriate to	421	The site will be assessed as a revised site as part of the Regulation 18 Call for Sites process.

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				comment further in response to Question 125.		
QUESTION 125: Should any sites be rejected?	1356	Comment	Support for SN0197: Believe that this site should be considered further; the landowner has confirmed with their solicitor that there is no ransom strip and they retain full access rights to their land; and the landowner's highways consultants also believe that NCC Highways concerns could be addressed, and that landscape mitigation measures could be considered.	A number of concerns were identified during the site assessment process which resulted in the site not being considered suitable as either a shortlisted or a preferred allocation site. The respondent has sought to address the highway concerns and the clarification regarding the site access and the possible existence of a ransom strip is welcomed. However, notwithstanding this update, the Council remains of the opinion that even at a reduced scale the landscape impact of development on this site would be greater than the landscape impact of the preferred site due to the prominent extension into the open countryside that would result from the development of this site. For this reason the Council does not consider SN0197 to be suitable for allocation.	420	No action required
QUESTION 125: Should any sites be rejected?	1604	Comment	Disagree that a development on these sites would have an impact on the landscape character of the area; there are numerous dwellings on this road and this site would effectively infill two parts of the settlement limit; it is adjacent to the settlement limit and would be a sensible extension to the SL; and the site is within relatively close proximity	The respondent has not referred to a specific site number within this comment however as they were the promoters of SN4013 it is a reasonable assumption that these comments should be related to this site. It is also assumed that the second site referred to in this representation is SN4028 which although promoted independently is adjacent to SN4013. Both sites are within Shotesham. The site was considered to be unsuitable for allocation due to the landscape	418	No action required

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			to the rest of the village and any landscape or townscape impacts could be mitigated.	impacts identified within the site assessment form. A review of these sites confirms these concerns and whilst the comments relating to the relationship between these sites and the existing settlement limit are noted the Council remains of the opinion that SN4013 and SN4028 are not suitable for either allocation or inclusion in the existing settlement limit. The site is within a sensitive location and it is not considered appropriate to extend the settlement limit to include these parcels of land.		
QUESTION 125: Should any sites be rejected?	433, 2172	Comment	Comments relating to SN0532: Caistor St Edmund & Bixley PC agrees with the rejection of this site; the Mineral Planning Authority note the reasoned justification for the sites does not include reference to mineral safeguarding - this needs to be addressed within the requirement's of the respective site allocation's policy; the site assessment for this site does not include reference to the active mineral extraction site within 250m of this site which we previously made reference to - the site assessment should be revised to include this information; and there are existing residential properties closer to the active mineral site that the proposed housing location - this has not led to complaints regarding amenity impacts from the existing operation and it	Site SN0532 was not considered to be suitable for allocation for the reasons set out in the site assessment form. The support for this conclusion is acknowledged. The comments from the Mineral Planning Authority are noted, as are the additional notes relating to the proximity of the site to an active mineral extraction site. It is agreed that the site assessment form should be updated to reflect this. The MPA has also advised that specific site allocation's should include reference to mineral safeguarding where appropriate and this is noted as a general comment for all site allocations within the VCHAP.	417	Update the site assessment form for SN0532 to include reference to the proximity of the proposed site to an active mineral extraction site (Contamination and Ground Stability section).

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			is therefore not expected that the proposed site would experience unacceptable impacts.			

Surlingham, Bramerton and Kirby Bedon

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 126: Settlement Limit	170	Object	Surlingham has lack of infrastructure so no preferred sites correct. Flood zone and a religious retreat need protection	Comments noted; at this stage none of the sites submitted have been identified as preferred or shortlisted sites. However, with regards to the concerns raised, the Council is engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Highways and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.	408	No action or change required,
QUESTION 126: Settlement Limit	1468	Object	Surlingham has suitable services and infrastructure to support small scale carefully designed additional housing without adversely affecting the character of the village.	Comments noted; at this stage none of the sites submitted were identified as preferred or shortlisted sites.	406	No action or change required.
QUESTION 126: Settlement Limit	303	Comment	To summarise Bramerton Parish Council recognises the current need for a small number of low cost/social dwellings, within the parish for Bramerton residents and/or those who have familial links to this area. These new dwellings would merely replace three so-called social housing properties recently sold on the open market. In addition, we are concerned about the impact of the increased volume of traffic through Bramerton as a result of the proposed 25-50 properties for the neighbouring parish of Rockland St Mary, particularly with regards to the safety of pedestrians, as existing footpaths are very narrow or in places non-existent.	The comments from Bramerton Parish Council are noted. Concerns raised about the increased traffic movements, are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies.	405	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 127: Should any rejected sites be allocated?	1472	Comment	SN2010REV should be preferred for allocation. The proposed allocation would follow the linear pattern of development without significant extension into the countryside. There are houses opposite part of the site already and as such there would be limited impact on the landscape. There are some trees along the road, however a viable access solution is likely to be available to address this.	The Council acknowledges the support made for the development of SN2010REV. However, the reasons for rejections are still relevant; access and highway requirements would require the removal of several mature trees situated along Mill Road, where their removal would not be considered acceptable. Whilst linear development in this location would be consistent with rest of Mill Road, development in this location would be detrimental to the landscape characteristics, where open views to the east would be interrupted resulting in a negative impact upon the Broads Authority.	476	No action or change required.
QUESTION 127: Should any rejected sites be allocated?	684	Comment	SN2010REV and SN2045SL are highly suitable for small development and a natural extension to existing housing on Mill Road. A precedent exists here for linear pattern development which would not have a major impact on the countryside. Surlingham Primary school is half full and needs more children to ensure its future. Surlingham has had no development in the past 20 years but has a school, a shop, transport and other facilities that are key factors in assessing sites. The sites is ideal for starter homes/ smaller retirement properties where people wish to remain in the village but need to downsize.	The Council acknowledges the support made for two of the rejected sites, SN2010REV and SN2045S. However, the reasons for rejections are still relevant; access and highway requirements would require the removal of several mature trees situated along Mill Road, where their removal would not be considered acceptable. Whilst linear development in this location would be consistent with rest of Mill Road, development in this location would be detrimental to the landscape characteristics, where open views to the east would be interrupted resulting in a negative impact upon the Broads Authority.	475	No action or change required.
QUESTION 127: Should any rejected sites be allocated?	531	Comment	Surlingham Parish Council would consider planning applications for sites - SN2010REV and SN2016SL. The Parish	Comments noted.	413	No action or change required.

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			Council supports SNDC's decision to reject all 4 remaining sites.			
QUESTION 127: Should any rejected sites be allocated?	6	Comment	The infrastructure in the village cannot take any more traffic, i.e more housing cannot be created without addressing all of the road infrastructure. Current traffic and speeding is already dangerous for walkers (only a short pavement near school) and bicycles.	At this stage, no sites have been considered suitable within this cluster. With regards to ensuring highway safety, the Council confirms that as part of the site selection process NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network.	412	No action or change required.
QUESTION 127: Should any rejected sites be allocated?	171	Object	Agree no sites suitable	Comments noted.	411	No change or action required.
QUESTION 127: Should any rejected sites be allocated?	507, 959, 961	Support	Support the rejection of the sites within the cluster.	Comments noted.	410	No action or change required.
QUESTION 127: Should any rejected sites be allocated?	1978	Comment	See attachment for full response. Part of the Parishes are located within the Broads IDD. The Board's byelaws apply to any new developments within the IDD.	Comments noted.	409	No action or change required.

Tacolneston and Forncett End

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 128: Settlement Limit	570, 1156	Mixed	Objections to the Tacolneston settlement limit: The SL should be extended along the eastern side of the B1113 Norwich Road to encompass [my client's site]; objection to the form and character summary - the post war secondary development is Tacolneston and the school/ amenities are here; and the main development is having a detrimental impact on the Conservation Area - major traffic/ safeguarding concerns, vibration, parking, air quality, habitat, visual, traffic noise.	A review of the existing settlement limit for Tacolneston and Forncett End has not resulted in any additional areas being proposed for inclusion in the defined settlement limits (with the exception of any new sites allocated as part of the VCHAP process). As there are no other additions proposed to the SL the Council has assumed that the wider comments relating to the impact of development on the Conservation Area relate to preferred allocation site SN1057 which is to the north of the village and in closest proximity to the Conservation Area. The site assessment has included a review of the impact of additional development in this location and has not raised significant concerns in any of these areas. The inclusion of an allocated site within settlement limits is intended to regularise the allocation process. The site to the east of the B1113 (Norwich Road) is site SN2031. This site was promoted for an area in excess of 1ha and therefore would be considered too large to be considered as a small-scale extension to the existing settlement limits. A full response to the representation received in relation to SN2031 has been provided to Question 130.	442	No action required

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QUESTION 128: Settlement Limit	108	Comment	Forncett PC agree with the extent of the settlement boundary (as far as the parish Forncett is concerned).	There are no amendments proposed for the Forncett End settlement limit and the support for this stance is noted.	441	No action required
QUESTION 129: Preferred Site - (Part of) SN1057, Land to the west of Norwich Road	1435	Support	Support for SN1057: Representation submitted in support of the allocation of SN1057; however the preferred allocation refers to 20 dwellings whereas recent discussions between [the respondent] and Council Officers has concluded that the site could accommodate 25 dwellings in addition to the 3 permitted self-build dwellings on the site frontage; no explanation has been provided explaining why 25 dwellings would not be appropriate - the allocation area is capable of accommodating at least 25 dwellings of a mix of sizes and types, including single storey along the site frontage; the site can deliver the following: up to 25 dwellings; pedestrian access to the primary school; mix of housing types and tenures; an attractive sized site for small-medium housebuilders; and the site has received strong interest from a number of housebuilders.	The support for the allocation of this site by the promoter of the site is noted, as are the comments made regarding the numbers of dwellings the Council considers to be acceptable on the reduced site area. At various points the site has been promoted for either a minimum of 25 dwellings or up to 25 dwellings the Council considers the former unlikely to be achieved. The respondent has made reference to advice received from Development Management colleagues advising of the acceptability of 25 dwellings on this site however these discussions took place outside the VCHAP process and centred on a specific proposal put forward by the agent. This advice will be reviewed and reflected in the VCHAP if appropriate.	464	Amend the preferred allocation boundary reflect permission for three self-build units and consider the site promoters evidence for accommodating 25 dwellings.
QUESTION 129: Preferred Site - (Part of) SN1057, Land to the west of Norwich Road	571, 1158	Object	Objections to SN1057: Failure to submit permitted development area rather than greenfield; allocated landscape area;	The Council acknowledges the objections received to the proposed allocation of SN1057, as well as the associated support for an alternative site SN2031 which will be responded to in detail in response to Question 130.	463	Consideration to be given to the site specific policy wording and the requirement for a pedestrian crossing as part of the

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			pedestrian safety - no footpaths on west side of the road; parking issues around the school and amenities which results in restricted access and single file traffic causing vibrations, air/noise pollution and danger; school is at capacity therefore combination of this site and TAC1 will contribute detrimentally to school expansion (already in 16 metres of listed buildings) and objection on the basis SN2031 is a more suitable and sustainable option for allocation.	Concerns have been raised about the loss of a greenfield site and whilst these concerns are recognised, due to the scale of development proposed through the VCHAP area as well as the rural nature of the Plan area it is accepted that the majority of new development will occur on greenfield sites. It is unclear what the respondent is referring to when commenting on the failure to submit a site within the permitted development area however it is assumed that this refers to the defined settlement limits of Tacolneston. Development within the existing settlement limits would allow limited infill opportunities only and would not be sufficient to meet the objectives of the VCHAP or the identified housing targets. The respondent has also referred to the site lying within an allocated landscape area. Again it is unclear what this refers to as the preferred site does not lie within any designated landscape areas. The Tacolneston Conservation Area is to the north of the site. The site assessment recognises that there are a number of trees subject to Tree Preservation Orders along the site frontage and that the site layout and design would need to have regard to these. The Council acknowledges that provision of an adequate visibility splay for site access may result in the loss of some of the existing landscaping.		highway works required for the delivery of this site.

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				NCC Highways Officers have provided technical comments that have informed the site selection process. As with many village schools it is recognised that parent parking at school drop-off and collection times can cause concerns for local residents however in this instance it is not considered that additional development in this location would exacerbate / significantly alter the existing situation. Due to the proximity of this site to the primary school it is reasonable to assume that development of this site would not result in additional vehicle parking associated with the school. NCC Officers have suggested that development of this site may necessitate the provision of a pedestrian crossing for the B1113. This would not only improve pedestrian safety for existing and new residents but would also serve as a traffic calming measure. These comments also refer to the school operating at capacity and that the pressure of new development would result in further expansion of the school to the detriment of the nearby listed buildings. NCC Education Officers have not raised concerns about the capacity of the school, with many schools noted as having reduced pupil numbers. Parental choice has meant that many children travel to schools from outside catchment areas therefore in the instance the school is operating at capacity places for out-of-catchment		

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				pupils would be limited to ensure children within the catchment area could be accommodated. This could also have the benefit of reducing traffic at these peak times. There are no plans to extend the school to accommodate increased pupil numbers and the significant costs associated with such an expansion mean that this would be unlikely in the future. However, if such an instance did occur, the assessment of any application to extend the school would need to take into consideration the impact of development on the nearby listed buildings.		
QUESTION 129: Preferred Site - (Part of) SN1057, Land to the west of Norwich Road	109	Comment	Comment on SN1057: Forncett Parish Council do not want to suggest any amendments to the recommendations for preferred or shortlisted sites.	The Council acknowledges these comments.	462	No action required.
QUESTION 129: Preferred Site - (Part of) SN1057, Land to the west of Norwich Road	2222	Comment	Comments relating to the ecology for SN1057: Green rating - no major ecological constraints identified from desktop assessment; hedgerow boundary identified as priority habitat but no other priority habitats identified; amber habitat zone for great crested newts; site within SSSI IRZ but residential development does not trigger NE	The comments of the NCC Ecological Officer are noted. Any subsequent planning application for development on this site would need to ensure compliance with current guidance and legislation and ensure that appropriate mitigation strategies are designed and implemented on site accordingly.	453	No action required

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			consultation; and applications to be accompanied by ecological appraisal and mitigation strategy.			
QUESTION 129: Preferred Site - (Part of) SN1057, Land to the west of Norwich Road	1979, 2011, 2137, 2156	Comment	Summary of comments relating to surface water drainage and foul water capacity matters for SN1057: Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment; if surface water discharges within the watershed catchment of the Board's IDD, this should be facilitated in line with the Non-statutory technical standards for SuDS; LLFA - green rating; Forngett has some capacity for foul water flows but does not have capacity for all of the sites that could be allocated within the developments identified; discussions will need to be held with AW if all of the identified development is to go ahead; and development must be phased in line with Water Recycling Centre treatment capacity being made available.	These comments are acknowledged. If SN1057 is allocated it will be the responsibility of the developer to ensure liaison with the correct third party regarding surface water drainage. The drainage strategy for the site will need to ensure compliance with the relevance legislation and guidance. The comments relating to the foul water capacity at Forngett WRC are noted, as is the suggestion that a phased approach to development may be required to ensure sufficient capacity. The comments of Anglian Water will be incorporated in the updated Water Cycle Study and will inform this matter. However it should also be noted that the Environment Agency have referred to a number of shortlisted sites as well as preferred sites within their capacity calculations and as such it is not anticipated that all of these sites will be allocated (and therefore capacity at the WRC would not be exceeded).	448	Review the Water Cycle Study (including the comments of Anglian Water) regarding the WRC capacity at Forngett. Consideration of whether site specific policy text is appropriate regarding the phasing of developments that would be accommodated by the Forngett WRC.
QUESTION 130: Should any shortlisted/rejected sites be allocated?	1161	Comment	Comments in support of SN2031: provision of evidence of mitigation measures to inform a reassessment of the site - including access (visibility), flood risk	The submission of additional evidence in support of SN2031 is acknowledged and should be reviewed by the appropriate technical consultees as part of further consideration of this site. However at	470	Review of the evidence and mitigation measures submitted by technical consultees - NCC Highways,

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			and impact on character and appearance - demonstrates that SN2031 is more suitable for allocation than preferred site SN1057; FLOOD RISK: Flood Risk and Drainage Strategy Initial Assessment (submitted) indicates surface water flood risk is not as extensive as shown on the EA maps and surface water drainage can be managed within the site; sketch plan demonstrates that 15 dwellings can be accommodated on land at low risk of flooding; SN2031 performs well against SN1057 in the SA/SEA with the exception of flood risk but it is considered this constraint can be mitigated and the SA/SEA score can be reassessed in light of the submitted evidence; LANDSCAPE: sketch demonstrates development can be achieved in a sympathetic manner to the prevailing character and appearance of this part of the village; locating development to the north of the site and retaining open space to the south would retain the 'green break' between the two parts of the settlement; the open space would be publicly accessible and a benefit of this site; existing boundary hedgerows would be	this time the Council remains of the opinion that residential development between the two distinct parts of the settlement would have an adverse impact on the verdant character which is considered to be an important feature of the village in this location.		Landscape Officer and LLFA. Review of the site classification if appropriate.

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			retained and enhanced where necessary to screen views of the development in the wider landscape; HIGHWAYS/ SITE ACCESS: submitted Visibility Splay drawings demonstrate Access A and B options meet the requisite visibility standards and can be achieved without the need to remove significant boundary trees or vegetation along the B1113; GENERAL: indicative scheme demonstrates a mix of dwelling sizes and tenures; confirmation that the site is suitable, available and achievable for residential development, either as an allocation or as an extension to the settlement limit; delivery of the site is economically viable;			
QUESTION 130: Should any shortlisted/rejected sites be allocated?	1721	Comment	Comments in support of SN4019: Concern that the offer of land for car parking associated with the school has not been considered in the site assessment; current school parking arrangements cause major traffic problems and potential dangers; the additional allocations proposed in the village would increase this problem; a new designated car park and pedestrian	This site was rejected during the site assessment process for a number of significant reasons which were set out in the site assessment form. These reasons included the impact of development on the townscape and landscape (including the adjacent Conservation Area), the potential impact of development on the area-TPO adjacent to the site and there being no suitable site access due to the highway constraints along Hall Road. Whilst it is recognised that the provision of a public car park associated with the delivery of	469	Update the site assessment form to reflect the offer of a public car park associated with the allocation of this site.

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			crossing would address these problems; and therefore request that this site is reconsidered as part of the VCHAP.	this site may be considered as a public benefit and the site assessment form should be updated accordingly it is not considered that this would address the significant constraints previously identified. The Council remains of the opinion SN4019 is unsuitable for allocation.		
QUESTION 130: Should any shortlisted/rejected sites be allocated?	1545	Support	Support for SN0016REV: GENERAL COMMENTS: the original site promotion details cannot be accessed to review and there is therefore a reliance on SNDC and consultees interpretation of the HELAA and site assessment document only and this is not always accurate and transparent; planning permission has been granted for an annex and works to 122 Norwich Road (2021/1044); SNDC had opportunity to consult with the landowner in relation to the site but chose not to - the description and area were not open for interpretation and a fair assessment of the site clearly did not happen; a phone call with SNDC confirmed that a site visit did not take place and I request that this is addressed. PROMOTED USE: this site has been considered unjustly and the assessment does not reflect the submission - submission was for 1 self-build dwelling on a 0.12ha plot with the site assessed for 24 dwellings on 0.95ha; disagree with the SNDC interpretation of the proposed orchard and ecology area as shown within the redline; disagree that the site could	A number of concerns have been raised in this representation about the accuracy of the assessment process for this site. As such the Council considers it appropriate to complete a new assessment for SN0016SLREV to review the findings of the initial assessment. However, without prejudice to a further assessment of the site, the Council remains concerns that there are fundamental heritage issues associated with the development of this site.	468	Undertake a reassessment of SN0016SLREV - with the corrected site area - to review the concerns raised by the landowner in this representation.

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			come forward for a larger number of dwellings due to the location of the site and its restrictions; subsequent planning permission has been granted for an annex and works to 122 Norwich Road; OBJECTIONS TO THE SITE ASSESSMENT: objection to the amendment of the site address (land is not to the rear of 122 (Norwich Road); the site plan promotes an area of 0.12ha, including two separate vehicle access points - the site is not 0.95ha as stated in the HELAA and site scores; the submission was for 1x self-build which reflects the form and character of the area - I object to the density being inflated without consultation; failure to identify two outbuildings on the site - I consider this to be previously developed land, not greenfield; two accesses to the site are available and the site assessment does not reflect this; robust objection to the NCC Highways RED score as the site was assessed for 24 dwellings - a previous application carried no highways objection and the footways are well maintained; NCC Highways and SNDC have failed to observe direct access from the southern linked area of the site to public footpath 5;			

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			Tacolneston and Forncett have two schools therefore this is an error in the data and maps; Anglian Water have confirmed a mains connection available to the south of the site and a third party landowner has 'in principle' granted access to the mains drainage system; object to an amber flood risk score as the site is confirmed in flood zone 1 and the HELAA score is green - piped drainage is available to the west, a ditch to the south and a betterment of drainage could accommodate one dwelling; objection to the landscape assessment - the site does not impact on the landscape or the setting of the listed buildings; development of this site would not introduce development to the rear of any property but this is a characteristic of the Conservation Area; a Conservation Appraisal needs to exist to understand the form and character of the area - SNDC website confirms this does not exist therefore I object on the grounds that no consideration has been given to existing structure on the site, the linked areas of the site and the benefits that the site could offer; the site could offer an ecological net gain;			

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			being in close proximity does not demonstrate an amber rating; COMMENTS ON THE SITE VISIT OBSERVATIONS: whilst undeniable the site forms part of the setting of the listed building but the site was promoted for 1x dwelling, not 24, therefore should have been less than substantial harm; the impact of the school (including possible future expansion) as well as a transmitter pole would have a greater detrimental impact on the listed buildings; disagree with the garden land/ curtilage description - SNDC officers previously described the land as undeveloped; partially disagree with the description of the boundary treatments around the site; disagree with the observation re. utilities on/adjacent to the site - the answer to this should be 'yes'; COMMENTS ON CONCLUSION: object to the comments made in the conclusion and consider this site to be suitable for inclusion in the settlement limit; and the public and heritage benefits of the site were not recognised; and			

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			refer to the site north of 59 Norwich Road which was previously considered to be acceptable due to the public and heritage benefits.			
QUESTION 130: Should any shortlisted/rejected sites be allocated?	110	Comment	General comment: Forngett Parish Council do not suggest any changes to the recommendations for the preferred or shortlisted sites; and Forngett PC do not wish to propose any changes to the rejected sites in Forngett End.	These comments are acknowledged	467	No action required
QUESTION 130: Should any shortlisted/rejected sites be allocated?	2097, 2224	Comment	Comments relating to shortlisted site SN0602: LLFA - green rating; and Ecological rating - green; no major ecological constraints identified from a desktop search; bounded on three sides by hedgerows (priority habitats); no other priority habitats identified; amber habitat zone for great crested newts; site in SSSI IRZ but residential development does not trigger consultation with Natural England; and planning applications should be accompanied by an appropriate ecological	These technical comments from the LLFA and the NCC Ecologist are noted. If allocated, it will be for the developer of the site to ensure that the required ecological assessments are undertaken and that the site design and mitigation measures are implemented in accordance with the recommendations of the appraisal.	465	No action required

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			appraisal and mitigation strategy which should inform the site design.			
QUESTION 131: Should any shortlisted sites be rejected?	111	Comment	General comment: Forncett Parish Council do not suggest any changes to the recommendations for the preferred or shortlisted sites; and Forncett PC do not wish to propose any changes to the rejected sites in Forncett End.	The comments of Forncett Parish Council are acknowledged.	466	No action required

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			There are already a huge number of sites available for new housing in villages as part of the current commitments (as yet not "built out") within the Joint Core Strategy. Existing commitments totalled 31,452 in April 2020. Many of these are in villages and Hempnall Parish Council considers that these commitments together with an estimated 4,450 new windfall houses by 2038 provide a more than adequate number of sites for new housing in villages. Adding the village cluster numbers on top of these current allocations and likely windfalls is unnecessary.	of the Village Cluster Plan in meeting the requirements as set out within the GNLP. The themes of the Parish Council's response relates to the need to travel and impact on achieving climate change objectives. In respect of the Village Cluster plan, it should be noted that the Council has taken a balanced approach to the distribution of growth, taking into account the findings of the Sustainability Appraisal in the choice of location and sites. The Council would also note that sustainable rural transport is a significant challenge across Greater Norwich and more widely across the East of England as a whole. Approximately 25% of the the Homes in Greater Norwich fall within the South Norfolk and Broadland Village Clusters . This percentage of population increases to 33% across the whole of the Eastern region. It is clearly necessary to establish sustainable transport solutions to for the significant rural population in order to achieve the government's Net Zero ambitions. The allocation of 9% of the homes planned for across Greater Norwich to an area containing 25% of the existing homes does not meaningfully increase the scale of the rural transport sustainability challenge. It does however make a significant contribution to improving the availability of homes, including affordable homes, and diversifying the housing market that would not		

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				otherwise be achieved. The Parish Council's specific comments in relation to Hempnall's Settlement Limit and specific sites within the Hempnall Village Cluster are addressed elsewhere under the relevant question.		
QUESTION 1: Do you agree with the Plan Objectives?	1783	Object	No justification has been given as to why the village clusters allocations for South Norfolk could not be included and considered as part of the GNLP. Indeed, the village cluster allocations for Broadland District are included and allocated as part of the GNLP and the policy framework for the decision to allocate village clusters throughout the Greater Norwich area is set out in policy 7.4 of the GNLP. The decision to separate the analysis and decision making for South Norfolk Village Cluster allocations from the remainder of the GNLP is both confused and unjustified. The preparation of the SNVCHP in isolation gives rise to a number of plan-making and procedural concerns: (i) Transparency in Planmaking and Development Management (ii) Disconnected timeframes for planmaking, assessment and Examination (iii) Failure to deliver on overarching Local Plan Objectives It is our opinion that in order to move to a	The respondent's main concerns relate to the separation of the VCHAP allocations from the GNLP. The approach of setting housing figures and a distribution of development through a separate strategic policies document is tried and tested though the development plan process, including through the current 2014 Joint Core Strategy (JCS) that precedes the GNLP. Justification for undertaking the VCHAP separately was set out in the papers to the Greater Norwich Development Partnership Board in January 2020 and in the Village Clusters Topic Paper that support the GNLP. Both the GNLP and the VCHAP have followed clear and transparent processes for engagement and consultation, meeting the requirements of the regulations for local plan production. The timetable for the VCHAP follows on closely from the GNLP to ensure the timely delivery of allocations across South Norfolk, and no evidence has been presented of any practical problems caused in terms of infrastructure co-ordination/delivery.	974	No action required.

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			sound local planning framework for the Greater Norwich area, the preparation of the SNVCHP and GNLP should be combined from this point on.	The respondents raised concerns about the implications of the separate VCHAP for the GNLP examination; that examination has subsequently commenced, and the Inspectors have not raised this as a fundamental concern. The respondents refer to the VCHAP being in contradiction to the 'commitment' in the GNLP to investigate the potential of a new settlement to accommodate further growth beyond that already proposed in the GNLP. The reference in submitted GNLP Policy 7.6 is to a new settlement to accommodate growth in any successor to the GNLP, whereas the VCHAP is required to deliver the growth identified in the emerging GNLP itself, therefore the two are clearly not contradictory. The GNLP examination will test the appropriateness of the settlement hierarchy and the distribution of development, including the 'at least 1,200' homes in the South Norfolk Village Clusters. As such it would fulfil the respondents requirement to test the 'appropriateness of village clusters when weighed against other locational growth options which deliver whole local plan objectives'. Should the VCHAP subsequently propose significantly more than 1,200 homes, which it currently does not, this would be tested through		

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				the VCHAP SA and Examination. As noted above, it is established practice in the preparation of development plans for different elements to be contained in separate documents; across Greater Norwich these documents (Site Allocations, Development Management Policies and Area Action Plans) have been produced by different authorities using SA frameworks that are appropriate to the document being prepared. The SA for the VCHAP is clearly produced in the context of that for the GNLP, but the focus of the document on small-scale allocations in rural settlements means that it does not need to follow an identical format. The respondent's further comments in relation to the SA are covered in the responses to that document. The respondent's concerns with the assessment of particular sites, specifically their promoted site at Spooner Row, is again concerned with how the GNLP has defined the settlement hierarchy and distribution of growth, and the approach to new settlements, which are outside the remit of the VCHAP. It should be noted that smaller parcels of the wider GNLP2101 site were assessed and considered as part of the VCHAP Regulation 18 process as sites SN0445, SN0447 and SN0448.		

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QUESTION 1: Do you agree with the Plan Objectives?	843	Object	1. Exceeds the 10-20 dwellings in the 2022 plan. 2. Under SNVC objective 3 we need to protect the character of the village and it's setting and the proposals are too high in density with queries around highway safety, loss of visual amenity and servicing/infrastructure constraints. 3. Development generates an increase in traffic adding to pollution and will result in loss of hedgerows and trees. 4. Loss of local walks which would be very detrimental to well-being if eroded. 5. The sites are in the landscape protection zone and have previously been protected from development and this sets an unwelcome precedent. Need to protect the strategic gap between Hethersett and Little Melton. 6. This does not contribute to the UK target of reducing net zero carbon emissions and does not adhere to the Biodiversity action plan which protects the harvest mouse, foraging bats and roosting birds all of which are found in the village.	1. This appears to be a reference to the at least 10-20 dwellings allocated to Little Melton as a Service Village in the 2014 Joint Core Strategy, which covers the period 2008 to 2026. Those dwellings were allocated at a site off Ringwood Close, which has subsequently been developed. The housing numbers in the GNLP are updated to cover the period 2018 to 2038, and new allocations are required through the VCHAP to accommodate an additional 1,200 dwellings, over and above the JCS. This equates to an average of 25 dwellings per clusters in South Norfolk, however this will vary depending on the facilities in the clusters, access to other facilities in nearby settlements, infrastructure constraints and the suitability of available sites. 2. & 3. The site assessments are based on 25 dwellings/hectare, which is considered appropriate for new development in most village cluster locations; however consideration can be given to varying this depending on the circumstances of each site. Highways considerations and loss of tree/hedgerows are taken into account as part of the site assessment process, in consultation with the relevant technical consultees, so that sites which potentially cause a highways safety issue or unacceptable loss of trees/hedgerows are not taken forward at the Regulation 19 stage.	971	Review the preferred and shortlisted sites at Little Melton.

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				4. The preferred and shortlisted sites do not affect any public rights of way and the necessary highways works associated with their development may lead to improved access to the nearby countryside. 5. It is acknowledged that some sites are in the Norwich Southern Bypass Landscape Protection Zone (NSBLPZ), as defined in the current (2015) South Norfolk Development Management Policies Document. The NSBLPZ is designed to protect areas with 'high levels of visual accessibility to and from the road to a predominantly open rural area that plays an important part in making the landscape setting of Norwich', and this consideration is part of the assessment of the relevant sites. It should also be noted that, whilst the Local Plan (current and emerging) seeks to protect the separate identity of settlements, including maintaining areas of open countryside between them, there is no defined strategic gap between Hethersett and Little Melton. 6. The accessibility of sites to services and facilities by non-car transport is a key consideration in the assessment of sites. The South Norfolk VCHAP sits alongside the GNLP which focuses 83% of new development in the Norwich urban area and Main Towns, but balances this with the need to sustain rural communities, in line with para 68		

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				of the NPPF. BAP species may be present in the settlement, however there is no evidence that the development of the preferred/shortlisted sites would affect these species.		
QUESTION 1: Do you agree with the Plan Objectives?	1774	Comment	Representation supports the objectives but with conditions due to concerns about inconsistencies &/or problems. The representation also responds to questions on core policies and specific sites. These are summarised and responded to separately in the relevant section. 1) We have sites involving the construction of 12 to 50 dwellings going to meet the 1200 dwelling requirement in the GNLP, but smaller sites of less than 12 dwellings not counting towards this 1200 dwelling requirement. This seems inconsistent with SNVC Objective 3 in protecting the character of villages as larger sites of 12 to 50 dwellings by their very nature have far greater impact and yet apparently, they are the only way of fulfilling the 1200 dwelling requirement! 2) SNVC Objective 3 states: "Ensure that the scale, location and density of housing is more related to the form and character of existing villages..." The particular question here is what is actually meant by "scale" and how is it determined? Within the South Norfolk village cluster housing allocation plan there are essentially 1200 dwellings to be built and 48 village clusters in which to build them. This would average out at 25 dwellings per village cluster! The	The plan does not seek simply to deliver developments of housing, but housing that includes affordable housing. National Planning Policy restricts securing affordable homes on sites of fewer than 10 homes, unless specifically justified and viable. Fine margins of viability and sensitivity to abnormal costs are indicative that such an approach is not justified. In addition, individual affordable homes that might be secured under smaller applications make it challenging for Affordable Housing providers to manage such provision. As such a 12 dwelling threshold is established to ensure that sites will be of an appropriate scale to deliver affordable housing, and thereby meeting the need for affordable housing. The appropriate scale to be allocated within an individual cluster is established by reference to the suitability of a particular village or cluster taking account of a range of factors including: the availability of suitable sites, the potential or need to provide additional infrastructure or facilities, the ability of the site to be effectively integrated into the village	970	No action required.

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			issue of “scale” needs further consideration and clarification.	and its setting and the relative range of services and facilities within reach of the village. A one size fits all approach to scale would not reflect the individual circumstances of a particular cluster. Where specific concerns were raised about the number or scale of allocations in villages these will be addressed in relation to the comments on specific site in a particular cluster.		
QUESTION 1: Do you agree with the Plan Objectives?	2004	Comment	This response makes comments regarding cross boundary issues which may result from the chosen distribution of the Village Clusters Local Plan. Education - Bungay, Beccles and Worlingham have allocated development in the Waveney Local Plan, along with associated education infrastructure. The expansion of Beccles and Worlingham will deliver new primary school. Allocations in Bungay set aside land for the expansion of Bungay High School. Some cross boundary movement of pupils is inevitable - VCHAP should ensure there is sufficient education capacity within Norfolk to meet needs of new housing. Flood and Water Management - more recent “Level 2” water cycle study from GNLP evidence base has not been included - not clear why? PRoW and Countryside Access - where possible policies should support connections of public rights of way	The Council has directly engaged with Norfolk County Council in respect of school places both in relation to the growth strategy set out within the Greater Norwich Local Plan (GNLP) and the much smaller allocations in the Village Cluster Plan. It is understood that, and in any event the broad distribution will be established through the GNLP and it is not considered that the diffuse impact of smaller allocations in villages is likely to cause a significant cross boundary strategic issue for education purposes. A level 2 water cycle study has been commissioned. This is to be completed on the same basis as the GNLP study and will inform and support the Draft Plan to be published under Regulation 19. The consultation offered the opportunity to comment on the content of policies related to individual allocations. Where opportunities for supporting connections to PRoW exist and have been identified they will be incorporated into policies as	969	No action required.

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			between the counties. Transport - Other than SA, there does not appear to be any other transport evidence within supporting documents. While SCC does not envisage significant impacts on highway network, a high level assessment of the impact caused by the Village Clusters Local Plan should be undertaken.	appropriate. The Council has fully engaged with Norfolk County Council as Highway Authority as part of the preparation of the Plan. There has now been further discussions between South Norfolk Council and Suffolk County Council that has agreed that proportionate consideration has been given to transport issues in the context of the development considered by the Village Cluster Plan and the overarching strategic distribution established through the GNLP.		
QUESTION 1: Do you agree with the Plan Objectives?	1764	Object	The GNLP strategy to direct at least 1,200 homes to South Norfolk Village Clusters has been proposed in advance of assessing the suitability of potential sites within South Norfolk. Therefore the decision to 'ringfence' this element of the GNLP housing requirement has been taken without having first assessed whether there are suitable sites to deliver this strategy. We therefore feel this is not an 'appropriate strategy', as required by paragraph 35 of the NPPF. We consider it is necessary to assess the potential Village Cluster sites in isolation, but also to assess them alongside other potential allocation sites within the Main towns and Key Service Centres. Settlement limits should also be reviewed across all settlements in South Norfolk. In addition, GNLP is yet to be subject to Examination and there are outstanding	The respondent questions the separation of the Village Cluster allocations in South Norfolk from the GNLP and the setting of requirement of 1,200 dwellings. The approach of setting housing figures and a distribution of development through a separate strategic policies document is tried and tested though the development plan process, including through the current Joint Core Strategy (JCS) that precedes the GNLP. Justification was also set out in the papers to the Greater Norwich Development Partnership Board in January 2020 and in the Village Clusters Topic Paper that support the GNLP. The approach will be tested through the GNLP Examination, which has commenced since the representation was made. The respondent's primary concern appears to be that sufficient suitable	968	No action needed.

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			objections that have not yet been resolved. As such, it is premature to progress the Village Clusters Plan.	sites may not be identified through the VCHAP to fulfil the GNLP requirements; however, the response fails to acknowledge that the Regulation 18 consultation does indeed identify sufficient preferred sites and the response does not suggest that any of those preferred sites are not suitable for allocation. The respondent notes their support 'the principle of enhancing and maintaining the vitality of rural communities', but suggests that this needs balanced with sustainable patterns of growth. Non-car access to services and facilities is a key factor in the VCHAP site assessment process, and again the respondent has not identified any particular sites which they feel are not suitable on this basis. Assessment of sites in the Main Towns and Key Service Centres has already been undertaken as part of the GNLP process, and this has been done in the context of 1,200 homes being allocated to the South Norfolk Village Clusters level of the settlement hierarchy. As such there is no need to repeat this process, when sufficient suitable sites can be found in the VCHAP. Lastly the respondent questions why the Settlement Limits for Main Town and Key Service Centres have not been reviewed alongside the VCHAP; this is an issue which should have been addressed to the GNLP and will therefore need to		

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				be considered through a subsequent development plan review. The VCHAP will be taken forward in line with relevant progress on the GNLP.		
QUESTION 1: Do you agree with the Plan Objectives?	1821	Comment	No objectives specifically refer to the protection of the environment. Objective 3 should be expanded to protect heritage and protected landscapes as well as the setting of the village. Why the HELAA has been amended, what extra distances were used and what is meant by safe and convenient access to services. The form and character sections should be expanded to more thoroughly explain how a settlement is served by facilities, summarise available services and set out where buses go and if they provide a peak time service. Are the sites shown in blue on the maps all rejected and being considered in a neighbourhood plan. Should services be plotted.	The Village Cluster Plan should be read within the context of the emerging GNLP, which will form part of the Development Plan for the area. The objectives of the Village Cluster plan specifically address the particular issues related to it and seek to avoid unnecessary repetition. The environment is specifically addressed by the GNLP. It is not considered necessary to repeat this here. It is agreed that reference to heritage and protected landscapes could benefit the objective. The details of the site assessment criteria were set out as part of the supporting documents and could be reviewed in making comments on the Council's conclusion on sites. The publication of this document is referred to in the consultation document. To aid transparency sites were coded against both the Norfolk HELAA criteria and the Village Cluster Assessment criteria. A proportionate explanation of the rationale behind the amendment to criteria is set out within the relevant section of the consultation document. Access to services and facilities was	967	Include reference to heritage and protect landscapes in Objective 3. Consider expanding the explanation of services and facilities in the relevant cluster sections.

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				explained in the individual site assessment forms, access takes a range of forms consistent with the rural locations of the site including access using footpaths and quite rural roads with places to step off. Inherently options for sustainable travel vary in rural areas when compared to urban environments and the assessment of sites and approach to assessment criteria reflects this. The content of the form and character sections remain closely aligned to the content of the adopted development plan, which is prima facie evidence that they represent a proportionate explanation appropriate to inclusion in a local plan. The blue coloured sites on the PDF maps cover both unsuitable sites assessed as part of the Village Cluster Plan and those not considered by the plan, as their allocation is being considered as part of a neighbourhood plan process. The consultation document is explicit where sites in a cluster are to be assessed in a Neighbourhood Plan as opposed to in the Village Cluster Plan, this includes a list of the relevant sites and can easily be cross referenced. The maps are proportionate evidence that, along with the individual site assessments, effectively supports interaction with the consultation. It is not considered necessary to plot all		

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				services and facilities, access is explained in the individual sites assessments.		
QUESTION 1: Do you agree with the Plan Objectives?	1737	Comment	In summary, the Village Clusters are likely to be the least sustainable locations for growth across the Greater Norwich area, yet they are proposed to accommodate a significant portion of the GNLP's housing growth. Allocating such a significant element of the GNLP's anticipated growth to these areas, where there are limited / no services and limited / no public transport, would be contradictory to the principles of sustainable development and the overall vision of the GNLP. We do not believe the approach proposed by the Village Clusters Plan has been justified and it is clearly not consistent with national policy. It does not respond to the principles of sustainable development, and it does not appear an effective assessment of the environmental impacts of this approach has been undertaken.	Much of the representation addresses issues that are covered by the GNLP, which is subject to its own process of consultation and examination and the respondent notes that similar representations have been made as part of that GNLP process. Those issues are not directly addressed here. In terms of the proportion of development that is being directed to the village clusters, across the GNLP area this represents 9% of the total housing growth (commitments and allocations), compared to 24.5% of existing dwellings being in the village cluster locations. Conversely 83% of growth is directed to the Norwich urban area and Main Towns. As such, this is considered a proportionate response to the needs of rural areas and entirely consistent with paragraph 68 of the NPPF which states that 'planning policies should identify opportunities for villages to grow and thrive'. The respondent makes assumptions about the theoretical distribution of development in the VCHAP, including that some sites may be in the smallest settlements without access to services/facilities, but do not reference any sites where they consider this is actually the case. The respondent makes the assumption that 'village cluster' sites are often the	966	No action required.

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				'least sustainable' option in terms of transport choices; however, dwellings in larger settlements can also be a considerable distance from a range of basic services. Access to local services and facilities by non-car modes is a significant consideration in the VCHAP site assessment process and the respondent has not identified any sites that fall short in terms of non-car access. The respondent questions the scale of development proposed and whether it will support local services and facilities. However the example given was the need for 500 dwellings to support a new primary school of 140 pupils (at current NCC pupil generation rates). This is very different to providing a level of housing that will supply continuing pupils to existing schools. The respondent questions the separation of the Village Cluster allocations in South Norfolk from the GNLP and the setting of requirement of 1,200 dwellings. The approach of setting housing figures and a distribution of development through a separate strategic policies document is tried and tested though the development plan process, including through the current Joint Core Strategy (JCS) that precedes the GNLP. Justification was set out in the papers to the Greater Norwich Development Partnership Board in January 2020 and in the Village Clusters Topic Paper that support the GNLP. As		

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				noted above the approach will be tested through the GNLP Examination. The respondent questions the implications of the VCHAP being found unsound; again this risk will be addressed through the GNLP Examination. However, it is worth noting that the whole 1,200 homes in the VCHAP is less than the buffer built into the GNLP.		
QUESTION 1: Do you agree	1673	Object	SNVC Objective 1 Those communities that wish to build more houses should be provided with help and support to allow them to do so through the Neighbourhood Plan process. The first sentence of this Objective should read to 'allocate viable and deliverable sites in response to requests from, and in consultation with, local communities and consistent with existing Neighbourhood Plans. SNVC Objective 2 – This objective, as worded, is meaningless and unnecessary. Where local schools are at risk of closure, or bus services are not economically viable, dialogue should be initiated with the affected community to resolve the difficulties by considering a range of alternatives. This may or may not lead to more houses. Conversely, where local services have reached the point of collapse due to past developments, more houses will make the situation worse.	SNVC Objective 1 - The VCHAP needs to make provision for the number of homes required by the GNLP, which itself derives the numbers from the Government's Standard Method for calculating local housing need. There would be no guarantee that sufficient allocations would be achieved through neighbourhood plans; particularly as the majority of Village Cluster parishes have not currently expressed an interest in undertaking a neighbourhood plan. Any neighbourhood plan group that chose to make allocations would seek its housing requirement from the strategic policies of the local plan, and would need to ensure that these are met, therefore it would not result in reduced numbers for those parishes. Those locations where neighbourhood plans are in preparation and making the allocations have not been included in the VCHAP (Dickleburgh, and Burston, Roydon and Scole within Diss and District NP). The choice of sites in the VCHAP reflects, where possible, the policies of existing neighbourhood plans.	963	Review Objective 3 to see if more guidance can be given in the VCHAP on what appropriate landscaping may involve and/or where to find additional information. This has subsequently been addressed through the preparation of LVAs for all preferred sites and the inclusion of criteria in relevant allocation policies.

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			The objective, as worded, makes no reference how new housing development will support local services and facilities, rather than overwhelm them. No reference is made for the need to protect local services and facilities. SNVC Objective 3 – Experience of local planning shows that ‘ensure appropriate landscaping measures’ cannot be relied upon to produce acceptable outcomes. The word “appropriate” is not defined. The wording should be changed to give the local community a formal role in approving any landscaping measures.	SNVC Objective 2 - The approach of allocating small amounts of development to maintain services in village cluster settlements is established though the GNLP. VCHAP allocations are being made in consultation with relevant service and infrastructure providers to help ensure these are of a scale and in locations where infrastructure capacity exists or can be improved. The Parish Council's responses seems to assume that similar infrastructure constraints do not exist in urban areas. SNVC Objective 3 - The parish council does not elaborate on what it considers to have been less than acceptable outcomes in landscaping terms, or give examples. The word 'appropriate' reflects the diversity of locations across the village cluster parishes and the multiple landscape character areas which are covered; as such, an appropriate scheme in one location could be/look very different from another. Additional information can be found in the existing Development Management Policies document, the Landscape Character Appraisals that support the Local Plan, the Councils Place Making Guide SPD and relevant Conservation Area Character Appraisals. The district council is the local planning authority; therefore, parish councils will remain important consultees on planning applications, but ultimately		

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				decisions will remain the responsibility of the LPA.		
QUESTION 1: Do you agree with the Plan Objectives?	1496	Object	Hales & Heckingham Parish Council do not agree with the objectives of Village Cluster Plan. Building new houses where there are no local jobs and limited amenities only increases the number of car journeys and puts pressure on insufficient resources.	The Village Clusters approach is established through the GNLP, which is subject to its own process of consultation and examination. The GNLP concentrates the majority of development in larger settlements, with the proportion of new developments in the Village Clusters being significantly lower than the proportion of the existing population in those parishes. The VCHAP site assessment and selection process takes into account accessibility to services and facilities, including local employment opportunities, by non-car options. Specifically in terms of Hales, the preferred site is less than 2km from a range of employment opportunities at Loddon Industrial Estate, with foot ways available, and is on the main Lowestoft/Beccles/Norwich bus route, as well as other local services to other settlements.	962	No action required.
QUESTION 1: Do you agree with the Plan Objectives?	516, 2000, 2177	Mixed	CPRE objects to the overall level of growth proposed within the GNLP, the amount of that growth allocated to the South Norfolk Village Cluster area and the reference to the amount of growth being a minimum. CPRE does not consider that the allocation of sites in village clusters will result in a good level of access to services and will not facilitate the radical shift away from the private car that is required to achieve air quality and carbon reduction targets.	Many of the issues raised by the CPRE relate to emerging policies of the Greater Norwich Local Plan (GNLP) rather than the Village Cluster Plan. This includes the comments made in relation to the overall level of growth in Greater Norwich, the approach to overall distribution across this area and the wording of policy requirements set out in the GNLP. At this stage, matters relating to GNLP	961	No action required.

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			The CPRE consider that the GNLP Sustainability Appraisal evidence clearly shows that a distribution based on Urban Concentration clearly out performs the distribution option that was actually chosen. CPRE objects to the decoupling of the Village Cluster Plan from the GNLP and does not consider that this approach is sound and notes minor inconsistencies between the emerging plan and that explained in the Council's Statement of Community Involvement. Specifically in respect of the Objectives of the Village Cluster Plan, CPRE considers that the amount of development proposed across Greater Norwich is excessive and as a result there is no justification for the allocation of further development. In the opinion of CPRE, the development of extant permissions and the delivery of future windfall, including affordable housing exception sites will deliver sufficient development. CPRE do not consider that the development planned will support local services and facilities, rather that it will put pressure on existing services and increase the need to travel. The CPRE consider that the most effective way to protect the character of villages and their settings would be to make no new allocations of land for development.	policies can only be dealt with through the examination of that plan. The Greater Norwich authorities have already set out their justification for these policies through that examination. For the sake of brevity, such arguments are not repeated here. In relation to those points that do relate to the Village Cluster Plan, the Council would respond as follows. A specific criteria has been defined for the assessment of sites through the South Norfolk Village Cluster Plan. This criteria was evolved from the Norfolk HELAA methodology. taking into account local characteristics and the Council considers that this methodology is in accordance with the expectation of paragraphs 78, 79 and 105 of the NPPF. Sustainable rural transport is a significant challenge across Greater Norwich and more widely across the East of England as a whole. Approximately 25% of the the Homes in Greater Norwich fall within the South Norfolk and Broadland Village Clusters . This percentage of population increases to 33% across the whole of the Eastern region. It is clearly necessary to establish sustainable transport solutions to for the significant rural population in order to achieve the government's Net Zero ambitions. The allocation of 9% of the homes planned for across Greater Norwich to an area containing 25% of		

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			CPRE considers that there is a confusion within the consultation document around what is a settlement limit extension and what is an allocation and that development that results from the extension of a settlement boundary could not be considered windfall development. Further points were made around potential overarching policies. These are dealt with separately in relation to the question on those policies. Saxlingham Nethergate Parish Council supports the objection by CPRE.	the existing homes does not meaningfully increase the scale of the rural transport sustainability challenge. It does however make a significant contribution to improving the availability of homes, including affordable homes, and diversifying the housing market that would not otherwise be achieved. The Regulation 18 consultation document of the South Norfolk Village Cluster Plan is prima facie evidence that sufficient suitable sites can be found in order to fulfil the requirements set out in the emerging GNLP. The Council does not consider that there is any clear justification to support a phased release of land as proposed by CPRE. It is indisputably the case that authorities have flexibility to produce multiple plans if local circumstances dictate and that all plan policies do not need to be included in the same document. This is set out in planning practice guidance, paragraph 004 Reference ID:61-004-20190315. In this instance, the decoupling of the Village Cluster Plan enabled the GNLP to continue to progress, and as such advance planning policies of critical importance to Greater Norwich, whilst also enabling further time to make sure that allocations in the South Norfolk Village Clusters were appropriate for that area. This type of pragmatic approach tailored to meet the particular		

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				circumstances of the district is exactly why flexibility exists in the plan making system and is entirely justified and appropriate. In any event, the soundness of the progression of the GNLP ahead of the Village Cluster Plan will be considered as part of the examination of the GNLP. The impact of proposed allocations on the character and appearance of settlement has clearly been considered as part of the assessment of sites. Alongside the limitation of development sites to those of a smaller scale, this is considered a an appropriate approach to ensure that the character and appearance of villages is given appropriate protection. Individual concerns about impact on character and appearance has been considered where such issues are raised in relation to a particular site. It is clearly the case than an approach of preserving character and appearance by allowing no further building, as is the essence of the CPRE response, is inconsistent with the NPPF which seeks, amongst other things, to "boost significantly the supply of homes" and "promoting sustainable development in rural areas".		
QUESTION 1: Do you agree with the Plan Objectives?	1495	Object	Hales & Heckingham Parish Council do not agree with the objectives for the Village Clusters Plan. Hales and Heckingham are in danger of being dormitory villages without the provision of local amenities to support the lives of residents.	The GNLP specifically requires that a minimum of 1,200 homes are provided for within the South Norfolk Village Clusters in order to promote social sustainability and rural life and services. This plan effectively responds to these requirements and is therefore directly in	947	No action required.

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				conformity with these requirements. The scale of development planned for within the GNLP has been defined taking account of government's methodology for calculating housing need, the likely contribution of windfall and the importance of providing sufficient flexibility of supply to ensure housing needs can be met. It is not the place of the Village Cluster Plan to revisit these considerations. Over the longer term, diversifying the supply of homes, including the delivery of smaller sites in villages is important to addressing existing supply constraints in the housing market as well as providing opportunities for homes, including affordable homes in villages. The overall distribution of development across Greater Norwich is set out within the GNLP, the Village Cluster Plan must be in accordance with the GNLP. The Village Clusters plan has taken account of the availability of local services and facilities in order to ensure an appropriate distribution of development.		
QUESTION 1: Do you agree with the Plan Objectives?	1579	Comment	See attached letter for full response. Objective 1: To ensure delivery of target would recommend an over-allocation of c.20%. (for any sites that fail to come forward). Support objective to ensure appropriate mix of house types, sizes and tenures, but object to inclusion of specific policy on housing mix.	Support noted. With regards to the point raised around making efficient use of land, the Plan The proposed density identified across Greater Norwich is set out within the GNLP, the Village Cluster Plan must be in accordance with the GNLP. If adopted, emerging GNLP policy 2 requires proposals to make efficient use of land with densities dependent on site characteristics, with higher densities and	946	No action required.

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			• Objective 2: Support objective to provide opportunities for new housing in a range of settlements to support local services/facilities. • Objective 3: support objective to ensure scale/location/density of housing is well related to form/character of existing villages, but consider that Objective fails to recognise NPPF para 124 focus on making efficient use of land. Therefore needs amending to ensure it achieves efficient densities that also relate well to local character.	car free housing in the most sustainably accessible locations in Norwich. Indicative minimum net densities are 25 dwellings per hectare across the plan area. This policy is considered to be in accordance with the NPPF and therefore the Council is content that the densities proposed within the VCHAP will be consistent with the NPPF.		
QUESTION 1: Do you agree with the Plan Objectives?	1255	Object	I fully support the comments of Barford and Wrampingham Parish Council, and those of CPRE. 1) The target of “at least 1200 dwellings” is not a sustainable approach for the Cluster Plan. It also fails to take into account the contribution of windfall sites. 2) The GNLP requires 42568 new dwellings including a 5% buffer. There is no justification in seeking 49492 dwellings which is some 20% above recent high building rates. 3) Putting houses on the edges of villages will just stretch current services, and increase car journeys. 4) Farm land should be kept for future food production.	The GNLP specifically requires that a minimum of 1,200 homes are provided for within the South Norfolk Village Clusters in order to promote social sustainability and rural life and services. This plan effectively responds to these requirements and is therefore directly in conformity with these requirements. The scale of development planned for within the GNLP has been defined taking account of government's methodology for calculating housing need, the likely contribution of windfall and the importance of providing sufficient flexibility of supply to ensure housing needs can be met. It is not the place of the Village Cluster Plan to revisit these considerations. Over the longer term, diversifying the supply of homes, including the delivery of smaller sites in villages is important to addressing existing supply constraints in the housing market as well as providing	945	No action required.

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				opportunities for homes, including affordable homes in villages. The overall distribution of development across Greater Norwich is set out within the GNLP, the Village Cluster Plan must be in accordance with the GNLP. The Village Clusters plan has taken account of the availability of local services and facilities in order to ensure an appropriate distribution of development. The additional growth planned for through the Village Cluster Plan does not meaningfully increase the challenge of rural transport. However, it does serve to help support existing rural services and help address issues of rural housing accessibility. As part of the site assessment process, the Council has taken into consideration the best most versatile land (BMV) by identifying the ALC of all sites submitted. Where possible, the Council will avoid allocating and preferring sites that are of a high grade.		
QUESTION 1: Do you agree with the Plan Objectives?	1492	Object	No. The JCS allocated Hales and Heckingham 10 new houses. To date 70 dwellings have been built and 20 more approved. During that time no investment has been made to improve village infrastructure. Amenities are extremely limited with no village hall. Heckingham Park was built with fitness facilities for residents but no access for other members of the village. This approach does not protect village communities or support rural services/facilities. No investment was made to improve broadband delivery to existing houses. The village is a mobile	The GNLP specifically requires that a minimum of 1,200 homes are provided for within the South Norfolk Village Clusters in order to promote social sustainability and rural life and services. The delivery of smaller sites in villages is important to addressing existing supply constraints in the housing market as well as providing opportunities for homes, including affordable homes in villages. The overall distribution of development across Greater Norwich is set out within the GNLP, the Village Cluster Plan must be in accordance with	944	No action required.

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			"not spot". Further development without investment in existing village infrastructure increases social problems.	the GNLP. The Village Clusters plan has taken account of the availability of local services and facilities in order to ensure an appropriate distribution of development.		
QUESTION 1: Do you agree with the Plan Objectives?	1785	Comment	Objective 2 - this is the wrong way round. Local services/facilities should be supporting the village clusters and their inhabitants. No mention of retrofitting older properties to bring them up to date with modern standards of insulation etc. Also it is obvious that cost of newly housing is too high for local people unless they have already got a step on 'housing ladder'. If we want to sustain our local communities, a large proportion of new build should be Affordable Housing, and not a developers' charter. If too much large housing is built we will have precious little countryside left. Villages will not thrive if suitable housing is not provided. Agree with others that quantity of development is unnecessarily high and distribution of development is unsustainable.	It is considered that the local services and facilities will be supported by future occupants of the houses brought forward in the Plan. Many of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on services/facilities. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process It is noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth. The updating of older properties is	839	No action required.

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				beyond the scope of the plan, however Policy SNVC2 could include ways to promote sustainable design. In the same way, South Norfolk's Development Management Policy DM 3.8 requires building to be orientated to gain benefit from sunlight and passive solar energy and wherever possible designed around a Sustainable Drainage System. Emerging GNLP Policy 2 – 'Sustainable Communities', is a wide-ranging policy and amongst other things, seeks to promote low carbon development and helps to address climate change. This policy states that if the potential to set more demanding standards locally is established by the Government, the highest potential standard will be applied in Greater Norwich. Point 10 of this policy specifically requires all new development to provide a 19% reduction against Part L of the 2013 Building Regulations (amended 2016). The concerns about the cost of affordable housing are noted. Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time.		

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QUESTION 1: Do you agree with the Plan Objectives?	1767	Comment	LMPC broadly agrees with the Objectives but does not agree that the current process has met the aims described in Objective 1 to provide opportunities for self-builds. LMPC was expecting the VCHAP process to provide an opportunity for local people to comment on possible changes to the settlement boundary. Several recent PAs have been refused as being outside the Settlement Boundary (one PA was also inside the Landscape Protection zone), people are now confused that there is a Preferred Site that is not even adjacent to the Settlement Boundary and is inside the Landscape Protection zone - this undermines faith in the planning system.	As part of the Regulation 18 consultation, in addition to the sites put forward the Council has actively sought views on the Settlement Limits themselves. Under each settlement, the Council has asked whether any proposed revisions to the Settlement Limits are agreed with and/or whether there are further changes that the Council should make. Maps showing all preferred, shortlisted (Reasonable Alternative), rejected (Unreasonable Alternatives) and the extent of settlement limits, including any proposed changes, have been published alongside the draft Plan. Without reference to the specific applications made within Little Melton, the Council is unable to provide a site specific response. TBC these sites will still be subject to existing local Development Management Policies and national policy guidance.	838	No action or required.
QUESTION 1: Do you agree with the Plan Objectives?	1456	Object	Objective 1 - the wording at present would likely be interpreted in application decision-making to permit 'in-fill' self-build development opportunities; however this is likely in many circumstances to be too restrictive to meet the overall thrust of the Village Clusters objectives, and should be broadened to refer to edge-of-settlement or similar, so as to include appropriate parcels of land on the side of /	In the context of Objective 1, the reference to 'in-fill' self-build development relates to amendments of settlement limits, sought after within the Plan. As such this objective is referring to opportunities for 'self-builds' applications to come forward through as a extensions to settlement limits.	837	No action required.

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			immediately adjacent to existing development.	The village clusters plan does not supersede existing Development Management policies within South Norfolk and therefore other are policies in place to permit development outside development boundaries, Policy DM1.3.		
QUESTION 1: Do you agree with the Plan Objectives?	1441, 1450	Comment	Although Lanpro and Glavenhill offers support to the concept of village clusters, agreeing that there is a need to allocate new housing in accessible, rural locations to help support sustainable patterns of growth, we cannot support the significant emphasis that is placed upon rural village clusters (outside of the old Norwich Policy Area (NPA)). An alternative strategy is suggested within these representations.	The number of homes being planned for are determined through the Greater Norwich Local Plan (GNLP), which has been agreed by each of the three constituent Councils. Prior to its adoption, the GNLP will be subject to independent examination. Amongst other things, this examination will consider whether too many, or too few homes have been planned for and whether the number of homes distributed to the South Norfolk Villages is appropriate. South Norfolk's village cluster plan will be consistent with the overall strategic policies of the GNLP and will not revisit the housing numbers set out in that plan.	836	No action required
QUESTION 1: Do you agree with the Plan Objectives?	1455	Object	Suggested alterations and broadening of elements of Objectives 1 & 2, to (1) take into account the change to electric vehicles in the Plan period, (2) that development should be across the range of settlements found in each cluster, and (3) that development should not be limited to strictly in-fill sites.	The planned transition to electric vehicles will be an important factor change to the sustainability of rural areas. Whilst taking account of these changes the plan seeks to create a balance between allowing development that supports the viability and vitality of villages, supporting health and well-being by providing opportunities for journeys to be undertaken by foot and cycle and protecting the intrinsic character and beauty of the countryside by ensuring new development relates well to the existing built-up form of	835	No action required.

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				village. The overall distribution of development across Greater Norwich is set out within the GNL, the Village Cluster Plan must be in accordance with the GNL. The Village Clusters plan has taken account of the availability of local services and facilities in order to ensure an appropriate distribution of development. The representation suggest that the Council restricting development to in-fill sites, the Council disagrees with this comment. The reference to in-fill development in the context of Objective 1, relates to the amendment of settlement limits and as such this objective is saying that through extensions/amendments to settlement limits, this would allow 'in-fill' development for self-build opportunities.		
QUESTION 1: Do you agree with the Plan Objectives?	1227	Object	Inevitable increased road safety and pedestrian safety risk posed by proposed new dwellings particularly on Wheel Road site. Existing road infrastructure is already inadequate and couldn't safely cope with additional traffic burden.	As part of the plan making process, the Council has engaged with Norfolk County Council as Highway's authority to assess the impact of sites in terms of: the safety and suitability of a site's access point onto the highway; and, the wider impact on the local highway network. This is considered a suitable mechanism to ensure that new development will not have acceptable impacts in terms of increased levels of traffic.	834	No action required.

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QUESTION 1: Do you agree with the Plan Objectives?	1222, 1241	Object	Understand the need for provision of additional sustainable housing developments to support rural communities and services. However, do not agree that the core objectives of the plan are sufficient. Truly sustainable development should have a greater consideration of climate change, future proofing new homes for future generations and loss of greenfield sites. Environmental impacts including loss of amenity, impacts to protected sites and features and impacts to landscape character should also be given greater consideration. While these are cited as criteria within the allocations assessment, they are given little weight in any of the conclusions drawn.	Policy SNVC2 seeks to ensure that development and design considers the needs of all residents and users in the design of new development, which includes within the South Norfolk Villages. If included, this policy will be an effective mechanism to ensure appropriately designed development. In addition, the Council already has a number of Policies to encourage good quality design within development. These include South Norfolk's Development Management Policy DM 3.8 'Design Principles applying to all development' specifically requires dwellings to be designed so that internal spaces are suitable, adaptable and will be able to accommodate a range of residents over time. These policies will sit alongside emerging emerging GNLP Policy 5: 'Homes' has a specific requirement for development proposals (for major housing development) to provide at least 20% of homes to the Building Regulation M4(2)[1] standard or any successor. It is also recognised that Policy SNVC2 could include ways to promote sustainable design. In the same way, South Norfolk's Development Management Policy DM 3.8 requires building to be orientated to gain benefit from sunlight and passive solar energy and wherever possible designed around a Sustainable Drainage System. Emerging GNLP Policy 2 – 'Sustainable Communities', is a wide-ranging policy	833	No action required.

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				and amongst other things, seeks to promote low carbon development and helps to address climate change. This policy states that if the potential to set more demanding standards locally is established by the Government, the highest potential standard will be applied in Greater Norwich. Point 10 of this policy specifically requires all new development to provide a 19% reduction against Part L of the 2013 Building Regulations (amended 2016). Appropriate consideration has been given to the impact of the preferred and shortlisted site on the character and appearance of the area, taking account of the advice of the Council's Senior heritage and Design Officer. This is set out in the Site Assessments that were published as a supporting document to consultation. In addition, The Plan is supported by a Sustainability Appraisal (SA) Report. This is an appraisal of the economic, environmental, and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development. Due regards have been given to this assessment's findings in the selection of sites. In addition, emerging GNLP Policy 3 – 'Environment Protection and Enhancement' requires development proposals to conserve and enhance the natural environment.		

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				Specifically, development will deliver net biodiversity gain through the provision of on-site or off-site natural features, creating new or enhancing existing green infrastructure networks that have regard to and help to achieve the local green infrastructure strategies. Reducing the loss of green field land can also mean directing growth to previously developed land (where available) to minimise land take at greenfield land. Generally, previously developed land is associated with larger settlements where changes to land use over time can see brownfield opportunities become available within existing built areas at locations such as former industrial land which has become redundant. However, the rural nature of many of the village clusters reduces the potential for widespread brownfield opportunities as the land use profile in many rural settlements tends neither to include large former-industrial opportunity sites nor estate regeneration opportunities.		
QUESTION 1: Do you agree with the Plan Objectives?	814	Comment	Whilst Thurlton Parish Council agree with the principles of the Core Objectives, the preferred sites do not appear to match up to these ideals. Many sites are seeing housing density proposals (ours included) which would undermine objectives 2 & 3. Objective 1 talks about supporting “Self-Build”, generally within existing settlement boundaries, which is a far more sustainable and long term benefit to the	The Council notes Thurlton Parish Councils support for 'self-build' opportunities. With regards to the concerns raised, that the preferred sites currently undermine objectives 2 and 3 of the draft Local Plan. The preferred site within Thurlton (SN0149) is proposed to be allocated for up to 12 dwellings on a site of 0.5ha.	832	No action required.

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			community, as the developer has a vested interest in the protection of the local area and environment.	Thurlton forms a village cluster with neighbouring parish, Norton Subcourse. Taken collectively, the cluster is considered to have a range of social and community facilities including a preschool, primary school, post office and shop, public house and village hall. There is also a bus service serving the Thurlton which connects surrounding villages to Norwich and Beccles. The level of service and facilities, combined with the proximity of the Key Service Centre of Loddon is considered to mean that an allocation of the scale proposed was appropriate in this location and as such would both protect village communities and also contribute to the longevity of areas. Appropriate consideration has been given to the impact of preferred site on the character and appearance of the area, taking account of the advice of the Council's Senior heritage and Design Officer. This is set out in the Site Assessments that were published as a supporting document to consultation. On the basis of the rationale set out within the site assessments it is not considered that the development of the proposed site would have an unacceptable impact on the character and appearance of the area and where there may be limited impact, this can be sufficiently mitigated. Consideration has been given to issues raised in relation to specific sites within the responses to		

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				representations contained within the Thurlton and Norton Subcourse chapter of the document.		
QUESTION 1: Do you agree with the Plan Objectives?	1819	Comment	Objective 3 - Protect the character of villages and their settings. As written, no objectives refer to the protection of the environment. At the very least, number 3 should be expanded to include not just protecting the setting of the village, but setting of other assets in the area like heritage and protected landscapes.	The Council agrees that specific reference should be made to the historic environment and protected landscape in Objective 3.	829	Amend objective 3 to include historic environment and protected landscape.
QUESTION 1: Do you agree with the Plan Objectives?	1636	Comment	In response to Question 1, in respect of the three defined 'Objectives' of 'Meeting Housing Needs', 'Protecting village communities and supporting rural services and facilities' and 'Protecting the character of villages and their settings', it is agreed that these are laudable aims and ones which Hopkins Homes would support, but as will be discussed further within our subsequent representations, without further amendment to the overall quantum and individual scale of development being proposed within the various Allocations of the Plan, it unfortunately appears unlikely that these aims will be met.	By the respondent's rationale, in order for the the Objectives to be fully met then the Council would need to reduce the overall quantum and individual scale of development proposed within the Plan. In the first instance, the GNLP specifically requires that a minimum of 1,200 homes are provided for within the South Norfolk Village Clusters in order to promote social sustainability and rural life and services. This plan effectively responds to these requirements and is therefore directly in conformity with these requirements. The overall distribution of development across Greater Norwich is set out within the GNLP, the Village Cluster Plan must be in accordance with the GNLP. With regards to scale and distribution of individual sites, the Village Clusters plan has taken account of the availability of local services and facilities in order to	827	No action required.

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				ensure an appropriate distribution of development. There is no clear evidence that development within South Norfolk villages will meaningfully increase burdens on services compared to equivalent growth in the Norwich Urban Area, Main Towns and Key Service Centres. Conversely growth within these locations would, self-evidently, not be as well located to support local services and facilities that help to minimise journey lengths, support active travel and support access to housing in rural areas.		
QUESTION 1: Do you agree with the Plan Objectives?	1116	Comment	LMPC broadly agrees with the Objectives but does not agree that the current process has met the aims described in Objective 1. LMPC was expecting the VCHAP process to provide an opportunity for local people to comment on possible changes to the settlement boundary.	As part of the Regulation 18 consultation, in addition to the sites put forward the Council has actively sought views on the Settlement Limits themselves. Under each settlement, the Council has asked whether any proposed revisions to the Settlement Limits are agreed with and/or whether there are further changes that the Council should make. Maps showing all preferred, shortlisted (Reasonable Alternative), rejected (Unreasonable Alternatives) and the extent of settlement limits, including any proposed changes, have been published alongside the draft Plan.	826	No action required.
QUESTION 1: Do you agree with the Plan Objectives?	522	Comment	In general I think the principles laid out are sound. However, more emphasis needs to be put on the environment and on investment in services and infrastructure.	These issues have also been raised in relation to the specific	825	No action required.

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			I live in Wrenningham and therefore my comments primarily relate to here. Drainage and flooding need to be a primary consideration. Also although the village has a school many of the classrooms are temporary and old. Further investment is necessary to meet the objectives of sustainability. Also any development must recognise that there are no other significant amenities in the village and that any new housing will require new residents to have their own transport as there is next to no public transport.			
QUESTION 1: Do you agree with the Plan Objectives?	619	Comment	Objections raised: Housing need under the GNLP is too high. In the VCHAP the 1,200 should be a maximum not a minimum as there's likely to be a higher number of windfall housing coming through. It is better to have organic growth in small villages such as through smaller sites. New housing estates unlikely to boost local services as likely to put increased pressure on services and existing infrastructure. Also there's likely to be an increase in vehicle journeys for secondary schools, medical needs, main shopping and employment with consequent impact on climate change.	The number of homes being planned for are determined through the Greater Norwich Local Plan (GNLP), which has been agreed by each of the three constituent Councils. Prior to its adoption, the GNLP will be subject to independent examination. Amongst other things, this examination will consider whether too many, or too few homes have been planned for and whether the number of homes distributed to the South Norfolk Villages is appropriate. South Norfolk's village cluster plan will be consistent with the overall strategic policies of the GNLP and will not revisit the housing numbers set out in that plan. The Council recognises that the capacity of Primary Schools, including where increased numbers on roll is important to long term sustainability, is a key part of the choice of allocation. In this regard, the Council has engaged with Norfolk	824	No action required.

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				County Council in respect of the capacity of schools to accommodate growth. The Council considers that growth within these areas would enhance or maintain the vitality of rural communities, by allowing villages to grow and thrive.		
QUESTION 1: Do you agree with the Plan Objectives?	480	Object	Objections raised: 1. fails to see how this can be classed as a 'Plan'. 2. these type of documents are prepared with the help of consultants, but they never tackle the real questions that effect people who live in the area. 3. The comments raised regarding the need for extra services/facilities, these have no definite proposal, it must be realised that without definite plans explaining when the necessary services would be provided and completed before any extra housing as started, how can a full responses be given. 4. Suggested that these documents are withdrawn until prepared properly.	The Council acknowledges the points made in the representation and takes each point raised in tern below. A Local Plan is a document which sets out planning polices and proposals for new development and is the starting point for determining local planning applications. The SNCV Plan is at draft stage and has just been consulted on at Regulation 18, under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This consultation provided an opportunity for members of the public and stakeholder bodies to provide views on the sites that had been promoted to us, the assessments undertaken so far, our suggestions for overarching policies that would apply to the allocated sites and the supporting evidence that helped us to prepare the emerging plan. The council is now reviewing the plan in light of the representations received. The assessment of sites has been undertaking in a consistent manner. The starting point has been the Norfolk-wide Housing and Economic Land Availability Assessment (HELAA) Methodology	823	No action required.

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				(2016), which has been agreed as part of the Norfolk Strategic Planning Framework process and is considered to be consistent with Government guidance. Whilst the HELAA provides a starting point, the full site assessment is a more detailed process which includes looking at the planning history of the site, undertaking a site visit and applying some more detailed criteria. Most noticeably the site assessment added criteria relating to the local Landscape Character Assessment, Better Broadband for Norfolk and revised the distance to services criteria to better reflect the rural nature of the Village Clusters Plan. The Site Assessments were also supported by a Technical Consultation with both internal consultees on landscape, heritage and environmental protection issues, as well as a range of external stakeholders, on issues such as highways, utilities and minerals and waste. The technical consultation also included issues of flood risk and ecology, although technical comments on these issues have been provided in response to this consultation. The comments and representations made at Regulation will feed into the next stages of the plan, helping to inform the allocation of sites further and where appropriate provide site specific policies such as the requirement of a footway, to ensure that the site		

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				delivers these requirements when brought forward. The next stage of the Plan is Regulation 19 which is a more formal stage which allows stakeholders to submit representations in respect of whether the plan is: 1) legally and procedurally compliant; 2) Sound (Soundness is defined in paragraph 35 of the NPPF and requires a Local Plan to be positively prepared, justified, effective and consistent with national policy) ; and 3) in compliance with the Duty to Cooperate. Representations made at Regulation 19 will be considered as part of any the independent examination into the Plan.		
QUESTION 1: Do you agree with the Plan Objectives?	1555	Object	Progressing the Village Cluster Plan ahead of the Greater Norwich Local Plan's examination and adoption is premature. There are a number of outstanding objections to the GNLP's approach. The GNLP's has allocated too much growth to village clusters and not enough growth to Main Towns and Key Service Centres. This approach is unsound and unsustainable. Policy 7.5 already allows for appropriate levels of growth in villages. Further land should have been allocated in Long Stratton. Primary school's have been used as a proxy for social sustainability in villages. This approach does not take into account whether those schools are over-subscribed and not all new residents will have primary	The Village Cluster Plan is being prepared in parallel with the Greater Norwich Local Plan (GNLP). The GNLP includes allocations for all places other than the South Norfolk Village Clusters, including Village Clusters in Broadland. By the respondent's rationale a Local Plan would need to establish, amongst other things, its housing requirement, settlement hierarchy and the appointment of housing numbers before progressing allocations, otherwise the certainty of apportionment before allocations sought be the respondent (at all levels of the hierarchy) could not be achieved. It has been considered that such an approach is likely to result in a longer timetable for plan making, with resultant impacts on the delivery of development. For these reasons the	696	No action required.

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			aged children, leaving them reliant on needing to travel, by private car, to higher order settlements.	approach advocated is not preferred. The respondent's objections to the GNLP are noted. As set out by the respondent, these objections have been made in response to the GNLP. The independent examination of the GNLP is the appropriate forum for these objections to be considered. The purpose of the Village Cluster plan is to make allocations in accordance with the strategic policies of the GNLP. It is of course the case that the capacity of Primary Schools, including where increased numbers on roll is important to long term sustainability, is a key part of the choice of allocation. In this regard, the Council has engaged with Norfolk County Council in respect of the capacity of schools to accommodate growth. The Council notes that it does not appear that the respondent has identified any specific incidences where particular schools cannot accommodate the level of growth proposed through the village cluster plan. It is of course the case that homes within higher order settlements would have more immediate access to a wider range of services. However, growth within these areas would not however enhance or maintain the vitality of rural communities, allowing villages to grow and thrive. The approach of relying on windfall development through GNLP policy 7.5 advocated by the respondent		

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				would do nothing to proactively deliver affordable housing in villages. It is of course the case that the opportunities for sustainable and active travel will vary between urban and rural areas, this is recognised in the NPPF and the much more limited scale of development proposed between 2018 and 2038 in individual villages as compared to higher order settlements. In regards to sustainable transport, the Council would also not that as of 2018 there were already 46,100 home in Village Clusters across Broadland and South Norfolk; around 25% of all homes in Greater Norwich. As a result of planned growth this proportion actually decreases to 21% over the plan period. Irrespective of planned growth, in order to achieve net zero emissions from Transport by 2050, it will be necessary to find additional sustainable transport solutions for those communities, whilst maintaining existing levels of services of which further proportionate growth is a key part.		
QUESTION 1: Do you agree with the Plan Objectives?	403	Comment	Acts of institutional corruption of the South Norfolk Planning function needs to be corrected. Allocations for accommodation for boat dwellers and caravan dwellers (not just dogs that have a 100% success rate in obtaining planning consent) needs to be	The accusation of corruption has been referred to the Council's Monitoring Officer. The Council's evidence on the needs for Caravan and Houseboats, including the need for Gypsies and Travellers, is being assessed through the independent examination of the Greater Norwich Local Plan (GNLP).	695	Accusation of corruption referred to the Council's Monitoring Officer.

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			identified at Parish level. The Council's ANA is deeply flawed.	The purpose of the Village Clusters plan is to meet the GNLP requirement for 1,200 homes, not to allocate/identify sites for caravans and houseboats, which will be dealt with through the GNLP or other authorities Local Plans.		
QUESTION 1: Do you agree with the Plan Objectives?	220	Comment	Perhaps you should further investigate the benefit of a new larger scale development area, and not spread so much through the villages; a proper arterial road link, scope to develop new service provisions, and reduce the commuting across the county. Is a new town viable? Where one might locate this is likely to be contentious, but such a choice might provide better rail access, and simpler implementation for modern living requirements	The Greater Norwich Local Plan (GNLP) assessed the appropriate distribution of development across the area, including areas of larger scale development, the potential for a new town and the amount of development that should be accommodated in South Norfolk Villages. On the basis of the analysis carried out through the GNLP it was established that 1,200 homes should be accommodated in the South Norfolk Village Clusters. Whilst large scale developments and new towns/settlement may provide a range of benefits they would not meet the needs of those wanting to live, or stay within rural villages or protect and support rural services and facilities. The GNLP has been agreed by each of the three constituent District Councils and will be subject to independent examination prior to its adoption. The Village Clusters plan is intended to be in accordance with the strategic policies of the GNLP.	694	No action required.

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QUESTION 1: Do you agree with the Plan Objectives?	623	Object	A summary of 100 words or less would be meaningless for such weighty and important topics. A full consultation response has been submitted by email attachment to lp@s-norfolk.gov.uk and via the consultation portal to be read and fed into the consultation for this consultation exercise to be considered valid.	The consultation allowed for attachments to be uploaded alongside representations. The summary section allowed for respondent's to succinctly summarise their comments. A comment summary of representations is an important part of the consultation process as it enables the public and other stakeholders to more easily understand what is included in detailed representations. This is particularly relevant in a document such as the Village Cluster Housing Allocation Plan where over 2,000 individual representations were made by nearly 800 individuals, which is likely to add up to hundreds of thousands of words.	693	Confirm that the respondent's representation has been separately received and considered.
QUESTION 1: Do you agree with the Plan Objectives?	204	Object	Alpington and Yelverton can't cope with traffic going through the village as it is, the village has always had a problem with speeding cars already.	As part of the plan making process, the Council has engaged with Norfolk County Council as Highway's authority to assess the impact of sites in terms of: the safety and suitability of a site's access point onto the highway; and, the wider impact on the local highway network. This is considered a suitable mechanism to ensure that new development will not have acceptable impacts in terms of increased levels of traffic.	692	No action required.
QUESTION 1: Do you agree with the Plan Objectives?	294	Comment	The detailed representation submitted covers four areas: An overarching commentary on the approach of the Village Cluster plan; comments on the objectives of the plan; comments on the definition and extent of settlement	The National Planning Policy Framework (NPPF) requires sites identified for development to be either available now or have a reasonable prospect that they will be available and could be delivered at the point envisaged. As such, basing	691	Add "and seek to deliver improvements to local services, facilities and infrastructure were justified and

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			boundaries; and, comments on individual sites. This response relates to the first two of those areas. The other areas are considered under the relevant questions for the Bressingham Cluster. The overarching comments submitted are summarised as follows: 1) the plan has only considered sites put forward by landowners, this denies the opportunity for cohesive and comprehensive village plans; 2) listing services without an assessment of their capacity to accommodate growth does not justify an allocation; 3) It is not possible to assess the impact on Bressingham without knowing exactly what sites will be allocated; 4) support for increasing the size of village settlements and the emphasis on protecting character, community and rural services. In regards to comments on objectives the following points are made: Under objective 1, there is no effort to tailor or justify the housing numbers for individual villages; objective 2 does not encourage or create improvements to local services; there is no specific objective requiring quality design or "building beautiful", this risks poor quality, common to schemes delivered by volume housebuilders; it is encouraging to see a preference for developing in depth rather than ribbon development.	the selection of allocation sites on those that are specifically being made available is a sensible and proportionate approach to plan making that avoids the possibility of significant additional site identification or evaluation work that would ultimately not result in the identification of available sites. The presence and accessibility of a services or facility provides a sensible baseline on which to assess the suitability of sites. Many services and facilities e.g. shops, pubs, restaurants do not have finite capacities that might restrict growth. Others such as school may provide a constraint. As part of the plan making process the Council has engaged with service providers to establish whether such constraints exist. In regards to school capacity, whilst the school did take a capacity entry of 20 pupils, only 4 of the new intake were catchment pupils with the remainder being pupils from Roydon and Diss therefore there is capacity at the school for catchment children if required. Furthermore, the primary school at Roydon has recently been expanded and both the schools at Roydon and Diss are below their Published Admission Numbers. It should be noted that the Regulation 18 consultation forms a key part of the evidence gathering stage of plan making. The Council has provided a clear direction of travel within the Regulation		appropriate" to objective 2.

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				18 consultation about those sites that were likely to be preferred for allocation. It is not possible for the Council to make its final choice before it has completed the Regulation 18 consultation and taken account of representations made. The publication of the Regulation 19 pre-submission consultation of the plan, which will be the plan the Council proposes to adopt subject to independent examination, will provide stakeholders with an opportunity to object to the plan should they consider that the Council's plan does not meet the required legal or policy tests. The Council welcomes the support for increasing the size of villages and the emphasis on projecting character, community and rural services. Objective 1 sets out what the plan is trying to achieve as a whole, in order to fulfil the requirements of the emerging strategic policies of the Greater Norwich Local Plan (GNLP) in terms of housing numbers, and sets out a number general principles for those allocations. Necessarily, fulfilling the strategic policy requirement for homes requires a relative assessment of the individual suitability of available development sites alongside the ability of a settlement to accommodate growth based on the range of services and facilities available locally. In respect of Bressingham, the		

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				preferred allocation were set out in the consultation document. It is notable that respondent's representation suggests the development of 97 homes across three individual sites. This implies that the respondent does not consider that the Council choice of 52 homes over 2 sites is inconsistent with the level of development appropriate within Bressingham. The Council notes the comments about encouraging or creating improvements to local services. Whilst the Council considers that it could only require improvements where it was justified, appropriate and proportionate to the proposed development it is accepted that this could be a beneficial addition to the objective. The Council notes that it sought views on whether specific requirements should be included in an allocation policy for preferred sites. Also, that the potential allocation of SN4036 in Bressingham proposed the incorporation of an area of parking for the school and a large area of open space. Policy SNVC2 was specifically identified to address issues of design within the South Norfolk Villages. If included, this policy will be an effective mechanism to ensure appropriately designed development. This policy will sit alongside emerging policies 2 and 3 of the GNLP, which set out general requirements for design and policy		

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				DM3.8 "Design Principles applying to all development", which is not proposed to be replaced. The Council welcomes the support for development in depth in appropriate locations. It would note however that not all linear development should necessarily be considered inappropriate based upon the individual merits of the site concerned. Whether or not a site is appropriate, taking account of landscape and townscape considerations forms part of the site assessment process.		
QUESTION 1: Do you agree with the Plan Objectives?	93	Object	Serious concerns with regards to access as central to the village by the local shop that already has delivery issues due to narrowness of Main Street. Why has land beside The Oaks not been considered to make them more of the village and would also solve the lack of footpath issues that gives major safety problems with risk to life?	The respondent has not specified the cluster or settlement to which their representations relate. However, in general terms consideration has been given to site access, the local highway network and the accessibility of local services and facilities has part of the assessment of sites. This has taken into account the advice of Norfolk County Council as Highway's Authority. The sites considered within the plan are those that have been put forward by landowners, developers or their respective agents. This is to ensure that land is available for development. Issues of concern in relation to sites considered as part of the plan are set out within the individual sites chapters.	689	No action required.

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QUESTION 1: Do you agree with the Plan Objectives?	887, 1349, 1352	Object	Greater Norwich's housing need to 2038 is 42,568 including buffer. The GNLP's proposal of 49,492 new dwellings including buffer is excessive. GNLP doesn't take full account of expected windfall development. Therefore, the sites allocated in the Plan are not needed. Bressingham proposals do not meet Objective 2. Three new estates will double Bressingham's population, the primary school is full and cannot expand, Bressingham has no public transport. Bressingham's community consists of dwellings along narrow streets, no estates. Infrastructure cannot cope with increased through traffic. Building estates is not organic growth and will destroy it.	The number of homes being planned for are determined through the Greater Norwich Local Plan (GNLP), which has been agreed by each of the three constituent Councils. Prior to its adoption, the GNLP will be subject to independent examination. Amongst other things, this examination will consider whether too many, or too few homes have been planned for and whether the number of homes distributed to the South Norfolk Villages is appropriate. South Norfolk's village cluster plan will be consistent with the overall strategic policies of the GNLP and will not revisit the housing numbers set out in that plan. Whilst it is accepted that the proposed allocation will make a significant addition to the built-up parts of the village located along High Street and School Road, the addition of 52 homes will not double Bressingham's population. The 2011 census recorded Bressingham's population as 877 usual residents and the number of homes in the Parish as 366. The Office of National Statistics estimated the population of Bressingham to be 896 people. As part of the production of the plan, discussions have taken place with Norfolk County Council in regards to a number of issues including Education and Transport. In regards school provision, South Norfolk Council has been advised that whilst Bressingham	688	No action required.

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				Primary school did take a capacity entry of 20 pupils, only 4 of the new intake were catchment pupils with the remainder being pupils from Roydon and Diss. Therefore there is capacity at the school for catchment children if required. Furthermore, the primary school at Roydon has recently been expanded and both the schools at Roydon and Diss are below their published admission numbers. Therefore, it is not considered that school capacity is a constraint to development at Bressingham. In regards to site access and the local highway network, no objection have been raised by Norfolk County Council as Highway's Authority to any of the preferred sites. Specific considerations relating to individual sites are considered as part of representations submitted on those sites. It is accepted that the public transport service that directly serves Bressingham is limited. This is specifically identified within the description of the Services and Community Facilities within the consultation version of the plan. Taken as a whole, the range of services and facilities within the village combined with the proximity of the main town of Diss is considered to mean that an allocation of the scale proposed was appropriate in this location. Appropriate consideration has been		

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				given to the impact of preferred and shortlisted sites on the character and appearance of the area, taking account of the advice of the Council's Senior heritage and Design Officer. This is set out in the Site Assessments that were published as a supporting document to consultation. On the basis of the rationale set out within those sites assessments it is not considered that the development of the proposed sites would have an unacceptable impact on the character and appearance of the area. Consideration has been given to issues raised in relation to specific sites within the responses to representations contained within the Bressingham chapter of the document.		
QUESTION 1: Do you agree with the Plan Objectives?	323, 784, 785, 1045, 1483, 1627	Mixed	The plan is not in conformity with the Greater Norwich Local Plan (GNLP). The quantity of development is unnecessarily high, not enough consideration has been given to expected windfall and needs can be met without further development in villages. The distribution of development is unsustainable and unjustified. Development in village clusters will increase vehicular journeys, with consequential impacts on climate change, cause an unnecessary loss of countryside that will be more damaging than an approach that concentrates development close to Norwich. New development will not help services but will put a strain on them. Brownfield sites should be prioritised.	The GNLP specifically requires that a minimum of 1,200 homes are provided for within the South Norfolk Village Clusters in order to promote social sustainability and rural life and services. This plan effectively responds to these requirements and is therefore directly in conformity with these requirements. The scale of development planned for within the GNLP has been defined taking account of government's methodology for calculating housing need, the likely contribution of windfall and the importance of providing sufficient flexibility of supply to ensure housing needs can be met. It is not the place of the Village Cluster Plan to revisit these considerations. Over the longer term, diversifying the supply of homes,	414	No action necessary.

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			There are no policies that ensure those most in need of housing will have access to the homes built.	including the delivery of smaller sites in villages is important to addressing existing supply constraints in the housing market as well as providing opportunities for homes, including affordable homes in villages. The overall distribution of development across Greater Norwich is set out within the GNLP, the Village Cluster Plan must be in accordance with the GNLP. The Village Clusters plan has taken account of the availability of local services and facilities in order to ensure an appropriate distribution of development. In term of the climate change impacts of increased vehicular trips, currently, around 33% of homes in Greater Norwich are located outside of the Norwich Urban Area and Main Towns. In order to achieve net zero emissions by surface transport the Council is working with transport partners to establish sustainable transport solutions for those significant number of homes in rural areas. Failure to achieve these solutions for those homes in rural areas will also mean that net zero targets cannot be met. The additional growth planned for through the Village Cluster Plan does not meaningfully increase the challenge of rural transport. However, it does serve to help support existing rural services and help address issues of rural housing accessibility. It is notable, that as an overall percentage, the GNLP does		

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				increase the proportion of homes within the Norwich Urban Area and Main Towns compared to the current situation i.e. it rebalances homes towards more built-up areas. The GNLP seeks to make the best use of suitable brownfield sites. Re-distribution to the fringe of Norwich will not reduce the loss of countryside greenfield sites, those sites will just be closer to Norwich. There is no clear evidence that in landscape terms those sites would be less impactful than sites planned through the Village Clusters Plan. Landscape impacts have been taken into account as part of the site assessment process. There is no clear evidence that development within South Norfolk villages will meaningfully increase burdens on services compared to equivalent growth in the Norwich Urban Area, Main Towns and Key Service Centres. Conversely growth within these locations would, self-evidently, not be as well located to support local services and facilities that help to minimise journey lengths, support active travel and support access to housing in rural areas. The approach taken within the plan of seeking to accommodate all planned development on sites of 10 or more ensures that those sites will provide for affordable housing in line with the GNLP		

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				policy. This is an essential element of ensuring those most in need can access housing. This could not be achieved through a reliance on smaller windfall sites than are unlikely to provide for affordable homes. The approach of seeking to ensure new development meets the needs for different sizes of homes also supports meeting identified needs.		
QUESTION 1: Do you agree with the Plan Objectives?	2022, 2025, 2026, 2027	Comment	Support objective 3 but consider that specific reference is included to protecting the Historic Environment. Further evidence on the impact of proposed development sites, in the form of an Heritage Impact Assessment consistent with Historic England's advice note 3 should be prepared where relevant. There is currently insufficient detail within the site allocation policies of the plan in respect of the historic environment.	The Council does not consider it necessary to refer to all considerations within the objective, and to do so may lose clarity of the purpose and goal of the objective. In this instance, the Council agrees the specific reference should be made to the historic environment in Objective 3. The Council notes Historic England wider concerns about the evidence that has informed the site assessment process and the inclusion of specific references within site allocations policies. In regard to evidence, it is important to note that the assessment of sites was informed by expert input from the Council's Senior Heritage and Design Officer. The Council remains of the view that this represented a proportionate approach that would be effective in ensuring the impacts on the Historic Environment were effectively taken into account within the plan. Nonetheless, the Council has now agreed an approach with Historic England to set out more clearly evidence of the assessment of	407	Amend objective 3 to read "... form and character of existing villages, protects the historic environment and ensures appropriate landscaping. ...".

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				impacts on the Historic Environment for list of relevant sites that has also been agreed with Historic England. These will be completed to accompany and inform the final version of the plan. At the Regulation 18 consultation stage the Council did not set out specific detailed Site Allocation Policies. Rather, the Council sort the views of the public and other stakeholders about whether there were specific issues that those detailed Site Allocation Policies should included. As such, detailed considerations had not been set out in full at that stage. The Council notes that specific comments have been made by Historic England in relation to a number of the preferred and shortlisted sites. These will be considered as part of finalising the plan and will inform site specific policy requirements.		
QUESTION 1: Do you agree with the Plan Objectives?	1221	Support	Respondent agrees with the objectives but is concerned developers' have been allowed to set the agenda by submitting their proposals before consultation and that this means communities will not be protected. Suggests that Objective 1 should be changed to ensure local requirements are determined before developers proposals are considered and that Objective 3 should be changed to ensure any development	The South Norfolk Village Cluster Plan is being prepared by South Norfolk Council, informed by consultation with the public and other stakeholders. Establishing an understanding of potential development sites that landowners intend to make available for development is an essential part of the plan making process which ensure that land identified for development is actually available for that purposes. Similarly, working with developers and landowners is essentially to ensuring	399	No action required.

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			proposal is in response to locally determined plans.	identified development sites are actually deliverable and will be developed in order to meet identified housing needs and demands. Over 450 sites promoted by landowners, agents and developers were assessed as part of the initial stage of plan making. Of these only 90 sites were ultimately preferred or shortlisted as potential development sites, in many circumstances on reduced or amended boundaries. This process is illustrative that the Council is progressing the plan based on its own priorities. The housing requirement for the Village Cluster Plan is defined within the Greater Norwich Local Plan (GNLP), a document produced in partnership between Broadland District, Norwich City and South Norfolk Councils working with Norfolk County Council. It is therefore considered the housing requirement addressed in objective 1 has been appropriately defined in response to local requirements. The Village Cluster Plan is a locally determined plan being prepared by South Norfolk Council, with decisions on allocation sites being made by the elected members in accordance with the democratic processes of the Council.		
QUESTION 1: Do you agree with the Plan Objectives?	938, 960	Support	Support is offered for the Plan's objectives for sites of 0.5 or more hectares. However, the respondents suggest that the plan should allow for a wider spread of	The planned transition to electric vehicles will support the transition to net zero emissions from surface transport. Such changes will be very	397	No action necessary.

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			developments of less than 0.5 hectares because: 1) the transition to electric cars will reduce the impact of cars in terms of climate change; 2) not all residents have children who need to use the local primary school; and; 3) wider dispersal in more remote areas would have benefits in terms of occupant's well-being and the balance of villages.	important to the sustainability of rural area. Whilst taking account of these changes the plan seeks to create a balance between allowing development that supports the viability and vitality of villages, supporting health and well-being by providing opportunities journeys to be undertaken by foot and cycle and protecting the intrinsic character and beauty of the countryside by ensuring new development relates well to the existing built-up form of villages. The Council would be concerned that wider dispersal as advocated by the respondent would not result in these outcomes, when considered in combination, being achieved as effectively. Existing regulations and policies relating to the reuse of existing buildings already provide scope for appropriate development in more isolated locations.		
QUESTION 1: Do you agree with the Plan Objectives?	34, 809, 1355, 1360, 2146, 2157, 2160	Mixed	These representations are in general supportive of the objectives. This is on the basis that they help meet the need for housing in a manner sympathetic to the character of villages and that, overall, is consistent with the requirements of National Planning Policy. Concern is raised by 1 respondent that objective 1 should be fully consistent with Policy 7.5 of the GNLP. The response from Norfolk County Council (NCC) notes that whilst the core policies refer to flood risk no reference to flood risk is included in the objectives, with	The Council welcomes the support for the proposed objectives. The Council is unclear why objective 1 is inconsistent with emerging Policy 7.5 of the Greater Norwich Local Plan (GNLP). If adopted as currently drafted, Policy 7.5 of the GNLP allows for some development adjacent to defined settlement boundaries, subject to specific criteria. The Village Cluster Plan includes proposals for defined settlement boundaries and the extension/rationalisation of settlement boundaries, whilst specifically providing	395	Amend objective 1 to read "... through the allocation of suitable, viable and deliverable development sites for housing. ...".

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			concerns raised that in doing so the plan relies on policies within the emerging GNLP, Development Management Policies Document and Neighbourhood Plans. NCC also suggest consideration should be given to undertaking LVIA or LVA on sites likely to have a significant impact on the landscape, that NCC may seek S106 or CIL contributions from development to fund improvements to County Wildlife Sites (CWS) where there is likely to be an increase in recreational pressure as a result of development and that the design of schemes should take into account the protection or enhancement of adjacent CWS or Roadside Nature Reserves.	for some additional development beyond current policy, would not detract from the implementation of Policy 7.5 based on the revised boundary. The Council accepts that there is no reference to flood risk in the proposed objectives. Flood risk is an important issue for all new development and is referred to in the core policies of the plan and has been taken into account as part of the site assessment process alongside a range of other technical concerns. Referring to all technical constraints in the objectives is likely to detract from the clarity of what the Council is seeking to achieve. However, reference could be provided to "suitable" development sites as an overarching reference to sites which can meet appropriate technical standards. All of the documents referred to by the County Council in relation to flood risk will form part of the Development Plan. In accordance with planning law, applications for Planning Permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The fact that detailed development management policies are contained within different documents does not reduce the weight that can be given to those policies. Indeed, paragraph 16(f) of the the National Planning Policy Framework (NPPF) states that plans should avoid "unnecessary duplication of policies that apply to a particular area". Government's Planning Practice		

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				Guidance on Plan Making also states that "Local plan policies should not duplicate those in a neighbourhood plan" (Paragraph: 0006 Reference ID:61-0006-20190723). Therefore, the Council does not share the County Council's apparent concerns in this regard. The site specific policies that will accompany individual allocations of land provide the opportunity to identify site specific considerations and the Council has sought representations in this regard. The Council notes the County Council's statement around S106 or CIL obligations. S106 obligations can be sought where they meet the relevant legal tests and CIL funding can be sought through the pooled Greater Norwich CIL fund in accordance with the longstanding partnership agreements, of which the County Council is part. The Council has sought specific comments on preferred and shortlisted sites and has paid for specific ecology advice through the County Council. The Council therefore trusts that any site specific consideration in relation to CWS, RSNR or other ecological issues will have been identified within that advice.		
QUESTION 2: Core Policy – Standard Requirements	2186	Comment	Comments submitted by NCC Children's Services regarding education provision within the village clusters plan area: Since the production of the RAG assessment in March 2019 the annual intake at primary schools in the area has dropped sharply and many schools are now down to a half form entry (15	The Council welcomes these comments from Norfolk County Council's Children Services and continues to engage with the team as the VCHAP progresses. The VCHAP recognises the key role that primary schools have within local communities and both proximity and access to a local primary school has formed an important part of the site	998	No action required

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			pupils/year) or less, which can be difficult to sustain. This change in position is attributed to a combination of lower birth rates and parental choice. On this basis a modest level of growth could prove to be beneficial to a number of schools within the District. New primary schools at Hethersett, Trowse and Wymondham College have eased the pressure on a number of schools that previously took overflow pupils from these areas. A further new primary school is currently timetabled for delivery at South Wymondham in 2024. A new primary school in Poringland is still a possibility if a site can be identified, although there is also now the potential to expand Trowse Primary School as an alternative option. The high costs of extending schools means this is only an option if significant development is proposed, rather if a school is operating at capacity, which can be managed through a combination of parental choice and alternative schools as many children now attend schools out of their catchment areas. Reference to a school being landlocked (or otherwise) reflects the existence of green space or the presence of existing development adjacent to the school rather than a future intention to expand the school. Some existing planning commitments will already have been taken into account in the pupil forecasting, however this usually only includes commitments with full planning permission at March 2019.	selection process. The Council notes that modest growth is supported and is considered to be beneficial to a number of schools that currently have low or falling numbers of pupils in attendance. The Council is aware that pressure for school places has been a recurrent concern in a number of representations submitted in response to the Regulation 18 consultation however as confirmed by these comments it is the Council's understanding that in many cases this is attributable to parental choice and may be managed through places at alternative schools if necessary. In addition, the recent opening of new primary schools in key locations, as well as a new primary school in Poringland (or the expansion of Trowse Primary School), have eased external pressures on some of the schools previously considered to be oversubscribed. The Council also recognises the high costs associated with the expansion of primary schools, as well as the constraints to achieving this in many locations, however where a need has been identified and the allocation of a new development site could provide a benefit to the school the Council is committed to exploring the opportunities with the relevant parties.		

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QUESTION 2: Core Policy – Standard Requirements	1753	Object	Objection by Hempnall Parish Council to the concept of the Village Cluster Plan - Council referred to full representation submitted in response to Question 1	The Council considers that the issues raised by Hempnall Parish Council in response to Question 1 have been responded to fully in the Council's response to Question 1 and therefore it is unnecessary to repeat those comments here.	997	No action required
QUESTION 2: Core Policy – Standard Requirements	2158	Comment	Summary of comments of the LLFA to the inclusion of a Standard Requirements policy: the current policy is limited in its provision and indicates that specific requirements may be optional; question whether sufficient consideration has been given to supporting policies (for example, flood risk and water management policies); the effects of the VCHAP sites has not been considered within The Greater Norwich SFRA Level 2; in light of recent flood events within South Norfolk better consideration of flood risk and its management should be considered in the VCHAP; and the LLFA would request that the VCHAP policies requires that any future development (or re-development) proposals show there is no increased risk of flooding from an existing flood source and mitigation measures are implemented to address surface water arising within the development site.	If retained within the VCHAP the intention of the Standard Requirements policy would be to identify on-site requirements common to all allocation sites. Consideration would need to be given to the wording of any such policy to ensure that it adds value to the existing suite of adopted planning policies and guidance, as well as the clarity of the wording. In response to the representation submitted by the LLFA the Council would note that engagement between the Council and the LLFA has continued and has included site specific discussions relating to promoted sites. As a consequence the Council has determined that a small number of sites should be removed from the VCHAP process due to the identified flood risks whilst other sites have been subject to ongoing discussions with site promoters to determine their suitability for inclusion in the process. Where relevant, areas of flood risk both on- and off-site have been noted as a result of internal desktop assessments and consultation responses, the technical comments of the LLFA and ongoing engagement with the LLFA and as	986	No action required

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				appropriate these features will be noted in the supporting site information and/or mitigation requirements within the site specific policy allocation text. The LLFA noted that the GNLP evidence base did not include a Level 2 Strategic Flood Risk Assessment of the VCHAP sites. This work has subsequently been undertaken to support the production of the village clusters plan with the findings of the report informing the final site selections. Existing legislation and planning policies set a clear framework for the avoidance of inappropriate development in areas of flood risk, the management and mitigation of existing surface water flood risks arising from new development, including its impact on existing land uses, and the consideration of the cumulative impact of development on all sources of flood risk. It is not considered appropriate for the Council to either simply repeat this guidance or provide additional technical detail to supplement the existing suite of guidance and legislation, rather it is considered that it is the role of the Council to signpost developers and applicants to this information. The Council therefore considers that it has given due regard to flood risk and water management as part of the VCHAP process.		

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QUESTION 2: Core Policy – Standard Requirements	2150	Support	NCC Strategic Planning comments on the proposed Standard Requirements policy: support the need for a standard requirement policy to cover over-arching requirements ensuring specific infrastructure constraints are addressed; the policy should indicate the following (a) those infrastructure types and services which potentially may need enhancing to support the proposed housing growth (e.g. local schools; library service etc); and (b) indicate the appropriate funding / delivery mechanisms, for example, use of community infrastructure funds; planning obligations; or planning condition.	The Council will be reviewing both the need for a Standard Requirement policy and the detailed content should it be considered appropriate to incorporate such a policy in the VCHAP. As part of the site assessment and selection process the Council has engaged with a number of technical consultees and infrastructure providers to understand existing provision, capacity and deficits where they exist. This has included engagement with Norfolk County Council in its role as infrastructure provider. These discussions have not raised any significant issues in terms of education facilities and where appropriate highways infrastructure requirements will be reflected in site specific allocation policy text. Overall, it is not considered that this policy should detail specific infrastructure projects but rather its intention would be to set out on-site requirements common to all allocation sites to avoid unnecessary repetition in each policy. Similarly, it is not considered that identifying funding mechanisms for infrastructure projects is an appropriate addition to a generic Standard Requirements policy in this document. The framework for the funding of future infrastructure projects is identified in a number of places including the Greater Norwich Growth Board and the Greater Norwich Infrastructure Partnership, for	984	No action required

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				example, in which the Norfolk County Council participates.		
QUESTION 2: Core Policy – Standard Requirements	1674	Comment	Mulbarton Parish Council have expressed support for a ‘Standard Requirements’ policy but consider that it should be expanded to include: a requirement to obtain and publish a statement from the local education authority detailing available capacity in the primary and secondary school catchment area; a requirement to obtain and publish a statement from the local health authority detailing available capacity for health and dental care in terms of patients per GP, etc. with a comparison against national standards, guidelines and benchmarks; and a requirement for the developer to produce and publish an environmental impact statement, however brief, describing the effect of additional journeys to work, etc. In addition, Mulbarton Parish Council also suggest rewording the policy as follows: the use of vague and undefined terms such as: “proportionate”, “minimising the impact” and “landscaping consistent with” should be changed to include a requirement to consult with the local community as to what is proportionate or acceptable; the phrase “minimising the impact on the amenity of local residents” should be changed to “enhancing the amenity of local residents, subject to the	The Council notes the additional information it is suggested should be included in a Standard Requirements policy however this is not considered to be a reasonable addition to any such policy. The Council responds by noting that there is ongoing dialogue with the County Council in terms of highways infrastructure and school capacity, and with the local NHS Integrated Care System, regarding Primary Care. Specifically, taking into account falling rolls and out of catchment pupils, there is not considered to be a capacity issue with Mulbarton Primary School. Similarly, the scale of development proposed within Mulbarton is considered acceptable in highways terms. Discussions with the NHS ICS about the proposed allocations continue however the constraints and resourcing issues that exist within the health and dental care sectors are widely recorded, are not specific to this locality and are not considered to be a justifiable reason to restrict future development. Furthermore, the ICS has been aware of the need to identify 1,200 new homes within the District that arises from the requirements of the GNLP. South Norfolk Council is not aware that an objection to this was raised with the GNLP. Additional evidence has also been produced to support the production of the VCHAP including a Sustainability Appraisal and a Habitats	979	Review the necessity for and/or level of detail required in the Core Policy, reflecting the need to balance what is already contained in national policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.

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			approval of the local community”; and in this context, we support the broad comments made by CPRE Norfolk and the South Norfolk Green Party, to the effect that further house-building in rural villages should be on an exceptional basis, and subject to a maximum limit, and not a minimum of 1,200 units.	Regulation Assessment which assess the anticipated impact of new development and inform the site selection process. A further requirement for applicants to source and submit additional information relating to these matters is considered to be unduly onerous. Comments have also been submitted relating to the detailed wording of any such policy, as well as the role of the local residents in the determination of subsequent planning applications on these allocation sites. The views of the local community are valuable and parish councils remain important consultees on planning matters however the final decision about the acceptability of a proposal remains the responsibility of the LPA. Detailed design guidance is already available for developers and applicants in the form of Landscape Character Assessments, Development Management policies, the Council’s Place Making Guide and Conservation Area Character Appraisals (where relevant). In addition, a number of areas have also undertaken (or have adopted) Neighbourhood Plans which help to shape development to reflect the local environment, in accordance with the wishes of the local community. Should the Council include a policy relating to Standard Requirements across all allocation sites consideration will be given to the wording of the policy to ensure clarity. However the policy would also need to reflect the diversity		

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				of the allocations throughout the village cluster area.		
QUESTION 2: Core Policy – Standard Requirements	1257	Comment	Support the comments of Barford and Wramplingham Parish Council and CPRE; the sewage system in Barford is unable to cope with the current numbers of houses and additional poorly located homes will add to the problem; and a standard requirement should be that additional houses do not exacerbate such problems.	The Council has noted that this response makes reference to an issue with the existing sewage system at Barford and whilst the respondent has not requested this to be addressed as part of this representation the Council will seek clarification of this situation with Anglian Water as part of the technical responses. In accordance with existing legislation and planning guidance, new development should not have an adverse impact on the existing development, or exacerbate existing known problems. As part of the site selection process the Council has sought to identify issues that may constrain the allocation of sites at an early stage (including through consultation with technical consultees) and where possible seek solutions or alternative options to avoid adversely impacting existing residents and businesses. As such it is not considered necessary to repeat this requirement in the VCHAP however further clarification should be sought from Anglian Water about any sewerage issues at Barford.	976	Information to be requested from Anglian Water (via AECOM) to verify the concerns raised about the existing foul water system at Barford, including capacity and infrastructure.
QUESTION 2: Core Policy – Standard Requirements	1775	Comment	An assumption has been made that numbers on sites will exceed 12 dwellings - more consideration should be given to smaller scale developments, including individual properties counting towards the 1,200 dwelling target. Larger developments may easily act counter to	The plan does not seek simply to deliver developments of housing, but housing that includes affordable housing. National Planning Policy restricts securing affordable homes on sites of fewer than 10 homes, unless specifically justified and viable. Fine margins of	975	No action required

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			protecting to the character of a village and its setting.	viability and sensitivity to abnormal costs are indicative that such an approach is not justified. In addition, individual affordable homes that might be secured under smaller applications make it challenging for Affordable Housing providers to manage such provision. As such a 12 dwelling threshold is established to ensure that sites will be of an appropriate scale to deliver affordable housing, and thereby meeting the need for affordable housing. The appropriate scale to be allocated within an individual cluster is established by reference to the suitability of a particular village or cluster taking account of a range of factors including: the availability of suitable sites, the potential or need to provide additional infrastructure or facilities, the ability of the site to be effectively integrated into the village and its setting and the relative range of services and facilities within reach of the village. A one size fits all approach to scale would not reflect the individual circumstances of a particular cluster. Where specific concerns were raised about the number or scale of allocations in villages these will be addressed in relation to the comments on specific site in a particular cluster.		
QUESTION 2: Core Policy – Standard Requirements	2023	Comment	Summary of comments from Historic England submitted in response to a 'Standard Requirements' policy:	The Council recognises its responsibility for preserving the historic environment, including both designated and non-designated heritage assets, and the role	973	Review the necessity for and/or level of detail required in the Core Policy, reflecting

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			support the inclusion of a standard policy to avoid repetition throughout the document; should be expanded to include reference to the historic environment; suggested policy text - "Development should conserve/ sustain or where appropriate enhance the significance of designated and non-designated heritage assets both on-site and in the surrounding area. This includes any contribution made to its significance by its setting".	that the Development Plan takes in preserving and enhancing the significance of these assets and their settings for current and future generations. The planning policy framework includes the NPPF (section 16), emerging GNLP Policy 3 and Development Management Policy DM4.10. Policy DM4.10 provides further interpretation of the strategic policies and includes a requirement for developers to "have regard to the historic environment and take account of the contribution which heritage assets make to the significance of an area and its sense of place". This policy also requires, where possible, new development to enhance/ sustain or better reveal the significance of heritage assets. The Council considers Policy DM4.10 to be up-to-date and as such whilst the importance of the historic environment is recognised it is not considered appropriate to repeat these requirements within the VCHAP. Furthermore, as part of the site assessments a review of the proposed sites was undertaken in conjunction with the Council's Senior Heritage and Design Officer and, in liaison with the Historic England, a number of Heritage Impact Assessments (HIAs) were also undertaken to inform the site selection process. These HIAs have helped to shape the site specific policy allocation text, including identifying mitigation measures considered appropriate for individual site development. If relevant		the need to balance what is already contained in national policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.

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				individual site allocation policies may also require the submission of further detailed heritage assessments to assist the decision maker at the time of the detailed planning application. On this basis, the Council considers that the impact of new development on the historic environment is sufficiently addressed within both the informative work undertaken as part of the VCHAP process and the existing planning policies.		
QUESTION 2: Core Policy – Standard Requirements	238, 324, 517, 786	Mixed	Summary of additional matters respondents considered should be included in a 'Standard Requirements' policy for all allocation sites: Standard requirements should take into account access to safe, unspoilt natural surroundings, access to good facilities including medical facilities, leisure facilities and public transport; Conservation Areas; Neighbourhood Plans; flood and drainage capacity; heritage assessments and supporting surveys and studies.	The Council considered the inclusion of a 'Standard Requirements' policy within the VCHAP to address those requirements identified as being common across all allocation sites. However, the Council will need to review the existing Development Plan to ensure that any such policy does not provide unnecessary repetition of existing up-to-date planning policies. Developers are, for example, already required by planning policy to have regard to Conservation Areas and Neighbourhood Plans as well as undertake appropriate site surveys as part of a detailed planning application and the duplication of these requirements would not be appropriate in the VCHAP. In regards to the more generic standard requirements the allocation sites have been assessed for their accessibility to local services and facilities, including public transport. Detailed site specific requirements (such as heritage assessments) will be set out in the individual site allocation policies	972	Review the necessity for and/or level of detail required in the Core Policy, reflecting the need to balance what is already contained in national policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.

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				and are unlikely to be required on all sites and therefore would not be appropriate for inclusion in a 'Standard Requirements' policy. The Council will need to be certain that any planning policy within the VCHAP adds value (and not unnecessary complexity) to the existing Development Plan. A review of these policies should be undertaken by the Council to ensure that the existing planning policies and the site allocation policies address all of the issues considered to be of relevance across the allocation sites.		
QUESTION 2: Core Policy – Standard Requirements	1478, 1582, 1637	Mixed	Representations made with regards to repetition of policy within the VCHAP and existing Development Management Policies. Comments are made with regards to being consistent with the emerging GNLP policies.	The Council acknowledges the comments in relation to the potential repetition across existing and emerging plans and recognises the importance of being concise. It is not the intention of the VCHAP to contradict policies in the GNLP and Development Management Policies and as such a review of the wording within the overriding policies is being undertaken.	958	No further action required.
QUESTION 2: Core Policy – Standard Requirements	1631	Comment	Re Question 2 - Villages differ in many ways as S. Norfolk is aware. They need individual consideration.	The assessment of sites has been undertaken in a consistent manner, and have also been supported by a Technical Consultation with both internal consultees on landscape, heritage and environmental protection issues, as well as a range of external stakeholders, on issues such as highways, utilities and minerals and waste. The technical consultation also included issues of flood risk and ecology, although technical comments on these issues are	957	No action required.

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				expected to be provided in response to this consultation.		
QUESTION 2: Core Policy – Standard Requirements	1444, 1452	Comment	The principle of having ‘standard requirements’ is a sensible approach and avoids repetition within the site specific policies of the draft plan. However, in this instance we consider them unnecessary and in the case of some of the requirements, inappropriate. We suggest that Policy SNVC1 be deleted and any specific requirements be included within the policy wording of individual allocations	The Council acknowledges the comments raised a within the representation and can confirm that they are already undertaking a review of the overall details of the core policies., as a result of the consultation. With regards to site specific polices, these will be detailed and include such requirements.	956	No further action.
QUESTION 2: Core Policy – Standard Requirements	404	Comment	There should be a standard requirement for each parish to make provision for alternative accommodation (caravans and/or boats).	The Council's evidence on the needs for Caravan and Houseboats, including the need for Gypsies and Travellers, is being assessed through the independent examination of the Greater Norwich Local Plan (GNLP). The purpose of the Village Clusters plan is to meet the GNLP requirement for 1,200 homes, not to allocate/identify sites for caravans and houseboats, which will be dealt with through the GNLP or other authorities Local Plans.	955	No action required at this stage.
QUESTION 2: Core Policy – Standard Requirements	815	Object	Thurlton Parish Council do not agree with the concept of a Village Cluster Plan. Each village is a small environment and each needs to be considered in its own rights, applying “one size fits all” policies on developments will inevitably lead to poor design, not in keeping with the existing form of those villages. Every application needs to consider Conservation Areas, Local Wildlife/Ecology, Flooding and Drainage	The Council does not agree that this approach has been undertaken within the VCHAP. The assessment of sites has been undertaken in a consistent manner, and have also been supported by a Technical Consultation with both internal consultees on landscape, heritage and environmental protection issues, as well as a range of external stakeholders, on issues such as highways, utilities and minerals and waste. The technical consultation also	954	No action required at this stage.

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			Capacity, availability of Services & Facilities (including access to GP's and Dental surgeries) , Access and Public Transport as a matter of course.	included issues of flood risk and ecology, although technical comments on these issues are expected to be provided in response to this consultation.		
QUESTION 2: Core Policy – Standard Requirements	216, 334, 523, 888, 915, 962, 1041, 1224	Mixed	Concerns raised with a 'one fits all approach' with specific comments relating to design, the impact on local and wider road networks, consideration of landscape designations and heritage, pressure on facilities including health infrastructure and ensuring that specific supporting documents are required where necessary ie ecology	NCC Highways officers have been involved with the assessment of the sites prior to consultation and also provided technical advice as part of the Regulation 18. Advice has been sought relating to both site access and the impact of the proposed development on the wider highway network. Where appropriate, mitigation measures have been identified and would be incorporated into specific site allocation policy text. In addition, technical advice has also been sought from a number of professional statutory and non-statutory bodies through the plan making stage, such as from English Heritage, NCC Ecologist Team, Environmental Agency etc, who have provided site specific and plan wide comments and where relevant these comments (including the requirements for additional reports etc) will be reflected within site specific policies. This will ensure that any scheme brought forward at the planning application stage is reflective of the requirements of the plan.	953	No action required at this stage.
QUESTION 2: Core Policy – Standard Requirements	939	Support	It is agreed that there should be a policy on 'Standard requirements'. However, the levels of suggested density of 25 dwellings per hectare may clash with some of these good intentions such as landscaping, impact on amenity and provision of open spaces. This therefore requires	In addition to the small number of 'Core Policies' that would apply to all of the sites in general terms, each allocated site will have an accompanying site allocation policy. This will set out how many dwellings that site is allocated for and also any specific requirements	942	No action required.

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			appropriate wording within stated policies to allow a bespoke approach, depending upon individual village housing and landscape.	which development of the site needs to meet e.g. protection of particular features on the site (such as trees, pond, hedgerows etc.), address a particular constraint of the site (such as a change in levels), access from a particular point, protection of particular views or taking account of the impact on a specific heritage asset, etc. In addition it should be noted that each allocated site will be subject to a planning application where specialist reports, surveys etc. will be required in order to determine the application. As such, aspects directly relating to amenity will be addressed at the detailed design and planning stage, where the Council will be expected to assess the proposed development against relevant planning policy.		
QUESTION 2: Core Policy – Standard Requirements	1768	Support	LMPC agrees with the policy on Standard Requirements and notes the policies for - ? Minimising impact on amenity of existing residents ? landscaping consistent with a rural, edge of village location	In addition to the small number of 'Core Policies' that would apply to all of the sites in general terms, each allocated site will have an accompanying site allocation policy. This will set out how many dwellings that site is allocated for and also any specific requirements which development of the site needs to meet e.g. protection of particular features on the site (such as trees, pond, hedgerows etc.), address a particular constraint of the site (such as a change in levels), access from a particular point, protection of particular views or taking account of the impact on a specific heritage asset, etc. In addition it should be noted that each allocated site will be subject to a planning application where specialist reports, surveys etc.	940	No action required.

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				will be required in order to determine the application. As such, aspects directly relating to amenity will be addressed at the detailed design and planning stage, where the Council will be expected to assess the proposed development against relevant planning policy.		
QUESTION 2: Core Policy – Standard Requirements	1357, 1362	Support	We support the inclusion of a policy on 'standard requirements' and believe the criteria suggested are appropriate.	Support noted.	939	No action required.
QUESTION 2: Core Policy – Standard Requirements	1117, 1223, 1242	Mixed	I agree that the Village Clusters Plan should include a policy on standard requirements to ensure any developments are in line with core policies. This should also ensure that any development has consideration for protecting amenity and landscape areas, removing impacts on protected sites and features while ensuring a standard of developments are maintained.	In addition to the small number of 'Core Policies' that would apply to all of the sites in general terms, each allocated site will have an accompanying site allocation policy. This will set out how many dwellings that site is allocated for and also any specific requirements which development of the site needs to meet e.g. protection of particular features on the site (such as trees, pond, hedgerows etc.), address a particular constraint of the site (such as a change in levels), access from a particular point, protection of particular views or taking account of the impact on a specific heritage asset, etc. In addition it should be noted that each allocated site will be subject to a planning application where specialist reports, surveys etc. will be required in order to determine the application. As such, aspects directly relating to amenity will be addressed at the detailed design and planning stage, where the Council will be expected to assess the proposed development against relevant planning policy.	938	No action or change required.

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QUESTION 2: Core Policy – Standard Requirements	810	Support	Agree with 'standard requirements' and the criteria set out.	Support noted.	937	No action required.
QUESTION 2: Core Policy – Standard Requirements	50	Support	I support the inclusion of a policy on 'standard requirements' but I think that the criteria need to take into account the variations in access and sustainable transport solutions between clusters, in line with NPPF paragraph 103, and should therefore not be so prescriptive as to automatically exclude sites in clusters which are inherently more 'rural' than others.	Support noted. With regards to the 'access and sustainable transport', NCC Highways officers have been involved with the assessment of the sites prior to consultation and also provided technical advice as part of the Regulation 18. Advice has been sought relating to both site access and the impact of the proposed development on the wider highway network. Where appropriate, mitigation measures have been identified and would be incorporated into specific site allocation policy text.	935	No action required.
QUESTION 2: Core Policy – Standard Requirements	35	Support	Please add consideration for Sport Englands principles of Active Design including walkable routes and cycle paths, access to co-location of facilities as a means to go above and beyond to support the health and wellbeing of residents in the natural village environment.	Support noted.	934	Review and consider 'Sport Englands principles of Active Design' for policy inclusion. Review the necessity for and/or level of detail required in the Core Policy, reflecting the need to balance what is already contained in national policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.

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QUESTION 3: Core Policy - Design	518, 787, 889, 1044, 1225, 1259, 1350, 1484, 1675, 1776, 1820, 2024, 2153, 2159	Mixed	General comments submitted relating the inclusion of a design policy within the VCHAP focused on the need for additional requirements to be set out within this policy to ensure a more comprehensive policy. Respondents suggested that this policy should be expanded to include the following matters: a requirement for sustainable development and the highest design standards to help address climate change; schemes designed to capture and recycle run off water; development designed to maximise the use of solar panels, insulation and ground/air source heating; design to reflect the design and layout of existing settlements; development should take into account adjacent/ surrounding properties, including integration and accessibility; policy should recognise that specific site design will be quite different; specific reference should be made to the use of local and vernacular materials; reference should be made to heritage assets and their settings; a definition of "good quality design";	The additional topics and areas of concern that have been suggested for inclusion in a design policy within the VCHAP are noted, as are the comments relating to the clarity of the wording of the policy. The Council considers that the issues raised may be grouped into distinct topics – the design, layout and visual impact of new development, sustainable construction and design that addresses climate change and maximising opportunities for healthy living arising from new development. Whilst the Council acknowledges the importance of all of these issues, as well as the important role that it can taking in promoting sustainability and healthy living, tackling climate change and delivering good design through the planning process, consideration must also be given to the existing Development Plan and the current adopted policies which address these issues in order to avoid unnecessary repetition and complexity. The NPPF sets out the requirements for these matters to be addressed within the planning system with further detail being provided in the JCS, emerging Policy 2 of the GNLP and a number of different policies within the Development Management Policies. The Council will need to review these existing policies and determine whether any further design policies would add value to the Development Plan.	965	Review the necessity for and/or level of detail required in the Core Policy, reflecting the need to balance what is already contained in national policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.

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			parking specifications to reflect two car parking spaces per site as well as a specification for off-road parking; consideration should be given to the Landscape Character Assessments of the Broads Authority; reference should be made to the healthy living (e.g. opportunities for cycling, walking and life-long housing); and reference should be made to development schemes to be designed to reflect the Norfolk LLFA Developer Guidance, the Local Flood Risk Management Strategy and national policies on the management of flood risk. Additional points noted within the comments submitted in response to this question are: noting that an 'encouragement' of good quality design is not sufficient; the phrase "massing for the locality" is unclear and should be replaced; if possible existing residents should consider their own amenity to have been enhanced by new development; and correction of typographical error.			
QUESTION 3: Core Policy - Design	325, 816, 1445, 1453, 1479,	Mixed	Summary of objections submitted to response to the Design Policy:	The Council acknowledges that design policy guidance exists in a number of places within the existing Development	964	Review the necessity for and/or level of detail required in the

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	1584, 1638, 1754		No need for an additional policy on design - there should already be a sound development control process wherever development takes place; Existing policies should ensure development is of good design, of sustainable construction and in keeping with the local scale and character; Already addressed in the Development Plan and where this is silent on an issue one would revert to the NPF for guidance; Inclusion of [a design policy] would be repetitive and result in more complexity and possible ambiguity about the precedence of the different policies; The July 2021 NPPF includes key changes regarding design at a local level, particularly to reflect local character and design preferences – a design policy in the VCHAP would fail to provide the detailed guidance required by the NPPF; The VCHAP could be amended to refer the developer/ applicant to the relevant design guidance; Each village is a small environment and should be considered as such in its own right - a 'one size fits all' policy will result in poor design that is not in keeping with the local character; and Many sites are seeing high densities proposals which lead to poor design.	Plan and will need to ensure that any design policies contained within the VCHAP do not repeat these existing policies (which are considered to be up-to-date). The Council wishes to avoid adding complexity to the planning system and recognises the different local characters that exist throughout the District. As appropriate the Council will include detailed design guidance within the individual site allocation policies and as such the Council will need to review the need for any further design guidance within the VCHAP and the added value that this may/ may not bring to the Development Plan.		Core Policy, reflecting the need to balance what is already contained in national policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.

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QUESTION 3: Core Policy - Design	239, 940, 963, 1120, 1358, 1363, 1769	Support	Summary of comments submitted in support of a design policy: Miscellaneous comments: agree that achieving a high quality of design is paramount; support the application of the proposed criteria; developers in control of design; big developers should not be able to influence national standards to suit their requirements; support for opportunities for local small builders within the clusters; caution required for self build - these should be confined to small numbers away from village centres; developments on the edge of villages should be appropriate for the locality; Concerns about existing house design: design and build of many new properties is poor - small gardens, thin walls, tightly packed, little privacy, minimal environmentally friendly technology; developments are maximum profit; failure of recent new development to match the existing form in the village (eg., widespread use of cladding); quality in design and build required to improve standards; and inadequate parking provided within recent developments.	The Council acknowledges that many of the comments submitted in support of a design policy are in response to concerns about the design and form of recent housing developments. Whilst it is widely recognised that 'good' design is a subjective matter the importance of good design is clearly recognised by the Council as evidenced by the number of existing planning policies that seek to secure the delivery of well-designed schemes. When preparing schemes applicants are required to have regard to existing policies within the Joint Core Strategy, the Development Management Policies Document, the South Norfolk Place-Making Guide SPD and where relevant Conservation Area Appraisal and Neighbourhood Plans. Decision makers have regard to the detailed design of a scheme, including design, layout and materials when determining planning applications and these matters are often the subject of ongoing negotiations with the applicant during the application stage. However, whilst reflecting local character all new development must make efficient use of land, optimising the use of land for development purposes, in accordance with the requirements of the NPPF with planning applications failing to meet this requirement being refused. This principle also guides the form and design of new developments. Car parking standards are applied in	960	Review the necessity for and/or level of detail required in the Core Policy, reflecting the need to balance what is already contained in national policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.

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				accordance with the Norfolk County Council 'Parking Standards for Norfolk 2007' guidance, unless subsequent Neighbourhood Plans have provided updated parking guidance for applicants and decision makers. The Council considers that one of the benefits of promoting smaller sites throughout the District will be the opportunities for smaller housebuilders and the variations in form and design that will naturally result as a consequence. In accordance with planning policy developers will be encouraged to reflect the local context of site when preparing a scheme and where appropriate site specific allocation policies will include specific design requirements to inform development of the site. The Council will need to reflect on inclusion of a Design Policy in the VCHAP and ensure that any policy included does not repeat planning policies within the existing planning framework and that it adds value to the planning process.		
QUESTION 3: Core Policy - Design	811	Support	Agree, criteria are appropriate, subject to the phraseology being linked to the emphasis placed on good design in the National Planning Policy Framework (2021).	Support noted. In addition to site specific policy, sites will be assessed against the NPPF at the planning determination stage.	952	No action required.
QUESTION 4: Core Policy – Housing Mix	1233	Support	There must be a policy on housing mix. The Policy must require local assessment of housing needs, employment	The overall need for housing across Broadland, Norwich and South Norfolk has been undertaken through the Greater Norwich Local Plan (GNLP). This	999	Review the necessity for and/or level of detail required in the Core Policy, reflecting

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			opportunities and school capacity not a simple distribution across the South Norfolk area with housing mix determined by what Developers want to build or we will end up with the wrong houses in the wrong places. Addressing the climate emergency is a government priority and development must minimise the need for people to travel to work or school etc by motor vehicle by ensuring the right houses in the right places are built. Any policy must be enforceable and enforced.	assessment took account of employment opportunities. The GNLP plans for both housing and employment growth to ensure that they are aligned. More locally, South Norfolk Council is engaging with Norfolk County Council as education authority in respect of school capacity as part of the production of the Village Cluster Plan. The information provided around School Capacity is informing the distribution of proposed allocation site. The GNLP allocates just 9% of the overall planned growth to the Village Clusters across Broadland and South Norfolk. These areas currently contain 25% of the current housing stock. This is therefore not disproportionate and is illustrative of the fact that the majority of new growth toward larger settlements and the Norwich urban area. As set out above, approximately 25% of the the homes in Greater Norwich fall within the South Norfolk and Broadland Village Clusters . This percentage of population increases to 33% across the whole of the Eastern region. It is clearly necessary to establish sustainable transport solutions to for the significant rural population in order to achieve the government's Net Zero ambitions. The allocation of 9% of the homes planned for across Greater Norwich to an area containing 25% of the existing homes does not meaningfully increase the scale		the need to balance what is already contained in national policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.

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				of the rural transport sustainability challenge. It does however make a significant contribution to improving the availability of homes, including affordable homes, and diversifying the housing market that would not otherwise be achieved. The allocation of further homes may also help support local services and facilities such as shops, pubs and public transport services that need custom to maintain their vitality. In accordance with planning law, applications for development will be determined in accordance with adopted Local Plan policies unless material considerations indicate otherwise. This is an effective mechanism to ensure policies are enforced in proportionate way.		
QUESTION 4: Core Policy – Housing Mix	967	Support	All villages require a good balance of generations and therefore suitable housing must go with that. I fully support affordable housing and the grouping of such new houses near the village centre appears to work very well for the residents, some of which do not have independent transport. A mix of large and small houses and single storey are essential for those wishing to stay local as their circumstances change. More self builds are appearing which again is supported but number and location needs careful planning to avoid distress of neighbouring residents due to multiple 24/7 builds all at once.	The Council will require a mix of housing (size and tenure) in line with the needs identified in the Strategic Housing Market Assessment (SHMA) that supports the GNLP and the VCHAP. Whilst the Council is not likely to actively seek self- and custom-build units on allocations of fewer than 40 dwellings (in line with emerging GNLP policy), the Council cannot prevent plots being sold to self- or custom-builders, provided the requirements of the overall site allocation are met (e.g. in terms of infrastructure provision or affordable housing delivery). Similarly, the Council cannot prevent, and may actively	996	Review the necessity for and/or level of detail required in the Core Policy, reflecting the need to balance what is already contained in national policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.

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				support, windfall sites coming forward for self- or custom-build.		
QUESTION 4: Core Policy – Housing Mix	941	Support	Bunwell is very understanding and progressive towards affordable housing needs and a further specific development is currently in progress. This appears to work well rather than including such housing in say 1 hectare developments of a large mix of owned housing. Perhaps as mooted by Government, owners/developers should contribute to a local fund to support dedicated new affordable housing sites within the village setting, plus local authorities consider more actively housing for older people wishing to downsize.	The policy for exceptions housing will continue to run alongside the VCHAP allocations. However, the allocations in the VCHAP will be expected to deliver affordable housing on-site, in line with the requirements of current local plan policies (28% of units on qualifying sites) and the emerging GNLP (33% of units on qualifying sites outside Norwich). The Council will also seek a mix of house sizes that reflects the need in the Strategic Housing Market Assessment (SHMA) that supports the GNLP and VCHAP.	995	Review the necessity for and/or level of detail required in the Core Policy, reflecting the need to balance what is already contained in national policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.
QUESTION 4: Core Policy – Housing Mix	1755	Object	Hempnall Parish Council does not support the Village Clusters approach - see our detailed response to Question 1	Hempnall Parish Council's representation in relation to Q1 has been responded to separately under that question. For the sake of brevity that response is not repeated here.	994	No further action necessary.
QUESTION 4: Core Policy – Housing Mix	2155	Support	Support the need for a policy on housing mix (Policy SNVC3)	The support for the proposed policy is noted and welcomed.	992	Review the necessity for and/or level of detail required in the Core Policy, reflecting the need to balance what is already contained in national policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.

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QUESTION 4: Core Policy – Housing Mix	1121, 1770	Mixed	Particular attention should be given to providing accommodation that is attractive to older people wishing to downsize. There should be communal facilities such as visitor accommodation and flexible support arrangements. There are many large houses that are occupied by single elderly residents, these houses would become available for families if better alternatives were provided for the elderly.	Across the Greater Norwich area consideration is given to the needs of older people's accommodation; however, the scale of development in most village cluster settlements is unlikely to support sites which include communal facilities. This would not preclude specialist providers from purchasing allocated sites to deliver older people's housing; however occupancy would not be restricted to local residents.	991	Review the necessity for and/or level of detail required in the Core Policy, reflecting the need to balance what is already contained in national policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.
QUESTION 4: Core Policy – Housing Mix	1777	Comment	Yes, probably. However, I recognise that the provision, or otherwise, of affordable/subsidised/rented council property/etc housing is a political decision to be made by elected representatives. My own power to influence such decisions is at the ballot box.	The respondents representation covers a number of issues. This response relates only to the elements of the representation that relate to question on the Housing Mix Core Policy. Other elements of the representation are responded to separately within the appropriate question. The Council considers it important that it seeks the view of the public on emerging local plans to help inform its decisions. Nonetheless, the Council remains the Local Planning Authority and the remains the final arbiter on the content of the Draft Plan that will be submitted for Independent Examination.	990	Comments noted. No further action required.
QUESTION 4: Core Policy – Housing Mix	524, 1157	Comment	These comments pertain to Wrenningham. Whilst maintaining a mix of housing is desirable any development should recognise that there is no public transport and therefore any new resident needs access to their own personal transport. This immediately precludes many of the	The settlements where allocations are proposed through the VCHAP are those which have a basic range of local services; however, the specific mix will be considered through any subsequent planning application for the site.	989	Review the necessity for and/or level of detail required in the Core Policy, reflecting the need to balance what is already contained in national

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			potential future residents on the basis of cost and/or infirmity			policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.
QUESTION 4: Core Policy – Housing Mix	812	Comment	Agree, although additional criteria could suggest that ‘in determining the appropriate mix and type of housing regard will also be had to the character and form of existing housing in the locality of the site’.	The support is welcomed. It is important to balance the needs to meet the specifically evidenced need for housing against concerns over character and appearance. Policies related to protecting the character and appearance of the area are set out elsewhere and in the determination of a planning application would be considered concurrently with any policy on housing mix. It is not necessary to repeat considerations to ensure they are taken into account. The decision maker on any application will make a judgement on the planning balance between any conflict between competing policies. This is common to the decision making process on planning applications.	988	Review the necessity for and/or level of detail required in the Core Policy, reflecting the need to balance what is already contained in national policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.
QUESTION 4: Core Policy – Housing Mix	1359, 1364, 1447, 1454, 1481, 1585, 1639	Mixed	Do not support the inclusion of a policy on Housing Mix on the basis that policies in existing and emerging plans are already sufficient.	It is acknowledged that current and emerging local plan policies already set out requirements in terms of housing mix and affordable housing; however, the Regulation 18 consultation was giving consideration to whether more detail could be included for the village cluster locations in terms of particular requirements e.g. for a proportion of single story development.	987	Review the necessity for and/or level of detail required in the Core Policy, reflecting the need to balance what is already contained in national policy, the GNLP and existing Development Management Policies with the desire to

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						achieve high quality development.
QUESTION 4: Core Policy – Housing Mix	326, 788, 817, 890, 1046, 1274, 1351, 1486, 1676	Mixed	Concerned that the mix of housing will not meet the requirements of local communities, in particular a lack of affordable housing and an over provision of larger 'executive' homes.	The overall need for housing and the numbers for the VCHAP are set out in the GNLP. The housing mix across the Greater Norwich area, in terms of the size and tenure of dwellings, is set out in the Strategic Housing Market Assessment (SHMA) that supports the GNLP and VCHAP. The submitted GNLP policies currently seek 33% affordable housing on qualifying sites outside of Norwich. Under para 64 of the NPPF the Council cannot seek affordable housing on sites which are 'not major', i.e. smaller than 10 dwellings or 0.5ha, hence the approach across Greater Norwich of allocating sites of 12+ units to help ensure the delivery of affordable units. Smaller, windfall sites will still be expected to deliver a mix of house sizes (as appropriate to the context of the site), but not affordable units. Scope also exists within existing and emerging planning policy for 'exceptions' site housing on sites outside of Development Boundaries/Settlement Limits, which meet a specifically identified local need.	985	Review the necessity for and/or level of detail required in the Core Policy, reflecting the need to balance what is already contained in national policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.
QUESTION 4: Core Policy – Housing Mix	519	Object	CPRE Norfolk does not agree there is a need for a Village Clusters Plan for the reasons stated in Q1. If, despite this, the Village Clusters Plan goes ahead it should	The matters raised by CPRE in relation to Question 1 have been responded to separately.	982	Review the necessity for and/or level of detail required in the Core Policy, reflecting

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			only allocate new sites for housing which meet a clearly demonstrable need. This need is highly unlikely to be for large 'executive-style' houses which have tended to proliferate in small housing developments across South Norfolk villages in recent years: these houses should not be part of the SNVCHAP. Instead, mechanisms should be in place to ensure that needed affordable housing in particular is provided.	The allocations made within the Village Cluster Plan are made to meet the locally assessed need for market and affordable housing as identified through the Greater Norwich Local Plan (GNLP). The emerging Homes policy of the Greater Norwich Local Plan (GNLP) requires development to provide for a range of homes for all sectors of the community, based on the latest housing evidence. This will help to ensure that the types and size of homes is consistent with the latest evidence of need. The approach taken within the Village Cluster plan seeking to allocate only sites that would be able to provide for affordable homes in line with emerging GNLP policy requirements.		the need to balance what is already contained in national policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.
QUESTION 4: Core Policy – Housing Mix	240	Support	People want to live in a rural location, so you take the rural location and build on it. Great! However, there should be properties to suit an aging population. Young people, in my opinion, still prefer to live closer to a city environment with easy access to nightlife and facilities. We also need more doctors/dentists/care facilities, not just houses.	The emerging Homes policy of the Greater Norwich Local Plan (GNLP) requires development to provide for a range of homes for all sectors of the community, based on the latest housing evidence. This would include older persons. In addition, the emerging Homes policy of the GNLP also seeks to ensure the delivery of specialist older persons accommodation and for 20% of homes on sites of 10 or more dwellings to meet the M4(2) standard or accessible and adaptable homes. This will help ensure that homes are suitable for older persons, amongst others. As part of its infrastructure planning function, including consideration of	981	Review the necessity for and/or level of detail required in the Core Policy, reflecting the need to balance what is already contained in national policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.

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				infrastructure needs during the preparation of the GNLP and the Village Cluster plans, the Council has engaged engaged with health colleagues and other services providers to help ensure that services are able to meet the demands of a growing and aging population. In combination, the GNLP and Village Cluster Plans will provide for a range of housing opportunities in both urban and rural areas. This will address the locally assessed need for housing and provide increased choice and opportunity to meet people's housing needs and demands.		
QUESTION 4: Core Policy – Housing Mix	217	Comment	Small housing patches (25 properties) have less revenue generation for the developers to provide new community services, and affordable provision is often whittled away as development commences. These commitments often ‘evaporate’! Housing size? Too often these properties are sized parsimoniously and have no generosity in room sizes, let alone family friendly gardens. Poorly designed sewers lead to garden space blighted by manhole covers. People will still tend to prefer older residences where there is more scope to change and adapt their home. Will efficient modern property standards be imposed, so replacement windows (example) will not be needed soon. Solar panel technology and placement pre-planned?	The representation covers a number of matters, including comments on a specific site. This summary under this question and response relates only to those elements of the representation that concerns the matter of the housing mix core policy. Issues raised in relation to specific sites are addressed in responses within the particular question relating to that site. The Council is preparing viability evidence alongside the preparation of the plan, this indicates that development of the type allocated within the plan is typically viable taking account of policy requirements. The emerging Greater Norwich Local Plan (GNLP) proposes that all new development must meet nationally	980	Review the necessity for and/or level of detail required in the Core Policy, reflecting the need to balance what is already contained in national policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.

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			We have had much experience of new housing and its limitations (incl. unadopted roadways, small garden plots, over-development etc.), and would hope that new build standards for the 21st century might try to provide homes that will endure, and be loved into the future, not just the next poor housing level that needs tearing down within thirty years.	prescribed space standards. Government continues to progress its Future Homes and Building standards through revisions to the building regulations. The purpose of these changes is to future-proof homes with low carbon heating and high standards of energy efficiency. As these standards are being progressed through separate regulation there is no need for such requirements to be set out in the Village Cluster Plan. The Council is preparing specific evidence in the form of a Water Cycle Study to assess whether new development can be adequately served by waste water infrastructure. Whilst some people may prefer to purchase older housing stock, there are not currently enough homes to meet future needs and demands and not all people are able to meet their needs through market housing. Therefore it is necessary to plan to provide the objectively assessed need for additional market and affordable homes, which is what the Village Cluster Plan seeks to do.		
QUESTION 4: Core Policy – Housing Mix	51	Support	I support the inclusion of a policy on 'housing mix', but it must include provision for self-build and custom housebuilding. There should be a specific provision for self-build and custom housebuilding in the 'housing mix' policy to ensure that such	The emerging Greater Norwich Local Plan (GNLP) proposed a requirement for 5% of dwelling on all residential sites of 40 or more dwellings and supports self and custom build housing through the proposed small scale windfall exception policy. The South Norfolk Village Cluster	978	Review the necessity for and/or level of detail required in the Core Policy, reflecting the need to balance what is already contained in national

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			sites are adequately accommodated when choosing preferred sites.	plan is considering amendments and rationalisations of settlement limits that will provide further scope for infill windfall developments of the type suitable for self and custom build housing. It is not considered that further provisions beyond these requirements is needed to meet the overall need for self and custom build homes and making further specific requirements of small allocations may impact on the ability of sites to meet other housing needs, such as affordable housing.		policy, the GNLP and existing Development Management Policies with the desire to achieve high quality development.
QUESTION 4: Core Policy – Housing Mix	205	Support	There should be more council houses as Alington is currently under a rural exemption, which means I can buy my council house.	The Council welcomes the support and intends to plan to meet both market and affordable housing needs. This will not however change the rules around the right to buy in designated rural areas, which is the subject of separate regulations.	977	No action necessary.
QUESTION 174: Monitoring Framework	821	Support	Agree with the monitoring framework	Support for the proposed monitoring framework is noted	959	No action required
QUESTION 174: Monitoring Framework	896, 1119, 2064	Comment	Comments submitted in response to the proposed monitoring framework: Agree with the proposed framework; Agree that it is essential the plan is monitored; Monitoring should include detailed monitoring of essential plan features (for example, affordable housing); Metrics chosen should be meaningful to	The Council recognises that a limited number of comments has been submitted in response to the proposed monitoring framework. Those comments received relate to two distinct areas: (1) the effective monitoring of affordable housing; and (2) monitoring of the historic environment. Additional comments have also been submitted relating to the mix of housing on sites throughout the village cluster area. The Council considers that this latter point relates	950	No actions required

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			the objectives of the Plan (for example, percentage of affordable housing and take-up rather than the number of builds); Concern that proposed wording means that an insufficient number of affordable homes will be delivered - current proposal suggests that affordable housing will be in accordance with the GNLP requirements but this should be changed to a firm figure (such as 50%); Clusters should concentrate on smaller properties for families and specifically avoid executive 5-bed houses - if required these properties could be delivered on developments of 5 dwellings or under; and recommend that the monitoring framework includes an indicator for the historic environment.	better to Question 4 (Housing Mix Policy) however to confirm the Council's position on this issue sites allocated within the VCHAP will be expected to accord with the current evidence relating to housing requirements (e.g., the SHMA) in order to ensure that the dwellings delivered on sites reflect the identified needs throughout the District in a proportionate manner. Appropriate evidence would be required to depart from this strategy however it is not considered reasonable to concentrate larger properties on smaller sites only as this would be unreasonably restrictive and result in a distribution that fails to address local need. Restrictions that limit the provision of larger dwellings to smaller sites only may also impact on the integrated delivery of affordable housing across the District. Affordable housing: With regards to the level of affordable housing to be provided on sites the current indicator seeks to monitor the provision of affordable housing in accordance with the requirements set out in emerging Policy 5 of the Greater Norwich Local Plan (33% across the plan area). Viability studies undertaken to inform this figure have indicated that smaller sites throughout the village clusters are only marginally viable at 33% affordable housing therefore increasing this percentage requirement may result in sites becoming unviable. Furthermore, the SHMA sets out the affordable		

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				housing requirements at district level and if taken in isolation the requirement for the South Norfolk area would be lower than that currently set out in GNLP Policy 5. The Council's Housing Enabling Officer has confirmed that take-up of affordable housing within South Norfolk by persons requiring affordable housing has always been 100%. The Council seeks to ensure that negotiations for the delivery of affordable housing ensure that the type and tenure of affordable housing will be genuinely affordable. The Council does not currently have an adopted planning policy securing a local connection cascade for the occupancy of affordable housing although there is a Cabinet policy seeking a local connection cascade for s106 properties. It should be noted that the Council does not always have discretion over local connection cascades. The Council considers that setting the affordable housing monitoring indicator in accordance with the GNLP policy requirements is appropriate and is therefore not proposing to amend this indicator. The Council does not consider it appropriate to monitor local connection occupancy of affordable housing as part of the VCHAP Monitoring Framework. Historic England: The Council has considered the merits of including a monitoring indicator relating to the historic environment as part of the		

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				VCHAP Monitoring Framework, noting the historic environment monitoring indicators currently in place as part of the South Norfolk Development Management Policies Document and the emerging GNLP Monitoring Framework. The existing monitoring indicators seek to reduce the numbers of buildings at risk, including both listed buildings and Scheduled Ancient Monuments on the Buildings At Risk Register, as well as monitor the number of planning permissions granted that result in improvements to heritage assets. The Council considers that these are the most appropriate monitoring indicators for the historic environment and that repetition of these in the VCHAP would be unnecessary. It is unclear how monitoring the impact of site allocations on the significance of a heritage asset would be achieved and whether this would add any additional value to the existing heritage monitoring indicators. As such no additional monitoring indicators relating to the historic environment are proposed at this time.		

Alburgh & Denton

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QUESTION 6: Should any of the rejected sites be allocated?	1391	Comment	No comment on specific site but please consider infrastructure implications in East Suffolk.	These comments are noted and it will be necessary initially to determine whether these third parties provided representations to the Regulation 18 consultation. However, specifically in terms of observations relating to the potential impact of site allocations on education facilities within adjacent settlements in the Suffolk area enrolment in primary schools would be managed through a combination of parental choice and alternative schools as many children now attend schools out of their catchment areas. Similarly, whilst many GPs can offer registrations for patients who reside outside their area these registration applications can be refused on appropriate grounds (including being closed to new patients) which can help to mitigate the impact of new development on these practices. The existing pressures on the NHS and GP practices within the area are however recognised.	864	Review whether the Integrated Care System (ICS) and Suffolk County Council provided representations during the Reg 18 consultation. Engage with these bodies as appropriate.
QUESTION 6: Should any of the rejected sites be allocated?	1920	Comment	Part of the Parish is located within the Waveney, Lower Yare and Lothingland IDD. The Board's byelaws apply to any new developments within the IDD.	Comments noted.	863	No action required.
QUESTION 6: Should any of the rejected sites be allocated?	1833, 1834, 1835, 1836	Comment	SN4031SL, SN00168, SN4011 and SN00193: The Environmental Protection Team are not aware of any significant land quality issue with the site or adjacent land.	Comments noted.	862	No action.

Alpington, Yelverton and Bergh Apton

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QUESTION 7: Settlement Limit	1707	Comment	The assessment of Site SN1012 has failed to take into account a number of factors and this site should be included in the extended settlement boundary because: 1. Insufficient consideration has been given to this part of the settlement contributions to rural growth under NPPF para 79; 2. The site is within walking distance of Green Pastures, which includes farm shop, cafe and Post Office, as well as bus services on the A146; 3. There is a public footpath to the school which avoid walking on carriageway or pavement, in any event the road is class C with a 30mph limit; 4. The junctions at either end of Mill Road are of a similar standard to those elsewhere in the cluster which would be used to access the preferred sites; 5. The frontage of the site would be in keeping with the linear pattern of development along Mill Road.	1. This part of Alpington/Bergh Apton has an existing Development Boundary which was subject to a small Settlement Limit extension in the 2015 Local Plan. As such, the Council has not discounted this area from contributing to future growth; 2./3./4. The site assessment acknowledges that the site is within walking/cycling distance of Green Pastures and the A146 bus stops. However the Highways Authority is concerned about the distance from other services, the lack of footways, the fact that Mill Road is narrow in places and the standard of the junctions at each end of the road. The road is also unlit. Whilst a public footpath does exist from the site to Alpington Village (which then has pavements to the school), the majority of the 1.4km distance would be on unmade, unlit footpath, which bisects a group of working farm buildings. As such it is unlikely to be an attractive walking route for primary school children; 5. Developing the frontage of the site would broadly be in keeping with the form of development on Mill Road. However the frontage of the site includes substantial trees/hedging, which contribute to the character of the area, and it has not been demonstrated	704	No action required.

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				that the site could be accessed without the detrimental loss of these features.		
QUESTION 7: Settlement Limit	192, 1002, 1003, 1605	Comment	1. Roads in and out of the village are not able to support increased development. 2. Infrastructure and public transport is insufficient to support new development and Alington school is full.	1. Norfolk County Council, as Highway Authority has considered the scale of development proposed through the VCHAP and not raised a concern in terms of the levels proposed in this cluster. 2. The villages has access to a range of basic services, including village hall, school, pub, farm shop with Post Office, bus services (OurBus services through the village and more extensive services on the A146), and football club. Norfolk County Council have confirmed that, taking into account falling rolls and out of catchment pupils, there is not a capacity issue at Alington School. There is no evidence that infrastructure in the village (such as broadband and utilities) cannot support the level of development proposed.	703	No action required.
QUESTION 7: Settlement Limit	139, 513	Object	1. Access to the Church Meadow site is too narrow and roads in the village generally are too narrow. 2. Alington has limited facilities, the school is over capacity; 3. Concern over the loss of habitat at Church Meadow; 4. Access to the Footpath on the Church Meadow site.	1. Norfolk County Council, as Highway Authority has considered the scale of development proposed through the VCHAP and not raised a concern in terms of the levels proposed in this cluster. The direct access to the site was not a refusal reason in the 2015 application decision for 21 dwellings on the Church Meadow site (which was principally refused for being outside the Development Boundary with no overriding need demonstrated for the development), however some localised improvements at Church Road may be	702	Confirm with the Highways Authority whether off site works at Church Road are be required.

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				required, 2. Alington has access to range of basic services, including village hall, school, pub, farm shop with Post Office, bus services (OurBus services through the village and more extensive services on the A146), and football club. Norfolk County Council have confirmed that, taking into account falling rolls and out of catchment pupils, there is not a capacity issue at Alington School. 3. The site is not a designated wildlife site and there is no evidence that the site is of particular importance for protected species or that open space and landscaping on the site could not be used to enhance biodiversity. 4. Yelverton footpath FP4 runs immediately north of the site, but there are no public rights of way within the site itself.		
QUESTION 7: Settlement Limit	133, 178, 180, 211, 214, 298, 473, 626, 1034, 1112, 1168, 1183, 1252, 1341, 1361, 1395	Object	1. Highways concerns - ability of existing roads in/out of the villages to cope; lack of footways; speeding traffic. 2. Lack of local services - no shop/only shop is farm shop; school at/over capacity; no GP; limited bus service. 3. Development should be on brownfield sites first/loss of habitat; 4. Changing the character of the village(s);	1. Norfolk County Council, as Highway Authority have considered the scale of development proposed through the VCHAP and not raised a concern in terms of the levels proposed in this cluster. Whilst many areas do not have footways, the centre of Alington which contains the main facilities (village hall, school, pub, bus stops, football club) do have footways, and new development would connect to/extend these where possible. Existing speeding traffic should be addressed through other mechanisms.	701	No action required.

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				2. The villages have a range of basic services, including 2 x village halls, school, pub, farm shop with Post Office, bus services (OurBus services through the villages and more extensive services on the A146), and football club. Norfolk County Council have confirmed that, taking into account falling rolls and out of catchment pupils, there is not a capacity issue at Alington School. Ongoing discussions are taking place with the local NHS Integrated Care System over capacity within GP services. 3. The GNLP takes an approach of maximising development on brownfield sites, and one of the two proposals in this Cluster is brownfield. However, the scale of development required to 2038 cannot be accommodated via the reuse of existing buildings or on brownfield sites. 4. Under the GNLP the level of growth proposed in the Village Clusters (9%) is significantly lower than the percentage of the population that already lives in those parishes (25%), consequently the impacts on the character of those settlements is considered proportionate. The choice of sites will also aim to minimise those impacts.		
QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	1179	Object	Objection	Objection noted.	821	No action required.

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QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	548	Support	The allocation is supported. Technical work supporting a previous planning application demonstrates that: - the site, though mitigations including potential highway widening and haunching works can be adequately accessed and traffic from an additional (up to) 25 homes would not have a severe impact on the local highway network; - construction traffic can be managed by a construction management plan; - the site can be adequately drained to not cause a risk of flooding on site or elsewhere; - that there are no ecology or heritage concerns; and that the site would not have a detrimental landscape impact due to its enclosed nature.	Comments noted.	798	Confirm with the Highway Authority the extent of any necessary off-site works.
QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	1335	Support	Out of the three I feel that SN0400 is the best site and will be the least dangerous to both schoolchildren at the school along with the vehicles dropping them off along with the least disruptive for transport of building materials off the A 146.	Comments noted.	797	No action required.
QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	2187	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Site appears to be used for grazing and is surrounded on all sides by hedges (priority habitat). The site partly lies within the	Comments noted.	796	Consider the need for the allocation Policy to specifically reference the hedgerows bordering the site.

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			amber zone for DLL and a PROW runs to the north of the site. A search of MAGIC reveals there are no other priority habitats onsite.			
QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	2088	Comment	Mitigation required for heavy constraints. Standard information required at a planning stage. The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. The on-site flood risk forms the start of a moderate flow path in the 0.1% AEP event, dissecting the site south-north to roughly the north-centre of the site. Flow lines indicate this flood water flows south off of the site, contributing to a major flow path south of the site. We advise this must be considered in the site assessment. A large area of the site is unaffected by flood risk and has the potential to be developed. Assessment: Green	Comments noted. The site is allocated at a low density of 14 dwellings/ha, to allow the site to accommodate/mitigate the identified flow path.	795	Allocation policy to reflect the need to accommodate the surface water flow path.
QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	2028	Comment	Although this site is located quite close to the grade I listed St Mary's Church, the site is tucked behind existing development and so the impact on the heritage asset and its setting would be minimal.	Comments noted.	794	No action required.

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QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	1921	Comment	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).	Comments noted.	792	No action required.
QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	1837	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, then an alternative condition could be attached to any approval requiring its implementation.	Comments noted.	791	No action required.

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QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	319, 614, 1004, 1005, 1074, 1186, 1390	Comment	1. Highways - inadequate/narrow roads in/out of the village, lack of footways in parts of the village with consequent environmental/safety concerns, needs a wider 20mph limit. 2. Lack of local facilities, particularly capacity issues at the school. 3. Housing needs to be a mix, including affordable units. 4. Environmental/biodiversity concerns.	1. Norfolk County Council, as Highway Authority has considered the scale of development proposed through the VCHAP and not raised a concern in terms of the levels proposed in this cluster. Whilst many areas do not have footways, the centre of Alington which contains the main facilities (village hall, school, pub, bus stops, football club) does have footways, and new development would connect to/extend these where possible. 2. The cluster has a range of basic services, including village halls, school, pub, farm shop with Post Office, bus services (OurBus services through the villages and more extensive services on the A146), and football club. Norfolk County Council has confirmed that, taking into account falling rolls and out of catchment pupils, there is not a capacity issue at Alington School. 3. The mix of houses, including the proportion of affordable units will need to reflect the core policies within the VCHAP and the other policy requirements in place at the time of any planning application. 4. The GNLP takes an approach of maximising development on brownfield sites, and one of the two proposals in this cluster is brownfield. However the scale of development required to 2038 cannot be accommodated via the reuse of existing buildings or on brownfield	784	Confirm with the Highway Authority any necessary off-site Highways requirements. Consider allocation policy criterion relating to the protection of existing trees and hedgerows bordering the site.

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				sites. The site itself is not identified as being of significance in wildlife conservation terms, however the protection of existing trees and hedgerows can be made a requirement in the allocation policy for the site.		
QUESTION 8: Preferred Site - SN0400, Church Meadow, Alington	98, 99, 132, 138, 183, 185, 190, 193, 195, 196, 198, 199, 202, 206, 212, 213, 225, 253, 274, 287, 288, 291, 313, 367, 415, 425, 426, 488, 503, 624, 865, 879, 916, 1030, 1032, 1033, 1065, 1113, 1169, 1187, 1339, 1342, 1365, 1397, 1408, 1596, 1611, 1730	Object	1. Highways - narrow, poor quality roads in/out of the village, limited pavements, with consequent concerns re safety and environmental damage. Church Meadow too narrow and existing parking problems. Church Meadow/Church Road junction, busy due to bus stops (inc. secondary school pick up) and village hall opposite. Speeding traffic in the village. Parking issues at the primary school. 2. Facilities - lack of local facilities/bus services, with particular concerns about capacity at the school; 3. Environment/biodiversity issues - greenfield site, impact on trees and hedgerows, need for environmental features as part of the new development; 4. Impacts on immediate neighbours - noise, loss of light and privacy. 5. Public Right of Way across the site 6. Site outside the Development Boundary 7. Drainage problems on site/waste water disposal issues. 8. Impact on the character of the area/village.	1. Norfolk County Council, as Highway Authority has considered the scale of development proposed through the VCHAP and not raised a concern in terms of the levels proposed in this cluster. Whilst many areas do not have footways, the centre of Alington which contains the main facilities (village hall, school, pub, bus stops, football club) does have footways, and new development would connect to/extend these where possible. Similarly no concerns have been raised about the adequacy of Church Meadow, although the previous planning application for the site did raise the need for some off-site highways improvements. Existing speeding traffic should be addressed through other mechanisms. 2. The cluster has a range of basic services (the majority of which are close to the site) including village halls, school, pub, farm shop with Post Office, bus services (OurBus services through the villages and more extensive services on the A146), and football club. Norfolk County Council has confirmed that, taking into account falling rolls and out of catchment pupils, there is not a capacity issue at Alington School. Ongoing discussions are taking place	783	Confirm with the Highway Authority what offsite highways works might be required (including possible widening of Church Road and crossing between Church meadow and the Village Hall). Consider the inclusion of criteria within the allocation policy regard the protection of existing trees/hedgerows (depending on the wording of core policies) and links to the footpath to the north of the site.

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			9. Need for a mix of homes.	with the local NHS Integrated Care System over capacity within GP services. 3. The GNLP takes an approach of maximising development on brownfield sites, and one of the two proposals in this cluster is brownfield. However the scale of development required to 2038 cannot be accommodated via the reuse of existing buildings or on brownfield sites. The site itself is not identified as being of significance in wildlife conservation terms, however the protection of existing trees and hedgerows can be made a requirement in the allocation policy for the site. There is no justification for the inclusion of specific features, over and above the requirements of national and local policy. 4. The site is 1.87ha, and development of 25 dwellings would represent a net density of less than 14 dwellings/hectare (lower than the existing Church Meadow/Priory Close/St Mary's Close estate), as such there would be sufficient scope to ensure the development does not adversely impact the amenity of neighbouring properties. However, detailed issues, such as the use of one or one and half story dwellings would be dealt with at the planning application stage in the context of existing national and local policy to maintain residential amenity. 5. There is no Public Right of Way		

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				definitive County map, other than that just outside of the site to the north. However the allocation policy for the site could include a requirement to link Church meadow to the existing footpath across the north east corner of the site, to increase the connectivity in the area. 6. The process of preparing the VCHAP encompass changing the Development Boundary where appropriate. 7. Both a Stage 2 Strategic Flood Risk Assessment and addendum to the GNLP Water Cycle Study are being prepared to support the VCHAP, taking on board the views of the LLFA, Environment Agency and Anglian Water. 8. The scale and density of development is considered proportionate in the context of the level of growth required across the GNLP area. The site assessment process has indicated that this site is suitable as a visually contained site which does extend into the open countryside. 9. The mix of houses, including the proportion of affordable units will need to reflect the core policies within the VCHAP and the requirements in place at the time of any planning application.		
QUESTION 9: Preferred Site - SN0529SL, Nichols Rd, Alington	900	Comment	Site SN0529SL is in a sustainable location with services and facilities available in the local area, the land is immediately available, and the owner is committed to the development of the site.	Comments noted.	774	No action required.

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			An experienced local development company, Crabtree Living Limited have been in discussions to bring the development forward, they are looking to progress a scheme to bring a high-quality development that respects the area and enhances the village.			
QUESTION 9: Preferred Site - SN0529SL , Nichols Rd, Alington	2188	Comment	Rating: Green no major ecological constraints identified from desk-top search. Part of agricultural field to south of dwellings. No priority sites identified (see MAGIC) but aerial image on google out of date (2008). Site located in green risk zone for great crested newts (Identified by Natural England). Site in a SSSI IRZ, but residential development is not identified as a trigger for consultation with Natural England.	Comments noted.	773	No action required.
QUESTION 9: Preferred Site - SN0529SL , Nichols Rd, Alington	2122	Comment	Few or no constraints. Standard information required at a planning stage. The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Assessment: Green	Comments noted.	772	No action required.
QUESTION 9: Preferred Site -	1922	Comment	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment.	Comments noted.	771	No action required.

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SN0529SL , Nichols Rd, Alington			Minor development – no further comments			
QUESTION 9: Preferred Site - SN0529SL , Nichols Rd, Alington	1838	Comment	The Environmental Protection Team is not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, an alternative condition could be attached to any approval requiring its implementation.	Comments noted.	770	No action required.
QUESTION 9: Preferred Site - SN0529SL , Nichols Rd, Alington	1006	Comment	1. The school is already at capacity. 2. There has been recent housing development close to this proposed site and further development would cause increased level of traffic which cannot be supported by the roads.	1. Norfolk County Council has confirmed that, taking into account falling rolls and out of catchment pupils, there is not a capacity issue at Alington School. 2. Subject to extending the existing pavement to the site and potentially some limited widening of Nichols Road,	769	No action required.

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				the Highways Authority has not objected to this scale of development in this location.		
QUESTION 9: Preferred Site - SN0529SL , Nichols Rd, Alington	194, 200, 299, 615, 1018, 1029, 1037, 1066, 1170, 1181, 1253, 1340, 1343, 1366, 1393, 1606, 1617	Object	A number of concerns were raised about the site: 1. Highways - Nichols Road is narrow and used by walkers and cyclists, road network generally is unsuitable for additional development, parking for the school already causes problems. 2. Lack of services/facilities in the village, including capacity issues at Alington School. 3. Loss of greenfield/agricultural land/habitat/biodiversity, including a frontage oak tree, would require extensive landscaping where it faces the open countryside; 4. Loss of light/privacy for existing residents; 5. Impact on the landscape/character of the area.	1. Subject to extending the pavement to the site access, and potentially some road limited widening, the Highways Authority do not object to this scale of development in this location; 2. The village has a range of basic services, including village hall, school, pub, farm shop with Post Office, bus services (OurBus services through the villages and more extensive services on the A146), and football club. Norfolk County Council have confirmed that, taking into account falling rolls and out of catchment pupils, there is not a capacity issue at Alington School; 3. The GNLP takes an approach of maximising development on brownfield sites, and one of the two preferred allocations in this cluster is brownfield. However the scale of development required to 2038 cannot be accommodated via the reuse of existing buildings or on brownfield sites only. The use of this site would not prejudice the continued use of the rest of the field for agricultural purposes. There is no reason why the site cannot be accessed from the northern end, avoiding the need to remove the frontage oak tree and the use of appropriate landscaping can increase the biodiversity of the site; 4. The site offers plenty of scope for	723	No action required.

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				sufficient distances to be maintained to nearby properties. If the levels of the site are an issue, this could be addressed at the planning application stage through development which is one or one and a half story; however, there is no indication that this will be necessary. 5. The site will have a limited impact on the immediate landscape. However, the proposal does not extend development any further south on Nichols Road than the existing housing; as such, longer distance views will be read in the context of the school and existing houses.		
QUESTION 9: Preferred Site - SN0529SL , Nichols Rd, Alington	489, 1090, 1541	Support	Support for the site, for reasons including: 1. In keeping with the form and character; 2. Close to local facilities; 3. Least impact on the village; 4. Developer confirms the site is available and deliverable.	Comments noted.	722	No actions required. Site is proposed as a Settlement Limit extension, therefore there will be no specific allocation policy.
QUESTION 10: Preferred Site - SN0412REV, Former concrete works, Church Rd, Bergh Apton	2015	Comment	Located within 250 metres of an existing landfill that could result in the nearby community being exposed to impacts including odour, noise, dust and pests. The severity of these impacts will depend on the size of the landfill, the nature of the waste it takes and prevailing weather conditions. Planning policy requirements (paragraph 182 of the National Planning Policy	The site is approx. 200m north (at its closest point) of the closed and restored landfill sites, NE of Hillside Farm, Wellbeck Road. Only the Norfolk Council Council's household waste site on Wellbeck Road, over 800m from the proposed allocation, remains open. A number of existing properties are already in closer proximity to the closed landfill than the proposed allocation.	715	Confirm with Environmental Protection that there are no outstanding issues with the closed site.

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			Framework (NPPF)) state that new development should integrate effectively with existing businesses and not place unreasonable restrictions upon them.			
QUESTION 10: Preferred Site - SN0412REV, Former concrete works, Church Rd, Bergh Apton	1923	Comment	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).	Comments noted.	714	No action required at this stage.
QUESTION 10: Preferred Site - SN0412REV, Former concrete works, Church Rd, Bergh Apton	1839	Comment	The Environmental Protection Team is aware that this is a brownfield site which has been subject to uses that have the potential to give rise to significant land quality issues. Having regard to this, along with the size of the site and sensitivity of the proposed development it is considered that a Detailed Land Contamination Report (Phase One and Phase Two) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be applied.	Comments noted.	713	Identify a Detailed Land Contamination Report (Phase One and Phase Two) as part of the Policy requirements for the site.
QUESTION 10: Preferred Site - SN0412REV, Former concrete	919, 1118, 1192, 1288,	Comment	General support for building on a brownfield site, rather than further greenfield land. Subject to various caveats:	1. Whilst the Highways have some concerns about the site, it is also acknowledged that the site has a previous industrial use, with the	712	Seek clarification from the Highways Authority as to what local

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works, Church Rd, Bergh Apton	1344, 1618, 1620		1. Highways - Parish Council generally supportive, subject to some local improvements. However, also some concerns raised re the volume of traffic and the 60mph limit; 2. High proportion affordable units; 3. Too many houses proposed - implications for mains drainage capacity, 4. Would wish to be consulted on detailed designs	associated traffic generation which can be offset against development traffic. 2. The proportion of affordable housing sought will be consistent with the percentages in Planning Policy at the time of any planning application however see also (3.) below. 3. The Brownfield nature of the site, with associated remediation costs, means that a substantially smaller development would be unlikely to be viable, particularly if a policy compliant level of affordable housing is also going to be achieved. A Water Cycle Study is being prepared to accompany the Regulation 19 version of the VCHAP, in consultation with Anglian Water, which aims to identify any pinch points in waste water disposal. 4. Detailed design would be dealt with at the Planning Application stage, and residents can register for updates on planning applications in their local area via the Council's website.		improvements may be required.
QUESTION 10: Preferred Site - SN0412REV, Former concrete works, Church Rd, Bergh Apton	181, 414, 616, 1128, 1172, 1532	Object	A number of concerns are raised concerning the site, including: 1. Highways - impact on the local road network (speed of traffic, lack of footways etc.); lack of a safe walking/cycling route to Alington School. 2. Lack of local facilities;	1. Whilst the Highways have some concerns about the site, it is also acknowledged that the site has a previous industrial use, with the associated traffic generation. The Local Plan is not the mechanism to deal with any existing traffic speed issues; 2. The cluster has a range of basic services, including 2 x village halls,	707	Seek clarification from the Highways Authority as to what local improvements may be required.

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			3. Out of character with the area/too dense; Site needs to: 4. be well landscaped; 5. include a high proportion of affordable housing; 6. include a high proportion of single story homes; 7. include environmentally features.	school, pub, farm shop with Post Office, bus services (OurBus services through the villages and more extensive services on the A146), and football club. The NPPF notes that development in one settlement can help support services and facilities in nearby settlements; 3./4. The site is currently a derelict industrial site, and therefore not in keeping with the surrounding rural area. Redevelopment offers the opportunity to enhance the boundary treatments and the biodiversity of the site. 5. The proportion of affordable housing sought will be consistent with the percentages in Planning Policy at the time of any planning application. 6. There is no particular justification for a larger proportion of single story development on this site and it will be more important to secure a high quality of design which makes the best use of the site. 7. There is no particular justification to seek higher environmental standards that will be required by national and local policy at the time of any planning application.		
QUESTION 10: Preferred Site - SN0412REV, Former concrete	631, 1022	Support	A number of benefits to development of this site: 1. Currently an unattractive brownfield site, out of character with the surrounding rural area;	Comments noted.	706	Confirm with the Highways Authority what local improvements might be needed.

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works, Church Rd, Bergh Apton			2. The land is available immediately and FW Properties are confident that a scheme is deliverable; 3. Delivery of open space and the creation of domestic gardens would benefit wildlife/biodiversity; 4. Delivery could include affordable housing to support local housing needs; 5. Previous use of the site has shown that the local highways can sustain larger lorries.			
QUESTION 10: Preferred Site - SN0412REV, Former concrete works, Church Rd, Bergh Apton	201, 514, 625, 1038	Support	Whilst there are issues with the site (additional traffic on the A146, remediation of previous uses), it is preferable to redevelop brownfield land and the site is the least disruptive to the village.	Comments noted.	705	No action required.
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	490	Comment	Re SN0433. This site would continue the limited development along Wheel Road, which is the main east-west cross road through the village, and would be an attractive site, and not detrimental to Stacey Cottage, which is at some distance. While questioning the need to remove the WHOLE of the roadside hedge, it prevents any appreciation of the landscape, and makes that section of the road dangerous for drivers and walkers, as it is impossible to see round the bend opposite Fortune Green; a more open aspect would be beneficial. An improved junction at Reeder's Lane would also improve safety.	Comments noted. The hedgerow is considered to contribute to the rural character of this part of the settlement and it is likely that any new housing would equally limit views of the landscape beyond. However there is a balance to be struck between the need for new homes and the impacts of specific developments. Currently there is no indication that Wheel Road is unsafe in this location.	820	Consider the classification of SN0433.

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QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	921	Comment	Bergh Apton Parish Council is impressed by the thoroughness of the review of the sites put forward for development in Bergh Apton. The extensive Parkland to the north of Cooke's Road and Threadneedle Street is a very important feature of the village. The Parish Council are grateful that its heritage has been recognised in the review.	Comments noted.	818	No action required.
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	2109	Comment	SN0433 Few or no constraints. Standard information required at a planning stage. The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. A large area of the site is not at risk of flooding and has potential to be developed. The on-site flood risk contributes to, and is adjacent to, a major off-site flow path. We advise this must be considered in the site assessment. Assessment: Green	Comments noted.	817	Consider the classification of SN0433.
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	2190	Comment	SN0433 - Land at Wheel Road, Alington Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy	Comments noted. It is likely that there would need to be substantial hedgerow removal to achieve the required highways visibility onto Wheel Road, given the orientation of the road, with	816	Consider the classification of SN0433.

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			required. Site is mostly bounded by mature hedges (a UK Priority habitat) which may also be important under the Hedgerow Regulations 1997 (evidence of OS 1st Edition map). Any losses should be minimised and compensated for. There are no other priority habitats onsite (MAGIC) but broadleaved woodland is adjacent - consideration should be given to increasing the area of priority habitat in any landscaping plans. Site in SSSI IRZ but residential development not a trigger for consultation with Natural England. Site in amber zone for great crested newts and not in a strategic GI corridor, although development should still seek a net gain for biodiversity. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy should inform the design.	the consequent potential loss in terms of priority habitat.		
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	1853	Comment	SN0122SL The Environmental Protection Team is aware that historic ordnance survey maps show this site includes a former pond/void that has been historically filled with an unknown material. Having regard to this along with the size of the site and sensitivity of the proposed development it is considered that a Detailed Land Contamination Report (Phase One and Phase Two) should be required as part of any planning application.	Comments noted.	815	Potential issue to pick up in the Core Policies (if carried forward in the VCHAP) regarding Phase One and Phase Two Contamination Report and construction management plans.

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			Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application.			
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	1851	Comment	SN0433REV The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. The site is near to the Wheel Of Fortune PH which has a potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise and cooking odours. In addition, placing sensitive receptors close to this business could impact its future viability. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction	Comments noted.	814	Potential issue to pick up in the Core Policies (if carried forward in the VCHAP) regarding Phase One and Phase Two Contamination Report and construction management plans.

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			Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application.			
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	1850	Comment	SN0210 The Environmental Protection Team is aware that this site includes a former gravel pit that has been historically filled with an unknown material. Having regard to this along with the size of the site and sensitivity of the proposed development it is considered that a Detailed Land Contamination Report (Phase One and Phase Two) should be required as part of any planning application. The site is close to a commercial premises and the Norfolk County Council Recycling Centre in Welbeck both of which have the potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise, dust and odour. It is therefore considered that this will need to be addressed as part of any application for dwellings.	Comments noted.	813	Potential issue to pick up in the Core Policies (if carried forward in the VCHAP) regarding Phase One and Phase Two Contamination Report and construction management plans.
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	1847	Comment	SN2006 The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	Comments noted.	812	Potential issue to pick up in the Core Policies (if carried forward in the VCHAP) regarding Phase One and Phase Two Contamination Report and construction management plans.

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			The site is adjacent to the A146 which has a potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise and air pollution. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site if the form of both an air quality and noise assessment. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application.			
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	1840	Comment	SN0433 - The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. The site is adjacent to the Wheel Of Fortune PH which has a potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise and cooking odours. In addition, placing sensitive receptors close to this business could impact its	Comments noted.	811	Potential issue to pick up in the Core Policies regarding Phase One Contamination Report and construction management plans. If SN0433 were to become a Preferred Site, consider the need for allocation policy criteria regarding the adjoining Public House.

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			future viability. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application.			
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	1841, 1842, 1843, 1844, 1845, 1846, 1848, 1849, 1852, 1854	Comment	The Environmental Protection Team is not aware of any significant land quality issue with these sites or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application.	Comments noted.	810	Potential issue to pick up in the Core Policies (if carried forward in the VCHAP) regarding Phase One and Phase Two Contamination Report and construction management plans.

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QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	1039	Comment	None of the rejected sites are suitable.	Comments noted.	809	No action required.
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	1138	Support	The following sites should be considered for low density development (1-3 dwellings per site) and a similar scale to the surrounding properties - SN2117, SN0122, SN0533 (which might be suitable for starter homes similar to the cottages and the part-ownership properties on this road), SN0203, SN2015. Add that hedgerows should be planted or maintained, a 20 mph to The Street, 30mph for Threadneedle Street and part of Cookes Road, to slow traffic in lieu of footpaths. These sites, in addition to site SN0412, would maintain the village aesthetic without overwhelming any one area or being detrimental to neighbouring properties.	It is noted that these sites are proposed in addition to the Preferred Site in Bergh Apton. The scale of development proposed (2-3 dwellings per site) would be Settlement Limit scale of development, and it is not clear in all cases that the site promoter would bring the sites forward for those number of homes. In addition, there are strong reasons for resisting development on some of these sites, as set out in the Site Assessments. The submitted GNLP includes a policy to facilitate small scale development on plots outside, but adjacent to, Settlement Limits or infilling small gaps in groups of existing houses; some of the above sites may be suitable for consideration under that policy, should the site promoters be looking for that scale of development.	808	No action required.
QUESTION 11: Should any of the	1182, 1346	Object	None of the rejected sites should be preferred or shortlisted.	Comments noted.	807	No action required.

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shortlisted/rejected sites be allocated?						
QUESTION 11: Should any of the shortlisted/rejected sites be allocated?	137, 140, 142, 157, 226, 265, 423, 1706	Mixed	Rejected Site SN1012, reasons the site should not be rejected: 1. Development off a private drive would not result in the loss of trees. 2. The existing houses in this location would have poor walking routes to facilities. 3. The recent industrial buildings nearby will generate more traffic than the houses proposed for this site. 4. Mill Road is suitable for two way traffic and the junctions at either end are likely to be used by some residents of the preferred sites. 5. Not all recent development has been linear in form. 6. Existing footpath to the school. 7. The site is close Green Pastures Farm Shop/Cafe and Post Office, and the bus routes on the A146. 8. Insufficient consideration has been given to this part of the settlement contributions to rural growth under NPPF para 79	1. No plans have been provided to demonstrate that the required visibility splays can be accommodated without the loss of trees and hedgerow. 2. There are many dwellings across the district with poor walking routes to facilities, however the aim of the Local Plan is to promote more sustainable patterns of future development, where possible. 3. The application for the employment buildings will have been considered on their own merits through the Development Management process and does not automatically set a precedent for additional development. 4. Concerns have been raised by the Highway Authority about additional development in this location. 5. The most recent developments in this location have been linear in form; whilst development in depth would not necessarily be ruled out, pre-application advice referred to in the representations raised concerns about the proposed layout of development. 6. Whilst there is a public right of way to Alington Village Hall (which then has pavements to the school), a substantial part of the 1.4km distance would be on unmade, unlit footpath, which bisects a	799	Re-consider whether the front of the site could be included as a Settlement Limit extension.

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				group of working farm buildings. As such it is unlikely to be an attractive walking route for primary school children; 7. The site assessment acknowledges that the site is close to some local facilities. However the Highways Authority is concerned about the distance from other services, the lack of footways, the fact that Mill Road is narrow in places and the standard of the junctions at each end of the road. 8. This part of Alington/Bergh Apton has an existing Development Boundary which was subject to a small Settlement Limit extension in the 2015 Local Plan. As such, the Council has not discounted this area from contributing to future growth.		
QUESTION 12: Should any of the shortlisted sites be rejected?	515	Comment	The villages of Bergh Apton and Alington need to retain their rural character. Excessive development particularly in the Poringland area is having a knock on effect on these villages, especially with much greater numbers commuters and delivery vehicles using local narrow roads.	The Preferred Sites have been chosen taking into account the character of the villages concerned. Under the GNLP the level of growth proposed in the Village Clusters (9%) is significantly lower than the percentage of the population that already lives in those parishes (25%), consequently the impacts on the character of those settlements is considered proportionate. Norfolk County Council, as Highway Authority has considered the scale of development proposed through the VCHAP and not raised a concern in terms of the levels proposed in this cluster.	806	No action required.

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QUESTION 12: Should any of the shortlisted sites be rejected?	184, 197, 203	Object	A number of general concerns raised, covering: 1. Roads in/out of the village a poor quality and narrow in places, with consequent safety and environmental concerns. 2. Limited services in the villages/cluster.	1. Norfolk County Council, as Highway Authority has considered the scale of development proposed through the VCHAP and not raised a concern in terms of the levels proposed in this cluster. Whilst many areas do not have footways, the centre of Alington which contains the main facilities (village hall, school, pub, bus stops, football club) do have footways, and new development would connect to/extend these where possible. 2. The cluster has a range of basic services including village halls, school, pub, farm shop with Post Office, bus services (OurBus services through the villages and more extensive services on the A146), and football club.	805	No action required.
QUESTION 12: Should any of the shortlisted sites be rejected?	101, 292, 502, 1000, 1001, 1345, 1367, 1663, 1664	Object	SN0433 should not become a Preferred Site for reasons including: 1. Poor road network in the vicinity of the site, especially Readers Lane which links to the B1332 Norwich/Bungay Road, and lack of pavements. 2. Impact on the character of the area and the local landscape. 3. Impact on the listed buildings (principally Staceys Cottage).	A number of the issues raised are picked up in the assessment of SN0433; 1. The Highway Authority has considered both the scale of development proposed within the cluster and this site in particular and their main concern is the direct access onto Wheel Road, rather than the wider highway network; 2. The Site Assessment acknowledges that the removal of the frontage hedge of Wheel Road, to allow for the required highways visibility on the site frontage, would alter the rural character of the area. This would be true for both the smaller SN0433 and the larger	804	Consider whether SN0433 should be a rejected site.

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				SN0433REV. However this impact would be exacerbated for the larger site, which would extend development further into the open countryside than other previous development on Wheel Road. 3. The distance between SN0433 and Staceys Cottage is considered sufficient to maintain the rural setting of the latter; the same would not be true of the larger SN0433REV. The other Listed Buildings on Reeders Lane are not considered to be materially affected by SN0433.		
QUESTION 12: Should any of the shortlisted sites be rejected?	1040	Comment	SN0433 has been shortlisted as a reasonable alternative but on the site assessment form it was rejected as a reasonable alternative. I therefore do not understand why it had been shortlisted. The access to the site is extremely difficult as it is close to the narrow junction of Wheel Road, Reeders Lane and Burgate Lane.	Site SN0433 was put forward in two configurations, the smaller SN0433 and the larger SN0433REV. On the site Assessment forms, the former should have identified as a 'Reasonable Alternative' and the latter 'Rejected'.	803	Correct the Site Assessment form for SN0433 to show the site as a 'Reasonable Alternative'.
QUESTION 12: Should any of the shortlisted sites be rejected?	491	Comment	SN0400. I note that there is no plan showing the proposed development. The only conclusion to be drawn is that the proposers do not care how this development takes place as the increase of the over-development of this area, at an urban, not a village, density, is only detrimental to those who already live on the estate. No open space has been earmarked for protection. In the previous expansion of Church Meadow the developers initially proposed one row of houses and an area of grass. They then	SN0400 is the Preferred Site. The purpose of the Local Plan is to allocate suitable sites where the principle of development is acceptable, within the parameters of other national and local planning policies. Those local policies include the need for open space provision on development of 15+ dwellings. There is no requirement to produce a detailed layout to show how this will be incorporated into the site at this stage. As proposed the site would be allocated at a gross density of approximately 14 dwellings/hectare,	802	No action required.

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			retrospectively obtained permission for two rows of houses and no open space.	reflecting the known constraints on the site and to ensure a density that is compatible with surrounding residential development.		
QUESTION 12: Should any of the shortlisted sites be rejected?	1132	Support	SN0210 should not be considered a reasonable site for development. Located opposite the recycling centre (noise, smell, traffic congestion) it is also adjacent to the historic church and a conservation area.	The Site Assessment for this site recognises that this location is not suitable for new development for a variety of reasons.	801	No action required.

Aslacton, Great Moulton and Tibenham

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QUESTION 13: Settlement Limit	1482	Object	Silverley would suggest that the Settlement Limit of Aslacton is amended to encompass the preferred Site (SN0459) (as amended in the appended representations) so that future homes and local facilities are within the limit of the village.	During the consultation the Preferred Sites were not shown as being within the revised Settlement Limits, however previous South Norfolk Local Plan allocations have been shown within them, for the reason given in the representation.	861	Consider the principle of including new allocations within the Settlement Limit, and the extent to which the landscaping area proposed with this site needs to be within that Limit.
QUESTION 14: Preferred Site - SN0459, Land off Church Rd, Aslacton	627	Support	The provision of up to 25 new dwellings will ultimately mean the addition of more vehicles on the already narrow roads surrounding Aslacton and Great Moulton. With an average of 2 cars per property this could amount to 50 extra vehicles or more. It is likely that in peak times cars will use Carr Lane and High Green. Great Moulton Parish Council would therefore request that prior to the development of this site, Norfolk County Council Highways department seriously consider reducing the speed limit on Carr Lane to 30mph or at most 40mph.	Comments noted. Norfolk County Council is a consultee on the VCHAP and will make its requirements known to the Local Planning Authority, which can be incorporated into the Plan as necessary. However, the level of traffic generated by the new development as a proportion of the current traffic using these roads, may not justify a speed limit change purely on that basis and the issue may need to be pursued with the County Council as a separate issue.	1001	Raise with the speed limits on Carr Lane and High Green with the County Council.
QUESTION 14: Preferred Site - SN0459, Land off Church Rd, Aslacton	290, 1488	Mixed	Support the inclusion of the site, but potentially extend the site to the Muir Lane boundary with this inclusion of more community space within the site.	Support welcomed. Since the submission of the representations there has been ongoing discussion between the site promoters, the Parish Council and the wider community regarding proposals for the site, focusing on the provision of a village green a small car park. This would involve extending the site to the	1000	Consider extending the allocation site to accommodate 30-35 dwellings and make it a policy requirement to deliver a village green and parking area.

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				Muir Lane boundary and potentially a realignment of the northern boundary, ultimately delivering 30-35 homes on the site.		
QUESTION 14: Preferred Site - SN0459, Land off Church Rd, Aslacton	2191	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. The allocation site is located within an arable field with a hedge (priority habitat) running along the western boundary. The site is located within a strategic Green Infrastructure Corridor which should be considered within the design. A search of MAGIC reveals no other priority habitats onsite. The site is located within a SSSI Impact Risk Zone whereby residential development may require consultation with Natural England. The site is located within the Amber District Level License zone for great crested newts. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy should inform the design. Consideration should be given to delivering Biodiversity Net Gain.	Comments noted.	872	Consider the need for the allocation Policy to specifically reference the strategic Green Infrastructure Corridor and the hedgerows bordering the site. Consider reference to consultation with Natural England due to SSSI in supporting policy text.
QUESTION 14: Preferred Site - SN0459, Land off Church Rd, Aslacton	2161	Comment	Carriageway widening and frontage footway should be required. The footway should extend eastwards to link with the bus stops at Muir Lane.	Comments noted.	871	Inclusion of policy criterion relating carriageway widening and frontage footway. Confirm whether 3rd party land is required

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						(as noted within Site Assessment)
QUESTION 14: Preferred Site - SN0459, Land off Church Rd, Aslacton	2120	Comment	LLFA: Few or no constraints. Standard information required at a planning stage. The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Assessment: Green	Comments noted.	870	No action required.
QUESTION 14: Preferred Site - SN0459, Land off Church Rd, Aslacton	2030	Comment	Site SN0459 - Land off Church Road, Aslacton Whilst there are no designated heritage assets within the site boundary, there is a grade II listed Church Farmhouse to the south east of the site. However, given the distance and intervening development and vegetation, we consider that the development of the proposed allocation would have limited impact on the setting of the heritage asset.	Comments noted- limited impact of the setting of the heritage asset.	869	No action required.
QUESTION 14: Preferred Site - SN0459, Land off Church Rd, Aslacton	1924	Comment	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).	Comments noted.	868	No action required at this stage.

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QUESTION 14: Preferred Site - SN0459, Land off Church Rd, Aslacton	1855	Comment	Not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition could be attached to any approval requiring its implementation.	Comments noted.	867	No action required.
QUESTION 14: Preferred Site - SN0459, Land off Church Rd, Aslacton	175, 179	Object	Lack of existing infrastructure - can not withstand further development Existing sewage capacity issues causing flooding, especially along Muir lane Narrow and congested roads (especially at peak times) No facilities - no pub, shop etc No streetlights or public footpaths	The Council acknowledge the safety concerns regarding the access and the suitability of The Street for further development. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that development of the site is broadly acceptable in highways terms. However, this will be subject to achieving a suitable and safe pedestrian access. It	866	Confirm footpath provision and 3rd party land. Pub in Aslacton is now closed - confirm this and update cluster description

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				has been noted that this will require the potential removal of privately owned hedgerow, which will need to be confirmed prior to allocation. Concerns with the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies. With regards to limited facilities, whilst it is recognised that rural settlements offer fewer services and facilities than their urban counterparts, a continued concentration of development in these locations will result in the inevitable decline of existing services and facilities within the rural areas. Therefore, locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services. Norfolk County Council has confirmed that, taking into account falling rolls and out of catchment pupils, there is not a capacity issue at Aslacton School. Ongoing discussions are taking place with the local NHS Integrated Care System over capacity within GP services. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority (LLFA) and it is considered that on-site drainage solutions can often help to address		

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				existing surface water issues and as such it is considered that this issue can be adequately addressed during the planning application stage.		
QUESTION 15: Should any shortlisted/rejected sites be allocated?	1733	Comment	Submissions in respect of Sites SN0554SL, SN0555 and SN0557SL Great Moulton I am writing on behalf of Saffron Housing Trust to express our support for this site for residential development being promoted by ESCO Developments Ltd. We believe this is a site that could come forward in association with our company in terms of delivering sustainable development in line with the emerging draft Greater Norwich Local Plan. We believe that we have sufficient capacity to ensure that we can assist in bringing forward this site for development. Currently, we have programmed this site to come forward in our build programme within our current 3 year development strategy – the fact that the site is in our core area of operation (South Norfolk Council), this brings a general support from our Board as I am sure you will appreciate. We believe that the site, as described in the ESCO proposals, is viable and would contribute to resolving the housing need in the area. We are aware of the emerging policy requirements from the draft Local Plan and are confident that these can be met and the proposed development delivered in a cost effective manner. We will show how the development will be	The combination of sites SN0554SL, SN0555 and SN0557SL Great Moulton All of the above sites have been subject to detailed site assessments with various constraints were identified at that stage on each site.	887	No action required.

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			low carbon and contribute to the Local Plan's objectives.			
QUESTION 15: Should any shortlisted/rejected sites be allocated?	1308	Comment	With regard to site SN3008REV which I represent, although rejected at the current proposed size of development the feedback was generally positive towards the site being considered as a smaller development of up to 12 dwellings. Therefore I would ask that this site be reconsidered as a smaller windfall site which could be achieved by incorporating it within a slightly extended village envelope. The site was originally proposed as a smaller site, but we were advised that sites which could accommodate larger scale development would be preferential.	The Council notes the request for the site to be considered as a settlement limit extension to accommodate a development of up to 12 dwellings. The site was initially put forward for a larger scale development, the scale was subsequently reduced in order to try and mitigate impacts on landscape and townscape. However, it is also acknowledged the site is remote from accesses and is heavily constrained in regards to surrounding highway network and access. The removal of a large section of hedgerow would be required to access the site. It is the view of the Council that the combined constraints that are connected to the site, that the site remains unsuitable.	886	Confirm with Highways whether access onto Priston Green Land would be achievable
QUESTION 15: Should any shortlisted/rejected sites be allocated?	1857, 1858, 1859, 1860, 1861, 1862, 1863, 1864, 1865, 1866, 1867, 1868	Comment	In relation to the rejected sites: The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	Comments noted.	877	No action required.
QUESTION 15: Should any	1856	Comment	SN2118: South of Sneath Road, Aslacton The Environmental Protection Team are not aware of any significant land quality	Comments noted.	876	No action required.

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shortlisted/rejected sites be allocated?			issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition could be attached to any approval requiring its implementation.			
QUESTION 15: Should any shortlisted/rejected sites be allocated?	2090	Comment	Few or no constraints. Standard information required at a planning stage. At risk of surface water flooding Source Protection Zone 3 The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration	Comments noted.	875	Allocation policy to reflect the need to accommodate the surface water flow path.

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			should be utilised.# "Flood risk in 0.1% AEP event is moderate ponding. This can be mitigated through application of appropriate engineering methods. The site is adjacent to a flow path; advise this must be considered in the site assessment. Assessment: Green			
QUESTION 15: Should any shortlisted/rejected sites be allocated?	2192	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. The allocation site is located along the northern edge of an arable field. A search of MAGIC reveals, except for hedges, no priority habitats onsite. The northern boundary is boarded by a hedge (priority habitat) which appears on the first OS map and may qualify as important under the Hedgerow Regulations 1997. Breaches to, or loss of hedge should be kept to a minimum and compensation provided (consideration should be given to siting any footpath to the south of the hedge to avoid impacts). The site is in a SSSI impact zone but 'residential' is not listed in the trigger list for consultation with Natural England. The site is not located in a strategic GI corridor but net gains for biodiversity should be provided. The site is in the Amber zone for District Level Licensing. Applications for planning	Comments noted.	874	Consider the need to reflect the protection of hedgerows in any Policy for the site.

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			consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which should inform the design.			
QUESTION 15: Should any shortlisted/rejected sites be allocated?	1651	Support	SN2118 Council has two points of concern which we felt the need to address, as landowners: It is 5-8 minutes by car to the local school. Those living adjacent to land and doing school drop-offs would be driving away from the school and not adding to congestion. Prohibitive cost of housing has vastly altered the demographics of those who can afford to buy 'family-size' homes. Re. location, properties here could cater for those who need to be near A140 / A11, and also to commute using train (e.g. from Diss). Believe that the land has not flooded in 40 years. A water course runs beneath, but drainage is good and a ditch could be put in if needed.	Comments noted.	873	No action required.

Barford, Marlingford, Colton & Wramplingham

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1653	Comment	Taking the above into consideration site SN0425 is considered to be suitable for residential development, and doesn't generate any significant harm that could not be dealt with during the normal course of preparing a planning application. Given the village cluster strategy which is now being proposed by GNLP and South Norfolk requiring more sites to fulfil the identified need for 1,200 new homes in these locations. Marlingford has been considered to be a suitable location for development and this is the only site that has been put forward for development in the village and should be considered further.	Whilst the Council acknowledges the representation made in respect to the allocation SN0425, the Council is still of the view that the site is unsuitable for development and no further evidence has been presented to suggest otherwise. NCC Highways have raised significant concerns with the existing road network in terms of road and junction capacity. The nearest school is located over 2km from the site where there is no safe pedestrian route available, nor does one appear to be feasible. In addition, large parts of the site fall within flood zone 2, the site is located within a sensitive River Valley setting, is located in proximity to a listed building and would conflict with the linear character of the settlement. On balance, it is considered that the negative impact of development in this location would outweigh any positive contribution 5 dwellings would constitute.	510	No action or change required.
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1652	Support	SN0552: Site promoter now wishes to amend the proposal for this site. Now wish to promote a smaller area of land to accommodate 25 dwellings and c.6 ha of semi-natural public open space. Further benefits would include an enlarged attenuation pond to west of the site to divert any on-street surface water flooding along Watton Road; and a new	The Council will review the revised the site boundary and proposal.	509	Complete site assessment for revised site as a REV of SN0552.

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			vehicular/pedestrian route through the site from Back Lane onto Watton Road. Also, an area of new tree planting to manage any landscape impacts. Promoter is still prepared to increase the land area, if necessary, to deliver a larger scheme, perhaps as a strategic reserve.			
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1869	Comment	SN0552: Land off Watton Road, Barford The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. The site is adjacent to the Cock Inn which has a potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise and cooking odours. In addition, placing sensitive receptors close to this business could impact its future viability. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	307	No action required re. survey at this time. Consideration will need to be given to the Cock Inn which has a potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise and cooking odours however it is not uncommon for residential properties to be in close proximity to public houses and/or food outlets.

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			applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition could be attached to any approval requiring its implementation.			
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1870	Comment	SN0416: Land south of Barford Church and north of Barnham Broom Road The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition could be attached to any approval requiring its implementation.	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	306	No action required at this time.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1871	Comment	SN0424: Land south of Marlingford Road, Colton The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition could be attached to any approval requiring its implementation.	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	303	No action required at this time.
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1872	Comment	SN0425: Land at Mill Road and Barford Road, Marlingford The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	302	No action required at this time.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition could be attached to any approval requiring its implementation.			
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1873	Comment	SN1013REV: Land between Church Lane and Back Lane, Barford The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	301	No action required at this time.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition could be attached to any approval requiring its implementation.			
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1874	Comment	SN0474: Land west of Colton Road, Marlingford The Environmental Protection Team is aware that historic ordnance survey maps show this site includes a former sand and gravel pit that has been historically filled with an unknown material. Having regard to this along with the size of the site and sensitivity of the proposed development it is considered that a Detailed Land Contamination Report (Phase One and Phase Two) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Detailed Land Contamination Report (Phase One and Phase Two) should be required as part of any planning application.	300	No action required at this time.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			could be attached to any approval requiring its implementation.			
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1875	Comment	SN0475REVA: Land east of Highhouse Farm Lane, Colton The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, an alternative condition could be attached to any approval requiring its implementation.	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	299	No action required at this time.
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1999	Comment	Electricity Transmission: Site SN0552 - Land off Watton Road, Barford Asset description - 4VV ROUTE TWR (001 -	The Council Acknowledge the comments made by National Grid and note that the site been identified as being crossed or in close proximity to National Grid assets. The Council will ensure that the	298	Discussion with National Grid to clarify National Grid's rights in relation to their existing assets and the implications of

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			223): 400Kv Overhead Transmission Line route: NORWICH MAIN - WALPOLE 1 A plan showing details of the location and details of National Grid's asset is attached. It is our policy to retain existing overhead lines in-situ, though there may be exceptional circumstances that would justify the request (e.g. if the proposal is of regional or national importance). We would welcome a brief phone call to clarify National Grid's rights in relation to their existing assets and the implications of allocating sites without making these clear. Please ensure the identified issue is acknowledged in future iterations of the VCHAP (e.g. reference to National Grid assets in site constraints/parameters and requirement that these remain in-situ). These have not been acknowledged in the latest draft of the Local Plan.	identified issue is acknowledged in future iterations of the VCHAP.		allocating sites without making these clear. These will be reflected within any allocation policy wording if necessary.
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	2162	Comment	Barford SN0552 - Identified as a reasonable alternative. The site is shown in the map booklet, split in two with sections north and south of the B1108. It is not clear that a safe and acceptable pedestrian route could be provided between the sites and local facilities. In the absence of evidence to the contrary, it is possible the Highway Authority would object to applications at these sites.	The comments from the NCC highways are noted and should this site progress further in the VCHAP process further discussions will be required to determine whether an appropriate highways solution is achievable.	297	Evidence is required to show that a safe and acceptable pedestrian route could be provided between the sites and local facilities.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	782	Comment	See no need for any other site to be allocated. As a Service Village the Joint Core Strategy (JCS) states that between 10-20 new dwellings are expected during the life of the plan, so far we have an increase of 16 dwellings (including 2 holiday lets) over the plan period to date, with still (in theory) five years of the JCS to run. There is also a pending application, which if granted permission would bring the total of new JCS dwellings in Barford to 23, which is beyond the upper limit of that expected for a Service Village.	The Council notes this objection but would note that the requirement for additional development has been set out in the Greater Norwich Local Plan (currently at Examination at the time of writing). Once adopted the JCS will be replaced by the GNLP, with many of the undeveloped sites in the associated site allocations plans being considered as carried forward allocations.	295	No action or change required.
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	773	Comment	Marlingford and Colton Parish Council welcome rejection of sites 424SL, 474 and 475. The lack of facilities/transport makes the parish unsuitable for significant development. This would likely apply if further sites were proposed. Please note that the PC previously supported 425 subject to strict conditions, but to accept the problems associated with access.	The Council acknowledge the comments from Marlingford and Colton Parish Council, including their support for SN0425.	294	No action or change required.
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1398	Object	Either Site SN0475REVA or SN0475REVB should be an allocated site in the Plan	The support for either SN0475REVA or SN0475REVB to be allocated is noted, however the representation made does not alter the opinion of the Council and these sites are still considered unsuitable.	293	No action or change required.
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1277	Object	Do not agree with the concept of the VCHAP and see no need for any other site to be allocated. Fully support the comments of Barford and Wramplingham Parish Council, and those of CPRE.	Objection noted	292	No action or change required.

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QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1876	Comment	SN0475B: Land east of Highhouse Farm Lane, Colton The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, an alternative condition could be attached to any approval requiring its implementation.	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	288	No action required at this time.
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	1925, 2178	Comment	Water management comments: Part of the Parishes are located within the Norfolk Rivers IDD. The Board's byelaws apply to any new developments within the IDD. Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. The on-site flood risk	The comments made in relation to water management are noted and the requirement for geotechnical investigation these issues will be explored further with the LLFA.	287	Policy wording to include requirements of LLFA as appropriate.

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			forms a minor flow path in the 0.1% AEP event, contributing to a major flow path off-site in the 0.1% AEP event. The road between the two polygons is affected by flood risk in the 0.1% AEP event. There is opportunity to mitigate the flood risk leading off the site. The majority of the site is unaffected by flood risk and has the potential to be developed.			
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	2193	Comment	SN0552 - Land off Watton Road, Barford Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. The application site lies across two fields, one south of Watton Road (grazing? /rough grassland), and one on the corner of Back Land and Watton Road (arable). The application site at Barford is located within a SSSI IRZ but 'residential' is not listed as a trigger requiring consultation with Natural England. It is located within a Strategic GI corridor, which should inform the EcIA and layout/enhancement of the site. The site is also located in the Amber Zone for District Level Licensing. A search of MAGIC shows that no Priority Habitats are onsite (the field to the south is shown on the 1905 OS map as an orchard). Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy should inform the	NCC Ecologist comments noted.	286	No action required at this time.

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			design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 18: Should any of the shortlisted / rejected sites be allocated?	159	Support	Barford needs modest development to create a sustainable village community by justifying the current and additional services needed. The proposed development off the Watton Road has good access and offers green space for public access which the village is in real need of.	The support for shortlisted site SN0552 is noted.	285	No action or change required.
QUESTION 19: Should any of the shortlisted sites be rejected?	2077	Comment	Water management comments: Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised.	The comments made in relation to water management are noted and the requirement for geotechnical investigation these issues will be explored further with the LLFA	310	Policy wording to include requirements of LLFA as appropriate.
QUESTION 19: Should any of the shortlisted sites be rejected?	1287	Comment	I consider that the shortlisted village cluster sites in the Barford and Wramplingham area should be completely rejected because I do not agree with the concept of a village cluster plan and I see no case or need for any other site to be allocated. As a Service Village the Joint Core Strategy (JCS) states that between 10-20 new dwellings are expected during the life of the plan. Barford has nearly reached the upper limit with still (in theory) five years of the JCS to run.	The Council notes this objection but would note that the requirement for additional development has been set out in the Greater Norwich Local Plan (currently at Examination at the time of writing). Once adopted the JCS will be replaced by the GNLP, with a number of the undeveloped sites in the associated site allocations plans being considered as carried forward allocations.	309	No action or change required.
QUESTION 19: Should any of the shortlisted sites be rejected?	783	Comment	We consider that the shortlisted village cluster sites in the Barford and Wramplingham area should be completely rejected because we do not agree with the concept of a village cluster plan and we	Objection to shortlisted site noted.	308	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			see no case or need for any other site to be allocated.			

Barnham Broom, Kimberley, Carleton Forehoe, Runhall and Brandon Parva

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 20: Settlement Limit	579	Object	NCC need to develop a climate action plan before any new builds take place. We need more green spaces, a village meadow and ways of conserving what is here rather than increase stress on the failing infrastructure and struggling wildlife.	Alongside the VCHAP is the Greater Norwich Local Plan (GNLP). The GNLP is being prepared jointly by Broadland, Norwich City and South Norfolk Councils and in partnership with Norfolk County Council. The GNLP covers the combined area of Broadland, Norwich and South Norfolk, excluding the area within the Broads Authority. It includes strategic planning policies for the whole of the area, including mitigating and addressing climate change. For example GNLP emerging Policy 2, in conjunction with other plan policies, requires development to be designed to minimise emissions. It is a broad strategic policy covering a wide range of design issues which is supported by the requirement for a Sustainability Statement to show how development will be low carbon. It also provides flexibility in what will undoubtedly be an era of rapid technological change to 2038 to ensure development seizes the broad range of opportunities to be designed to reduce emissions. Carbon emissions in Greater Norwich will continue to be monitored using district wide figures produced by Government on transport, domestic and industrial emissions. It is the GNLPs ambition is to reduce per capita emissions and thereby contribute to meeting the national target to bring all greenhouse gas emissions to net zero by	882	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
				2050/51, as well as helping to meet local targets, statements and plans. Measures contained within the GNLP will enable further emissions reductions, continuing recent year-on-year trends. Further to the concerns raised around wildlife, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 20: Settlement Limit	1099	Support	This seems the best option with the least impact on other residents. Already on the main Norwich Road with easy access in and out of the village without any disruption.	Support noted.	881	No action required.
QUESTION 21: Preferred Site - SN0018SL, Land north of Norwich Road, adj 101	2066	Comment	Please see attached for full response. Few or no constraints. Standard information required at planning stage. Source Protection Zone 3 The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration	Comments noted.	890	Note Ground Source Protection Zone 3 in policy/ supporting text. No further action required.

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			should be utilised. Assessment: Green			
QUESTION 21: Preferred Site - SN0018SL, Land north of Norwich Road, adj 101	2005	Comment	Foul Water Capacity For sites SN0552, SN0018SL, SN2110, SN4051, SN0055, SN0174 and SN0196 available information indicates may be around 150 houses planned here in total for preferred and shortlisted sites. Barnham Broom has some capacity for foul water flows (for approximately 50 houses) but not for all the houses planned in these developments. Discussions will need to be held with Anglian Water (AWS), and development must be phased in line with WRC treatment capacity being made available.	Comments noted; Barnham Broom has some capacity for foul water flows (for approximately 50 houses). Note that not all of the sites listed would be brought forward under the VCHAP.	889	Discussions with Anglian Water (AWS), and development must be phased in line with WRC treatment capacity being made available.
QUESTION 21: Preferred Site - SN0018SL, Land north of Norwich Road, adj 101	1926	Comment	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. Minor development – no further comments	Comments noted.	888	No action required.
QUESTION 21: Preferred Site - SN0018SL, Land north of Norwich Road, adj 101	2194	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. The application site comprises a single field. Except for the hedges, there are no Priority Habitats onsite (MAGIC). It is located within a SSSI Impact Risk Zone, but housing is not identified as requiring consultation with Natural England. It is	Comments noted	885	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			located in an area identified as an amber zone for great crested newts.			
QUESTION 21: Preferred Site - SN0018SL, Land north of Norwich Road, adj 101	1877	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. The site is adjacent to a telephone exchange which has a potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site.	The Council notes these comments, including the reference to the adjacent telephone exchange. As an extension to the existing Settlement Limit (rather than an allocation) the site would not be subject to specific policy. Instead, specific matters would need to be dealt with in accordance with DM policies at the planning application stage.	884	No action required
QUESTION 21: Preferred Site - SN0018SL, Land north of Norwich Road, adj 101	1, 36	Support	The site is most in keeping with the rest of the village, and will have the least negative environmental impact in an area already heavily constrained by agricultural activity. Appropriate reasonable size	Support noted.	883	No action required.
QUESTION 22: Preferred Site - SN2110, Land south of Norwich Road, Barnham Broom	578	Object	NCC need to develop a climate action plan before any new builds take place . We need more green spaces, a village meadow and ways of conserving what is here rather than increase stress on the failing infrastructure and struggling wildlife.	Alongside the VCHAP is the Greater Norwich Local Plan (GNLP). The GNLP is being prepared jointly by Broadland, Norwich City and South Norfolk Councils and in partnership with Norfolk County Council. The GNLP covers the combined area of Broadland, Norwich and South Norfolk, excluding the area within the Broads Authority. It includes strategic planning policies for the whole of the area, including mitigating and	925	No action or change.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
				addressing climate change. For example GNLP emerging Policy 2, in conjunction with other plan policies, requires development to be designed to minimise emissions. It is a broad strategic policy covering a wide range of design issues which is supported by the requirement for a Sustainability Statement to show how development will be low carbon. It also provides flexibility in what will undoubtedly be an era of rapid technological change to 2038 to ensure development seizes the broad range of opportunities to be designed to reduce emissions. Carbon emissions in Greater Norwich will continue to be monitored using district wide figures produced by Government on transport, domestic and industrial emissions. It is the GNLPs ambition is to reduce per capita emissions and thereby contribute to meeting the national target to bring all greenhouse gas emissions to net zero by 2050/51, as well as helping to meet local targets, statements and plans. Measures contained within the GNLP will enable further emissions reductions, continuing recent year-on-year trends. Further to the concerns raised around wildlife, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development		

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				proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 22: Preferred Site - SN2110, Land south of Norwich Road, Barnham Broom	1262	Comment	In principal I support this site for up to 9 dwellings on the basis that it continues the existing building line, infills and does not impact directly upon a large number of other residents. However, the site could lend itself to a larger number of dwellings, which would be an issue. Also access to the proposed site, if approved should not be via an access left vacant between two existing properties, which would be detrimental. The retention of the existing mature trees should be guaranteed. Entry and exit to site should be contained within the site.	With regards to the potential number of dwellings coming forward on the site, as a Settlement Limit extension site this will be determined at the planning application and will be influenced by current policies dealing with amenity, scale, etc. In determining any application, the Council will seek to ensure that an appropriate density is achieved. In addition, any future scheme will be subject to achieving a satisfactory access and be in accordance with the Highways Authority.	897	No action required.
QUESTION 22: Preferred Site - SN2110, Land south of Norwich Road, Barnham Broom	2195	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. The site is part of an agricultural field, bounded along the northern edge by a ditch, and line of standard trees. To the north is an area of deciduous woodland (priority habitat) (see MAGIC). The site is in a SSSI Impact Risk Zone although 'residential' development would not trigger consultation with Natural England. The site is in an amber zone for great crested newts (identified by Natural England as part of DLL licensing).	Comments noted.	896	Consider the need for the allocation Policy to specifically reference priority habitats (e.g., hedgerows).

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			Consideration should be given to creating priority habitats (e.g., hedgerows).			
QUESTION 22: Preferred Site - SN2110, Land south of Norwich Road, Barnham Broom	2145	Comment	Few or no constraints. Standard information required at a planning stage. Source Protection Zone 3 The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Assessment: Green	Comments noted.	895	No action required.
QUESTION 22: Preferred Site - SN2110, Land south of Norwich Road, Barnham Broom	2006	Comment	Foul Water Capacity For sites SN0552, SN0018SL, SN2110, SN4051, SN0055, SN0174 and SN0196 available information indicates may be around 150 houses planned here in total for preferred and shortlisted sites. Barnham Broom has some capacity for foul water flows (for approximately 50 houses) but not for all the houses planned in these developments. Discussions will need to be held with Anglian Water (AWS), and development must be phased in line with WRC treatment capacity being made available.	Comments noted; Barnham Broom has some capacity for foul water flows (for approximately 50 houses) but not for all the houses planned in these developments. Note that not all of the sites listed would be brought forward under the VCHAP.	894	Discussions will need to be held with Anglian Water (AWS), and development must be phased in line with WRC treatment capacity being made available.
QUESTION 22: Preferred Site - SN2110, Land south	1927	Comment	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment.	Comments noted.	893	No action required.

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of Norwich Road, Barnham Broom			Minor development – no further comments			
QUESTION 22: Preferred Site - SN2110, Land south of Norwich Road, Barnham Broom	1878	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	Comments noted. The requirement for Contamination Report would be addressed at the planning application stage in response to existing policy and legislative requirements.	892	No action required.
QUESTION 22: Preferred Site - SN2110, Land south of Norwich Road, Barnham Broom	2, 37, 858, 1100	Support	Support; small logical connection linking to the rest of the village.	Support noted.	891	No action required.
QUESTION 23: Preferred Site - SN4051, Land on the corner of Bell Road and Norwich Road, Barnham Broom	576	Object	NCC need to develop a climate action plan before any new builds take place. We need more green spaces, a village meadow and ways of conserving what is here rather than increase stress on the failing infrastructure and struggling wildlife.	Alongside the VCHAP is the Greater Norwich Local Plan (GNLP). The GNLP is being prepared jointly by Broadland, Norwich City and South Norfolk Councils and in partnership with Norfolk County Council. The GNLP covers the combined area of Broadland, Norwich and South Norfolk, excluding the area within the Broads Authority. It includes strategic planning policies for the whole of the area, including mitigating and addressing climate change. For example, GNLP emerging Policy 2, in conjunction with other plan policies, requires development to be designed to minimise emissions. It is a broad strategic policy covering a wide range of design issues which is supported by the requirement for a Sustainability Statement to show how development	926	No action required.

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				will be low carbon. It also provides flexibility in what will undoubtedly be an era of rapid technological change to 2038 to ensure development seizes the broad range of opportunities to be designed to reduce emissions. Emerging policies 1, 2, 3, 4 and 7 support further development of the green infrastructure network which will provide for mitigation of and adaptation to climate change, including promoting biodiversity net gain and improved and linked habitats. Carbon emissions in Greater Norwich will continue to be monitored using district wide figures produced by Government on transport, domestic and industrial emissions. It is the GNLPs ambition is to reduce per capita emissions and thereby contribute to meeting the national target to bring all greenhouse gas emissions to net zero by 2050⁵¹, as well as helping to meet local targets, statements and plans. Measures contained within the GNLP will enable further emissions reductions, continuing recent year-on-year trends. Further to the concerns raised around wildlife, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be		

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				required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 23: Preferred Site - SN4051, Land on the corner of Bell Road and Norwich Road, Barnham Broom	2181	Comment	More houses need to be built, but it is wrong to use this one-dimensional approach. It should be about allowing communities to grow. This requires vision, leadership and a sense of what community might look like a generation ahead. Barnham Broom has a primary school, church, village hall and playing field, pub and shop. It faces real issues, particularly roads and transport, but deals with them - e.g. the much-used village hall, recent projects to restore the Church Bells, build a memorial garden, and rejuvenate the Barnham Broom Fuel Allotment Charity. A recent substantial residential development and continued infilling means the population is expanding. I fully support the attached letter, which proposes how SN4051 might be crucial to community development. Maybe the village playing field with its 60's village hall could be developed for housing and the proceeds used to acquire and develop SN4051, with improved village hall and playing field facilities. This would provide a gathering space in the centre of our village with village hall, shop and pub.	Comments noted. Locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services. The provision of several relatively small allocation sites as required by the National Planning Policy Framework means this approach also has the benefit of supporting small-scale builders, providing choice for the market and helping to ensure the delivery of housing in popular village locations. It is noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.	924	No action required.
QUESTION 23: Preferred Site - SN4051, Land on the corner of Bell Road and Norwich	3, 38, 86, 87, 859, 1101, 1263, 1814	Mixed	Concerns raised with increased traffic and highway safety issues, concerns with flooding, concerns with school capacity and environmental impacts.	The Council acknowledge the safety concerns regarding the access and the suitability of Bell Road. As part of the site selection process, NCC Highways officers have provided technical advice	916	Confirm junction realignment at Bell Road with Highways Authority and include

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Road, Barnham Broom				relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that development of the site is broadly acceptable in highways terms where development of the site offers the opportunity to realign Bell Road and improve the current junction arrangement. With regards to the concerns raised regarding flooding, discussions have taken place with the Lead Local Flood Authority (LLFA) who have provided feedback on the proposed allocations and made recommendations where appropriate. In addition, further comments are also expected from the Environmental Agency and Anglian Water, who will help inform individual allocation policy wording. The concerns about the capacity of the school and implications for further resources and facilities are acknowledged. This technical consultation has included discussions with NCC Children's Services, where information was shared on School capacity. At the time of writing, Barnham Broom is not yet at 100% capacity. Numbers at this school are expected to drop with the opening of the new school at Hethersett and the planned opening of the new school at Wymondham		appropriate wording in the policy

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				(currently scheduled for 2024). Further to the concerns raised around destruction of the environment, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 23: Preferred Site - SN4051, Land on the corner of Bell Road and Norwich Road, Barnham Broom	2118	Comment	See attachment for full details. Few or no constraints. Standard information required at a planning stage. Source Protection Zone 3 The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Assessment: Green	Comments noted.	902	No action required.
QUESTION 23: Preferred Site - SN4051, Land on the corner of Bell Road and Norwich	2007	Comment	Foul Water Capacity For sites SN0552, SN0018SL, SN2110, SN4051, SN0055, SN0174 and SN0196 available information indicates may be around 150 houses planned here in total for preferred and shortlisted sites.	Comments noted; Barnham Broom has some capacity for foul water flows (for approximately 50 houses) but not for all the houses planned in these developments. Note that not all of the	901	Discussions will need to be held with Anglian Water (AWS), and development must be phased in line with WRC treatment

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Road, Barnham Broom			Barnham Broom has some capacity for foul water flows (for approximately 50 houses) but not for all the houses planned in these developments.	sites listed would be brought forward under the VCHAP.		capacity being made available.
QUESTION 23: Preferred Site - SN4051, Land on the corner of Bell Road and Norwich Road, Barnham Broom	1879	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. The site is on the opposite side of Bell Road to The Bell Inn which has a potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise and cooking odours. In addition, placing sensitive receptors close to this business could impact its future viability. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site.	Comments noted. The site is on the opposite side of Bell Road to The Bell Inn which has a potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise and cooking odours. In addition, placing sensitive receptors close to this business could impact its future viability. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site.	900	Consider the need for the allocation Policy to specifically reference impact to and from the Bell Inn.
QUESTION 23: Preferred Site - SN4051, Land on the corner of Bell Road and Norwich Road, Barnham Broom	1928	Comment	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).	Comments noted.	899	No action required.
QUESTION 23: Preferred Site -	2196	Comment	Rating: Green no major ecological constraints identified from desk-top	Comments noted.	898	Consider the need for the allocation Policy to

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SN4051, Land on the corner of Bell Road and Norwich Road, Barnham Broom			search. Surveys, and biodiversity enhancement in accordance with policy required. The site is part of an agricultural field (grazed), bounded by hedgerows (priority habitats). To the north is an area of deciduous woodland (priority habitat) (see MAGIC). The site is in a SSSI Impact Risk Zone although 'residential' development would not trigger consultation with Natural England. The site is in an amber zone for great crested newts (identified by Natural England as part of DLL licensing). Impacts to priority habitats should be minimised and compensated for, and consideration to the creation of additional priority habitats.			specifically reference the priority habitats (hedgerows and deciduous woodland).
QUESTION 24: Should any shortlisted / rejected sites be allocated?	1762	Comment	Comments in support of SN0174 and SN0196: HIGHWAYS AND ACCESS: Client has retained a legal right over Bankside Way to provide access to these sites for the purpose of future residential development; allocation of SN0451 appears to resolve the highways constraint at Bell Road/ Mill Road/ Norwich Road junction; improvements associated with SN0451 could reduce the viability of this site and impact on the overall numbers possible, as well as the number of affordable units delivered; HOUSING NUMBERS: consider a more holistic approach to planning at Barnham Broom should be undertaken - consider	HIGHWAYS AND ACCESS: The Council welcomes the clarification that the landowner has retained legal rights for access to SN0174 and SN0196 via Bankside Way - should these sites be reclassified as preferred options for allocation the Council may require formal submission of evidence to support this confirmation. In terms of the identified highways improvements associated with the potential allocation of SN4051 consideration would need to be given to the phasing of development within Barnham Broom should SN0174 and SN0196 be reclassified to ensure that highway safety was not adversely affected by allocations in the wider area in advance of these works being undertaken. Further discussions would be required with the Highways Authority	933	Should either SN0174 and SN0196 be allocated consideration would need to be given to phasing of development to allow alterations to Bell Road/ Mill Road/ Norwich Road to be completed first - confirmation required from NCC Highways that this would be necessary/ appropriate. Review SN0451 to determine appropriate numbers of site and confirm viability with

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			that with highways constraints addressed the village could provide up to 125 dwellings - there is no upper limit to the amount of development proposed in the VCHAP; NEIGHBOURHOOD PLAN: request that Barnham Broom be allowed to bring forward a Neighbourhood Plan setting out proposals for up to 125 new dwellings (those identified as Shortlisted and Preferred sites in the Regulation 18 VCHAP document); it should be for the people of Barnham Broom to decide which sites are allocated and come forward over the Plan period alongside associated benefits; AMENDMENT TO SN4087SL: as originally proposed this site should be replaced and incorporated into SN0174 as 10 First Homes.	to understand the implications of this, as well as the contribution these sites may be required to make to facilitate these junction improvements works. HOUSING NUMBERS: The Council notes the suggestion that Barnham Broom could deliver significant additional growth to that currently proposed in the VCHAP however the Council does not consider that this would meet the objectives of the VCHAP, in particular dispersing growth widely throughout the District to support existing communities and their services and facilities. The approach set in the Village Clusters aims to achieve a number of goals, including supporting services and facilities across a wide range of rural settlements, including those that have not benefited from the support of new development in the recent past. This approach helps to achieve the Government's aim (NPPF para 69) of a proportion of housing on smaller sites. The aim being to diversify the housing market and housing delivery, with the consequent benefit this has to smaller-scale local builders and supply chains. NEIGHBOURHOOD PLAN: The Council encourages parishes wishing to undertake Neighbourhood Plans and proactively offers support to Neighbourhood Plan Groups throughout the process. There are currently a number of active Neighbourhood Plan Groups within the District, including		the promoter of the site in response to concerns raised about the cost of the identified junction improvements.

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				Plans seeking to undertake their own housing allocations. To date the Council has not been advised that a qualifying body is seeking to produce a Neighbourhood Plan for Barnham Broom and it is certainly not correct to suggest that the Council has prevented or refused the opportunity for this to occur. The Neighbourhood Plan allocation process would require a number of stages to be undertaken including an appraisal of available sites against an identified criteria and the production of an evidence base (including a Sustainability Appraisal) to support the allocations. It should be noted that in order to allocate additional sites or housing numbers within a Neighbourhood Plan appropriate evidence would be required to demonstrate a need above that identified by the GNLP and the VCHAP. SN4087SL: Finally, in respect of the amended proposal to incorporate 10 First Homes the Council acknowledges this suggestion. All planning applications are required to deliver an appropriate housing mix in accordance with the most up to date evidence. This includes the provision of affordable housing in accordance with planning policy. The Council notes that First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units and as such would be		

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				required as part of any new housing development in any case.		
QUESTION 24: Should any shortlisted / rejected sites be allocated?	1763	Comment	SN4087SL was originally submitted as an exception site for up to 10 self-build dwellings however on review of the VCHAP the proposal is amended to (a) 10 self-build dwellings within site SN1074; or (b) if SN1074 is not allocated or a Neighbourhood Plan is not brought forward a new site directly adjoining Bankside Way to the south.	The Council notes the alternative proposal submitted in respect of SN4087SL. Clarification should be obtained from the site promoter that SN4087SL is no longer being promoted to the VCHAP as a potential housing allocation site. The alternative proposals are noted and the site to the south of Bankside Way should be noted as a new site submission and be subject to the site assessment process.	932	New site to be registered and site assessment to be undertaken. Clarification to be sought from the site promoter that SN4087SL is to be removed from the VCHAP process.
QUESTION 24: Should any shortlisted / rejected sites be allocated?	1264	Support	SN0174, SN0196, SN4087SL all appear to offer more suitable alternative sites other than the preferred larger central site. The sites 0174 and 0196 do provide extensions to an existing dwellings site, which has proved successful and has the infrastructure and civis already established. Within these two sites the provision of 50+ dwellings could be established, without too much disruption to existing housing. SNC planners have discriminated against these sites on the basis that the Bell/Norwich Road layout needs addressing, which is agreed and yet the proposal is for a 45 build upon the junction? SN0055 also has merit.	Comments noted. SN0174 are both SN0196 shortlisted site and have been considered suitable for development. However, SN4087SL is considered to unsuitable for a Settlement Limit extension for reasons stated within the Regulation 18 consultation document.	930	No action required.
QUESTION 24: Should any shortlisted / rejected sites be allocated?	580	Object	NCC need to develop a climate action plan before any new builds take place. We need more green spaces, a village meadow and ways of conserving what is here rather than increase stress on the failing infrastructure and struggling wildlife.	Alongside the VCHAP is the Greater Norwich Local Plan (GNLP). The GNLP is being prepared jointly by Broadland, Norwich City and South Norfolk Councils and in partnership with Norfolk County Council. The GNLP covers the combined area of Broadland, Norwich and South	927	No action required.

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				Norfolk, excluding the area within the Broads Authority. It includes strategic planning policies for the whole of the area, including mitigating and addressing climate change. For example GNLP emerging Policy 2, in conjunction with other plan policies, requires development to be designed to minimise emissions. It is a broad strategic policy covering a wide range of design issues which is supported by the requirement for a Sustainability Statement to show how development will be low carbon. It also provides flexibility in what will undoubtedly be an era of rapid technological change to 2038 to ensure development seizes the broad range of opportunities to be designed to reduce emissions. Emerging policies 1, 2, 3, 4 and 7 support further development of the green infrastructure network which will provide for mitigation of and adaptation to climate change, including promoting biodiversity net gain and improved and linked habitats. Carbon emissions in Greater Norwich will continue to be monitored using district wide figures produced by Government on transport, domestic and industrial emissions. It is the GNLPs ambition is to reduce per capita emissions and thereby contribute to meeting the national target to bring all greenhouse gas emissions to net zero by 2050, as well as helping to meet local		

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				targets, statements and plans. Measures contained within the GNLP will enable further emissions reductions, continuing recent year-on-year trends. Further to the concerns raised around destruction of the environment, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 24: Should any shortlisted / rejected sites be allocated?	2197	Comment	SN0055- Land east of Spur Road and south of Norwich Road, Barnham Broom Agricultural field bounded by hedges (priority habitat). No other priority habitats onsite (see MAGIC). Site within an amber habitat zone for great crested newts (identified by Natural England). SN0174- Land off Bell Road, Barnham Broom Agricultural field bounded by hedge to the north which is a priority habitat. No other priority habitats onsite (see MAGIC). Site mostly within an amber habitat zone for great crested newts (identified by Natural England) and partly within a strategic Green Infrastructure corridor. Applications for planning consent should be accompanied by a Preliminary Ecological	Comments noted.	923	No action required at this stage.

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			SN0196 - Land to the west of Mill View, Barnham Broom Agricultural field bounded by hedges (priority habitat). No other priority habitats onsite (see MAGIC). Site partly within an amber habitat zone for great crested newts (identified by Natural England) and partly within a strategic Green Infrastructure corridor. Rating for these sites: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required.			
QUESTION 24: Should any shortlisted / rejected sites be allocated?	2107	Comment	SN0055 Few or no constraints. Standard information required at a planning stage. Source Protection Zone 3 The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Assessment: Green	Comments noted.	922	No action required.
QUESTION 24: Should any shortlisted /	2106	Comment	SN0174 - Few or no constraints. Standard information required at a planning stage. Source Protection Zone 3	Comments noted	921	No action required.

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rejected sites be allocated?			The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Assessment: Green			
QUESTION 24: Should any shortlisted / rejected sites be allocated?	2105	Comment	SN0196 - Few or no constraints. Standard information required at a planning stage. Source Protection Zone 3 The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Assessment: Green	Comments noted.	920	No action or change
QUESTION 24: Should any shortlisted / rejected sites be allocated?	2008	Comment	Foul Water Capacity For sites SN0552, SN0018SL, SN2110, SN4051, SN0055, SN0174 and SN0196 available information indicates may be around 150 houses planned here in total for preferred and shortlisted sites. Barnham Broom has some capacity for foul water flows (for approximately 50 houses) but not for all the houses planned in these developments. Discussions will need to be	Comments noted; Barnham Broom has some capacity for foul water flows (for approximately 50 houses) but not for all the houses planned in these developments. Note that not all of the sites listed would be brought forward under the VCHAP.	918	Discussions will need to be held with Anglian Water (AWS), and development must be phased in line with WRC treatment capacity being made available.

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			held with Anglian Water (AWS), and development must be phased in line with WRC treatment capacity being made available.			
QUESTION 24: Should any shortlisted / rejected sites be allocated?	1880, 1881, 1882, 1883, 1884, 1885	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	Comments noted. The requirement for Contamination Report would be addressed at the planning application stage in response to existing policy and legislative requirements.	917	No action required.
QUESTION 24: Should any shortlisted / rejected sites be allocated?	1383	Comment	Site SN0174 is approximately 150m from Barnham Broom Fen County Wildlife Site. Notwithstanding any other concerns, any development on this site would need to demonstrate that there would not be any indirect impacts on the CWS, should there be any hydrological connectivity.	NCC Senior Ecologist has provide comments on the site and it has been noted that the agricultural field bounded by hedge to the north is a priority habitat. No other priority habitats onsite (see MAGIC). Site mostly within an amber habitat zone for great crested newts (identified by Natural England) and partly within a strategic Green Infrastructure corridor. It should be noted that applications for planning consent will be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy will inform the design.	904	No action required.
QUESTION 24: Should any shortlisted /	39	Object	These should all be rejected, they will affect the feel of the village and severely disrupt other people's way of life	The Council notes the objection to all of the sites that have been promoted within the cluster. The VCHAP seeks to allocate the identified housing requirement set out in the Greater	903	No action required.

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rejected sites be allocated?				Norwich Local Plan through a dispersal of housing on smaller sites throughout the village cluster area; as set out in the objectives of the Plan this is to boost the vitality of these areas, improve local choice and support existing services and facilities within these communities.		
QUESTION 25: Should any of the shortlisted sites be rejected?	40, 1102	Mixed	Comments submitted objecting to shortlisted sites SN0174 and SN0196: These sites should be rejected; Bankside Way has not been constructed for through traffic and the access is not fit for purpose; Would result in the loss of the cul-de-sac area where children currently play safely and would have a negative impact on the existing community that has been established at Bankside; New properties would be disconnected from the village; Intrusive visual impact on the Yare Valley; and Existing land suffers from flooding.	The Council recognises these concerns towards the proposed shortlisted sites west of Bankside Way. In terms of the highways concerns, further discussions have taken place with the Highways Authority who have raised queries about the possible existence of a ransom strip at the end of Bankside Way, as well as the need to include third party land to create appropriate visibility splays. Should the sites be reclassified as part of the continuing site selection process it would be necessary to ensure that access to these sites is both achievable and accessible. The site assessment forms note that development in this location would have the potential to have both an adverse landscape and townscape impact, including connectivity to the main village (depending on the access arrangements to the site). The concerns were reflected in the concluding section of the site assessment and in part formed the reason for these sites not being considered as preferred options for allocation. In particular these assessments note that development	931	If reclassified to preferred sites, confirmation would need to be sought that access to these sites is both achievable and acceptable (possible need for third party land). If reclassified to preferred sites, the site boundaries should be reviewed to address the landscape impact and improve the relationship with the existing development to the north.

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				within the western areas of these sites would have the most landscape impact however it was also recognised that the site boundaries could be reduced to address this impact. Should the classification of these sites be amended the site boundaries of the sites should be reviewed to reduce the landscape impact. A reduction in the proposed site area would also improve the relationship between the shortlisted sites and the existing development to the north. Concerns have also been raised about possible surface water flooding in this location however discussions with the LLFA have not raised any technical concerns. The Council is aware that a surface water flowpath runs parallel to the western boundaries of the sites and it would be necessary to ensure that any development on these sites did not contribute to this flowpath. Surface water drainage would need to be accommodated within the boundaries of the site in accordance with current policy and legislation.		
QUESTION 25: Should any of the shortlisted sites be rejected?	581	Support	NCC need to develop a climate action plan before any new builds take place. We need more green spaces, a village meadow and ways of conserving what is here rather than increase stress on the failing infrastructure and struggling wildlife.	Alongside the VCHAP is the Greater Norwich Local Plan (GNLP). The GNLP is being prepared jointly by Broadland, Norwich City and South Norfolk Councils and in partnership with Norfolk County Council. The GNLP covers the combined area of Broadland, Norwich and South Norfolk, excluding the area within the Broads Authority. It includes strategic	928	No action required.

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				planning policies for the whole of the area, including mitigating and addressing climate change. For example GNLP emerging Policy 2, in conjunction with other plan policies, requires development to be designed to minimise emissions. It is a broad strategic policy covering a wide range of design issues which is supported by the requirement for a Sustainability Statement to show how development will be low carbon. It also provides flexibility in what will undoubtedly be an era of rapid technological change to 2038 to ensure development seizes the broad range of opportunities to be designed to reduce emissions. Emerging policies 1, 2, 3, 4 and 7 support further development of the green infrastructure network which will provide for mitigation of and adaptation to climate change, including promoting biodiversity net gain and improved and linked habitats. Carbon emissions in Greater Norwich will continue to be monitored using district wide figures produced by Government on transport, domestic and industrial emissions. It is the GNLPs ambition is to reduce per capita emissions and thereby contribute to meeting the national target to bring all greenhouse gas emissions to net zero by 2050, as well as helping to meet local targets, statements and plans. Measures contained within the GNLP will enable		

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				further emissions reductions, continuing recent year-on-year trends. Further to the concerns raised around destruction of the environment, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 25: Should any of the shortlisted sites be rejected?	4	Object	SN0055 is not an appropriate site for development. Required footways would narrow the existing road which is already prone to speeding by traffic making it more dangerous, particularly as no footways currently exist on either side. Traffic calming measures may mitigate this. Any proposed development should be more environmentally aware than the recent bank side development where there appear to be no obvious environmental measures (increased vegetation, renewable energy etc). A further development of this sort would damage the health and sustainability of the village.	These comments are noted. The Council has undertaken site assessments on all of the promoted sites within the village and concluded that those sites selected pre-Regulation 18 were the most suitable options for development, including shortlisted site SN0055. As part of the consultation and site assessment process technical discussions have taken place with a number of technical consultees. Mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include the provision of a footway. Whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the	919	No action required.

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				impact of alterations to the existing road, as well as the increased traffic movements, on the local ecology are also noted however these matters would be dealt with during the planning application and it would be necessary for all new development to adhere to existing Development Management policies relating to the environment. In addition, emerging Policy 2 of the GNLP 'Sustainable Communities', is a wide-ranging policy and amongst other things, seeks to promote low carbon development and helps to address climate change. This policy states that if the potential to set more demanding standards locally is established by the Government, the highest potential standard will be applied in Greater Norwich. Point 10 of this policy specifically requires all new development to provide a 19% reduction against Part L of the 2013 Building Regulations (amended 2016). If adopted, all development will be subject to the requirement set out in these policies.		

Bawburgh

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QUESTION 26: Settlement Limit	586	Object	The addition of the preferred site to the settlement limit would adversely contribute to the valley setting and rural entrance to the village.	There is existing development to the north and south of the site, as well as some limited development to the west on the opposite side of Stocks Hill. This existing pattern of development will limit the visual impact of new development in this location, reducing its impact on the valley setting and the entrance to the village. Consideration of the landscape and townscape impact has formed part of the site assessment process, and landscaping of the site would play a key role in protecting the character of the area.	15	None required
QUESTION 27: Preferred Site - SN4053, Land to the east of Stocks Hill	2208	Comment	Technical ecological comments for SN4053: Green rating - no major ecological constraints identified from desktop search; surveys and enhancement in accordance with policy required; agric field bounded by hedgerows (priority habitat) on 3x sites - no other priority habitats on site; site in GI corridor; and green habitat zone for GCNs.	The Council notes the comments of the county ecologist and that no significant ecological constraints have been identified on this site. The developer of the site will be required to ensure an appropriate site design that as far as possible seeks to retain natural features on the site. If retention is not possible any proposal on the site will be required to mitigate and/or compensate for their loss as appropriate in accordance with planning policy.	698	No action required
QUESTION 27: Preferred Site - SN4053, Land to	1929, 2115	Comment	Comments received relating to water management: Site is adjacent to a flow path and this should be considered in the site	Note the comments relating to both the adjacent flowpath and potential discharge arrangements for future development on the site. Ongoing discussions with the LLFA will be	23	Discussion with the LLFA regarding the implications of the adjacent flowpath and any possible mitigation

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the east of Stocks Hill			assessment; Outside the IDD boundary; Within the Norfolk Rivers IDB watershed catchment; and If surface water discharges within the watershed catchment of the Board's IDD then discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS)	necessary to understand the implications of the flowpath for the site however it is not anticipated that it would preclude the development of this site.		requirements for policy text.
QUESTION 27: Preferred Site - SN4053, Land to the east of Stocks Hill	1886	Comment	Comments received from Environmental Protection Officer: Unaware of any significant land quality issues on-site or adjacent to the site; Due to scale of scheme a Phase One Land Contamination Report (desktop study) should accompany any planning application on the site; Proximity to the village hall may result in amenity issues for new residents (noise, car headlamps); Proximity of residential dwellings to the village hall could impact on the viability of the business; A Construction Management Plan is likely to be a requirement of any planning approval on the site.	The Council notes the comments relating to the land quality issues and the requirements for both a Construction Management Plan and Contamination Report as part of any subsequent application on the site. It is considered that a sensitively designed site will address the concerns that have been raised about the proximity between the site and the village hall opposite. Design details will be agreed during the planning application process but can also be incorporated into the site allocation policy, if appropriate, to address concerns about potential residential amenity and village hall viability issues however it is also noted that there is already residential development immediately adjacent to the village hall.	21	Requirement for a Phase One Land Contamination Report (desktop study) and a Construction Management Plan to accompany any planning application submitted for the site - to be included in a site allocation policy if appropriate. Consideration to be given to the wording of a site allocation policy to address site layout/ design and the potential residential amenity issues that have been identified.
QUESTION 27: Preferred Site - SN4053, Land to	573, 587, 2031	Object	Concerns have been raised about the following issues:	The site is considered to be well related and proportionate in scale.	19	A Heritage Impact Assessment will be undertaken to

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the east of Stocks Hill			Traffic concerns, including the narrow bridge; Flooding in the village and concerns about drainage issues; Lack of local amenities and poor connectivity to reach facilities; Environmental impact on the green belt; Townscape and landscape impacts; Light pollution; Represents an inappropriate level of growth relative to the number of dwellings in the village; and Adjacent to the Bawburgh Conservation Area - a Heritage Impact Assessment will be required to determine site suitability and possible mitigation measures.	in scale to the existing built form of the settlement. The site is also well located in relation to existing services and facilities within the village, including the village hall and the primary school. NCC Highways has assessed the site and concluded that the site was acceptable in both access and highway safety terms. The Lead Local Flood Authority (LLFA) has noted that site is adjacent to a flowpath and advised that this should be considered as part of the site assessment. The LLFA has not raised an objection to the allocation of this site. The comments of Historic England are noted, as are the concerns relating to landscape and townscape impact of development on this site, and these issues will be subject to further review and assessment where appropriate. These assessments could identify mitigation measures/ enhancements to be incorporated into a site allocation policy to address any issues that may be identified.		determine the site significance and possible mitigation measures. Site will be reviewed to determine whether a Landscape Visual Appraisal (LVA) is required for this site. Discussion with the LLFA to determine whether any site specific policy wording would be required for an allocation on this site to address the adjacent flowpath identified.
QUESTION 27: Preferred Site - SN4053, Land to the east of Stocks Hill	1782	Support	The site is well located, 330m from school and 350m to the pub; village hall is directly opposite. There are good footways and main road is 20mph . Owners of site wish to include provision for a village shop as part of scheme. Land is relatively level, and is an 'infill' parcel. There are limited mature hedges/trees; A47 traffic is not notably known. Site not highly visible in landscape - notable views	The Council notes the ongoing support for this site from the site promoter.	16	No action required

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			towards Norwich Highways proposals, for access and footway connections have been considered further. Flood risk EA preliminary assessment undertaken to demonstrate no issue. Landscape assessment concludes that whilst site could detract from views towards bypass, there are positive measures e.g. central access road, with wide verges would create positive vista. Land is ready and available to be progressed.			
QUESTION 28: Should any of the shortlisted sites be rejected?	410	Object	Comments in support of rejected site SN0002SL: SN4053 sets a precedent for development; SN0002SL does not impact on neighbouring properties as it is surrounded by mature vegetation; development of SN0002SL would not result in development of similar sites along Stocks Hill as these sites are too small to develop; and would like to remain in Bawburgh but in a smaller, more efficient property.	The Council recognises the potential relationship between this site and the current preferred site SN4053 however concerns remain that this proposal would constitute backland development and could result in a poor relationship with both the host property and the preferred site. However, detailed matters such as design, layout and amenity impact would be considered in detail at the planning application stage. The site should be reassessed to determine suitability for an addition to the Settlement Limit.	699	Review the site assessment of SN0002SL to determine whether preferred allocation SN4053 could offer an opportunity for the extension of the settlement limit to include SN0002SL
QUESTION 28: Should any of the shortlisted sites be rejected?	1887, 1888, 1889, 1890	Comment	Comments received from Environmental Protection relating to sites SN4071, SN3032, SN0015 and SN0002SL: Unaware of any significant land quality	The above comments have been noted however at this stage it is not proposed that any of these sites are shortlisted or preferred for allocation. As such although these comments have been	25	No action required.

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			issues on the site or adjacent land; and Due to scale of development proposed a Phase One Land Contamination Report (desktop study) would be required with any application on these sites; and Size of development and proximity to existing dwellings is likely to require the submission of a Construction Management Plan. Additional comments received from Environmental Protection relating to site SN0015: The site is close to pig and poultry rearing that has the potential to adversely affect residential amenities of new residents (noise, odour, flies) and this could also impact on the future viability of the business.	retained for future reference it is not considered necessary comment further at this time.		

Bressingham

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 29: Settlement Limit	279, 295, 648, 728, 770, 891, 1353, 1421, 1446, 1499	Mixed	The following concerns have been raised in response to Question 29: INFRASTRUCTURE: Primary school at capacity; lack of employment opportunities; additional pressures on GP and dental surgeries; poor IT infrastructure within the village; new wildlife habitats required ; HIGHWAYS: Inadequate local road network; widening of roads will have adverse impact on local ecology; inadequate treatment of roads locally during winter months; SL should be extended around recent development; issues with on-street parking; PRINCIPLE, LOCATION AND SCALE OF DEVELOPMENT: Already a disjointed settlement; location is ok but quantum of housing proposed and the associated traffic generated too great; do not wish to live in a housing estate;; disagree with the preferred sites; oppose the need for a VCHAP; approach is incorrect – should not rely on submission of sites by landowners for selection; VCHAP should plan for the future by creating new developments with adequate land and facilities to benefit village and residents; rejection of sites along A1066 is incorrect as there are easily accessible facilities and visitor attractions along this route; development along the A1066 is the historical centre of the village so should be recognised as such and be	The Council recognises the concerns that have been raised in response to Question 29. Question 29 specifically referred to proposes changes to the Settlement Limit and whether these are considered to be suitable. Many of the responses received focussed more generally on the principle of new development in Bressingham and concerns about the impact this could have on the existing services, facilities and residents, rather than alterations to the Settlement Limit. Where appropriate the Council has responded to these comments but in some instances further detail is provided in subsequent responses. It is recognised that Bressingham does not have a continuous defined Settlement Limit and that areas of the village are dispersed. The existing Settlement Limit reflects this pattern of growth and seeks to avoid the coalescence of these distinct areas by retaining gaps between them. To preserve the character of the settlement it is not proposed that the main Settlement Limit boundaries are amended as part of this revision (with the exception of the inclusion of new allocations which would be included within the Settlement Limits). Recent new dwellings at High Road are already within the existing Settlement Limit and therefore no further changes are	27	No action required.

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			within the Settlement Limits; retail and employment opportunities along the A1066 are critical for the success of the village; local objectives should be identified for the plan to be of relevance – 3rd cluster along the A1066 recognised, avoidance of roadside ribbon development, protection of gaps between distinct areas in the settlement, opportunities for in-depth housing and less restrictive settlement boundary to the west of Common Road.	necessary to include this development. Inclusion of an area within the defined Settlement Limit is not a reflection of the historic importance of that area; nor is its omission a reflection on the importance of that area to the functioning of the settlement. Rather, the function of the Settlement Limit is to differentiate between those areas in which new development is more likely to be supported and those areas in which it is more appropriate to apply more restrictive planning policies. As such the Council remains of the opinion that the areas of retail and employment sites along the A1066 to the south of the settlement are not suitable for inclusion within a defined Settlement Boundary. The level of growth identified for Bressingham is a balanced decision determined by a number of factors. These considerations include the overall objectives of the VCHAP, the findings of the Sustainability Appraisal and the level of services and facilities available within a settlement cluster. The Council considers that a reasonable level of growth has been identified for Bressingham taking all of these factors into consideration. In terms of more specific comments about the existing infrastructure the Council responds as follows: Bressingham is well located with good access to the services, facilities and employment opportunities within the		

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				nearby market town of Diss. A number of local facilities and services have also been identified within the settlement itself and these would be supported by new development. Emerging Policy 2 of the GNLPP sets out a requirement for new major developments to have access to fibre broadband. Representatives of NCC Education department have been contacted directly regarding the issues raised about the capacity of the school and whilst it is recognised that the school currently operates at capacity many of these pupils currently travel to the school from outside the catchment area. As such should additional pupils from within the catchment area wish to attend the school in the future there would be places available for these children. Meetings have also taken place between officers at South Norfolk Council and the Integrated Care Systems (NHS) to better understand the impact the VCHAP may have on existing NHS services within the South Norfolk (and adjacent) areas. However, whilst the Council recognises these concerns it is also clear that this is a national issue to be addressed. The ICS continues to be informed of the progress of the VCHAP and offered opportunities to be involved with the planning of growth within South Norfolk. The ICS has also been involved in wider discussions about the overall		

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				growth within the Greater Norwich Local Plan areas, of which the allocations made in the VCHAP will contribute towards. Discussions have taken place with NCC Highways officers to assess the suitability of the local road network. A number of sites that were promoted were discounted due in part to highways concerns - either due to constraints that would prevent safe access and egress to the site or impacts on the wider road network. Sites accessed directly from the A1066 would not be supported by NCC Highways for new residential development precluding housing allocations in these locations. Discussions with NCC Highways have identified highway mitigation measures to address issues that have been identified during the site selection process and these will be incorporated into final policy text where appropriate.		
QUESTION 29: Settlement Limit	112, 259, 1477	Support	Comments received: Settlement Limit should remain as already defined; local infrastructure cannot support extension with some already unable to cope with the existing demands; future development should be infill within the existing Settlement Limit only; and consider these to be the best sites	The Council notes these representations which support the retention of the existing Settlement Limit rather than an increase in the defined boundaries. There is currently no proposal to amend the Settlement Limit at Bressingham with the exception of sites that are allocated as part of the VCHAP being included in the Settlement Limit as a consequence of their allocation. The Council considers the preferred sites at Bressingham to be well related to the existing pattern of development and	26	No action required.

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				would form a natural extension to the existing Settlement Limits. Comments relating to the capacity of the local infrastructure are acknowledged and have been addressed via the technical consultation which was undertaken as part of the site selection process. These matters are dealt with in more detail in subsequent questions and answers.		
QUESTION 30: Preferred Site - SN3019, Land west of School Road	2032, 2209	Mixed	Ecological and heritage consultee comments for SN3019SL: Site is opposite Grade II listed Pine Tree Cottage therefore a Heritage Impact Assessment should be undertaken; and Ecology - green rating following desktop assessment; green habitat zone for GCNs; standard information required at the planning application stage.	The Council notes these comments from the technical consultees. At this time the inclusion of SN3019SL as a preferred allocation site is under review following the identification of flood risk issues on the site, however should the site remain within the VCHAP as either a shortlisted/ preferred site then a Heritage Impact Assessment will be required.	734	Heritage Impact Assessment required
QUESTION 30: Preferred Site - SN3019, Land west of School Road	260, 280, 335, 555, 582, 611, 618, 646, 730, 756, 764, 892, 1425, 1434, 1490, 1500, 1625, 1628, 1716, 1791, 2274	Mixed	A summary of the representations received relating to SN3019SL: FLOODING & DRAINAGE MATTERS: Serious flooding across the site due to inadequate drainage; School Road already experiences regular flooding, including those properties at the bottom of School Road; and no mains drainage. INFRASTRUCTURE MATTERS: School operates at capacity; inadequate existing infrastructure in the village to support the proposed growth; no employment potential; poor IT infrastructure within the village; impact on existing GP and dental surgeries; limited existing services mean a	The Council's responses to the representations received to Question 30 have been grouped together below by category: FLOODING & DRAINAGE MATTERS: Concerns that have been raised by both local residents and technical consultees regarding the possible flood risk associated with the development of this site have been recognised and explored further in direct discussions with the Lead Local Flood Authority. As such the Council considers that it is appropriate to review the inclusion of this site as a preferred allocation.	40	Review of the inclusion of SN3019SL as a preferred allocation site following discussions with the Lead Local Flood Authority. If the site remains as either a shortlisted/ preferred allocation site a Heritage Impact Assessment will be required.

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			well-related site is irrelevant; existing issues with connections to both water and electrical supplies; ECOLOGY/ LANDSCAPE/ HERITAGE MATTERS: This site is a haven for wildlife; oak tree should be protected as well as hedgerows; loss of peace and tranquility resulting; site is more detached than others and more prominent in the landscape; existing pattern of development is single frontage; detrimental impact on townscape and landscape; development would be urban sprawl and further extension into the countryside; topography of the site within the landscape has not been considered HIGHWAYS MATTERS: Existing congestion along School Road would be exacerbated by increased traffic levels; School Road is in poor condition and too narrow to cope with the additional traffic; restricted visibility and safety concerns about the junction with the A1066 with no highways comments to address this issue; concerns about the impact of construction traffic; opportunities exist to provide a safe pull-in for school traffic along the site frontage; negative impact of additional traffic on wellbeing of residents; environmental impact of road widening, including impact on ecology and increased carbon footprint of the village; SCALE & LOCATION: Disproportionate amount of development within a small area; why is proximity to schools being	INFRASTRUCTURE MATTERS: a key objective of the VCHAP is the distribution of new development throughout the settlements in the District to support existing services and facilities within these communities. Whilst it is recognised that rural settlements offer fewer services and facilities than their urban counterparts, a continued concentration of development in urban areas will lead to an inevitable decline of existing services and facilities within rural areas. The VCHAP seeks to re-balance this, as well as offer new opportunities for growth within local communities. Technical consultees have been invited to submit representations relating to their capacity constraints and these comments have been taken into account during the site selection process. Discussions with Anglian Water are continuing however at this stage no specific infrastructure constraints have been identified. Meetings between Council Officers and the Integrated Care System (NHS) have also taken place in order to understand the constraints and opportunities new development will offer for existing NHS services. However, as noted elsewhere, matters relating to capacity within the NHS are a part of a larger nationwide issue being considered outside the remit of the planning system. Similarly, discussions with NCC Education have acknowledged that whilst the school is currently		

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			promoted above all other considerations?; unclear about the housing mix; housing associations have experienced problems moving tenants into the village; and consideration should be given to smaller sites within the village.	operating at capacity this is in response to children attending out-of-catchment. A combination of falling numbers of pupils on the school roll and a reduction in out of catchment school places mean that the school would be able to accommodate local children should the need arise. ECOLOGY/ LANDSCAPE/ HERITAGE MATTERS: The site selection process has included an assessment of the impact of development on the environment. This included heritage, landscape, townscape and ecology. It has been noted separately that Historic England have requested the completion of a Heritage Impact Assessment should this site remain within the process in order to assess the impact development would have on the significance of Pine Cottage (opposite). If the site remains as either a shortlisted/ preferred site within the VCHAP a HIA will need to be completed to inform site specific planning policy wording if appropriate. The scale of development proposed on this site is considered to be commensurate to the surrounding pattern of development and whilst recognising that there would be some landscape impact the Council does not consider that it would be to a detrimental degree and furthermore, that with good design the development of this site could create a rural entrance to the village. Finally, it would be a requirement that any planning application for development of the site		

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				would be accompanied by the submission of the appropriate ecological surveys, mitigation measures and biodiversity enhancement opportunities – a desktop study by the County Ecologist has not indicated any specific ecological constraints on this site. HIGHWAYS MATTERS: NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network, including safety aspects where appropriate. Mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include carriageway widening along the site frontage as well as the provision of a footway to the school. Norfolk County Council have assessed the road network as a whole to determine whether the traffic from the proposed number of houses could be accommodated, and the fact that a particular road or junction has not been explicitly commented on does not mean it has not been considered as part of this process. Whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage.		

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				Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, on the local ecology are also noted however these matters would be dealt with during the planning application and it would be necessary for all new development to adhere to existing Development Management policies relating to the environment, as well as emerging Policy 2 of the GNLP. SCALE & LOCATION: Proximity to local schools has been used as an important assessment criteria for the site selection process however a wide range of additional criteria also determine the suitability of a site for allocation in the VCHAP including (but not restricted to) accessibility to local services and facilities and the availability of public transport locally. It is therefore an incorrect statement that the proximity of a site to a primary school is the overriding concern in the site selection process. In addition to the Council's own site assessment process (which has used agreed methodology) the site selection process is also informed by the production of a Sustainability Appraisal which provides important supporting evidence about the suitability of sites in terms of their overall sustainability. The details of the housing mix on allocated sites will be determined at the planning application stage however it will be guided by policy requirements, the most		

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				recent housing need evidence and discussions with the Council's Housing Enabling Officer to ensure that development that comes forward is the most appropriate for the area. Throughout the village of Bressingham a significant number of sites have been promoted for allocation enabling the Council to consider the most appropriate options for the village. The Council remains of the opinion that the location of the selected sites was acceptable at the Regulation 18 stage of the process however as noted above matters relating to the flood risk on site SN3019SL will lead to a review of this site within the VCHAP.		
QUESTION 30: Preferred Site - SN3019, Land west of School Road	1713	Comment	Additional comments: New development will require additional allotments for new residents due to the small size of gardens; Adjacent Parish land is being proposed as a woodland site and this would mean expansion of the allotments would not be possible; and All current plots are in use and allocated.	The requirement for additional allotment sites is noted and there may be an opportunity to explore the provision of allotment provision within the site allocations for Bressingham to address this issue.	35	To consider whether a site for allotments is an appropriate addition to a site allocation in Bressingham.
QUESTION 30: Preferred Site - SN3019, Land west of School Road	1443	Comment	Specific comments relating to the impact on the local school: The school is at capacity and further local housing would mean the Local Authority would be required to enable and finance the following: extension of school owned land, additional buildings to provide	The concerns about the capacity of the school and implications for further resources and facilities are acknowledged. Discussions with NCC Education have included a review of the status of Bressingham Primary School. Whilst it was noted that the school was currently operating at capacity it was	32	Review of NCC Highways recommendations for inclusion in policy allocation text.

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			further classrooms and services, extension of the playground and extension of the current playing field area; Additional housing could exacerbate existing parking and road safety issues; and Further parking on site SN4036 would be welcomed although previous discussions also took place at Pascoe Place but did not come to fruition.	also recognised that the majority of these do not attend from within the school's catchment area. Therefore should additional pupils from within the Bressingham Primary School catchment area choose to attend this school there would be sufficient places for them to do so. A number of suggestions have been put forward to address the existing parking and road safety issues as part of this representation. Discussions with NCC Highways have identified proportionate mitigation measures that should be brought forward as part of the site allocation policy text.		
QUESTION 30: Preferred Site - SN3019, Land west of School Road	113, 1930, 2140	Comment	Comments relating to water management issues: Outside the IDB boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment - If surface water discharges within the watershed catchment of the Board's IDB, this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS); notice must be taken of run-off and drainage from this site as this road is already subject to surface water flooding; a riparian owned watercourse runs adjacent to the southern site boundary; a major flow path affects the majority of the site - flow lines show this water flows south off the site;	The comments relating to the flood risk of this site are noted and have been the subject of further discussions with the Lead Local Flood Authority who have expressed concerns about development of this site. As such the inclusion of this site within the VCHAP will need to be reassessed.	31	Review the inclusion of the site based upon the identified flood risk and discussions with the LLFA to determine whether the site should be removed from the list of preferred allocation sites.

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			access to the site is heavily affected by the on-site flood risk; a small area to the west of the site is unaffected by flood risk; and advise that inclusion of this site in the plan is reassessed.			
QUESTION 30: Preferred Site - SN3019, Land west of School Road	1566	Support	Comments in support of this allocation: The site is well related and connected to the centre of the village; existing footpath provision; and any footpath or surface water drainage issues could be reasonably mitigated.	The Council acknowledges the ongoing support for the allocation of the site by the site promoter. However, whilst the Council maintains that this site has a number of benefits in terms of connectivity and proximity to existing facilities and services both the Regulation 18 consultation and the technical consultation resulted in the Council being made aware of serious concerns about surface water flow routes across this site, as well as related off-site flooding. Subsequent discussions with the Lead Local Flood Authority (LLFA) have resulted with a recommendation from the LLFA that this site should not be allocated being maintained. The Council will need to consider the preferred allocation status of this site in light of these comments.	30	The Council will need to review the preferred allocation status of this site following receipt of consultation responses.
QUESTION 31: Should any of the shortlisted / rejected sites be allocated?	297	Comment	Comments in a single representation suggesting a preference of site development within Bressingham (set out in order of preference): SN3037 (part) - 50 dwellings 1161 (2011 LP submission) - 35 dwellings	The Council welcomes comments on the site selection, including alternative options for allocation.	738	No action required

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			SN4037 - 12 dwellings (but only if essential) Commentary in a single representation setting out sites to be rejected: SN3019SL - should be retained as open landscape between the clusters of development - possible opportunity to provide a parking area to allow safer traffic and pedestrian movements - would also increase ribbon development SN2079 and SN2054 - essential to the open landscape and should be protected - SN2079 allows views of the war memorial SN3010, SN3036 and SN3038 - currently in employment use and should be retained as such SN3038 - premature to consider development on this site now - possible future employment land SN4026 and SN3023SL - outside the settlement boundary SN4033 - access issues and landscape impact			
QUESTION 31: Should any of the shortlisted / rejected sites be allocated?	2215	Comment	NCC Ecology comments on SN4037: Green rating with no ecological constraints identified during desktop survey; agricultural field bounded by priority habitat (hedgerows);	The Council notes these comments, including the existence of the PROW adjacent to the site, and is reassured that an appropriate ecological avoidance, mitigation and enhancement strategy would be achievable on this site. The developer of the site will be required to submit the appropriate	737	No action required

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			PROW along western boundary; green habitat zone for GCNs; site is SSSI IRZ but residential development is not a trigger for consultation; and planning applications to be accompanied by surveys and mitigation which inform the site design.	supporting evidence at the time of application, clearly indicating how this has informed the site design, in accordance with current planning policy. Consideration should also be given to the inclusion of Biodiversity Net Gain on development sites in line with emerging legislation.		
QUESTION 31: Should any of the shortlisted / rejected sites be allocated?	2078	Comment	LLFA response to SN4037: Green rating - the site contributes to an off-site flowpath; flowlines indicate flood water flows south-east to a large flow path southeast of the site; the majority of the site is not at risk of flooding and has the potential for development; this should be considered in the site assessment.	The Council has noted the concerns of the LLFA relating to the wider flowpath to the south of the site (specifically in relation to site SN3019SL) and has sought further clarification from the LLFA following receipt of these comments. Discussions with the LLFA indicated that appropriate design solutions on-site would be achievable and could improve the situation off-site as the flowpath originates within SN4037. However it was suggested that combined development of SN4036 and SN4037 may not be achievable and further clarification on this matter should be sought prior to the final site selection process.	736	Confirm with the LLFA whether the simultaneous allocation of site SN4036 and SN4037 is possible and review current site selections in Bressingham if appropriate.
QUESTION 31: Should any of the shortlisted / rejected sites be allocated?	1448, 1630	Comment	Preferred sites around Bressingham are too big; area around School Road is already congested; reconsider the smaller sites or areas that have roads more suited to the additional level of traffic;	These comments are noted. The Council has undertaken site assessments on all of the promoted sites within the village and concluded that those sites selected pre-Regulation 18 were the most suitable options for development for the reasons set out in the preceding questions and responses. Whilst the Council recognises the concerns raised in this representation about the size of	735	No action required

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			planning for the future is what is required, including forecasting growth; and a new development with land to incorporate facilities and services is needed.	the selected sites it remains of the opinion that this is a suitable approach as this will allow for the emergence of a coherently planned form of development with the potential for additional local benefits to be realised (for example, affordable housing, school car parking area). More generally, the GNLP has forecast growth in housing numbers (as well as employment land requirements) and plans for this accordingly, taking into consideration the existing and future infrastructure requirements. The housing targets set out within the VCHAP are derived from the evidence compiled for the GNLP with a key objective of the plan being the distribution of new housing to support the existing rural communities and their facilities within the District. As part of the site selection process consideration has been given to the level of existing services and facilities in proximity to promoted sites and technical discussions have taken place with infrastructure providers to determine capacity and constraints within the networks/ services. Specific reference has been made to healthcare facilities and whilst discussions have taken place with the ICS (NHS) about the proposed VCHAP strategy and housing numbers to be delivered it is recognised that capacity and resourcing issues within the NHS fall outside the remit of the planning system. Whilst there are often		

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				opportunities for new development to provide/offer land and/or buildings for NHS usage the uptake and resourcing of these facilities again falls outside of the planning system. Early engagement with the ICS however (as has occurred via both the GNLP and VCHAP processes) affords the ICS an opportunity to future plan their resources to accommodate the growth in local communities. Similarly, discussions with NCC Education relating to existing and anticipated future pupil on-roll numbers have informed the site selection process, and have included conversations about the potential expansion of schools were appropriate.		
QUESTION 31: Should any of the shortlisted / rejected sites be allocated?	552	Support	Support for SN2079: Better related to the village than other sites due to the housing opposite and would form a natural rounding of the boundary; no environmental designations on the site, low risk area to west only for surface water flooding; site could support 12 dwellings - single if necessary to address concerns about the scale [height]; no impact on amenities of properties opposite; public footpath could connect to existing along High Road and private driveways would address highways issues;	The site assessment recognised that this site relates well to the existing village but key concerns were raised relating to the highway impact, the potential for off-site flooding (although it was acknowledged that this was not shown on the flood maps) and the landscape impact of development in this location. Previous comments from NCC Highways suggested that whilst impacts on the wider road network were likely to be acceptable, immediate access to site would require road widening works to be undertaken. It is unclear whether private driveways (as suggested) would be an acceptable alternative solution but this could be explored further prior to final site allocations. Public comments submitted as part of	76	Review the site assessment in light of the Regulation 18 consultation and technical consultee comments and if the landscape impact is considered to be acceptable seek further technical comments from both LLFA and NCC Highways regarding the suggested solutions for the site put forward as part of this representation. The site may then be reconsidered as an allocation site.

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			site is well related to services and facilities; EA maps do not show the site to be located within an area of flood risk but this could be managed via a surface water management plan; no significant landscaping features on the site which is also relatively flat - development of the site could include soft landscaping; and site is not within the designated river valley and could be designed to sensitively address heritage assets.	earlier consultation by the GNLP expressed clear concerns about the risk of off-site flooding from this field, particularly affecting those properties immediately to the south. It is recognised that this is not shown on the EA flood maps and if the site is reviewed and considered to be acceptable in landscape terms then seeking specific comments from the LLFA to seek clarification about this issue would be a prudent next step. In terms of the landscape impact, it is noted that the evidence submitted to support the site promotion indicates that this parcel of land is elevated within the wider landscape. Furthermore in this context, the lack of significant site features would result in development in this location being more prominent. Appropriate on-site landscaping could potentially mitigate the impact of development on the openness of the war memorial at the junction of Folly Lane and Fersfield Road and a review of the extent of the River Valley designation confirms that this designated area lies further to the site, closest to the A1066. Notwithstanding these points the topography of the site remains a concern and development on this site should be considered within the wider landscape setting.		
QUESTION 31: Should any of the shortlisted /	262	Object	Objection to any new development in Bressingham: Infrastructure inadequate to support new	The Council recognises the concerns that exist concerning new development within existing rural communities however it also remains of the opinion	74	Review of the Water Cycle Study to determine the position of Anglian Water

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rejected sites be allocated?			development of this scale; poorly maintained and narrow roads; highway junction visibility concerns; school operating at capacity; inadequate drainage; lack of public transport as well as poor connectivity to services and facilities; and Rural communities such as this one can accommodate individual sensitively placed newbuilds but not substantial developments.	that distribution of development throughout these villages remains an appropriate approach to ensuring the ongoing vitality, growth and sustainability of our rural areas. The Council acknowledges that the level of services and facilities available within these areas will be fewer than those within the market towns or urban fringe areas and the Council has considered the existing services and facilities available to new and existing residents as an important consideration in the site selection process. Bressingham is considered to be a sustainable location for the level of growth proposed in the VCHAP. As part of the consultation and site assessment process technical discussions have taken place with a number of technical consultees. NCC Highways have advised that with some local highways improvements associated with site specific developments site allocation within Bressingham is acceptable however overall the preferred sites are considered favourably in highway terms. Discussions have also taken place with NCC Education who have confirmed that whilst the school is currently operating at capacity this is due to the large number of children enrolled from out of the catchment area therefore the school can accommodate children from Bressingham should spaces be required. The Lead Local Flood Authority has also		regarding new development within Bressingham.

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				provided technical advice about the sites promoted within Bressingham and these comments will lead to a review of the preferred allocation sites within Bressingham. Detailed comments from Anglian Water are pending and will be reviewed as part of the Water Cycle Study in due course.		
QUESTION 31: Should any of the shortlisted / rejected sites be allocated?	894, 1437	Object	Agree to the rejection of the unsuccessful sites in the village; Do not agree with the potential allocation of shortlisted site SN4037 (either instead of or in addition to the Preferred sites); Allocation of SN4037 does not meet the objectives of the Plan- SN4037 would not support the existing community and would damage the character of the village; negative impact on the wildlife in the adjacent woodland; and would result in additional flooding.	This Council considers that this site relates reasonably well to the existing form of development in Bressingham although recognises that it would represent a departure from the predominant linear form of development. It is unclear why development of this site would not support the existing community within the village, particularly given the proximity of this shortlisted site to the current preferred allocations. Similar objections have not been made to those potential development sites. On balance the site is considered to be less intrusive in the wider landscape than alternative sites that have been assessed due to existing development and vegetation around the site. Appropriate mitigation measures would be necessary to address any potential impacts on the adjacent listed building but the Council is satisfied that this would be achievable. Any planning application submitted for development on the site would be required to include an ecological survey (and mitigation measures) as supporting evidence in accordance with current policy as well	58	No action required

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				demonstrate Biodiversity Net Gain in accordance with emerging legislation. Detailed discussions have also taken place with the Lead Local Flood Authority who have suggested that an appropriate sustainable drainage scheme could be accommodated on the site and could improve the situation off-site to the south.		
QUESTION 31: Should any of the shortlisted / rejected sites be allocated?	914	Support	Support for SN3037: Derelict site with little ecological value; site is an eyesore and could be improved with sympathetic development; better connected to Diss; and a smaller number of dwellings with landscaping and a play area could be an asset to the southern end of the village.	Whilst the benefits of redeveloping brownfield sites is acknowledged this site was subject to a full site assessment and was considered to be unsuitable for a number of reasons including the piecemeal form of development that would result from dwellings in this location. NCC Highways have also confirmed that residential access onto the A1066 could not be supported. For this reason this the Council does not consider this to be a reasonable option for allocation as part of the VCHAP.	57	No action required.
QUESTION 31: Should any of the shortlisted / rejected sites be allocated?	912	Support	Support for site SN3038: Eastern edge could be suitable for a small number of dwellings - possibly no more than 6; Site benefits from mains drainage, bus route and being close to the shop; Loss of good farmland can be kept to a minimum with small developments; and	A significantly larger site was promoted for development in this location and was subject to a full site assessment. The site is a considerable distance from the main areas of the settlement and as such a smaller number of dwellings would not form an appropriate addition to the existing Settlement Limits of Bressingham - a minimum of 12 dwellings would be required for the site to be considered as an allocation. Whilst the benefits of utilising brownfield sites is recognised this site has poor connectivity back into the main	55	No action required

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			Use brownfield sites where possible to avoid loss of farmland.	areas of the village and would not be supported by NCC Highways who have advised that access to residential sites from the A1066 can not be supported for highway safety reasons. In landscape terms this site also lies within a designated River Valley and would appear as piecemeal development within the wider landscape. The Council therefore remains of the opinion that this site is not suitable for allocation in the VCHAP.		
QUESTION 32: Should any of the shortlisted sites be rejected?	2275	Comment	Comments submitted in response to proposed Settlement Limit boundaries and allocations in Bressingham including a number of alternative options for development in the settlement [including sites not promoted to the VCHAP] and an addition to the settlement limit comprising existing development along the A1066.	This representation raises a number of different issues but as it has been submitted in response to a number of questions relating to Bressingham ,and has been responded to in detail in relation to those questions, the Council does not consider it necessary to repeat the wider issues again in this response. The respondent has suggested that a number of alternative sites should be considered either for allocation or as additions to the settlement limit. For the reasons outlined previously the Council does not consider these to be appropriate options for allocation or settlement limit extensions. To be clear, the Council recognises that Bressingham does not have a continuous defined Settlement Limit and that areas of the village are dispersed. The existing Settlement Limit reflects this pattern of growth and seeks to avoid the coalescence of these distinct areas by retaining gaps between them. To	905	No action required

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				preserve the character of the settlement it is not proposed that the main Settlement Limit boundaries are amended as part of this revision (with the exception of the inclusion of new allocations which would be included within the Settlement Limits). Inclusion of an area within the defined Settlement Limit is not a reflection of the historic importance of that area; nor is its omission a reflection on the importance of that area to the functioning of the settlement. Rather, the function of the Settlement Limit is to differentiate between those areas in which new development is more likely to be supported and those areas in which it is more appropriate to apply more restrictive planning policies. As such the Council remains of the opinion that the areas of retail and employment sites along the A1066 to the south of the settlement are not suitable for inclusion within a defined Settlement Boundary.		
QUESTION 32: Should any of the shortlisted sites be rejected?	767	Object	Object to shortlisting of SN4037: Impact on the school; impact on road drainage (northern and southern ditches connect to School Road); and impact on a valuable wildlife habitat.	These comments have been noted. Discussions with NCC Education have taken place during the consultation process and it has been confirmed that whilst the school is operating at capacity the majority of pupils are travelling from outside the catchment area therefore the school does have places should children from within Bressingham choose to attend. Whilst certain on and off-site features have been noted by NCC Ecology it is considered that appropriate mitigation measures and sensitive design at a planning	80	Review the LLFA comments and the surface water flowpath to determine whether it remains suitable to shortlist this site,

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				application stage could address these concerns. The comments of the LLFA have been noted and whilst on-site surface water flooding is not considered to be an issue of concern it is recognised that surface water flowpaths from this site connect to a larger surface water flowpath to the south and that this flowpath has resulted in past flood events along School Road.		
QUESTION 32: Should any of the shortlisted sites be rejected?	895, 1438, 1440	Mixed	Support rejection of shortlisted site SN4037; Does not meet the Plan's objectives or policies; does not relate well to the existing community or settlement and will have a detrimental impact on the landscape, ecology, current traffic numbers and existing flood situation. [Note: The Council has noted that this representation variably refers to sites SN4036 and SN4037 but considers it likely that the respondent intended to make all of these comments in relation to SN4037, the shortlisted site that is one of the subjects of question 32]	The Council acknowledges these comments and has considered all of these matters within the initial site assessment, as well as in detail with a number of technical consultees who have provided further evidence/ information to inform the site selection process. As part of these discussion the LLFA has continued to express concerns about a local surface water flowpath and this may impact on the inclusion of this site within the VCHAP following a further review.	79	No action required.
QUESTION 32: Preferred Site - SN4036 - Land to the east of School Road	1502	Object	Comments objecting to Preferred sites SN3019SL and SN4036: Lack of local infrastructure; Detrimental to the townscape; Narrow roads; and	It is noted that this should be a response to Questions 30 and 32. The VCHAP seeks to distribute growth at a small scale evenly throughout the rural areas of the South Norfolk District to increase the sustainability of these settlements and communities. Growth	78	No action required

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			No consideration given to the local impact or the sustainability of development in this location at the scale proposed.	in areas that have not previously been supported by new developments will provide support for existing facilities and services within these areas whilst providing a broader range of housing choice. The assessment process has included discussions with technical consultees, including NCC Highways, NCC Education and the LLFA all of whom have provided feedback on the current proposed preferred and shortlisted sites. These comments form part of the site assessment and will be reviewed alongside submissions received during the public consultation to determine whether changes are required to the current proposed site allocations.		

Brooke, Kirstead and Howe

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QUESTION 33: Settlement Limit	1806	Comment	1. The Settlement Limit in Brooke should be increased by no more than 25 new dwellings; this reflects the average requirement for additional housing allocations across the 48 village clusters in South Norfolk 2. Brooke has limited facilities - no post office, no medical facilities, very limited shopping provision and very limited employment opportunities; any significant expansion of the population would simply increase the number of people having to travel outside the village for their everyday living requirements 3. Brooke has already accommodated new dwellings on Howe Lane in excess of the allocation in the current Local Plan	1. Whilst an average of 25 dwellings each across the 48 village clusters would deliver the minimum 1,200 dwellings, the plan also recognises that some clusters include a wider range of services/facilities and have better access to nearby larger settlements and can therefore support larger developments. 2. Brooke has a range of basic services, including primary school, village hall, pubs, regular bus service to larger settlements, selection of employment opportunities etc. It is acknowledged that very few of the village clusters include a GP surgery and are reliant on nearby larger settlements for these. 3. The current Local Plan allocated two sites to accommodate new development in Brooke, but this did not represent a 'ceiling' on development, should planning applications be received on other suitable windfall sites, such as the infill site for three dwellings at Howe Lane.	642	No action required.
QUESTION 33: Settlement Limit	1304	Comment	Concerns: 1. volume of traffic using High Green - narrow road; primary school; large number of parked cars at peak times; access to shops/hairdresser's; 2. 50 houses encompassing both sides of the Norwich Road too many and larger	1. The Highways authority has not raised any objection in principle to an increase in traffic on High Green but have raised concerns about the suitability of the access to the promoted allocation-scale sites. 2. Whilst an average of 25 dwellings each across the 48 village clusters would	641	Consider the level of detail in the Policy re. access for the Preferred site(s) and the need to landscape the site(s) to take account of their location on the entrance to the village.

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			than envisaged average of up to 35 houses; would create a housing estate at the north end out of keeping with the appearance of the village; could presage more building behind the developments; access to/from a busy road hazardous; 3. no sites shortlisted at Kirstead/Howe. It seems that Brooke is bearing the brunt of development, which seems unfair.	deliver the minimum 1,200 dwellings, the plan also recognises that some clusters include a wider range of services/facilities and have better access to nearby larger settlements and can therefore support larger developments. Brooke comprises a range of development types and styles that have evolved over many years. The scale is comparable with previous developments at Brecon Road/Coniston Road and St. Peter's Road/Burgess Way. 25 dwellings per hectare is not considered inappropriate in a rural context. However careful consideration will be given to the landscaping of this approach to Brooke. Further development adjacent to this site would be subject to future iterations of this plan, or successor documents. 3. two sites at Kirstead were assessed, but not considered suitable for development, and no sites were proposed at Howe.		
QUESTION 33: Settlement Limit	1267, 1703	Mixed	The extent of the settlement area must be addressed. Currently there is little control over development distance from the road in an east west direction, only a limit to the North. The two proposed sites for up to 25 houses are a consequence of the inadequate definition of this area.	Both the VHCAP and previous Local Plans have set Development Boundaries/Settlement Limits for Brooke, which have managed the release of land for development over time, reflecting the needs at the time. Further development to the rear of the Preferred sites would be a matter for future iterations of this plan, or successor documents.	640	No action required.

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QUESTION 33: Settlement Limit	1377	Object	Concerns over the Shortlisted site (SN2119) re. drainage and flooding issues that are much worse than the proposal indicates. Proximity to wildlife meaning there would be significant adverse consequences in terms of ecology. Highways dangers given the location on arguably the blindest bend in the whole village.	A number of the issues raised are acknowledged in the Site Assessment of SN2119. In particular, the Highways Authority view that the site needs to be accessed via Astley Cooper Place, as access onto High Green does not appear to be achievable (poor alignment of the road and lack of footway) and would potentially result in the loss of trees/hedgerow, detrimental to the approach to the Conservation Area.	639	Assess whether the site should be included in the VCHAP or rejected, likely to need further input from Highways and the LLFA.
QUESTION 33: Settlement Limit	438	Object	Re. the Preferred Sites. I don't object to the site but to the number of properties. Highways state that if 50 properties were built then a roundabout might be required which would require even more houses to negate cost. The number of properties should be reduced to negate road alteration. Building what would be a housing estate on the main road into Brooke would have a massively detrimental visual impact on the village. If an allocation is to be made careful thought should be given to screening the sites to make them look more in character with the village.	The Highway authority has raised no objection in principle to accessing the Preferred site(s). Clarification on the specific highways requirements for the site will be sought and taken into account as part of the finalised policy. The scale is comparable with previous developments at Brecon Road/Coniston Road and St. Peter's Road/Burgess Way. 25 dwellings per hectare is not considered inappropriate in a rural context. However careful consideration will be given to the landscaping of this approach to Brooke.	638	Consider the level of detail in the Policy re. access for the site(s) and the need to landscape the site(s) to take account of their location on the entrance to the village.
QUESTION 33: Settlement Limit	356	Object	SNDC state "No alterations are proposed to the existing Settlement Limit" so if my understanding is correct nothing would change, and the Settlement area designated is considered to be adequate for Brooke.	The reference to 'no alternations proposed to the existing Settlement Limit' indicates that no changes are currently proposed to accommodate small infill/windfall development. Any new allocation in the VCHAP on the Preferred Site(s) would be in addition to altering the Settlement Limit for windfall/infill purposes.	637	No action required.

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QUESTION 33: Settlement Limit	1289	Comment	I don't object to new houses being built but think they should be smaller groups and near the centre of the village. Affordable for young families.	Delivery of affordable housing will be primarily as a proportion of the housing on allocated sites. Making such sites too small would make the delivery of affordable units inconsistent with national policy and/or potentially unviable. In additional, in order to have some assurance of delivery, the Council is working with those sites which have been actively promoted for development.	636	No action required.
QUESTION 33: Settlement Limit	28, 124, 152, 233, 254, 266, 282, 308, 536, 1196	Object	Concerns raised about the potential inclusion of the Preferred Site(s) on Norwich Road, including: 1. Will destroy the rural character of the existing properties. Inappropriate scale/density. Not part of the historic pattern of development. 2. Brooke does not have the facilities to support the level of development 3. No benefit to existing residents 4. Difficult to access/roundabout required which could lead to further development. 5. Reference to plans on SN0432REVA which were 'rejected'.	1. Brooke comprises a range of development types and styles that have evolved over many years. Whilst development has predominantly extended east/west along High Green and The Street, development has also extended north along Norwich Road. The scale is comparable with previous developments at Brecon Road/Coniston Road and St. Peter's Road/Burgess Way. 25 dwellings per hectare is not considered inappropriate in a rural context. However careful consideration will be given to the landscaping of this approach to Brooke. 2. Brooke has a range of basic services, including primary school, village hall, pubs, regular bus service to larger settlements, selection of employment opportunities etc. It is acknowledged that very few of the village clusters include a GP surgery and are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the	624	Consider the level of detail re. access in the Policy for the Preferred site(s).

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				number of out of catchment pupils, there is not a capacity issue at the school for local children. 3. The VCHAP aims to deliver development which supports local services and facilities and funding, via a proportion of CIL payments, is made to the parish. 4. The Highway Authority has raised no objection in principle to access to the preferred sites. Clarification on the specific highways requirements for the site(s) will be sought and taken into account as part of the finalised policy (see also 5.) 5. The previous planning application on the east side of Norwich Road (SN0432RVA) also encompassed SN2018, which has been rejected for the VCHAP. However, that application was withdrawn by the applicant, not refused by the Council. Further development adjacent to SN0432REVA would be subject to future iterations of this plan, or successor documents.		
QUESTION 33: Settlement Limit	474, 868	Comment	Site SN0020SL. Consideration should be given to revising the settlement boundary line created by The Mallows development, which resulted in a long narrow neck of 'countryside' extending into our curtilage dividing our dwelling from the Mallows boundary. This is inconsistent treatment of	This is a narrow strip between the rear of properties fronting High Green and the recently completed Mallows Walk development. Concern was raised in the site assessment about the possible loss of trees in the Conservation Area. However, as the site would be a relatively small Settlement Limit extension, and the numbers involved	623	Reconsider for inclusion within the Development Boundary/Settlement Limit.

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			the curtilage of our house with number 6 The Mallows.	would not be relied upon to meet the VCHAP requirements, the issues raised by this site could be dealt with via a planning application. As such, the inclusion of the site can be reconsidered.		
QUESTION 33: Settlement Limit	160	Comment	The Chairman says not everyone wants to live in the city. Of course he is right, but, to cut emissions and pollution, people should be encouraged to live near areas of employment and where there are retail, hospitality and entertainment venues - not in surrounding villages. Having said that, and given the current circumstances, the plan for Brooke is reasonable.	Comments noted.	622	No action required.
QUESTION 33: Settlement Limit	29, 146, 1197	Comment	Preference for the Preferred sites as the best alternatives for the village; although these would be better limited to one site not two. Note existing constraints on High Green, compared to Norwich Road.	Comments noted.	621	No action required.
QUESTION 33: Settlement Limit	127	Support	I agree with the limits but this area needs more affordable housing for the local community.	No changes are proposed to the Settlement Limit, other than for the potential inclusion of the Preferred site(s). The allocation of the Preferred site(s) is designed to deliver a mix of housing, including affordable units, as covered by proposed Policy SNVC 3.	620	No action required.
QUESTION 33: Settlement Limit	1245	Support	I agree with the current Settlement Limit, and it should not be extended. Development outside this limit should be discouraged unless it has the support of the community and there is a demonstrated need. Many services will	No changes are proposed to the Settlement Limit, other than potentially including the Preferred site(s). The need for additional development across Greater Norwich is already set out in the GNLP, which includes a Settlement	619	No action required.

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			need to be accessed outside the village by motor vehicle (or home deliveries). Further expansion of the village will not help reduce vehicle journeys to minimise climate change and will put further traffic on an already busy road.	Hierarchy for the appropriate distribution of development. The GNLP takes a balanced approach to the distribution of housing, with only 9% of new dwellings going to village cluster locations, compared to nearly 25% of the existing dwellings being in those parishes. Whilst Brooke does not have the same services as larger Market Towns and Key Service Centres, it is well served for a village of its size, with good public transport links to Poringland, Norwich and Bungay.		
QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	1268	Object	1. There is no need to build any new houses over and above those contained in the current South Norfolk Local Plan as there is an excess of housing stock in this plan to cater for the increases in the region of 4000 extra houses. 2. The proposed development to the North of Brooke is out of proportion to the rest of the village and represents a possible 20% increase in population and a 10% increase in housing stock to the village.	1. The level of housing across the Greater Norwich area is set out in the GNLP and will be tested through the Examination of that Plan. 2. The scale of development is comparable with previous developments at Brecon Road/Coniston Road and St. Peter's Road/Burgess Way. It is not clear why a 10% increase in housing stock is considered to lead to a 20% increase in population; however, a 10% increase is comparable with the village clusters as a whole, and significantly smaller than the percentage increase planned across Greater Norwich.	552	No action required.
QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	832, 901, 905	Object	Development set out in the VCHAP is not necessary, based on the response prepared by CPRE, and the level which is needed could be directed to Norwich and other larger settlements. Basing the VCHAP on school catchments does not recognise that some schools are at/near	Responses to the CPRE representation are covered under the Objectives and Core Policies. The GNLP takes a balanced approach to the distribution of housing, with only 9% of new dwellings going to village cluster locations, compared to nearly 25% of the existing	551	No action required.

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			capacity and does not represent 'good access to services and facilities'.	dwelling being in those parishes; however, this issue will be considered through the GNLP Examination in Public (spring 2022). Consultation with the County Council has indicated that, with falling rolls and many children attending out-of-catchment schools, capacity exists within most village cluster primary schools to accommodate the modest growth proposed. The VCHAP site assessment process clearly factors in access to local services and facilities, and support for existing local provision can prevent future reliance on (and travelling to) facilities in larger settlements.		
QUESTION 34: Preferred Site - SNO432REVA, East of Norwich Road	27, 95, 131, 153, 167, 186, 221, 255, 267, 271, 283, 309, 312, 357, 421, 424, 439, 537, 596, 635, 839, 872, 1008, 1011, 1141, 1199, 1261, 1290, 1295, 1309, 1386, 1696, 1739, 1797, 1807, 1817	Object	Various objections were raised, many of which relate to this being one of two preferred sites either side of Norwich Road, totalling 50 dwellings. Issues raised cover: 1. Will be detrimental to the approach to the village along Norwich Road/the character of the village/the rural character of existing properties. Not part of the historic pattern of development. Disproportionate to the scale of the settlement. Development will be too dense. The site will need to be carefully landscape/screened. Impacts on what makes a village a desirable location. 2. No benefits to the existing residents/village. 3. Concern over the numbers. Village is	1. Brooke comprises a range of development types and styles that have evolved over many years. Whilst development has predominantly extended east/west along High Green and The Street, development has also extended north along Norwich Road. The scale is comparable with previous developments at Brecon Road/Coniston Road and St. Peter's Road/Burgess Way. 25 dwellings per hectare is not considered inappropriate in a rural context. However careful consideration will be given to the landscaping of this approach to Brooke. 2. The VCHAP aims to deliver development which supports local services and facilities and funding, via a proportion of CIL payments, is made to the parish.	508	Policy for the site to consider: landscaping of the site, with particular regard to the approach from the north; the need for a roundabout to access the two preferred sites; crossing point on the B1332 to create a safe route to school. HIA to be undertaken to assess the heritage impact

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			only required to accept 25 dwellings. No limit on the number of dwellings, as further sites of 1-11 units could also come forward. Could infrastructure (especially the roundabout) mean more dwellings are needed? These sites facilitate future development on the remainder of the field(s). 4. Access/transport concerns - unsafe for children close to a busy main road. B1332 already too busy and difficult to cross. Increased traffic noise/pollution. Loss of the layby. Access needs to be a roundabout, with visual/traffic flow implications. More driveways onto a busy main road. Site poorly located in terms of access to local services with a lack of footway and cycleways. 5. Limited facilities to support additional development. No GP or post office. Amenities under pressure. Schools at capacity. 6. Blocks historic views of Brooke church. 7. Use Brownfield sites first. Greenfield land should be retained for agriculture. 8. No gas or streetlighting and poor drainage in some areas. 9. Alternative locations suggested - Infill the area behind The Street/St Peter's Road/Burgess Way; sites should be closer to Poringland; scatter development on small sites of approximately 5 units each.	3. Whilst an average of 25 dwellings each across the 48 village clusters would deliver the minimum 1,200 dwellings, the plan also recognises that some clusters include a wider range of services/facilities and have better access to nearby larger settlements and can therefore support larger developments. Both the VCHAP and the GNLP envisage that further windfall development will occur in the village clusters, however this will be primarily within the defined Development Boundaries/Settlement Limits, and therefore not unlimited. Further development adjacent to this site would be subject to future iterations of this plan, or successor documents. Clarification on the specific highways requirements for the site will be sought and taken into account as part of the finalised policy. 4. Highways have indicated that a crossing point on the B1332 will be required, creating a safe walking route to the primary school for new and existing residents. Access arrangements will need to balance the safe and free flow of traffic with measures which ensure traffic speed (raised as an issue by a number of respondents) is successfully managed; however, further driveways on to Norwich Road are unlikely. The site is considered to be well located in terms of walking/cycle access to services and facilities in the village, many of which are located close		

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			10. No plans to show what is going to be built. Homes likely to be poor quality of new homes.	to the Norwich Road/High Green Junction. Highways have not raised an objection to the loss of the lay-by. 5. Brooke has a range of basic services, including primary school, village hall, pubs, regular bus service to larger settlements, selection of employment opportunities etc. It is acknowledged that very few of the village clusters include a GP surgery and are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity issue at the school for local children. 6. A Heritage Assessment will be undertaken to a format agreed with Historic England. Notwithstanding this, the previous concerns raised in relation to a site in this location were to a significantly larger proposal, with greater impacts on the Conservation Area. 7. The GNLP prioritises the allocation of Brownfield sites in Norwich and other larger settlements; however, the housing requirements of the GNLP cannot be met without the use of Greenfield land. 8. Gas and streetlighting are not a prerequisite for new development, and nationally the move is away from further reliance on gas. Whilst details of		

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				drainage would be dealt with at the planning application stage, the statutory bodies have not raised any objection to this site. 9. The alternative locations suggested are not considered suitable for various reasons, including: not being promoted for development, and therefore having no assurance of deliverability/delivery; being too small to secure affordable housing, open space etc., yet cumulatively still potentially impacting on infrastructure; and/or being outside the scope of the VCHAP. 10. The level of detail sought would come at the planning application stage, and anything shown at this stage would be purely indicative. Housing would be constructed to the national and local standards in place at the time.		
QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	2216	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Agricultural field. Site in SSSI Impact Risk Zone but residential not identified for consultation with NE. No priority habitats onsite although hedge (a priority habitat) along southern boundary bordering neighbouring dwelling. Site within amber habitat zone for great crested newts.	Comments noted. A number of the requirements will be standard across all developments and can be reflected in the core policies as necessary.	503	Consider the need to reflect the protection of hedgerows in any Policy for the site.

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QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	2111	Comment	Few or no constraints. Standard information required at a planning stage. Assessment: Green	Comments noted.	502	No action needed.
QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	2034	Comment	Although there are no designated heritage assets on site, the site lies to the southeast of the grade II listed Brooke Lodge and to the north of the Brooke Conservation Area. Development has the potential to impact on the significance of these designated heritage assets. A heritage impact assessment of the site should be undertaken.	Heritage assets were considered as part of the assessment of sites; however a Heritage Assessment of the site will undertaken, to a format agreed with Historic England, which will document how these issues have been considered.	501	Complete the Heritage Assessment of the site and reflect the outcomes in the Regulation 19 version of the VCHAP.
QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	1704	Comment	Summary of Objections 1. There is no need to build any new houses in South Norfolk outside the current Local Plan as there is already an excess of housing stock. 2. The proposed development is out of proportion to the rest of the village and represents a possible 10% increase in housing stock to the village. A proposed development of no more than 6 houses may be acceptable, representing a potential 2% increase in housing stock. 3. Consideration of the carbon dioxide emissions of the construction and population has not been adequately addressed. 4. More details are required on access issues.	1. The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. 2. The proportion of new development in the Village Clusters is substantially lower than the proportion of the population that currently lives in those parishes. 3. The environmental performance of new development is an issue being addressed through national policy and the GNLP. An SA supports the production of the VCHAP and considers the issue of distribution of development in this context. 4. The site has been assessed by the highway authority, who agree in	500	Consider the level of detail re. access in the Policy for this site.

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			5. The timing of the plan is suspicious, re the history of planning permission refusals on these sites. 6. There is a significant risk of surface flooding, and a considerable risk to biodiversity.	principle that suitable access can be achieved. Further detail can be included in the Policy for the site, if necessary. 5. The previous planning application on this site, for a larger number of dwellings, was withdrawn by the applicant. The VCHAP considered 450 sites across the district, and preferred and shortlisted over 80 of them, full assessments were available as part of the consultation and the timing of the consultation was not related to any individual site. 6. Issues of surface water flood risk and biodiversity have been considered in the site assessment, in conjunction with the relevant technical consultees, and no overriding issues were identified for this site.		
QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	1547	Comment	Development of approximately 25 dwellings would be too dense and out of character. Any further development along Norwich Road should be similar to the existing (6-8 dwellings would seem more appropriate).	Brooke is made up a variety of development densities and styles, and new development does not necessarily need to repeat what is adjacent. Local Plan policies, including those on design, landscaping and amenity, are in place to guide the form of development. 25 dwellings/ha is not considered inappropriate for a rural location.	498	No action required.
QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	1932	Comment	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. Minor development – no further comments	Comments noted.	497	No action required.

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QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	116, 118, 148, 1198	Comment	Comments received: The most acceptable of the sites proposed, subject to a suitable mix of property types, including properties affordable to younger people; Good access to the B1332 and the Norwich-Poringland-Bungay bus route; Less disruptive for existing residents (good access during and after construction); and Walking distance of local facilities.	Comments noted. Development will be expected to meet the affordable housing requirements in place at the time of any application. Housing mix is considered under proposed core Policy SNVC 3.	496	No action required.
QUESTION 34: Preferred Site - SN0432REVA, East of Norwich Road	66, 161, 273, 346, 632, 1215	Support	Comments received include: Village needs new houses, but these need to be a mix of properties, including affordable; Location is the least disruptive to the majority of residents; Good access to the B1332; Better access to local facilities; Least impact on habitats.	Comments noted. Development will be expected to meet the affordable housing requirements at the time of any planning application. Housing mix is covered by proposed core Policy SNVC 3.	492	No action required.
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	1269	Object	1. There is no need for new houses anywhere in SNDC outside the LDP as there is an excess of 4000 houses already planned. 2. The development is out of proportion and is a 20% population and 10% increase in housing	1. The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. 2. The proportion of planned new development in the Village Clusters (9%) is substantially lower than the	569	Consider the level of detail re. access in the Policy for this site.

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			3. Consideration of the carbon dioxide emissions of the construction and population has not been adequately addressed in any overall council housing strategy that requires reduction, not increases in emissions. 4. Access issues are ignored 5. The timing is suspicious post local elections 6. A significant risk of surface flooding, and a considerable risk to biodiversity exists	proportion of the population that currently lives in those parishes (almost 25%). A 10% increase in dwelling stock is comparable with the level across the Village Clusters and substantially lower the increase across the GNLP. It is also not clear why a 10% increase in dwelling stock will equate to a 20% increase in population. 3. The environmental performance of new development is an issue being addressed through national policy and the GNLP. An SA supports the production of the VCHAP and considers the issue of distribution of development in this context. 4. The site has been assessed by the highway authority, who agree in principle that suitable access can be achieved. Further detail can be included in the Policy for the site, if necessary. 5. The Regulation 18 version of the VCHAP has been production since early 2020 and was, unfortunately, partly delayed due to the impacts of COVID 19. 450 sites across the district were considered, and over 80 preferred and shortlisted. Full assessments were available as part of the consultation and the timing of the consultation was not related to any individual site. 6. Issues of surface water flood risk and biodiversity have been considered in the site assessment, in conjunction with the		

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				relevant technical consultees, and no overriding issues were identified for this site.		
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	833, 902, 906	Object	Development set out in the VCHAP is not necessary, based on the response prepared by CPRE, and the level which is needed could be directed to Norwich and other larger settlements. Basing the VCHAP on school catchments does not recognise that some schools are at/near capacity and does not represent 'good access to services and facilities'.	Responses to the CPRE representation are covered under the Objectives and Core Policies. The GNLP takes a balanced approach to the distribution of housing, with only 9% of new dwellings going to village cluster locations, compared to nearly 25% of the existing dwellings being in those parishes; however, this issue will be considered through the GNLP Examination in Public (spring 2022). Consultation with the County Council has indicated that, with falling rolls and many children attending out-of-catchment schools, capacity exists within most village cluster primary schools to accommodate the modest growth proposed. The VCHAP site assessment process clearly factors in access to local services and facilities, and support for existing local provision can prevent future reliance on (and travelling to) facilities in larger settlements.	568	No action required.
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	26, 96, 125, 128, 154, 168, 187, 222, 234, 256, 270, 284, 310, 358, 422, 440, 538, 597, 840, 874, 1009, 1201, 1278, 1291, 1296, 1310, 1373,	Object	Various objections were raised, many of which relate to this being one of two preferred sites either side of Norwich Road, totalling 50 dwellings. Issues raised cover: 1. Will be detrimental to the approach to the village along Norwich Road/the character of the village/the rural character of existing properties. Not part of the historic pattern of development.	1. Brooke comprises a range of development types and styles that have evolved over many years. Whilst development has predominantly extended east/west along High Green and The Street, development has also extended north along Norwich Road. The scale is comparable with previous developments at Brecon Road/Coniston Road and St. Peter's Road/Burgess Way. 25 dwellings per hectare is not	564	Policy for the site to consider: landscaping of the site, with particular regard to the approach from the north; the need for a roundabout to access the two preferred sites; creating a safe route to school; and protection of any on site

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	1387, 1699, 1798, 1818		Disproportionate to the scale of the settlement. Development will be too dense. The site will need to be carefully landscape/screened. Impacts on what makes a village a desirable location. 2. No benefits to the existing residents/village. 3. Concern over the numbers. Village is only required to accept 25 dwellings. No limit on the number of dwellings, as further sites of 1-11 units could also come forward. Could infrastructure (esp the roundabout) mean more dwellings are needed? These sites facilitate future development on the remainder of the field(s). 4. Access/transport concerns - unsafe for children close to a busy main road. B1332 already too busy and difficult to cross. Increased traffic noise/pollution. Loss of the layby. Access needs to be a roundabout, with visual/traffic flow implications. More driveways onto a busy main road. Site poorly located in terms of access to local services with a lack of footway and cycleways. Needs to retain access to the fields for agriculture. 5. Limited facilities to support additional development. No GP or post office. Amenities under pressure. Schools at capacity. 6. Blocks historic views of Brooke church.	considered inappropriate in a rural context. However careful consideration will be given to the landscaping of this approach to Brooke. 2. The VCHAP aims to deliver development which supports local services and facilities and funding, via a proportion of CIL payments, is made to the parish. 3. Whilst an average of 25 dwellings each across the 48 village clusters would deliver the minimum 1,200 dwellings, the plan also recognises that some clusters include a wider range of services/facilities and have better access to nearby larger settlements and can therefore support larger developments. Both the VCHAP and the GNLPS envisage that further windfall development will occur in the village clusters, however this will be primarily within the defined Development Boundaries/Settlement Limits, and therefore not unlimited. Further development adjacent to this site would be subject to future iterations of this plan, or successor documents. Clarification on the specific highways requirements for the site will be sought and taken into account as part of the finalised policy. 4. Highways have indicated that creating a safe walking route to the primary school will be a requirement. Access arrangements will need to balance the the safe and free flow of		biodiversity/landscape features.

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			7. Use Brownfield sites first. Greenfield land should be retained for agriculture. 8. No gas or streetlighting and poor drainage in some areas. 9. Alternative locations suggested - Infill the area behind The Street/St Peter's Road/Burgess Way; sites should be closer to Poringland; scatter development on small sites of approximately 5 units each. 10. No plans to show what is going to be built. Homes likely to be poor quality of new homes. 11. Protection of mature trees around the site.	traffic with measures which ensure traffic speed (raised as an issue by a number of respondents) is successfully managed; however, further driveways on to Norwich Road are unlikely. The site is considered to be well located in terms of walking/cycle access to services and facilities in the village, many of which are located close to the Norwich Road/High Green Junction. Highways have not raised an objection to the loss of the lay-by. 5. Brooke has a range of basic services, including primary school, village hall, pubs, regular bus service to larger settlements, selection of employment opportunities etc. It is acknowledged that very few of the village clusters include a GP surgery and are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity issue at the school for local children. 6. A Heritage Assessment will be undertaken to a format agreed with Historic England. 7. The GNLP prioritises the allocation of Brownfield sites in Norwich and other larger settlements; however, the housing requirements of the GNLP cannot be met without the use of Greenfield land.		

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				8. Gas and streetlighting are not a prerequisite for new development, and nationally the move is away from further reliance on gas. Whilst details of drainage would be dealt with at the planning application stage, the statutory bodies have not raised any objection to this site. 9. The alternative locations suggested are not considered suitable for various reasons, including: not being promoted for development, and therefore having no assurance of deliverability/delivery; being too small to secure affordable housing, open space etc., yet cumulatively still potentially impacting on infrastructure; and/or being outside the scope of the VCHAP. 10. The level of detail sought would come at the planning application stage, and anything shown at this stage would be purely indicative. Housing would be constructed to the national and local standards in place at the time. 11. Significant landscape/biodiversity features can be protected via the policy for the site.		
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	320	Comment	Development on the main road is not a good idea. New houses which have been built have been sold again because of road noise.	The B1332 is typical of many roads in rural and more urban areas, in terms of the volume and nature of traffic, and the road itself passes through Brooke and a number of other settlements. As such, the nature and volume of traffic is not	561	No action needed.

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				considered exceptional or a barrier to well-designed development.		
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	1548	Comment	Development of approximately 25 dwellings would be too dense and out of character. The large neighbouring dwellings immediately to the south are all set in spacious plots of approximately 0.4 acres and in a linear form. Any further development along Norwich Road should be similar.	Brooke comprises a range of development types and styles that have evolved over many years and the VCHAP is seeking to achieve a mix of dwellings as part of small-scale allocations. The scale is comparable with previous developments at Brecon Road/Coniston Road and St. Peter's Road/Burgess Way. 25 dwellings per hectare is not considered inappropriate in a rural context. However careful consideration will be given to the landscaping/the setting of this approach to Brooke.	560	Consider policy wording re the setting of Brooke on the Norwich Road.
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	2218	Comment	Rating: Green. No major ecological constraints identified from desk-top search. Surveys and biodiversity enhancement in accordance with policy required and to inform design. Site in SSSI Impact Risk Zone but residential not identified for consultation with NE. Site within amber habitat zone for great crested newts. Agricultural field with no priority habitats onsite, deciduous woodland is located to the north, a hedge (a priority habitat) along southern boundary bordering neighbouring dwelling.	Comments noted.	558	Consider reference to adjoining woodland/hedgerows within the policy for the site.
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	2113	Comment	Few or no constraints. Standard information required at a planning stage. Assessment: Green	Comments noted.	557	No action required.

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QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	1933	Comment	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. Minor development – no further comments.	Comments noted.	556	No action required.
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	1705	Comment	Summary of Objections 1. There is no need to build any new houses in South Norfolk outside the current Local Plan as there is already an excess of housing stock. 2. The proposed development is out of proportion to the rest of the village and represents a possible 10% increase in housing stock to the village. A proposed development of no more than 6 houses may be acceptable, representing a potential 2% increase in housing stock. 3. Consideration of the carbon dioxide emissions of the construction and population has not been adequately addressed. 4. More details are required on access issues. 5. The timing of the plan is suspicious, re the history of planning permission refusals on these sites. 6. There is a significant risk of surface flooding, and a considerable risk to biodiversity.	1. The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. 2. The proportion of new development in the Village Clusters (9%) is substantially lower than the proportion of the population that currently lives in those parishes (almost 25%). 3. The environmental performance of new development is an issue being addressed through national policy and the GNLP. An SA supports the production of the VCHAP and considers the issue of distribution of development in this context. 4. The site has been assessed by the highway authority, who agree in principle that suitable access can be achieved. Further detail can be included in the Policy for the site, if necessary. 5. The previous planning application on this site, for a larger number of dwellings on a substantially bigger footprint, was withdrawn by the applicant. The VCHAP considered 450	555	Consider the level of detail re. access in the Policy for this site.

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				sites across the district and preferred and shortlisted over 80 of them. Full assessments were available as part of the consultation and the timing of the consultation was not related to any individual site. 6. Issues of surface water flood risk and biodiversity have been considered in the site assessment, in conjunction with the relevant technical consultees, and no overriding issues were identified for this site.		
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	117, 120, 149, 347, 1202, 1323	Comment	Comments received raised some concerns over new development, especially if both preferred sites go ahead, but if it is to occur: there needs to be a mix of properties, including affordable; the site offers good access to the bus services; north of the village is least disruptive; and it needs a high standard of design, which includes shielding development from traffic noise.	Comments noted. Development will be expected to meet the affordable housing requirements at the time of any planning application. Housing mix is covered by proposed core Policy SNVC 3 and Design by SNVC 2, plus other national and local policies.	554	No action required.
QUESTION 35: Preferred Site - SN0432REVB, West of Norwich Road	30, 67, 162, 634, 1214, 1808	Support	Comments received include: Village needs new houses, but these need to be a mix of properties, including affordable; Location is the least disruptive to the majority of residents; Good access to the B1332; Site to the west of the B1332 least intrusive as it fills the gap between the existing housing and the grounds of Brooke Lodge.	Development will be expected to meet the affordable housing requirements at the time of any planning application. Housing mix is covered by proposed core Policy SNVC 3.	553	No action required.
QUESTION 36: Should any shortlisted /	2223	Comment	SN2119 Rating: Amber - measures required - priority habitat onsite or proximity to SSSI (recreational impact concerns) and or	Comments noted.	606	Concern re priority Habitat to be reflected in the Site Assessment.

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rejected sites be allocated?			buffer required. Site incorporates priority habitat (deciduous woodland). Site in amber habitat zone for great crested newts. Access via Astley Copper Place would impact deciduous woodland which should be avoided and as a last resort compensated for. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy should inform the design.			
QUESTION 36: Should any shortlisted / rejected sites be allocated?	2089	Comment	SN2119 Few or no constraints. Standard information required at a planning stage. Assessment: Green	Comments noted.	605	No action required.
QUESTION 36: Should any shortlisted / rejected sites be allocated?	1741	Object	Does not agree with the reasons for rejection used to rule out new residential development within discounted site SN0490, that is within the centre of the village. It simply cannot be the case that the heritage, townscape and landscape impacts that are relied upon to reject site SN0490 are so severe that this site should be discounted in favour of the serious landscape and highway safety harm that would result from the preferred sites SN0432REVA and SN0432REVB.	Much of the representation deals with why the Preferred Sites should not be taken forward, but includes some inaccuracies, including: 1. That the Preferred Sites are not in keeping with the pattern of development and are physically detached services/facilities - whereas the Preferred Sites immediately adjoin recently completed allocations from the 2015 Local Plan, which themselves adjoined older development on Norwich Road. The preferred sites are also closer to the majority services and facilities	604	No action required.

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				than SN0490. 2. That there is a lack of foot/cycleways from the Preferred Sites to the local services/facilities - whereas, apart from a short stretch on the west side of Norwich Road, there is a continuous footway to the centre of the village. For site SN0490 there is no footway on part of The Street that connects Mereside to the local services. 3. That the accesses for the Preferred Sites will cause a safety issues - whereas, in principle the Highways Authority are satisfied that safe access can be achieved. 4. That the Preferred Sites will have a detrimental effect on the Conservation Area - whereas SN0490 is considered more sensitive, being within the Conservation Area. A Heritage Assessment will be completed, to a format agreed with Historic England.		
QUESTION 36: Should any shortlisted / rejected sites be allocated?	1715	Comment	Site SN2174 should be allocated for the following reasons: 1. It is quite easy to cycle/walk from the site into Brooke to access services. 2. This field has never become flooded. The ditch along one side of the site has always taken all the water that it has needed to. The flood risk seems to be overstated in the assessment. 3. There is one mature tree on the front	Sites SN2174 at Kirstead, whilst having good access to the Norwich/Poringland/Bungay bus route, is at least 2.5km from the other services and facilities in Brooke, on a stretch of road at the national speed limit, which is unlikely to be attractive for walking and cycling for everyday journeys. Whilst the field may not have become flooded, that does not constitute evidence that the site is not at flood risk. Similarly, no evidence has been supplied	603	No change required.

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			line of this site which could be incorporated into any scheme. The rest of the hedge line is rather scrappy and any scheme could incorporate renewal.	to indicate that the mature tree and/or replacement hedging could be incorporated whilst also achieving a suitable access. Kirstead has not had a Settlement Limit/Development Boundary since the 1994 Local Plan (i.e. not in the 2003 or 2015 Plans), and inclusion of this site would require the reinstatement of a Settlement Limit, which could encourage further development in this location.		
QUESTION 36: Should any shortlisted / rejected sites be allocated?	1314	Comment	Three rejected sites could be reviewed: Two at Kirstead Green (SN2174 and SN4004). The arguments for rejection (apart from the issue of surface water) do not seem strong. Modest development here would fit the concept of sustainability whilst being reasonably near facilities and services. The site southeast of Mereside (SN0490). 'Visibility' from Hungate Lane (not a busy road) and a PRoW are not strong, although the situation and access require consideration. Inclusion of the above would alleviate pressure on the shortlisted sites whilst still potentially achieving the proposed number of houses.	Sites SN2174 and SN4004 at Kirstead, whilst having good access to the Norwich/Poringland/Bungay bus route, are at least 2.5km from the other services and facilities in Brooke, on a stretch of road at the national speed limit, which is unlikely to be attractive for walking and cycling for everyday journeys. Kirstead has not had a Settlement Limit/Development Boundary since the 1994 Local Plan (i.e. not in the 2003 or 2015 Plans), and inclusion of either of these sites would require the reinstatement of a Settlement Limit, which could encourage further development in this location. Site SN0490 is not in as prominent location as the Preferred Sites on the B1332, however the location within the Conservation Area is considered to be more sensitive. A number of other	601	No action required.

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				unresolved issues remain, including flood risk and ecology from the 2015 appeal dismissal and the provision of carriageway widening and footpaths off site. Overall, the above sites did not perform as well in the Site Assessment as the Preferred Sites.		
QUESTION 36: Should any shortlisted / rejected sites be allocated?	656	Comment	Reconsider the inclusion of SN4065SL. The site sits between two existing properties (the Oaks and Oaklands). Site is considered to comply with Paragraph 78 and Paragraph 68 of the NPPF and GNLP Policy 7.5 Small Scale Windfall Housing Development which support Windfall Development. Proposal would be for a single self-build property on the site that will have a "Fabric First" approach to Sustainable Development and support the Windfall Development numbers. The site is not in a flood risk area. Site has extremely good visibility of approximately 200m in each direction. The importance of Brooke Wood - This is on the opposite side of the road to our site and there is also a small strip of grazing land opposite that also helps increases the distance from our site.	Whilst the site promoters have a specific project in mind for the site, as an infill plot which is too small to allocate, the VCAHP would not have a mechanism to secure either the self-build or fabric first approach to development. Inclusion of this site would also require a Settlement Limit to be drawn around neighbouring properties, potentially encouraging further development in this location. The site is over 1.5km from the facilitates and services on an unlit, 60mph road, as such it is unlikely to be attractive to walk or cycle to local facilities, or to access public transport to larger settlements. The site is also identified as being partially at risk of surface water flooding using information form the Greater Norwich Strategic Flood Risk Assessment. Whilst the above factors would still be a consideration, the fact that the site is not considered suitable for inclusion in the VCHAP does not prevent an	598	No action required.

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				application under GNLP Policy 7.5, should that Policy become part of the adopted Development Plan, which would be able to control the form/nature of development through any grant of permission.		
QUESTION 36: Should any shortlisted / rejected sites be allocated?	1271	Object	If a smaller number of houses were allocated, opportunities should be taken as and when land or space becomes available or accessible in other areas of the village. this would fit better with the character of the village	The VCAHP needs to demonstrate that allocated sites are available to deliver the minimum 1,200 homes across the South Norfolk Village Clusters and cannot rely on windfall development on unidentified sites.	597	No action required.
QUESTION 36: Should any shortlisted / rejected sites be allocated?	475	Comment	Site SN0020SL should be reconsidered in relation to the current settlement boundary and a more logical and sensible revision made to the boundary line - please see comments in response to question 33. A site visit to see the present inconsistency would be welcomed.	This is a narrow strip between the rear of properties fronting High Green and the recently completed Mallows Walk development. Concern was raised in the site assessment about the possible loss of trees in the Conservation Area. However, as the site would be a relatively small Settlement Limit extension, and the numbers involved would not be relied upon to meet the VCHAP requirements, the issues raised by this site could be dealt with via a planning application. As such, the inclusion of the site can be reconsidered.	595	Reconsider for inclusion within the Development Boundary/Settlement Limit.
QUESTION 36: Should any shortlisted / rejected sites be allocated?	285	Comment	It appears that The Mallows site is yet to be completed and consideration should be given to this. Further development would not have such a detrimental visual impact.	The remaining units at The Mallows are part of the baseline figures for the Plan, and the VCHAP needs to make allocations which are in addition to this. Additional land adjacent to The Mallows has not been promoted for development, and therefore there	594	No action required.

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				would be no assurance of the deliverability of a site here.		
QUESTION 36: Should any shortlisted / rejected sites be allocated?	150, 268, 272, 1010, 1212, 1809	Comment	Shortlisted and rejected have no advantages over the preferred sites.	Comments noted.	592	No action required.
QUESTION 36: Should any shortlisted / rejected sites be allocated?	68, 235, 359, 875, 1282, 1800	Comment	SN0490 at Mereside should be preferred as it is central to the village, with good access to local services/facilities, is less visually intrusive and small in scale.	Although the site is centrally located in the older part of Brooke, the walking distances to services/facilities are similar to those for the Preferred Sites. Whilst the site is in a less predominant position, away from the main B1332, the location within the Conservation Area is considered to be more sensitive. In addition, given that the site would accommodate approximately 17 dwellings, it could only be seen as a replacement for one of the Preferred Sites.	591	No action required.
QUESTION 36: Should any shortlisted / rejected sites be allocated?	1031	Object	Concern over the volume of traffic and the suitability of Astley Cooper Place as an access. Occupiers are likely to use cars for the most journeys. Few services and facilities in the village.	Discussions are ongoing with the Highway Authority about the suitability of access to this site. However, Brooke is considered to have the basic range of services and facilities to support the level of growth envisaged in the VCHAP.	590	Ongoing discussions with Highways about suitable access to this site.
QUESTION 36: Should any shortlisted / rejected sites be allocated?	257	Object	Reasoned rejection of sites already stated.	Comments noted.	589	No action required.
QUESTION 36: Should any shortlisted /	155, 223, 1203, 1392	Object	None of the sites are acceptable and more housing is not needed in Brooke.	Whilst the Council considers there is a need for some new development in Brooke, as part of meeting requirements	588	No action required.

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rejected sites be allocated?				of the GNLP, the rejected sites have been turned down at this stage for a variety of reasons summarised in the Regulation 18 document and set out in the Site Assessment Booklet.		
QUESTION 36: Should any shortlisted / rejected sites be allocated?	129, 188, 311, 442, 539, 598	Support	Support for the shortlisted sites and various rejected sites: 1. SN2119 North of High Green – less visual impact; form of development would lead to a better sense of community; good mixes of houses; problems could be easily overcome. 2. SN0490 Mereside – little visual impact and could be screened by trees; existing access; close to facilities; limited/sympathetic development could be acceptable. 3. SN0584 West of Burgess Way – access left from existing development; extends an already developed area. 4. Small number of houses on a variety of sites.	1. SN2119 has been shortlisted by the Council, however concerns remain about the access arrangements, which the Highways authority require to be via Astley Cooper Place. The site also potentially impacts on the adjacent Listed Building and TPO trees. The layout of development/type of properties proposed by the promoter can only be treated as indicative at this stage, and there is nothing to prevent similar property types being delivered on the preferred site (s). 2. SN0490, permission has previously been refused on this site for a number of reasons, most significantly the impacts on the conservation area, the site is not considered suitable in townscape/landscape terms. 3. SN0584, whilst this site has been promoted for development, there remain concerns over its deliverability in terms of securing access rights. The site is promoted for 25 dwellings, which will be difficult to achieve on a site which is constrained by shape, adjoining bungalow development and being in the setting of the Conservation Area and Listed Buildings.	577	Continued discussion with the Highways Authority regarding the access to SN2119.

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				4. The option of a number of small sites is unlikely to deliver affordable housing or open space, and may be constrained in the housing mix that would be viable, or the off-site highways improvements that could be delivered, compared to a larger scheme. Cumulatively, such sites would still have the similar impact on infrastructure.		
QUESTION 36: Should any shortlisted / rejected sites be allocated?	163	Support	I think the two sites proposed are enough. No further development is appropriate.	Comments noted.	572	No action required.
QUESTION 37: Should any shortlisted sites be rejected?	1272	Support	All of them for reasons given to 33, 34 and 35	See responses to Q33, Q34 and Q35.	618	No further action required.
QUESTION 37: Should any shortlisted sites be rejected?	224	Comment	All of the shortlisted sites should be rejected. There is a danger that any new building will set a precedent for future planning relaxation which will in turn damage the character and integrity of our village.	The aim of the VCHAP is to allow for planned growth to meet the requirements of the GNLP, taking into account as far as possible the character of the settlements concerned.	617	No action required.
QUESTION 37: Should any shortlisted sites be rejected?	164	Comment	In the light of international crises, such as COVID and global warming, concerned that the focus nationally should be on reducing population growth and therefore the need for new housing.	The VCHAP needs to allocate sites to meet the requirements of the GNLP; not doing so would be likely to lead to more ad hoc development via speculative applications, with negative consequences in terms of being able to plan for development which addresses climate change.	615	No action required.

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QUESTION 37: Should any shortlisted sites be rejected?	130, 1285, 1316	Comment	Support for the possible inclusion of SN2119	A number of the issues raised in the Site Assessment of SN2119 have not yet been resolved. In particular the Highways Authority view that the site needs to be accessed via Astley Cooper Place, as access onto High Green does not appear to be achievable (poor alignment of the road and lack of footway), and would potentially result in the loss of trees/hedgerow, detrimental to the approach to the Conservation Area. The shape of the site and the need to take account of the TPO trees and Listed Building also constrain the potential development. Further discussion may also be required we the surface water flood risk on the site.	611	Assess whether the site should be included in the VCHAP or rejected, likely to need further input from Highways and the LLFA.
QUESTION 37: Should any shortlisted sites be rejected?	7, 84, 103, 151, 286, 333, 1208, 1810	Comment	Concerns raised about site SN2119, including: 1. Poor Access to High Green/via Astley Cooper Place. 2. Biodiversity of the site. 3. Poor drainage.	A number of the issues raised are acknowledged in the Site Assessment of SN2119. In particular the Highways Authority view that the site needs to be accessed via Astley Cooper Place, as access onto High Green does not appear to be achievable (poor alignment of the road and lack of footway). However, the Highways Authority have not raised a concern in principle about the use of Astley Cooper Place for access.	610	Assess whether the site should be included in the VCHAP or rejected, likely to need further input from Highways and the LLFA.
QUESTION 37: Should any shortlisted sites be rejected?	540, 609	Object	Concerns about the Preferred Sites, including the need for a roundabout and drainage of the sites.	These issues are dealt with in the responses to questions 34 and 35.	609	See actions in relation to questions 34 and 35
QUESTION 37: Should any	45, 69, 123, 134, 156, 177, 269, 366, 441,	Object	A number of responses were given for rejecting SN2119, including: 1. Poor access to High Green/Astley	A number of the issues raised are acknowledged in the Site Assessment of SN2119. In particular the Highways Authority view that the site needs to be	608	Assess whether the site should be included in the VCHAP or rejected, likely to need further

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shortlisted sites be rejected?	621, 876, 911, 1204, 1205		Cooper Place 2. Distance to local facilities and narrow footpaths won't encourage walking 2. Copse/Wood at the end of Astley Cooper Place has wildlife value 3. Site shape would lead to a poor form of development 4. Poor drainage/localised flooding 5. Heritage impacts on the Listed Building and Conservation Area 6. Impact on privacy 7. Development at The Mallows not yet complete.	accessed via Astley Cooper Place, as access onto High Green does not appear to be achievable (poor alignment of the road and lack of footway), and would potentially result in the loss of trees/hedgerow, detrimental to the approach to the Conservation Area. The shape of the site and the need to take account of the TPO trees and Listed Building constrain the potential development. However, the Highways Authority have not raised a concern in principle about the use of Astley Cooper Place for access, and concerns about overlooking would be considered as part of the detail design at the planning application stage. Whilst there may be other development in Brooke which has yet to be completed, the VCHAP is looking at the longer-term need for new dwellings across the Village Clusters.		input from Highways and the LLFA,
QUESTION 37: Should any shortlisted sites be rejected?	258	Support	They should be rejected on the grounds already stated.	Comments noted.	607	No action required.

Bunwell

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QUESTION 38: Settlement Limit	1530	Comment	Support for SN0537 providing that the total number of dwellings is gradual and eventually reached over a period of at least a decade and includes the 7 properties currently under construction on the adjoining site to the west. This reflects 2005 Bunwell Parish Plan which achieved a response of 78% of all Bunwell households and I believe would achieve a similar result today.	This representation has also been received in response to Question 39 which relates specifically to the allocation of SN0537. The Council has responded fully to Question 39 and refers the reader to that section of the document.	94	No action required
QUESTION 38: Settlement Limit	1465	Comment	Comments relating to sites promoted at The Turnpike: close proximity to the Church and previous objections to development in this location from Historic England; extensive development at The Turnpike would create a nucleated settlement away from the existing concentration of housing at Bunwell; and consideration must be given to road safety of school children and safe access to the B1113.	Whilst the Council acknowledges these comments the sites promoted for allocation as part of the VCHAP process along The Turnpike at Bunwell are not currently considered to be appropriate for allocation. The Council remains of the opinion that there are currently more appropriate sites for allocation within the settlement that would result in stronger relationships between the existing development in the settlement.	93	No action required.
QUESTION 38: Settlement Limit	947	Object	Objection submitted to preferred site SN0537: Bunwell is defined by ribbon development, estate development of 25 dwellings does not reflect the existing pattern of development; current development under construction has outstanding issues still to be resolved;	This representation principally focuses on objections to the development of preferred site SN0537, rather than specific alterations to the settlement limit for Bunwell, but has not been submitted against Question 39 so the Council's response is made against Question 38. In terms of the specific objections to	92	No further action required at this time.

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			existing poor ditch maintenance leads to flooding within Bunwell; ditches within Bunwell are not fit for purpose leading to flooding of Bunwell Street; negative environmental impact associated with the development of this site; and subject to drainage concerns no issues with other sites out forward within the village.	preferred site SN0537 whilst the concerns about the existing ditch maintenance, the current site development and the works traffic are noted these issues are considered to be matters that are most appropriately addressed outside the site allocation process and not as part of the current site allocation review. Whilst Bunwell has historically been formed by ribbon development, not all development within the settlement is characteristic of this, particularly in areas furthest away from the village core. It is therefore not considered that a modest scale development of up to 25 dwellings would significantly alter the overall character of the village. Views from the local footpath network would not be so significantly altered as to adversely impact on these local footpaths. The Lead Local Flood Authority has assessed this site and have noted that surface water contributes to a flowpath to the north-east of the village. In accordance with planning policy and guidance, new development must not result in an increase in off-site flooding. In addition it is considered that on-site drainage solutions can often help to address existing surface water issues and as such it is considered that this issue can be adequately addressed during the planning application stage.		

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				Comments about the environmental impact have also been noted however all development will be required to deliver net-gain on site and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site, as well as significant on-site features (e.g., trees and hedgerows). Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. Comments relating to the other sites within the village of Bunwell are also noted.		
QUESTION 38: Settlement Limit	942, 968	Support	Agree to the proposed settlement limit approach for Bunwell	The Council notes the comments of support that have been submitted in response to Question 38.	91	No action required
QUESTION 39: Preferred Site - SN0537, Land to the north of Bunwell Street	2128	Comment	Comments of the LLFA: The on-site flood risk forms the start of a flow path in the 0.1% AEP event. Flow lines indicate this flood water flows east from the site, contributing to a major flow path east of the site. We advise this must be considered in the site assessment. The majority of the site is unaffected by flood risk and has the potential to be developed.	These comments have been noted and will be subject to further discussion with the LLFA as appropriate. The Council welcomes the point that the majority of the site would not be affected and development would not be precluded.	109	To consider the implications of this surface water flowpath, including further discussions with the LLFA and policy wording implications if appropriate.
QUESTION 39: Preferred Site - SN0537, Land to	2009	Comment	Environment Agency comments relating to Fornsett Foul Water Capacity: For sites SN0537, SN1057, SN0538REV,	Note the comments of the Environment Agency in relation to these sites. Further discussions continue to be held with Anglian Water (AW) following the	107	Schedule further follow-up discussions with Anglian Water to determine the

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the north of Bunwell Street			SN0539, SN2126 and SN0602, available information indicates there may be around 120 houses planned here in total. Forncett has some capacity for foul water flows (can accommodate the 'preferred' sites) but does not have capacity for all the houses planned in these developments. Discussions will need to be held with AWS if all development goes ahead, and development must be phased in line with Water Recycling Centre (WRC) treatment capacity being made available.	receipt of detailed AW comments on the site selection process however at this time the VCHAP is only seeking to allocate the preferred sites and therefore sufficient capacity should be available at the Forncett Waste Recycling Centre. This position will need to be reviewed further if the allocations and/ or numbers on these sites are amended. The Council is preparing a Water Cycle Study as part of the evidence base for the VCHAP which will assess the capacity and constraints within this infrastructure.		availability of foul water capacity as well as any planned works to these treatment plants. Review of the WCS when prepared to determine any particular issues and/or potential policy wording that may be required for specific sites.
QUESTION 39: Preferred Site - SN0537, Land to the north of Bunwell Street	1934	Comment	Water Alliance comments: Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).	These comments are noted.	106	No action required.
QUESTION 39: Preferred Site - SN0537, Land to the north of Bunwell Street	2035	Comment	Historic England comments: There are no designated heritage assets on site. Green Farmhouse listed at grade II, lies to the east of the site. However, given the distance we consider that the development of the proposed allocation would have limited impact of the setting of the heritage asset.	The HE comments are noted.	105	No actions required.
QUESTION 39: Preferred Site -	943, 970	Comment	Only support SN0537 if this is solely for residential development and not light	The Council is unclear of the source of reference to light industrial use of the	104	Reconsider the extent of the boundaries of

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SN0537, Land to the north of Bunwell Street			industrial as detailed in the Suitability Assessment; and Object to the boundary of this site extending north beyond the rear of BUN1 as this will impact on the view approaching from the B1113 and users of the adjacent footpath to the east.	site however for clarification, the VCHAP is solely seeking to allocate residential development and as such this site has only been considered to be a preferred option for housing. The comments relating to the northern boundary of the preferred site are noted and on reflection the Council concurs that a review of the northern boundary of this site is appropriate to ensure that a strong relationship would result between SN0537 and the adjacent site.		SN0537 and in particular the relationship between this site and the adjacent site.
QUESTION 39: Preferred Site - SN0537, Land to the north of Bunwell Street	995, 1056, 1058, 1347, 1476	Mixed	Objections received to Preferred site SN0537: Infill within the village would be preferable; Current building work on the adjacent site is already resulting in disruption; Bunwell has already provided its share of development to meet local housing need; - no local benefit arising; poor public transport network; limited facilities and services; WATER MATTERS: Ongoing ditch issues relating to future maintenance on BUN1 - concerns that development on this site would exacerbate these problems; surface water flood risk across part of the site; recent flooding within the village; ongoing drainage issues with the older sections of	Whilst Bunwell is characterised by linear development there are existing examples of small development pockets (including on the current development site adjacent to this preferred site) and a well-designed scheme would not be considered inappropriate in this location. Matters relating to the creation of a new access into the site, potential ecological implications of the adjacent pond and addressing on site drainage would be addressed in detail at the planning application stage however initial technical responses relating to all of these matters indicate that these issues could be satisfactorily addressed at that stage. Comments relating to both on-site drainage and surface water, as well as wider drainage issues within the village are noted. Discussions have taken place	100	Review the correspondence with NCC Highway Engineers regarding the existing piped drains to determine whether this needs to be considered further.

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			the drainage system operating at capacity (advised by Highways Engineer); HIGHWAYS MATTERS: No existing site access; highway constraints in the village, including narrow roads and several blind corners on the approach to SN0537; concerns that the roads are not suitable for an additional 25 dwellings; lack of street lighting; LANDSCAPE/ ECOLOGICAL MATTERS: pond adjacent to this site; loss of existing landscape features visible in views across this site on the approach from the B1113; impact on users of the footpath network; PLANNING HISTORY: previous preferred site to the west remains undeveloped; SN0537 previously subject to a withdrawn planning application [2020/1464]; Bunwell PC and Bunwell Development Housing Group have recommended two other sites for development - SN2126 and SN0538REV	with the Lead Local Flood Authority who have advised that with appropriate mitigation measures in place development of this site would be achievable. Wider flooding events in December 2020 were experienced in a large number of localities and have been attributed to saturated catchment flooding due to prolonged rainfall however the comments received relating to the adequacy of the existing drainage network have been noted and will be explored further with the relevant technical body. It is acknowledged that during the construction phase of development there will be disruption to existing residents. Whilst this can be difficult it is only a temporary issue and it would not be reasonable to restrict new development for this reason. Concerns about the withdrawal of a previous application on this site, as well as ongoing boundary/ ditch maintenance issues on the adjacent site have been discussed with those officers currently seeking a solution and the Council does not consider that these matters should result in this site being rejected as an allocation site. In fact, the allocation of this site may present an opportunity to resolve the issues on the adjacent site. The withdrawn application was considered to be of an inappropriate design which does not preclude the allocation of this site.		

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				It is recognised that a number of alternative sites within Bunwell have been promoted to the VCHAP and that these have varying levels of support locally. These sites have previously been assessed as alternative development options and have either been considered suitable for shortlisting should SN0537 be re-categorised or have been rejected due to their identified constraints. Although the concerns expressed above have been noted the Council is seeking to ensure that the most appropriate option for development is brought forward within Bunwell and remains of the opinion that SN0537 is a suitable site for allocation.		
QUESTION 39: Preferred Site - SN0537, Land to the north of Bunwell Street	1428, 1527	Support	Comments of support for SN0537: recognition of need for additional housing and attractiveness of Bunwell; SN0537 is the best option for maintaining the linear pattern of development whilst having less impact on existing properties and retaining open feel in the village; and support for SN0537 providing gradual development of the site over a decade, and the total number includes the 7 properties under construction on the adjoining site to the west.	With reference to the timescales for development: If this site is allocated within the VCHAP the timescale for development of the site would be dependent upon the submission of a subsequent planning application. It is not considered reasonable or necessary to restrict this modestly sized site to a phased development timescale which would typically be more appropriate for a larger scale of development. Development of 25 dwellings on site SN0537 would not include the 7 dwellings currently under construction to the west of the site. These dwellings were approved separately under reference 2019/1542 and were allocation BUN1 in the 2015 Site Specific Allocations and Policies Document.	95	No action required

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				The Council notes the additional comments supporting SN0537 that have been received.		
QUESTION 40: Should any shortlisted / rejected sites be allocated?	2236	Comment	NCC ecological comments: Rating for these sites - green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required.	These comments are noted. Should a review of sites in Bunwell result in alternative sites being considered for allocation the detailed comments of NCC ecology will need to be reviewed further.	117	No action required at this time.
QUESTION 40: Should any shortlisted / rejected sites be allocated?	2087, 2098, 2099	Comment	None of the shortlisted sites should be rejected.	These comments are noted.	116	No action required.
QUESTION 40: Should any shortlisted / rejected sites be allocated?	2010	Comment	Environment Agency comments relating to Forncett Foul Water Capacity: For sites SN0537, SN1057, SN0538REV, SN0539, SN2126 and SN0602, available information indicates there may be around 120 houses planned here in total. Forncett has some capacity for foul water flows (can accommodate the 'preferred' sites) but does not have capacity for all the houses planned in these developments. Discussions will need to be held with AWS if all development goes ahead, and development must be phased in line with Water Recycling Centre (WRC) treatment capacity being made available.	Note the comments of the Environment Agency in relation to these sites. Further discussions continue to be held with Anglian Water (AW) following the receipt of detailed AW comments on the site selection process however at this time the VCHAP is only seeking to allocate the preferred sites and therefore sufficient capacity should be available at the Forncett Waste Recycling Centre. This position will need to be reviewed further if the allocations and/ or numbers on these sites are amended. The Council is preparing a Water Cycle Study as part of the evidence base for the VCHAP which will assess the capacity and constraints within this infrastructure.	115	Schedule further follow-up discussions with Anglian Water to determine the availability of foul water capacity as well as any planned works to these treatment plants. Review of the WCS when prepared to determine any particular issues and/or potential policy wording that may be required for specific sites.

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QUESTION 40: Should any shortlisted / rejected sites be allocated?	948, 972, 996, 997, 1458, 1510	Mixed	A summary of the comments suggesting alternative options/ combinations on the current shortlisted sites: SN2126 - should be amended to a 'preferred' site, ideal site especially if additional numbers are subsequently required in Bunwell, a lower density development that retains at least some of the existing trees would be a preferable option; SN0539 - should be considered as a 'preferred' site, would require the demolition of barns which are currently used by 2 businesses, agree with the comments made in the assessment regarding Lilac Farm; SN0538REV - should be retained as a 'shortlisted' site, the break in housing along this stretch is considered desirable by some people in the village; SN0537 & SN2126 (combination) - suggest splitting the allocation across these two sites, would reflect the pattern of development and respect the character of the village, would retain the open fields around Lilac Farm as well as those opposite; SN0538REV & SN2126 (combination) - these are the sites preferred by the Bunwell Development Housing Group and Bunwell Parish Council, SN0538REV is a village centre location within walking distance to local facilities and the school,	All of the above sites have been subject to detailed site assessments with various constraints were identified at that stage on each site. The VCHAP process remains committed to identifying the most appropriate allocation site for Bunwell and the Council accepts that due to the number of sites promoted within the settlement an alternative approach to development could be achievable on a combination of sites.	113	No action required

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			has a newly constructed road access, is in keeping with the new Saffron development and is large enough to accommodate the total required, SN0538REV has a low surface water flood risk, these sites are not a gateway to the village and are not used by walkers; and General - Any new development in Bunwell should be characteristic of the surrounding area and existing housing development.			
QUESTION 40: Should any shortlisted / rejected sites be allocated?	1057, 1528	Comment	Objections to Question 40: current building work along Bunwell St has already proved detrimental to the appearance of the village, and the local wildlife.	The Council notes these comment however without a site reference it is unclear which site the respondent is referring to. The Council recognises that changes to the existing settlement can be unsettling however the growth of villages through new development is important to ensure support the vitality of the rural community, and support existing services and facilities.	111	No action required.
QUESTION 41: Should any shortlisted sites be rejected?	453, 512, 617, 1012, 1311, 1474	Object	Objections to SN0538REV and SN0539: SN0538REV - the assessment has not taken reasonable consideration of the impact that development would have on the neighbouring properties, development will run the length of existing gardens undermining privacy and blocking field views, property prices will be devalued, the site would not be in keeping with the existing pattern of linear development and would alter the character of the village, village traffic is already at an unacceptable level, proposed scale of development is out of proportion to other small scale	The Council notes the objections to both of these shortlisted sites. Detailed site assessments have been undertaken for both of these sites and should the allocation of these sites be subject to review these would be considered again. The final site layout and design of these sites (if allocated) would be the subject of subsequent planning applications however if appropriate the detailed policy text could set out site specific considerations which, for example, could include landscape buffer strips to protect the amenities of neighbouring properties. Similarly if allocated,	121	No action required.

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			developments in rural villages, previous planning stated that Bunwell would not have infill development along The Street as the gap between existing properties should be maintained; and SN0539 - no consideration given to existing properties, development would destroy the linear layout and current views, over-population of this part of the village.	consideration could be given in the supporting policy text to the form of development appropriate on these sites. However, it is noted that whilst a linear form of development dominates the existing grain of the village there are examples of other forms of development in the village. Loss of the landscape gap in this part of the village and the resultant impact on the townscape would be a consideration if either (or both) of these sites were to be reconsidered as preferred sites for allocation.		
QUESTION 41: Should any shortlisted sites be rejected?	525	Object	Objection to an unreferenced shortlisted site: Already suffered from development of a new dwelling on a house on one side and this would result in development on the other side too; and New houses on this site will overlook our garden and conservatory resulting in loss of privacy; Settlement limit is drawn incorrectly and excludes part of our (and our neighbour's) garden.	Although it is unclear which shortlisted site these comments should be attributed to (possibly SN0538REV) in general terms it should be noted that detailed site design and layout would be a matter for a future planning application which would be determined in accordance with the relevant planning policies. It would be necessary to ensure that there was not an undue loss of residential amenity for existing properties. In terms of the settlement limit, the boundary is drawn to reflect the existing development boundary and in places is drawn tightly around existing development. In some instances (as in this case) this excludes part of residential gardens associated with existing dwellings.	120	No action required.
QUESTION 41: Should any	77	Object	Objection to shortlisted site SN2126: Large dwelling would not be in keeping with the settlement line;	The constraints on this site have been noted within the site assessment form, including the presence of trees within the site. It has been noted that if	119	No action required.

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shortlisted sites be rejected?			Removal of trees to the rear would harm the form and character of the village; and Small number of dwellings (2-4) would be more reasonable and sustainable.	development of this site were to occur the number of dwellings appropriate on this site could be restricted as a result. However, restricting development of this site to frontage development only may not be the most efficient use of the land and would be in conflict with the NPPF - with careful site design development on this site could complement existing development patterns within Bunwell whilst making the most efficient use of the land. The Council also notes that as the front section of this site falls within the existing settlement boundary an opportunity for small-scale development already exists.		
QUESTION 41: Should any shortlisted sites be rejected?	974, 998, 1529	Comment	None of the shortlisted sites should be rejected.	The Council notes these comments and the support for the shortlisted sites as expressed in response to Question 39. At this time the Council is not proposing any amendments to the sites selected as either preferred or shortlisted options within Bunwell. Concerns about the clarity of questions relating to the shortlisted and rejected sites have been noted.	118	No action required.

Burston, Shimpling and Gissing

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 42: Settlement Limit	2036	Comment	To be considered as part of the Diss and District Neighbourhood Plan.	Sites put forward within Burston and Shimpling are to be considered and allocated as part of the Diss & District Neighbourhood Plan (DDNP). Therefore the Council acknowledge that Historic England comments will be considered as part of the NP. Gissing is not included as part of the DDNP, therefore any sites promoted in Gissing have been assessed for suitability through the South Norfolk Village Clusters Housing Allocations Plan. However, out of the sites promoted for development in Gissing, none were considered suitable.	235	No action or change required.
QUESTION 42: Settlement Limit	1935	Comment	IDB comments were made via the Diss & District Neighbourhood Plan consultation.	Sites put forward within Burston and Shimpling are to be considered and allocated as part of the Diss & District Neighbourhood Plan. The Council acknowledge that the Water Management comments were made direct to the NP. Gissing is not included as part of the DDNP, therefore any sites promoted in Gissing have been assessed for suitability through the South Norfolk Village Clusters Housing Allocations Plan. However, out of the sites promoted for development in Gissing, none were considered suitable.	234	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 42: Settlement Limit	264, 1385, 1467	Object	Objections raised to development in villages and then more specifically on the proposed site of SN0349.	In the first instance, the Council would just like to confirm that this question specifically refers to any changes to the existing settlement limit, as part of the VCHAP review of all Settlement Limits. At the time of writing, there are no alterations proposed to the existing Settlement Limit. With regards to the objection to 'any' development within this cluster, sites promoted to SNC within Burston and Shimpling have been forwarded to the Neighbourhood Plan Steering Groups, as these areas fall within the Diss and District Neighbourhood Plan (DDNP). Therefore, decisions relating to the allocation of these sites will be undertaken through the DDNP. With regards to future development for these areas, the South Norfolk villages of Burston, Scole and Roydon have been provided with an indicative housing growth figure of at least 25 new homes each by South Norfolk Council, with the expectation that this will be met within the Neighbourhood Plan. However, Gissing is not included as part of the DDNP, therefore any sites promoted in Gissing have been assessed for suitability through the South Norfolk Village Clusters Housing Allocations Plan. It is noted that only 1 site was promoted for development in Gissing, however, was rejected and not considered suitable for development.	233	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 43: Should any of the rejected sites be allocated?	956, 1389, 1475	Comment	In summary, alternative rejected sites appear to be much more suitable. In keeping with the scale and character of the village, and minimal impact on existing residents. Request a review of other proposed site as more appropriate.	The Council acknowledge the comments raised in support of the rejected sites. However, there is insufficient evidence to suggest that the rejected sites are now more suitable for development, for example highways, landscape, heritage concerns have not been resolved.	236	No action or change required.

Carleton Rode

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 175: Settlement Limit	1515	Object	Settlement Limit should be extended to the east along Flaxlands Rd to include an additional parcel of land for up to 6 dwellings adjacent to 2017/2096. This would provide a further small site for housing to enable to continued growth of the settlement.	The Council notes these comments as well as a similar submission made by the same respondent to Question 44. This amendment to the previously promoted site is considered as a revised site submission and as such will be subject to a new site assessment. It is therefore not considered appropriate to comment further on this site here.	122	This site should be logged as a revised site submission and be subject to a new site assessment.
QUESTION 44: Should any rejected sites be allocated?	1612	Comment	Support for SN4009: Site should either be allocated or be included within the SL; Relates well to the existing SL to east and south; Would enable linear development matching the east side and extending to the crossroads; and Mitigation could address heritage, landscape and surface water flooding issues.	This site was subject to a detailed site assessment and was considered as both a potential allocation site and an extension to the existing settlement limit. A number of constraints to development on this site were identified, including the surface water flooding which covers an extensive area within the site. Additional evidence to support the allocation of this site or its inclusion within the Settlement Limit has not been submitted and it is not considered appropriate to recategorise this site.	126	No further action.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 44: Should any rejected sites be allocated?	1536	Comment	Support for site SN4068: A reduced version of this site should be considered for 5-6 dwellings on a site of 0.4ha would address the concerns raised in the site assessment for SN4068, adjacent land has planning permission and has been sold, the adjacent site would represent a logical extension to the village, the site is well connected and is deliverable immediately.	These comments have been noted and this site has been included as a revised site in the new site assessments.	124	This amended site will be subject to a detailed site assessment.
QUESTION 44: Should any rejected sites be allocated?	1936, 1937	Comment	Outside the IDD boundary and partially within the Norfolk Rivers watershed catchment; and If surface water discharges within the watershed catchment of the Board's IDD, discharge to be in line with the Non-statutory technical standards for SuDS.	The Council notes these comments but at this time no sites are proposed for allocation within Carleton Rode.	123	No action required.

Dickleburgh

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 45: Settlement Limit	1938, 2037	Comment	If consulted, IDB comments will be made via the Dickleburgh Neighbourhood Plan consultation. English Heritage will consider sites as part of the Dickleburgh Neighbourhood Plan.	Noted that comments will be made as part of the Dickleburgh Neighbourhood Plan.	34	No action or change required.
QUESTION 45: Settlement Limit	848, 1640	Comment	Consider that the sites at Harvey Lane and Land to the south of Harvey Lane / Langmere Road are suitable for development. Respondents disappointed to note that sites in Dickleburgh have not been assessed through this Plan, and are proposed to be assessed only through the Dickleburgh Neighbourhood Plan	There are two emerging Neighbourhood Plans within the South Norfolk District that are proposing to make their own housing allocations, one of which is Dickleburgh. These Neighbourhood Plan documents sit alongside the Local Plan and when adopted are also taken into account in determining planning applications. Most of these Neighbourhood Plans include more detailed Development Management policies that aim to shape development proposals to better reflect local circumstances. Decisions relating to the allocation of these sites will be undertaken through the relevant Neighbourhood Plan. Sites promoted to SNC within Dickleburgh have been forwarded to the Neighbourhood Plan Steering Groups for assessment and possible allocation as part of that document.	33	No action or change required.

Ditchingham, Broome, Hedenham and Thwaite

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 46: Settlement Limit	1404	Comment	No specific comments on the Settlement Limit but note proximity to East Suffolk and encourage engagement with infrastructure providers covering this area, in particular the Norfolk and Waveney Clinical Commissioning Group and Suffolk County Council as the Education Authority.	These comments are noted and it will be necessary initially to determine whether these third parties provided representations to the Regulation 18 consultation. However, specifically in terms of observations relating to the potential impact of site allocations on education facilities within adjacent settlements in the Suffolk area enrolment in primary schools would be managed through a combination of parental choice and alternative schools as many children now attend schools out of their catchment areas. Similarly, whilst many GPs can offer registrations for patients who reside outside their area these registration applications can be refused on appropriate grounds (including being closed to new patients) which can help to mitigate the impact of new development on these practices. The existing pressures on the NHS and GP practices within the area are however recognised.	128	Review whether the Norfolk and Waveney NHS Integrated Care Systems (ICS) and Suffolk County Council provided representations during the Reg 18 consultation and if not engage with these parties as appropriate.
QUESTION 46: Settlement Limit	477	Object	Disagree with proposed changes to Settlement Limit as this should include site SN0078 as a preferred site. Existing preferred allocations would end up included in the SL.	Throughout the VCHAP area all sites identified as preferred allocations will be incorporated within the settlement limits and it is unclear why the respondent objects to this approach. The Council acknowledges the support that has been submitted by the promoter of the site to the allocation of SN0078 but considers that it is more appropriate to respond fully to this against Question 49 of this document.	127	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 47: Preferred Site - SN0373, Land between Thwaite Road and Tunneys Lane	2238	Comment	No major ecological constraints identified, site in strategic GI corridor and green habitat for GCNs, site near Broom Heath Pits SSSI, LNR and county wildlife site.	These comments have been noted and the Council notes that sensitive landscape designations are in proximity to this preferred allocation site. In accordance with planning policy requirements future developers of the site would be required to address these matters within any subsequent planning applications submitted for the development of this site. This would include undertaking the appropriate ecological surveys, minimising the impact of new development and designing suitable mitigation measures into the site from the outset.	137	No action required.
QUESTION 47: Preferred Site - SN0373, Land between Thwaite Road and Tunneys Lane	1939, 2012, 2085, 2179	Comment	Comments relating to existing WRC infrastructure and surface water: Site is adjacent to the Waveney, Lower Yare and Lothingland IDD - if surface water discharges within this catchment area it should be in line with non-statutory technical standards for SuDS; on-site flood risk forms the start of a minor/ moderate flowpath in the 0.1% AEP event, flood risk concentrated to the centre/ west of the site, opportunity to mitigate flood risk leading off the site, large area is unaffected by flood risk and has development potential; and Ditchingham WRC has capacity for the planned growth from this site [& others] but capacity would be limited if these allocations are substantially increased.	Matters relating to surface water flooding were noted during the site assessment process and have been subject to further discussions with the LLFA. In its original form the promoted site was of significant size and the site assessment process found that a reduced site area would be the most appropriate option for allocation. Subsequent discussions with the LLFA have determined that the boundaries of this site could be amended further to avoid the identified areas of surface water flooding - the site boundaries should therefore be subject to review to determine the most appropriate areas for allocation. Comments relating to the foul water capacity at Ditchingham WRC have been noted and are subject to ongoing discussions with Anglian Water as part of the Water Cycle Study to ensure an appropriate solution would be	136	Review the proposed site boundaries following discussions with the LLFA about the identified areas of surface water flooding on site. Ongoing liaison with Anglian Water, via the production of the Water Cycle Study, to understand the existing and future capacity at Ditchingham WRC and the implications that this could have on new allocations in this settlement.

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				available to allow the delivery of additional development in this area.		
QUESTION 47: Preferred Site - SN0373, Land between Thwaite Road and Tunneys Lane	2264	Object	Objection to SN0373: Allocation of SN0373 would result in housing delivery in the area being controlled by a single party who could land bank or build at their own market absorption rates, SN0373 is not as well located as SN0078 and would result in landscape/ character harm, if allocated the site should be as a reserve site subject to the delivery of DIT1 within a 2 year period with failure to deliver resulting in removal of the allocation.	Assurances have been provided from the developers of the existing allocation DIT1 who have advised of the anticipated timescales for the delivery of this site, as well as the potential for linkages between these two sites. At this stage however the two parcels remain under separate control and this matter is to be explored further to ensure that delivery of SN0373 is achievable, as set out in the Council's response to Question 47. Notwithstanding this point, it is not uncommon for the delivery of a site to be within the control of a single party with benefits associated with a more coordinated and sustainable form of development arising. The Council does not consider the suggested 'reserve site' option to be appropriate or necessary.	134	No action required.
QUESTION 47: Preferred Site - SN0373, Land between Thwaite Road and Tunneys Lane	1519	Support	Support for SN0373: Confirmation from the landowner that adequate rights of access have been retained through DIT1 to access this site; and confirmation that the site is available and achievable with a commitment to bring the site forward in a timely manner.	The Council notes these comments of support and clarification from the landowner at this time, particularly those relating to the access arrangements to the preferred allocation site however whilst the evidence supplied acknowledges that the developer of the adjacent site is open to the option of working collaboratively with the landowner of the preferred allocation site it does not state that access rights to the site have been retained. Details confirming the	133	Contact the promoter of the site to clarify the legal position regarding access to the preferred allocation site from the existing DIT1 allocation.

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				access arrangements should be clarified prior to possible allocation of the site.		
QUESTION 48: Preferred Site - SN2011SL, Land off Lamberts Way, Ditchingham	1940, 2013, 2152	Comment	Comments on the infrastructure and surface water flooding for site SN2011SL: Site is immediately adjacent to the Waveney, Lower Yare and Lothingland IDD, minor development – no further comments; Ditchingham WRC has sufficient capacity for the planned growth but if the allocations are substantially increased then capacity will be limited; and LLFA rating - green with no additional comments.	The Council notes these comments. Ongoing discussions with Anglian Water about the capacity of Ditchingham WRC are taking place however it is not considered that the inclusion of this site within the settlement limit would result materially alter the existing capacity levels.	142	No action required.
QUESTION 48: Preferred Site - SN2011SL, Land off Lamberts Way, Ditchingham	2240	Comment	No major ecological constraints identified, land adjacent to a priority habitat, site in amber habitat zone for GCNs and strategic GI corridor, site within SSSI IRZ but this is not triggered by residential development.	These comments are noted. It would be for the site developer to address and provide appropriate mitigation measures for all relevant ecological matters at the planning application stage should the site be included within the revised settlement limit.	141	No action required.
QUESTION 48: Preferred Site - SN2011SL, Land off Lamberts Way, Ditchingham	478	Object	Objection to SN2011SL: This site is not being promoted for the allocation being offered and there is no evidence it would deliver the housing suggested; The site would have an adverse impact on the local landscape and amenity; and	The site has been promoted for development of a single dwelling but the site assessment recognises that this parcel of land has the potential to accommodate a larger number of dwellings should it be included within the adjacent settlement limit. As such the final number of dwellings to be brought forward on this site would be subject to site constraints with numbers, layout, design and site access amongst the matters to be determined via	140	No action required.

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			Inadequate access road if the site is developed to its full potential.	planning application and being informed by the relevant planning policies - at this time inclusion of the site within the settlement limit would provide an opportunity for future development within the village.		
QUESTION 48: Preferred Site - SN2011SL, Land off Lamberts Way, Ditchingham	31, 55, 1497	Support	Support for SN2011SL: Support for small scale sustainable development with a low environmental impact.	The site has been promoted for a single dwelling but has been assessed as being a suitable addition to the existing settlement boundary. As such, once included within the settlement boundary it would be possible for a larger scheme to be submitted on this site subject to on-site constraints. Therefore whilst the support for a single dwelling is recognised it should be noted that once included within the settlement boundary the site could potentially be developed for a greater number of dwellings than the promoter of the site has currently indicated.	138	No action required.
QUESTION 49: Should any shortlisted / rejected sites be allocated?	2273	Support	Comments submitted in support of SN0078: mature trees on the site are predominantly around the boundaries of the site which would be proposed for retention with additional compensatory planting also possible on site; the site is well located for services and facilities; site has the potential to accommodate up to 15 dwellings; all landowners support the submission of the site and are engaging with SME housebuilders; and	The Council acknowledges the comments that have been submitted by the site promoter supporting the allocation of this site. In doing so the promoter of the site has confirmed that all landowners support the promotion of the site and are currently engaged in active discussions with third party housebuilders. This provides some reassurance about the deliverability of the site. At the time of the initial assessment the Council also raised concerns about the landscape and ecological impact arising from developing this site. A further review of the site suggests that many of these	915	Review the classification of SN0078 following receipt of Regulation 18 representations, including further discussions with NCC Highways to confirm whether a suitable access is achievable into the site.

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			no known constraints - many of the mature trees on the site need to be managed/ removed, no significant landscape impact.	trees are no longer present and as such the Council considers it appropriate to reassess this site to see whether it would offer a preferable allocation option within this village cluster at this time.		
QUESTION 49: Should any shortlisted / rejected sites be allocated?	2083	Comment	LLFA comments: Green rating - no issues raised	The Council has received these comments from the LLFA and believes that they relate to site SN4020 however there was no site reference included and this attribution should be confirmed. The Council recognises that no surface water issues have been raised in this response.	914	Confirm with the LLFA that these comments relate to site SN4020
QUESTION 49: Should any shortlisted / rejected sites be allocated?	2244	Comment	Comments from NCC Ecology on shortlisted sites SN0345 and SN4020: SN0345 - Amber rating - site opposite Broom Heath SSSI, LNR, CWS and candidate county geodiversity site which is known to support reptiles and GCNs; site within strategic GI corridor; potential for impact on SSSI; planning application would be required to include an ecological appraisal; SN4020 - Amber rating - identified as good-quality semi-improved grassland; adjacent to Broom Heath SSSI, LNR, CWS and within the candidate county geodiversity site which is known to support reptiles and GCNs; site within strategic GI corridor; potential for direct and indirect impacts - buffer zone recommended between development and land to the north; planning application would be required to include an ecological	These comments are noted. At this time these sites have been shortlisted but not preferred for allocation. Should the sites be reviewed and this categorisation be amended the implications for the adjacent ecological areas will be considered as part of the site re-evaluation process. Possible mitigation measures have been identified within this technical consultee response and it could be appropriate to identify these within the background text to any allocation, or within site specific policy text, in order to inform the design and development of the site and ensure that these constraints are mitigated appropriately.	176	No further action at this time but should the allocation of either of these sites occur consideration will need to be given to policy specific text, including the background text, and the recommendation for identified mitigation strategies.

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			appraisal; and General - measures required			
QUESTION 49: Should any shortlisted / rejected sites be allocated?	1591	Comment	Support for SN4020: Should be considered as either a preferred site or an extension to the Settlement Limit as it continues the linear pattern of development from the previous allocation BRO1.	Whilst this site would be a continuation of the existing linear form of development it is considered that a further linear extension could result in a sub-optimal impact on both the landscape and the townscape. A continuation of the existing form of development in this location would extend significantly beyond the dwellings on the southern side of Old Yarmouth Road. Development in this location would be prominent and would also have the effect of reducing the separation between Broome and Ellingham. For these reasons, and due to the advantages of other promoted sites within this cluster, the site was not considered to be a preferred option. The Council did however recognise some benefits associated with this site and as such it was considered as a Reasonable Alternative (shortlisted) site within the initial site assessment.	174	No action required.
QUESTION 49: Should any shortlisted / rejected sites be allocated?	1403	Comment	Support for SN0346: Site is well connected to the local services and facilities; Landowner is seeking advice regarding the designation and ecological value of the of the adjacent CWS - subject to this work the site could present an opportunity for future growth; and an adjacent site has	The site has been subject to a detailed site assessment and it was concluded that development of this site at this time was not optimal for the reasons identified. At the time of preparing this response (January 2022) additional information confirming the landowner's ecological assertion has not been received for consideration by the Council. The Council remains committed to ensuring that the most	172	No action required.

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			been developed without ecological constraints preventing it coming forward.	appropriate sites are preferred for allocation taking into consideration the objectives of the Plan, the sites available for allocation and the constraints and/or opportunities that the different sites would provide. The Council maintains its original position regarding the allocation of this site.		
QUESTION 49: Should any shortlisted / rejected sites be allocated?	1400	Comment	Support for SN0345: Submission of a supporting 'Highways Suitability Technical Note' considering access opportunities for the site; and ecology report currently being prepared to assess the ecological impact of allocation of this site - initial positive findings submitted; and illustrative masterplan prepared and submitted to support allocation of the site - unclear which area of the site would be allocated so masterplan covers full site area.	The supporting information has been reviewed and addresses some of the issues that were noted as being potential constraints to the development of this site. It is noted that a full ecological report remains pending. In terms of the area noted as being shortlisted for allocation at the Regulation 18 stage of the VCHAP production, it is the striped area only that is shown on the published maps and the illustrative masterplan therefore includes an area not considered to be suitable for allocation however it is noted that this has been submitted for illustrative purposes only.	171	Review additional supporting information on receipt and consider whether there is an opportunity/ a need to allocate this site in addition to SN0373 if this is appropriate.
QUESTION 49: Should any shortlisted / rejected sites be allocated?	834	Comment	Support for SN3004SL: The site has been considered unacceptable as backland development - backland development is part of the grain of development in this area; no material harm to adjacent occupiers; no landscape harm - application to be accompanied by LIA; and	It is acknowledged that there are existing examples of backland development along Old Yarmouth Road however these properties developed over a significant period of time and do not represent current policies within the Local Plan which does not support new dwellings outside the development boundaries. Whilst an existing extension to the settlement boundary can be seen further to the south west along Old Yarmouth Road this was drawn around an existing tight cluster of	170	No action required

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			FZ1 location.	backland properties and consolidated an existing identifiable group rather than encouraging new development to come forward to the rear of those dwellings set along the road frontage. The same principles towards new development would also apply in these locations should these sites be promoted for further residential use. Furthermore the proposed site is of smaller dimension than those that have been previously been subject to previous development and it is therefore considered that an extension to the settlement limit in this location could result in a poor form of development arising to the east of Old Yarmouth Road. Reference to the impact of development in this location on the River Valley setting are noted however the amber score is in accordance with the agreed HELAA scoring methodology. Specific matters such as the impact of a new dwelling on the residential amenities of the occupiers of 130 Old Yarmouth Road would be a matter to be considered in detail during the planning application stage.		
QUESTION 50: Should any shortlisted sites be rejected?	85, 2049	Comment	Comments on shortlisted site SN0345: Poor bus services - will increase reliance on private vehicles; traffic speed along Loddon Road; poor visibility (due to tree shading) along Loddon Road; existing congestion along Loddon Road with roads unsuitable for increased traffic; pedestrian footways, a crossing point and additional	These concerns principally relate to highways matters and the accessibility of the site. It is acknowledged that the development of this site would result in the loss of existing vegetation along the site boundary to allow for the creation of the site access and visibility splays. A review of the significance of these features would be required before re-	178	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			bus stops would be required along Loddon Road; and inadequate assessment made of the loss of existing vegetation along the road frontage.	classification of this site. NCC Highways have advised that both road widening and connecting footpaths would be required should this site be allocated. The additional requests for extra bus stops and crossing points could be reviewed however any additional requirements arising from the development of this site would need to be proportionate, necessary and viable. Comments relating to the existing public transport service are noted.		
QUESTION 50: Should any shortlisted sites be rejected?	1378	Object	Objection to SN0345: Detrimental impact of development on the adjacent Broome Heath; development of this site would reduce links between the heath and surrounding countryside; increase in indirect disturbance impacts such as noise and lighting; recommend removal as a shortlisted site.	The Council recognises these concerns. Mitigation measures have been identified within the technical consultation response which seek to address some of these concerns. Whilst the Council is not currently proposing an allocation on this site, should this site be reconsidered as a preferred option the ecological constraints of the site would be a key consideration and any allocation would consider the mitigation measures that may be required for the policy text.	177	No action required.

Earsham

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 52: Preferred Site - SN0218, Land north of The Street	2248	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Agricultural field bounded by hedges (priority habitats). No other priority habitats identified (see MAGIC). Site within strategic Green Infrastructure corridor, amber/green habitat zones for great crested newts, and SSSI IRZ but residential development does not trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy should inform the design. Consideration should be given to delivering Biodiversity Net Gain.	NCC Ecologist comments noted; no major ecological constraints identified from desk-top search – ecological requirements and mitigation measures would be assessed as part of the development management process.	327	No action required
QUESTION 52: Preferred Site - SN0218, Land north of The Street	1718, 1941, 2070, 2169	Comment	Local facilities e.g. doctors and primary school, are already at full capacity. Concerns raised with access to the site - speeding and safety concerns. Concerns with the sites location on the edge of a flood plain - raised issues over surface water flooding. Currently, the reasoned justification for the sites does not include reference to mineral resource safeguarding.	Most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems (ICS), Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are	7	Site allocation policy wording will include appropriate highway footway provision and other identified infrastructure requirements directly associated with the delivery of this site. Consultation with the Mineral Planning Authority will take place as part of the

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
				identified and understood as part of the plan making process. All of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.		planning application process, once the details of layout are known. The need for consultation will be contained in the site allocation policy/ supporting text, as appropriate.
QUESTION 52: Preferred Site - SN0218, Land north of The Street	1595	Support	We support the preferred site SN0218; The site is well related to Earsham village, facilities and services. Suitable access could be obtained to the south east as the site benefits from a long site frontage.	The support for SN0218 is noted. With regards to a suitable access, the Highway Authority (HA) have advised that the site can provide a suitable vehicular access with good visibility. In addition the site has the ability to set back development to provide a footway.	6	The detailed access point to be confirmed with the HA prior to development and any upgrade requirements will be incorporated within the site policy.
QUESTION 53: Preferred Site - SN0390, Land east of School Road	1719	Comment	Concerns raised with regards to local facilities e.g. doctors/primary school, already at full capacity. Substantial traffic increase in recent years, possibly due to schools being outside village with greater journey distances. Earsham floods in many locations - further building may increase this. Located on edge of flood plain, mostly to east - further improvements needed to drains and soakaways before further development occurs. Parish Council were not in favour of this site being developed due to constraints mentioned - easterly section of the site is approximately 40% in the Flood Zone.	The concerns about the capacity of the school and implications for further resources and facilities are acknowledged. This technical consultation has included discussions with NCC Children's Services, where information was shared on School capacity. However, it has been identified that as the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, therefore in many instances this type of development is unlikely to have a significant impact on school capacity and other facilities. It is noted that all of the planned developments will also need to	331	Policy wording to include highway mitigation measures.

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			Would exacerbate traffic on School Road, which sees speeding on a daily basis. Could add 100+ vehicles to confined area and, with narrow entrance, potential for accidents. Would cause major congestion, especially at school peak times.	contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth. With regards to Highways, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. Mitigation measures have been identified and would be incorporated into specific site allocation policy text. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority who have advised that with appropriate mitigation measures in place development of this site would be achievable.		
QUESTION 53: Preferred Site - SN0390, Land east of School Road	2250	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Agricultural field bounded along southern edge by a hedge (priority habitats). No other priority habitats identified (see MAGIC). Site within strategic Green Infrastructure corridor, amber/green habitat zones for great crested newts, and SSSI IRZ but residential development does not trigger consultation with Natural England. Applications for planning consent	NCC Ecologist comments noted.	328	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 53: Preferred Site - SN0390, Land east of School Road	2038	Comment	There are no designated heritage assets on site. The closest listed building lies to the south of the site but given the distance it is considered development would have limited impact of the setting of the heritage asset.	English Heritage comments are noted; there are no designated heritage assets on or near the site that would cause harm. A heritage impact assessment is not required by English Heritage however discussions with the Council's own Senior Conservation & Design Officer suggest that a HIA may be a useful assessment of the heritage impact arising from development on this site.	13	Consider whether a HIA is required for this site and undertake if appropriate.
QUESTION 53: Preferred Site - SN0390, Land east of School Road	1942, 2086	Comment	Water management comments: Within the Waveney, Lower Yare and Lothingland IDD. A Board Adopted Watercourse is located to the east of the proposed site boundary. Byelaw 3 applies to any proposed discharge of surface water from the proposed site. All other Board Byelaws will also apply to this development. Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised.	Water management comments noted.	12	No action required.
QUESTION 53: Preferred Site -	1575	Support	Owner of site supports proposed amendment of settlement limit to include their land. However, a slight amendment to site area (1.25ha) is proposed to enable	The Council acknowledge the support of the site. The representation provides a revised boundary which includes more land (same land owner) in order to	11	Consult with highways to confirm additional piece of land (including the existing dwelling)

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SN0390, Land east of School Road			better access. Third party land referenced by NCC Highways is within same ownership. The inclusion of the rectory land (north west) as part of wider site would provide a suitable access onto School Lane. This includes demolition of building. The site is of sufficient scale to enable replacement dwelling on same plot or as part of wider housing allocation.	provide a suitable access and to resolve highway concerns. The inclusion of this area of land has the potential to provide a suitable means of access to the site, however this is subject to the approval of the Highway Authority. It is also noted that this would also require the demolition on an existing dwelling.		would achieve a suitable access.
QUESTION 53: Preferred Site - SN0390, Land east of School Road	1414	Comment	East Suffolk comments; No specific comments on the increased settlement boundary. Recommended consideration towards infrastructure implications in East Suffolk.	East Suffolk comments noted. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems (ICS), Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. The development of certain sites will require some local infrastructure upgrades, for example an extension of a footway to link the site to the village.	8	Continue to engage with service providers.

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				All of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.		

Forncett St Mary and Forncett St Peter

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 54: Settlement Limit	106	Support	Forncett Parish Council agree with the extent of the existing settlement boundary for Forncett i.e. No alterations are proposed	The Council acknowledge that the Parish Council agree with the extent of the existing settlement boundary i.e. no proposed changes.	14	No action required.
QUESTION 55: Should any rejected sites be allocated?	97	Comment	Site Ref: SN2058 Despite there being a nearby listed building on the offside of Station Road, this site is at least one hundred metres away, with no direct sight line to the building. Besides this, the frontage of any development proposed would remain unchanged. Site has always been considered as a brownfield site by South Norfolk Council. There have been many efforts to maintain a viable business on this plot all of which have suffered the same fate of closure. Most recently, this has involved a holiday letting business. The impact of 2020 was tremendous on all sectors but as everybody knows the holiday business has been hit hard. It is not viable for this to remain as employment land. My site is approximately 2.2 acres of which I have suggested only five developments at the end of my land, with its own access. NCC Highways are happy with the roads and access to this site, following a visit over a year ago. My site has good clear vision of the road in both directions. You have previously agreed the entrance and the splay vision so I am confused why it is	The Council acknowledges the representation made with respect to rejected site SN2058. Whilst the applicant suggests that NCC Highways are happy with the access, the Council have received advice from NCC Highways as part of the site selection process and they have raised serious safety concerns due to the sites location on the north side of Station Road and the inside of an 'S' bend, with an existing access being located 45m to the east of the railway bridge. This part of Station Road is predominantly a national speed limit one with very few opportunities for pedestrians and cyclists to seek refuge on road verge. There is no evidence to suggest that the view of NCC highways has since changed. With regards to the holiday lets and the employment use, whilst the Council is sensitive to the current climate, no evidence has been presented to suggest that the holiday accommodation is not viable in this location. Therefore, the Council is still of the view that the site is unsuitable for additional residential development.	616	No action or change required.

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			now in question. Long Stratton has a good selection of shops and amenities and we are only 20 minutes away from Norwich Hospital and City Centre, making it an inviting location.			
QUESTION 55: Should any rejected sites be allocated?	107	Comment	Comment submitted on behalf of Fornsett Parish Council, who at their meeting on 17/06/21 agreed with the list of rejected sites and did not wish to suggest and amendments.	Comments noted.	334	No action or change required.
QUESTION 55: Should any rejected sites be allocated?	1943	Comment	Water management comments: Part of the Parishes are located within the Norfolk Rivers IDD. The Board's byelaws apply to any new developments within the IDD.	Comments noted.	333	No change or action required.

Gillingham, Geldeston, and Stockton

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 56: Settlement Limit	620	Object	Already too many cars for the size of village, anymore would just be completely hazardous and would lead to bottle neck situations. The Old Yarmouth Road already has a dangerous speed limit. Not enough facilities to support the amount of residents e.g schools, dentistry, doctors. Other problems include ruining green areas of natural beauty and habitat, not environmentally friendly, the houses are out of keeping in terms of modern architecture in amongst this beautiful village.	The Council acknowledges the concerns raised regarding a general increase in traffic volumes, however no site reference is given and therefore the Council is unable to give a site specific response. In general, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In addition, whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies. With regards to infrastructure, the Council is engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles in Education and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. With regards to	522	No action or change required.

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				environmental concerns, it is acknowledged that development sites can be home to wildlife, and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures. With regards to the design of the dwellings, these will be considered at the planning application stage where the materials etc can be specified in order to keep the development in keeping with the local character.		
QUESTION 56: Settlement Limit	1822	Comment	Broads Authority comments: 'with a further cluster of development at west Kings Dam' – do you mean along Kings Dam to the west? As written, it does not seem to read well. It is not clear if a settlement limit alteration is made for Gillingham. There is a question asking for views, but the text is not clear and a dashed red line is not obvious on the map. It does not say 'no alteration to the settlement limit is made' like in other places	The Council can confirm that no alterations are proposed to the existing settlement limits within this cluster, including Gillingham, as part of the settlement review undertaken by the Council. However, sites that are allocated within the plan will automatically be included within the settlement limit.	521	Council to clarify cluster introduction paragraph with regards to the development at Kings Dam.
QUESTION 56: Settlement Limit	1317	Object	I object to proposals to extend the development zones in Geldeston and Gillingham due to the limitations of the current road infrastructure. Access to the villages of Geldeston and Gillingham is very poor and proposals to increase the number of dwellings will undoubtedly make matters worse. Road safety is a major concern due to on-road parking on	The Council acknowledges the concerns raised regarding an increase in the traffic volumes, as well as the associated highway safety concerns. In general, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway	520	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			The Street at Gillingham and at Kells Way in Geldeston; in both locations road widths are reduced to a single lane as current dwellings do not have off-road parking.	network. In addition, whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies.		
QUESTION 56: Settlement Limit	1608, 1795	Comment	Geldeston is a small compact village (pop. 397, 2011 census) and as the representative of its residents the Parish Council is glad to see that no changes to the Settlement Limit are proposed. Geldeston's present population and spatial organisation enable it to preserve a strong sense of community that is much valued by old residents and newcomers alike. [This is part of the Geldeston Parish Council's collective response to preferred site SN0437]	Comments from Geldeston Parish Council are noted. Whilst no updates are proposed to the Settlement Limit resulting in windfall sites, the Council would note that any allocations made via this Plan will be incorporated into the Settlement Limit.	519	No action or change required.
QUESTION 56: Settlement Limit	1416	Comment	No comment on specific site but please consider infrastructure implications in East Suffolk.	Comments noted.	518	Council to engage with East Suffolk with regards to infrastructure implications
QUESTION 56: Settlement Limit	908, 1313	Object	Concerns are raised: 1. Roads, traffic and safety	The Council acknowledges the concerns raised.	517	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			2. The environment and nature 3. Pressures on local resources 4. Flooding and safety	1. In general, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In addition, whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies. 2. Comments about the environmental impact have also been noted however all development will be required to deliver net-gain on site and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site, as well as significant on-site features (e.g., trees and hedgerows). Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. 3. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in		

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				many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care System (ICS), Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process 4. With regards to the concerns raised regarding flooding, discussions have taken place with the Lead Local Flood Authority (LLFA) who have provided feedback on the proposed allocations and made recommendations where appropriate. In addition, further comments are also expected from the Environmental Agency and Anglian Water, who will help inform individual allocation policy wording.		
QUESTION 56: Settlement Limit	1243	Object	Gillingham Settlement Limit allocations are greater than 1 hectare, with one site being twice this size. This is not in line with the objectives of the NPPF. The plan states that the existing primary school at Gillingham is operating at capacity. However, the village clusters are defined on the basis of catchment areas to primary schools. Therefore, it is unclear	The Council acknowledges the concerns raised. With regards to the size of the sites and the NPPF; Paragraph 69a of the NPPF notes the importance of small and medium sized sites, up to 1 hectare in size, in contributing to meeting housing needs, particularly in terms of the ability to deliver those sites quickly. The NPPF also states that plans should contain policies to optimise the use of land in	516	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			how the limits of this Settlement Limit have been defined and justified. The FRA relied upon for the development at GIL 1, 2019/1013 needs to be updated in line with EA guidance to support the allocation of these sites.	their area and meet as much of the identified need for housing as possible. Therefore, the Council considered that whilst one of the sites is slightly over the 1ha threshold, the development of this site for up to 35 dwellings would be optimum and would go towards meeting the required housing requirement for the area, in accordance with the GNLP. With regards to the requirement of a Flood Risk Assessment (FRA), the Council will be guided by the Environment Agency, who have been consulted as part of the Regulation 18 and in this instance and have requested that an FRA will be required to support SN0478 (adjacent to GIL1), if allocated.		
QUESTION 56: Settlement Limit	702	Object	The village roads cannot cope with additional levels of traffic. We are a rural community with horses, people and other animals sharing the roads. We do not need streetlights and pavements as a rural community we should be allowed to remain rural. The addition of 20 properties plus 40 vehicles will destroy the rural nature of the community. As an historic village the nature of that history will be destroyed with another modern, unimaginative development of property which would be better suited to a suburban setting. Local flora and fauna would be devastated	The Council acknowledges the concerns raised; however, no site reference is given and therefore the Council is unable to give a site-specific response. In general, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In addition, whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the impact of alterations to the existing road, street lighting, ecology, layout design, as well as the increased	515	No action or change required.

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			by additional people, development and vehicles.	traffic movements would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies.		
QUESTION 56: Settlement Limit	1232	Object	Gillingham Settlement Limit allocations are greater than 1 hectare, with one site being twice this size. This is not in line with the objectives of the NPPF. The plan states that the existing primary school at Gillingham is operating at capacity. However, the village clusters are defined on the basis of catchment areas to primary schools. Therefore, it is unclear how the limits of this Settlement Limit have been defined and justified. The FRA relied upon for the development at GIL 1, 2019/1013 needs to be updated in line with EA guidance to support the allocation of these sites.	The Council acknowledges the concerns raised. With regards to the size of the sites and the NPPF; Paragraph 69a of the NPPF notes the importance of small and medium sized sites, up to 1 hectare in size, in contributing to meeting housing needs, particularly in terms of the ability to deliver those sites quickly. The NPPF also states that plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. Therefore, the Council considered that whilst one of the sites is slightly over the 1ha threshold, the development of this site for up to 35 dwellings would be optimum and would go towards meeting the required housing requirement for the area, in accordance with the GNLP. With regards to the requirement of a Flood Risk Assessment (FRA), the Council will be guided by the Environment Agency, who have been consulted as part of the Regulation 18 and in this instance and have requested that an FRA will be required to support SN0478 (adjacent to GIL1), if allocated.	514	No action or change required.
QUESTION 56: Settlement Limit	918	Object	I object to the size of the development due to the increase in the volume of traffic it will bring.	The Council acknowledges the concerns raised regarding an increase in the traffic volumes, however no site reference is given and therefore the	513	No action or change required.

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				Council is unable to give a site-specific response. In general, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In addition, whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies.		
QUESTION 56: Settlement Limit	717	Object	The more housing that is being built on the fields surrounding our homes, is making the risk of flooding even higher.	The Council acknowledges the concerns raised with regards to flood issues. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority (LLFA) who have provided comments on the preferred and shortlisted sites and where relevant advised whether with sites are suitable for development and whether any mitigation measures are required. These measures will be included within the site allocation policy to ensure compliance with the LLFA. A review of the boundaries of the preferred site SN4078 may be necessary reflecting identified flood risk.	512	Review of flood risk/ boundaries of preferred site SN4078

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QUESTION 56: Settlement Limit	932, 1725	Support	Agree with existing settlement limit for villages of Geldeston and Gillingham. It is considered that the line defining the settlement limits is appropriate and should not be extended.	Comments noted. Whilst no updates are proposed to the Settlement Limit resulting in windfall sites, the Council would note that any allocations made via this Plan will be incorporated into the Settlement Limit.	511	No action or change required.
QUESTION 57: Preferred Site - SN0437, Land off Kells Way, Geldeston	544, 883	Object	Concerns raised with regards to SN0437; concerns raised with Kells Way as a single-track road, not all properties along Kells Way have off-street parking, the road is busy now with all the traffic from Kells Meadow, would like to see a new access via Old Yarmouth Road; the infrastructure can not cope with more homes,	NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. Mitigation measures have been identified and would be incorporated into specific site allocation policy text. With regards to an alternative access via Great Yarmouth Road, NCC Highways have advised that they would not consider this to be suitable for a new access. The access to Kells Way will need to meet the standard Highway requirements with regards to visibility, this will be determined as part of the allocation. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies relating to the environment. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, including within this cluster. Therefore, in many	523	Confirm that highway standards can be met to the existing allocation

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				instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care System (ICS), Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.		
QUESTION 57: Preferred Site - SN0437, Land off Kells Way, Geldeston	1796	Comment	Parish Council comments/suggested requirements: [1] No houses should be built on the preferred site until the Anglian Water pumping station below the Kells Estate has been replaced or upgraded; [2] after requirement 1. is met, up to five -- certainly no more than 10 -- houses might be built on site No. SN0437, but only if effective measures are taken to reduce the hazards to all residents from vehicles passing through Kells Meadow and along Kells Way; [3] similar proposals for densely built-up housing were made under the Local Development Framework in 2003; concerns with infrastructure.	With regards to the proposed number of units on site, these are considered to be sustainable and would represent an efficient use of land (in accordance with Section 11 of the National Planning Policy Framework (NPPF)). The scale of development is consistent with the objectives of the VCHAP in promoting social sustainability by supporting rural life and services. The concerns about the implications for further resources and facilities are acknowledged. The Council is engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems (ICS), Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority. In addition, continued engagement with Anglian Water is taking place as part of the	153	Discussions with NCC Education regarding school capacity and facilities. Further discussions between developer and NCC Highways to confirm access. Review of the WCS to determine capacity and possible infrastructure constraints at Geldeston.

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				production of the Water Cycle Study which is being produced to support the site selection process. This work seeks to identify constraints and opportunities within the existing water infrastructure and will ensure that issues are identified and understood as part of the plan making process. The Council is aware that development of the site will be subject to achieving satisfactory access through the FW Properties development, this will be explored further prior to development.		
QUESTION 57: Preferred Site - SN0437, Land off Kells Way, Geldeston	2251	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Rough grassland bounded along northern and western edge by hedges (priority habitat). No other priority habitats identified (see MAGIC). Site within amber habitat zones for great crested newts, and SSSI IRZ but unlikely to require consultation with Natural England (residential development >50 units) Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy should inform the design. Consideration should be given to delivering Biodiversity Net Gain.	NCC Ecologists comments noted.	151	No action required
QUESTION 57: Preferred Site -	2039	Comment	There are no designated heritage assets on site. However, the site is adjacent to the	The Historic England comments are noted; an HIA is required to inform	150	HIA to be undertaken

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SN0437, Land off Kells Way, Geldeston			Geldeston Conservation Area. There is also a pair of grade II listed cottages to the west of the site at West End. Any development of the site has the potential to impact on the significance of these designated heritage assets. A Heritage Impact (HIA) Assessment of the site should be undertaken to assess the impact of the proposed development on the listed building and conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement. Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.	whether the site is allocated, and to include any identified mitigation measures.		
QUESTION 57: Preferred Site - SN0437, Land off Kells Way, Geldeston	965	Comment	Concerns about the impact of additional housing on existing drainage infrastructure (operated by Anglian Water) because of numerous previous incidents of effluent discharge affecting our and neighbouring properties in Station Road. Will there be any assessment of the local pumping stations and drainage system to ensure they will be sufficiently robust to cope with increased sewage and surface water from run off?	Comments relating to both on-site drainage and surface water, as well as wider drainage issues within the village are noted. Consultation responses have been received from the Lead Local Flood Authority (LLFA) who have advised that with appropriate mitigation measures in place development of this site would be achievable. Wider flooding events in December 2020 were experienced in a large number of localities and have been attributed to saturated catchment flooding due to prolonged rainfall however the comments received relating to the adequacy of the existing	149	Discussion with AW to determine any identified issues and impacts on possible site allocation. Also review as part of the WCS.

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				drainage network have been noted and will be explored further if appropriate. The Council continues to engage with Anglian Water as part of this process, both directly and as part of the production of the Water Cycle Study which will form part of the evidence base supporting this Plan. The WCS seeks to identify infrastructure capacity and constraints within the AW network and how these may impact on the selection of allocated sites.		
QUESTION 57: Preferred Site - SN0437, Land off Kells Way, Geldeston	1944, 2117	Comment	Comments relating to water management: Site is immediately adjacent to the Waveney, Lower Yare and Lothingland IDD; If surface water discharges within the watershed catchment of the Board's IDD, this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS); Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing but where possible surface water infiltration should be utilised; and Adjacent to a flow path and this must be considered in the site assessment. Site is affected by a Source Protection Zone 3 and developers will need to liaise with the Environment Agency to ensure that development / drainage does not adversely affect the water quality; however, Zone 3 is the lowest risk	The comments made in relation to water management are noted and with reference to the presence of the surface water flowpath and the requirement for geotechnical investigation these issues will be explored further with the LLFA.	148	Discussion with the LLFA to determine whether this testing forms part of the standard planning application process.
QUESTION 57: Preferred Site - SN0437, Land off	1722	Support	Support the increase in the number of properties to 20 dwellings. The site is capable of providing a range of house	The Council acknowledges the support for the development of the site. With regards to housing mix, the Council will	24	No action required.

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Kells Way, Geldeston			types including smaller two and three bedroomed properties and bungalows. Provided the layout is appropriately designed, the total number of dwellings could flex according to local housing demand and need. This appears an extended settlement boundary for the village. The site has good access to services and facilities, no flood risk concerns, no heritage assets will be affected. The landscape generally consists of large open arable fields defined by countryside hedging with belts and areas of woodland.	seek to provide new housing development to meet housing needs (using the most up to date Strategic Housing Market Assessment (SHMA)). This will ensure that allocated sites provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of their life cycle e.g. first-time buyers, affordable housing, upsizing/downsizing etc		
QUESTION 57: Preferred Site - SN0437, Land off Kells Way, Geldeston	416, 703, 860, 885, 909, 1043, 1104, 1200, 1318, 1726	Object	The topography of the site presents several problems with sewage/drainage, no mention of upgrading wastewater management. Concerns raised with existing insufficient infrastructure, more development will increase this pressure. Concerns with highway safety (visibility, traffic volume etc') and access of Kells Way; Kells Way is not considered to be suitable for an increased traffic flow/ There are infrequent bus services which will force the reliance of motorized vehicles Concerns with the impact on the local environment, effects on the Conservation Area, play area and wider Waveney Valley.	Topographical surveys will be a policy requirement for development where this is considered to be appropriate. As part of the evidence base for the VCHAP, a Greater Norwich Water Cycle Study (March 2021) and a Level 1 Strategic Flood Risk Assessment were prepared and will be used to guide development. As part of the next stage (Reg 19) there will be specific supplement to the Water Cycle Study and a stage 2 SFRA which will help inform areas where upgrades in services are required. With regards to access, the Highways Authority have been previously consulted and have advised that access via Great Yarmouth Road is not suitable/safe and access via Ketts Way is	20	Sites located within areas at risk of any flood will be expected to provide specialist reports, where necessary and policy wording will include any site-specific upgrades that are required to facilitate the development. Development of the site will be subject to achieving satisfactory highway requirements and therefore any requirements with be policy specific. Policy wording will contain landscape mitigation

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			If developed, the scheme should be reduced in scale (5 bungalows has been suggested to avoid overlooking). Requested access to the site via Old Yarmouth Road.	considered acceptable, subject to achieving satisfactory highway requirements i.e sufficient road widths and visibility splays. The effects on the wider landscape have been acknowledged, with specific regard to the north of the site, these will be considered at the detailed design stage, where mitigation measures will be proposed. A Heritage Impact Assessment (HIA) will be required to assess any impact on heritage assets arising, this includes the Conservation Area. With regards to a reduction in size, South Norfolk has a commitment of achieving 1200 and it has been considered that the site could accommodate up to 20 homes, which will also be in accordance with the National Planning Policy Framework (NPPF) in making best use of the land.		measures which will be guided by statutory bodies. The Council recognizes the concerns with the scale of development of the site; the site layout of the site will be developed to ensure there are no amenity impacts such as overlooking. Policy text to include requirement for topographical survey if appropriate. Production of a Heritage Impact Assessment.
QUESTION 58: Preferred Site - SN0478, Land south of GIL 1, Gillingham	777	Object	Summary; I object for multiple reasons. Concerns about the behaviour of contractors working on the existing site. Please see detailed representation for further information & objections.	The Council acknowledge the concerns raised and take these very serious. The Council has an expectation that the developer/contactors to act in a certain manor and will highlight this to the developer.	524	Contact Hopkins home to raise the concerns with the potential anti-social behaviour occurring on site.
QUESTION 58: Preferred Site - SN4078, Land south of GIL 1, Gillingham	263, 277, 349, 350, 352, 353, 420, 606, 680, 706, 855, 1059, 1076, 1236, 1244, 1270, 1319, 1337,	Object	1. Issues relating to: Flooding, site is located within Flood Zone 3, there is-existing surface water issues from Hopkins development. Further development will only make this worse. 2. Issues relating to Highways; that the site	1. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority who have advised that with appropriate mitigation measures in place development of this site would be achievable. The site will also be subject	157	Allocation Policy wording to include the requirement for a Flood Risk Assessment (SFA). Discussion with NCC

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	1727, 1731, 1745		is located on a blind double S bend on that part of Street is a safety concern, concerns with extra traffic, access road is inadequate. Concerns with infrastructure capacity; School is already at capacity. Doctors are full and are having to use Beccles GP Environmental concerns; negative impacts on Wildlife in the School Pond, damage Conservation area and Noise and light pollution concerns. Concerns with cost of housing.	to a Stage 2 Strategic Flood Risk Assessment at the Regulation 19 stage of the Plan production to assess in greater detail the flood risk on the site, as well as identify whether there are any suitable/ appropriate mitigation measures. Wider flooding events in December 2020 were experienced in a large number of localities and have been attributed to saturated catchment flooding due to prolonged rainfall however the comments received relating to the adequacy of the existing drainage network have been noted and will be explored further if appropriate. 2. Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. Mitigation measures have been identified and would be incorporated into specific site allocation policy text. 3. The concerns about the capacity of the school and implications for further resources and facilities are acknowledged. Discussions with NCC Education will include a review of the status of Gillingham Primary School. All of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure		Education about the capacity of Gillingham Primary School. Review of the Stage 2 SFRA when available.

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				effectively supports growth. 4. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, on the local ecology, noise and light pollution are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies relating to the environment. 5. The details of the housing mix on allocated sites will be determined at the planning application stage, where affordable homes will be sought in line with policy requirements.		
QUESTION 58: Preferred Site - SN0478, Land south of GIL 1, Gillingham	2019	Comment	Located within Flood Zone 3 - require site specific Flood Risk Assessments to be submitted at application stage for any proposed development.	Environment Agency comments noted. The Council notes the area of FZ3 that has been identified and, as the VCHAP progresses, has commissioned a Stage 2 SFRA that will include a more detailed assessment of this site and its constraints. This will inform the allocation of this site and, if allocated, identify mitigation measures to be explored at the planning application stage.	156	Allocation policy wording to include FRA requirement.
QUESTION 58: Preferred Site - SN0478, Land south of GIL 1, Gillingham	2252	Comment	NCC Ecologist comments: No major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required.	NCC Ecologist comments note.	155	Consultation required with Natural England (residential development >10 units), if allocated – note to be added to the

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			Agricultural field to south of existing consented site 2019/1013. Partly bounded along northern edge by hedge (priority habitat). No other priority habitats identified (see MAGIC). Site within amber habitat zones for great crested newts (large pond adjacent to school), and SSSI IRZ will likely require consultation with Natural England (residential development >10 units) if allocated. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, and the landscape strategy for 2019/1013, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			supporting text for the policy
QUESTION 58: Preferred Site - SN0478, Land south of GIL 1, Gillingham	933	Support	On behalf of the owners of the land, the preferred allocation site SN0478 is supported. The Council required that the land should be the subject of a Flood Risk Assessment and a Landscape Impact Assessment. The Flood Risk Assessment shows that it is possible to build on Flood Zone 1 and this provides a constraint on the eastern boundary of the allocation. The findings of the Landscape Impact Assessment are that the development of the land can take place without any 'material' harm to the landscape.	The Council acknowledges the support including the supporting documents. With regards to proposed numbers, these are indicative and will be subject to achieving satisfactory access/highways improvements through GIL1.	154	Further discussions with LLFA.
QUESTION 58: Preferred Site - SN0478, Land south of GIL 1, Gillingham	1945, 2121	Comment	Comments relating to water management: Adjacent to the Waveney, Lower Yare and Lothingland IDD; A riparian watercourse is located to the east of the proposed site which feeds into a Board Adopted Watercourse within the Waveney, Lower	The content of these representations are noted, with particular reference to the presence of the surface water flowpaths adjacent to the site. Discussions are continuing with the LLFA to understand the implications of these	152	Review with LLFA impact on surface water flowpath on site allocation

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			Yare and Lothingland IDD. If surface water discharges within the watershed catchment of the Board's IDD, this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing but where possible surface water infiltration should be utilised; and adjacent to a flow path and this must be considered in the site assessment. Site is affected by a Source Protection Zone 3 and developers will need to liaise with the Environment Agency to ensure that development / drainage does not adversely affect the water quality; however, Zone 3 is the lowest risk	however at the time of writing it is considered that the presence of the flowpath may be adequately addressed within the site layout and drainage strategy.		
QUESTION 59: Should any shortlisted / rejected sites be allocated?	792	Comment	Concerns in relation to lack of amenities and services, no capacity at schools, flooding and highway concerns.	These comments have been noted. The Village Cluster boundaries have been defined based on groups of villages that share a range of services and facilities, which new development could reasonably be expected to support. However, they have predominantly been defined on the basis of primary school catchment areas, which are considered to provide a consistent local point of reference for social sustainability. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care System (ICS)	164	No action or change required.

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				Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. The development of certain sites will require some local infrastructure upgrades, for example an extension of a footway to link the site to the village. The current consultation offers people the opportunity to indicate where there are specific requirements needed to enable the development of a particular site to happen. All of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.		
QUESTION 59: Should any shortlisted / rejected sites be allocated?	2253	Comment	NCC Ecology comments: SN0274 REVA or REVB No major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Agricultural field opposite road to application 2019/1013 (and south of 2020/0491 at the service station). Bounded on two sides by hedge (priority	NCC ecology comments noted.	163	Consultation will be required with Natural England (residential development >10 units) if allocated.

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			habitat). No other priority habitats identified (see MAGIC). Site within amber habitat zones for great crested newts (large pond adjacent to school), and SSSI IRZ will likely require consultation with Natural England (residential development >10 units) if allocated. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, and the landscape strategy for 2019/1013 and 2020/0491 should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 59: Should any shortlisted / rejected sites be allocated?	2020, 2180	Comment	Water management comments: Sites REV A and B are both located within Flood Zone 3 which would require a site specific Flood Risk Assessments to be submitted for at application stage for any proposed development. Both REV A and B; infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. REVA : The on-site flood risk forms a minor/moderate flow path in the 0.1% AEP event, contributing to a major flow path south of the site. Flood risk is concentrated to the eastern/southeastern site boundary with flow lines indicating water flow south off of the site. There is opportunity to mitigate the flood risk leading off of the site. A large area of the site is unaffected by flood risk and has potential to be	The content of the representations is noted and with reference to the presence of the surface water flow path and the requirement for geotechnical investigation. Further discussions with the LLFA have advised that for REVA access into this site could potentially be affected – access to the site should avoid the areas of flood risk. REVB would be the preferred site of the two shortlisted Gillingham sites as the site has only a very minor flood risk.	162	Council to review whether REV would be the more suitable location for development.

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			developed. REV B: Flooding on-site is very minor, concentrated to the southern boundary/road area. The site is immediately adjacent to another allocated site (Ref: SN0274REVA). Consideration of how each site may impact each other/off-site flood risk must be considered in the site assessment.			
QUESTION 59: Should any shortlisted / rejected sites be allocated?	607	Object	If access to the development could be gained from McDonalds roundabout the traffic/congestion problems surrounding The Street would be avoided. A buffer greenbelt could also be created between any homes potentially affected by the development and the new site. Gillingham school would need to be expanded to cope with the extra pupils and associated parent parking.	Whilst the respondent does not specify which site they are referring to, it is presumed reference is being made to shortlisted site SN0274 REVA or REVB and this being a more suitable site, if access could be achieved via the roundabout.	161	Council to review whether SN0274 REVA or REVB should be preferred.
QUESTION 59: Should any shortlisted / rejected sites be allocated?	1338	Comment	SN0274 REVA or REVB This site is on the edge of Gillingham village with potential better access, closer to the few amenities available and less impact on the already congested village roads.	The Council acknowledges the support for SN0274 REVA or REVB sites with potential preferred access, proximity to services and less impact on congestion.	160	Council to review all comments from consultation, in relation to SN0274 REVA or REVB and whether these sites should be allocated.
QUESTION 59: Should any shortlisted / rejected sites be allocated?	934	Support	It is requested that shortlisted sites SN0274 REV A and REV B should be allocated instead, and this should be in addition to the land to the south of GIL 1. The Flood Risk Assessment has shown that there is an area of land in Risk Zone 1 that	The Council acknowledge the request to allocate SN0274 REVA and B and as part of the review of sites post Regulation-18 will consider whether these sites should be allocated, as well as the best	159	The Council will review any additional shortlisted sites where necessary.

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			can accommodate the development. The Landscape Impact Assessment has demonstrated that the development of the land can take place without any 'material' harm to the landscape.	combination of sites for allocation within this cluster.		
QUESTION 59: Should any shortlisted / rejected sites be allocated?	1320	Support	Do not support development on the rejected sites.	Noted.	158	No action or change.
QUESTION 60: Should any shortlisted sites be rejected?	1238, 1246	Object	Shortlisted sites SN0274 REV A and REV B are located directly opposite preferred site SN0478 and should be rejected for the same flood risk and environmental concerns. However, it is noted that these sites could provide some benefits in terms of potential transport linkage to the existing service station to the north which could alleviate pressure on The Street through Gillingham. No such benefits would be provided through development of site SN0478	Comments relating to both on-site drainage and surface water, as well as wider drainage issues within the village have been noted. Consultation responses have been received the Lead Local Flood Authority (LLFA) who have advised that with appropriate mitigation measures in place development of this site would be achievable. Wider flooding events in December 2020 were experienced in a large number of localities and have been attributed to saturated catchment flooding due to prolonged rainfall however the comments received relating to the adequacy of the existing drainage network have been noted and will be explored further if appropriate. In addition, the Environmental Agency (EA) have confirmed that a Flood Risk Assessment will be required to support any future application.	169	Further discussion with water management consultees and to include suitable allocation policy wording regarding flood management if these sites are reclassified.
QUESTION 60: Should any	1079	Object	Ref. SN0274 - this site should be rejected on the grounds of flooding; the site here	Comments relating to both on-site drainage and surface water, as well as	168	Further discussion with water management

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shortlisted sites be rejected?			has already been waterlogged with run off collecting at this low point already.	wider drainage issues within the village have been noted. Consultation responses have been received the Lead Local Flood Authority (LLFA) who have advised that with appropriate mitigation measures in place development of this site would be achievable. Wider flooding events in December 2020 were experienced in a large number of localities and have been attributed to saturated catchment flooding due to prolonged rainfall however the comments received relating to the adequacy of the existing drainage network have been noted and will be explored further if appropriate. In addition, the Environmental Agency (EA) have confirmed that a Flood Risk Assessment will be required to support any future application.		consultees and to include suitable allocation policy wording regarding flood management as appropriate.
QUESTION 60: Should any shortlisted sites be rejected?	345	Object	SN0478 The current site is new and hasn't been given time to see the impact this will have on flooding, local environment etc. Residents of the new estate were informed that it would not be extended due to the risk of flooding and the site sitting on a flood plain so this would mean that have been lied to.	The site is partially located within Flood Zone 3 where full consideration will be required to flood risk on site. The site will be subject to a full Flood Risk Assessment (FRA), this will include any mitigation factors. In addition, the Council has commissioned a Level 2 Strategic Flood Risk Assessment (SFRA) which will provide an assessment of the areas at high risk as well as looking at the cumulative impacts of the sites across the Plan.	167	Further discussions required with the water management consultees in order to address flood risk concerns. Include the requirement of a FRA and any additional requirements set by the consultees within the allocation policy wording

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QUESTION 60: Should any shortlisted sites be rejected?	1728	Comment	SN0274 rev A and B Gillingham Both these should be rejected on similar grounds to SN 4078, but with greater impact. Reject other proposals in Gillingham as creeping suburbanisation with associated environmental implications.	The Council acknowledge the comments relating to the rejection of shortlisted site SN0247 (REVA and B) and rejection to all proposals in Gillingham. The Council acknowledge the fear in the urbanising of local areas. However, a key objective of the VCHAP is to distribute new development throughout the rural areas of the District, across the 48 clusters. In addition, each site has undergone a site assessment process where aspects such as landscape and townscape have been a key consideration, and as such development will seek to avoid harm on the local character.	166	No action or change required.
QUESTION 60: Should any shortlisted sites be rejected?	707	Comment	SN0437 - land in Geldeston should be rejected. A suburban appropriate development will destroy the historic character and rural community. Excessive traffic on rural roads will result in accidents, speeding is already a problem. The recently finished development has already caused severe traffic issues with traffic volume and speeding. Development will result in more people and vehicles creating pressure on the environment, wastewater management and surface flooding.	NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. Mitigation measures have been identified and would be incorporated into specific site allocation policy text. The site is located within a Flood Zone, where a full Flood Risk Assessment (FRA) will be required to support the development of the site; this will also include any mitigation measures. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, on the local ecology are also noted however these matters would be dealt	165	No action or change required.

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				with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies relating to the environment.		

Hales and Heckingham, Langley with Hardley, Carleton St Peter, Claxton, Raveningham and Sisland

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QUESTION 61: settlement Limit	1507	Object	Hales & Heckingham Parish Council does not support SN0308 allocation for housing at the current time due to the lack of amenities in the village and within a sustainable travel distance. The assessment form is incorrect in that the village no longer has a village hall. The only amenities within the village are an Indian restaurant, a small playing field, a mobility shop and the petrol station on the A146. Anecdotal evidence is that both primary schools in Loddon are full and having to make infrastructure adjustments to accommodate this year's intake of new pupils from the current number of new dwellings. If children were to walk to the schools, part of the footpath is along the side of the busy A146. All of the schools are over 2 miles from this site and the reality is this will increase the number of short car journeys. It is very difficult to get an appointment at the Chet Valley Medical Practice and the dentists are no longer accepting national health patients. The great majority of roads in the villages are single track which are not suitable to take the increased traffic associated with further development here. There are already problems on the narrow lanes for walkers and cyclists as the steep banks do not allow anywhere to get off the roadway	Hales has a basic range of basic services and the Council acknowledges the inaccuracy made with regards to the village shop now being closed. However, the Council also recognises that there are some inherent tensions linked to the relative accessibility of a range of higher order services and goods in several locations compared to other. However, the Plan aims to reflect the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages selection of employment opportunities etc. It is acknowledged that very few of the village clusters include a GP surgery, and are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity issue at the school for local children. The Council is also engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Education. This will ensure that infrastructure issues are identified and understood as part of the plan making process.	628	Review and update site assessment form - the assessment form is incorrect in that the village no longer has a village hall.

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			and there are limited unofficial passing places. The centre of the village lies in an area where there is no mobile signal and broadband is problematic for many houses. The countryside and views around the villages are greatly valued and the destruction of these by further encroachment of development without planning for the provision of local amenities is not supported by the Parish Council.	As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that given the location of the site and its existing relationship with the 2015 allocation, a suitable access could be achieved from the south through this site. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies.		
QUESTION 61: settlement Limit	1501	Object	Hales & Heckingham Parish Council do not agree with the changes proposed to the Settlement Limit. The JCS allocated 10 new houses - so far just under 70 dwellings built and 20 more approved. No investment has been made to improve village infrastructure. The amenities are extremely limited with no village hall. Further development without investment in the existing village infrastructure increases social problems.	No alterations are proposed to the existing settlement limits within this cluster. However, settlement boundaries will be amended to include any subsequent allocations, as a result of the Village Cluster Housing Plan. It is noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth	627	No action or change required.

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QUESTION 61: settlement Limit	1442	Object	The parish of Sisland should have either a small allocated site or a similarly appropriate settlement limit, in order for its community to benefit from the Village Clusters Plan and for the objectives of the Plan to be applied to this settlement.	The parish of Sisland is sparsely populated consisting of a few individual dwellings and therefore no alterations are proposed to the existing settlement limit. With regards to potential allocations within Sisland, none were presented to the Council for consideration and therefore the Council is unable to assess further land within the parish for suitable allocations.	626	No action or change required.
QUESTION 61: settlement Limit	355	Object	Access to the site is on a bend on the B1136. Despite a speed limit of 30mph through traffic regularly travels faster. There will be at least 55 more cars to add to the traffic through the village. There are no facilities in Hales except Masala Garden restaurant and the filling station. The nearest schools are in Loddon and they are already full. It is difficult to get medical appointments. Development would be detrimental to wildlife and the environment.	The representation made does not specify which site they are referring to, however the Council assumes that the comments are made in respect of SN0308, Land off Briar Lane, Hales. NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that given the location of the site and its existing relationship with the 2015 allocation, a suitable access could be achieved via this site to the south. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies. It is acknowledged that very few of the village clusters include a GP surgery, and	625	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
				are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity issue at the school for local children. The Council is also engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Education and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. It is acknowledged that development sites can be home to wildlife, and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures.		
QUESTION 62: Preferred Site - Part of SN0308, Land off Briar Lane, Hales	1473	Comment	Whilst not objecting to this site, it is noted that it would effectively form part of a large current housing development located in the largest village in this cluster (a village that has already undergone considerable residential expansion in recent years); it is posited that to truly achieve the stated aims of the Village Clusters Plan, particularly Objective 2, new housing opportunities should consist of deliverable & viable sites found across the cluster, and this site in Hales should therefore not preclude further	The Council noted the representation made in respect of SN0308, VCHAP Objective 2 and precluding other sites for consideration. The development of SN0308 has not precluded the allocation of other sites in this cluster. It is noted that 2 sites were promoted for consideration within the Hales Cluster, where both sites were subject to the same assessment. SN0308 was considered suitable whereas SN0530 was considered unsuitable (largely due	245	No action or change required.

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			consideration of other (smaller) sites across the range of settlements in this cluster.	to highways constraints and accessibility).		
QUESTION 62: Preferred Site - Part of SN0308, Land off Briar Lane, Hales	337, 340, 341	Comment	It has been requested that the development facilitates a village hall for the local community. Concerns with visibility, suggestion of a roundabout on Yarmouth Road to provide safe access. Concerns with capacity of existing infrastructure, privacy loss and overlooking and the damage to wildlife	The Council acknowledge the safety concerns regarding the access and the suitability of the Yarmouth Road. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that given the location of the site and its existing relationship with the 2015 allocation, a suitable access could be achieved via this site to the south. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements and amenity issues are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies. With regards to infrastructure, the Council is engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Highways and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.	244	A request for a village hall has been made – consider whether this would be reasonable and/or achievable

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				It is acknowledged that development sites can be home to wildlife, and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures. With regards to the request of a new village hall, this is something that would need to be investigated further to determine whether this is achievable.		
QUESTION 62: Preferred Site - Part of SN0308, Land off Briar Lane, Hales	1891	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	243	No action required

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			could be attached to any approval requiring its implementation.			
QUESTION 62: Preferred Site - Part of SN0308, Land off Briar Lane, Hales	1946, 2079	Comment	Water management comments: Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, the discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing but where possible surface water infiltration should be utilised The on-site flood risk is a moderate flow path in the 0.1% AEP event, dissecting the site south-north in the west of the site. Flow lines indicate this flood water flows north off of the site, contributing to a larger flow path west and north of the site. A large area of the site is unaffected by flood risk and has the potential to be developed.	The comments made in relation to water management are noted and the requirement for geotechnical investigation these issues will be explored further with the LLFA. The comments relating to the flood risk of this site are noted and the site assessment and technical comments will be reassessed to confirm the suitability of the site for allocation	242	Review the inclusion of the site based upon the identified flood risk.
QUESTION 62: Preferred Site - Part of SN0308, Land off Briar Lane, Hales	2254	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Agricultural field bounded on two sites bounded partly by hedges (priority habitat). No other priority habitats identified (see MAGIC). Site within green habitat zone for great crested newts, and	The NCC ecologist comments are noted.	241	No action required

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			in SSSI IRZ but residential development does trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 62: Preferred Site - Part of SN0308, Land off Briar Lane, Hales	2040	Comment	Whilst there are no designated heritage assets on the site, the former Hales Hospital (grade II listed) lies to the east of the site. Therefore, any development of this site has the potential to impact upon the setting (and significance) of this heritage asset. A Heritage Impact Assessment (HIA) of the site should be undertaken to assess the impact of the proposed development on the listed building and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement. Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.	The HE comments are noted; HIA required to inform whether the site is allocated, including any mitigation measures.	240	An HIA is required to inform the allocation of the site including any mitigation, enhancement and policy wording.
QUESTION 62: Preferred Site - Part of SN0308, Land off Briar Lane, Hales	49, 342	Object	Object to SN0308 due to poor access, the A146 is a busy road that is used as a rat run between Norwich and Lowestoft, limited services, infrastructure capacity concerns.	The Council acknowledge the safety concerns regarding the access and the suitability of the A146. As part of the site selection process, NCC Highways officers have provided technical advice relating	239	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			Development will ruin the village of Hales and Heckingham and the lives of those residents who moved here for its tranquility and village and countryside feel. Wildlife concerns; agricultural field is home to hundreds of animals who will be homeless!	to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that given the location of the site and its existing relationship with the 2015 allocation, a suitable access could be achieved via this site to the south. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application and it would be necessary for all new development to adhere to existing Development Management policies. With regards to infrastructure, the Council is engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Highways and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. It is acknowledged that development sites can be home to wildlife and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures.		

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 62: Preferred Site - Part of SN0308, Land off Briar Lane, Hales	338, 743	Support	Support for the allocation SN0308; good location for housing, no specific site constraints and is deliverable, good access, impact on the listed former Hales Hospital can be mitigated through appropriate design.	Support for SN0308 noted.	237	No action or change required.
QUESTION 63: Should any of the rejected sites be allocated?	1892	Comment	SN0530: Land west of Claxton Church Road, Claxton The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, the an alternative condition could be attached to any approval requiring its implementation.	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	246	No action required

Hempnall, Topcroft Street, Morningthorpe, Fritton, Shelton and Hardwick

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 65: Settlement Limit	1756	Comment	The notes state that no alterations are proposed to existing settlement limits. However if the 2 preferred sites identified in Hempnall were approved for housing the settlement limit would be enlarged to accommodate these sites and so this is misleading. We oppose new development outside the current settlement limit and oppose any changes to that boundary. Re. SN0220SL the PC is negotiating with Saffron Housing for this site to be used for social housing. However if progressed as a site for market housing the PC would oppose this because it contravenes our policy on the settlement limit.	As well as the sites being put forward to the Council, we have also been seeking views on the existing Settlement Limits themselves. Whilst no alterations are proposed to the existing settlement limits within this cluster, as part of the existing settlement review (reviewing existing permissions that may alter the settlement limit), new sites have been put forward through the Plan (allocations and/or settlement limit extension). If these site are successful then they will naturally be included with the settlement limit, The Council acknowledge the comments made with regards to negotiations with Saffron Housing for this site to be used for social housing and these will be further explored. However, the principle of residential development will also need to be considered as part of the site selection process.	629	Update required from Saffron Housing with regards to site being put forward for social housing; policy wording to reflect this if appropriate.
QUESTION 66: Preferred Site - SN0220SL, Land at Millfields	1757	Comment	We support provision of affordable social housing via Rural Exception Sites. The PC and Saffron Housing has plans to build affordable housing on this site. We are therefore surprised to see it being promoted as a preferred site in the VCHAP. If approved for market housing this would prevent its classification as an Exception Site and our affordable housing scheme will be lost. If it cannot be treated as a rural exception	The Council acknowledge the comments made with regards to negotiations with Saffron Housing for this site to be used for social housing and these will be further explored. The inclusion of smaller sites within Settlement Limit will enable windfall sites to be permitted, in accordance with the requirements of the National Planning Policy Framework.	630	Update required from Saffron Housing with regards to site being put forward for social housing; policy wording to reflect this if appropriate.

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			site for social housing, we would prefer that it be used for additional bungalows for elderly residents. The 'SL' classification should not mean even more houses are permitted on Greenfield sites. All new houses should contribute to targets.	In this instance, the 'SL' suffix has been used to denote sites below the 0.5ha threshold which is the minimum size site being sought for allocation through the VCHAP. However, due to the opportunities that this site presents it is also being considered as a possible allocation site.		
QUESTION 66: Preferred Site - SN0220SL, Land at Millfields	2255	Comment	NCC Ecologist comments: Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Agricultural field partly to the north by allotments. No priority habitats identified (see MAGIC). Site within amber habitat zone for great crested newts, and in SSSI IRZ but residential development does trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.	NCC Ecologist comments noted.	318	No action required
QUESTION 66: Preferred Site - SN0220SL, Land at Millfields	2041	Comment	Historic England comments: SN0220SL, Land at Millfields Whilst there are no designated heritage assets on the site, the disused windmill (grade II listed) lies to the east of the site. Therefore, any development of this site has the potential to impact upon the setting (and significance) of this heritage	The HE comments are noted; HIA required to inform whether the site is allocated, including any mitigation measures	317	Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			asset. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed building and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement. Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.			
QUESTION 66: Preferred Site - SN0220SL, Land at Millfields	2001	Comment	Inaccuracy of the definition of this site within the 'Village Clusters' section of the 'Introduction and Background'. Here, the Settlement Limit Extension sites are defined as being "for sites smaller than 12 dwellings". On examination it is found that this site is not for fewer than 12 dwellings: SN0220SL Land at Millfields, Hempnall for up to 15 dwellings. It is stated this will now be an allocated site, yet is included in the SNVCHAP.	SN0220SL was initially submitted to the Council as a Settlement Limit extension given its 0.48ha site area. However, as part of the site assessment process it was then concluded that the site would be best utilised for a smaller allocation of up to 15 dwellings, given its very few identified constraints. Allocating the sites within the Plan ensures that enough land is available in appropriate locations to meet the growth targets, in accordance with the requirements of the GNLP. This includes, as appropriate, any onsite requirements developers will be expected to provide, for example greenspace and local infrastructure (roads, schools, and flood storage).	315	No action or change required,

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QUESTION 66: Preferred Site - SN0220SL, Land at Millfields	1947, 2071	Comment	Water management comments; Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. The site is also located within a Source Protection Zone 3.	The comments made in relation to water management are noted and the requirement for geotechnical investigation these issues will be explored further with the LLFA.	314	No action required
QUESTION 66: Preferred Site - SN0220SL, Land at Millfields	641	Comment	It is considered that any potential allocation should consider future housing needs and growth. Whilst we would not seek the policy wording to predetermine any future surrounding land as appropriate for development, equally no reference risks the design of an abrupt settlement edge that does not facilitate future growth.	Comments noted; The core aim of the VHCAP is to deliver a series of small allocations of up to 25 homes across the plan area. The site was initially submitted as a settlement limit, but has been considered suitable for a small allocation of up to 15 dwellings. At this stage, the site is not considered as a phased development for a larger scheme.	312	No action or change required.
QUESTION 66: Preferred Site - SN0220SL, Land at Millfields	553	Object	Object to Site SN0220SL - Land at Millfields site is at the edge of the village, has poor access and would result in a significant break out into the open countryside.	Objection to a SN0220SL, Land at Millfields noted. With regards to the site location, the site is located to the west of the village and would lend itself to a natural extension of existing development. With regards to access concerns, these have been discussed with Highways and any development of the site would be subject to Millfields (private road) being widened and other off-site highway upgrades.	311	Allocation wording to include Millfields (private road) being widened and other off-site highway upgrades.

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QUESTION 67: Preferred Site - SN1015, Land adjacent to the primary school, The Street	1758	Object	Hempnall Parish Council objects to the inclusion of this site as a preferred site in the South Norfolk Village Clusters Housing Allocations Preferred Sites Plan. Hempnall PC considers the amount of new housing currently projected for the village, resulting from the JCS site south of Bungay Road, the affordable housing scheme that the PC seeks to implement in conjunction with Saffron Housing at Millfields and from likely windfalls - totalling approximately 45-50 houses - is that the right amount for the village. We don't want any of the sites put forward by landowners for the inclusion in the GNLP to be allocated in the plan. We would also like our policy that all development be restricted to inside the current development boundary to be honored except in regard to the provision of a rural exception site for affordable housing. The addition of extra housing, via the introduction of the village cluster approach, is not wanted or needed in Hempnall.	Whilst these comments have been submitted in relation to preferred site SN1015 the Council considers that a number of the points raised relate to the principle of the Plan and its objectives and a detailed response is set out in Response ID 993. Site-specific reasons for the Parish Council's objection to this site have not been included here however the objection to the site has been noted.	878	No action required.
QUESTION 67: Preferred Site - SN1015, Land adjacent to the primary school, The Street	554	Object	Object to Site SN1015 - Land adjacent to the primary school, The Street would result in the loss of an important green space/gap in the street scene in Hempnall.	The Council acknowledge the objection and the concerns with a potential loss of an important green space/gap. As part of the site assessment process, the site has been identified as being relatively open and within close proximity to a PRoW. In order to maintain the character and some through views, the Council expects development to be lower density.	323	If allocated the policy will require layout and design of the scheme to be low density and take into account the open views.

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QUESTION 67: Preferred Site - SN1015, Land adjacent to the primary school, The Street	1948, 2132	Comment	Water management comments; Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Part of the on-site flood risk contributes to an adjacent flow path in the 0.1% AEP event. Flow lines indicate this flood water flows southwest off of the site, contributing to a larger flow path southwest and south of the site. There is some moderate ponding present in the 0.1% AEP event in the south of the site. We advise this must be considered in the site assessment. The site is adjacent to a flow path. This must be considered in the site assessment.	The comments made in relation to water management are noted, including the requirement for geotechnical investigation. With regards to the onside flow path, this has been discussed further with the LLFA; Significant concerns have been raised with achieving safe access and egress to this site due to a significant area of ponding on the road frontage of this site as well as the topography of the land. A safe access/egress to the adjacent primary school is provided by the pedestrian access further to the east. This site is an old quarry site (resulting in the unusual topography of the site) and whilst the on-site engineering could address the ponding there is also a significant flowpath adjacent to the north of the site. A review of the wider area shows a number of areas of ponding which suggests poor infiltration locally (possibly linked to the former quarrying activity removing local sand and gravel deposits). Management and mitigation would be key to the development of the site but it was noted as being particularly sensitive.	322	The comments relating to the flood risk of this site are noted and the inclusion of this site within the VCHAP will need to be reassessed.
QUESTION 67: Preferred Site - SN1015, Land adjacent to the primary school, The Street	2256	Comment	NCC Ecologist : Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Site comprises part of an agricultural field and a grassland area adjacent to the school. Hedges are priority habitat so	NCC Ecologist comments noted.	321	Consideration to be given to PROW Hempnall/H18/3 that passes through site.

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			losses should be minimised (use existing access), and as a last resort compensated for. No priority habitats identified (see MAGIC). Site within green/amber habitat zones for great crested newts, and in SSSI IRZ but residential development does not trigger consultation with Natural England. PROW Hempnall/H18/3 passes through site.			
QUESTION 67: Preferred Site - SN1015, Land adjacent to the primary school, The Street	2042	Comment	Historic England comments Site: SN1015, Land adjacent to the primary school, The Street The site is located almost entirely within the Hempnall Conservation Area. It lies opposite two grade II listed buildings, Lime Tree Cottage, and Pevensey House and close to a third grade II listed building, the Hollies. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement. Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.	The HE comments are noted; HIA required to inform whether the site is allocated, including any mitigation measures.	320	Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 67: Preferred Site - SN1015, Land adjacent to the primary school, The Street	642	Support	The allocation of this site for residential development is supported and these representations seek to highlight the benefits of such an allocation, whilst addressing points raised in the supporting Site Assessment prepared by the Council.	Support for SN1015 noted.	319	No action or change required.
QUESTION 68: Should any rejected sites be allocated?	1256	Object	Existing building is also on site and approval for additional building already in form of outbuildings, in regards Gardeners Cottage, there is already approval for building in front of Gardeners Cottage and also house has been already built close to the boundary on the other side. There is limited opportunity for self builders and infill plots in the area, especially for a eco home on character with keeping with the village, no need to consider the schools as not wanting to go back to school. In recent years council have let building outside village area. So object to rejection.	Whilst submitted in response to Question 68 the Council considers that this comment relates to the existing settlement limit at Topcroft Street and is therefore most relevant to Question 65. Although this plot lies outside the existing settlement limit the existing defined limits about the site to both the north and the south and also on the west side of The Street. In recognition of this the inclusion of this plot would appear to be a reasonable option for consideration; however, the Council has noted a number of constraints which may impact on the suitability of this site for inclusion within the settlement limit. Gardeners Cottage is a Grade II listed building and the associated plot may be considered to be the curtilage of the listed building. The extent of this would need to be confirmed, as development within this plot could impact on the significance of this listed building and its setting. There are also a number of TPOs in place affecting trees both within the plot and along the frontage of the site which would likely impact on the developable area. The Council notes that both the listed building and its spacious plot and the associated mature	632	No action required

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				trees form an important part of the existing streetscene, contributing to the verdant character of the street. Reference has been made in this submission to the recent planning history of the site. These applications relate to outbuildings which would be associated with Gardeners Cottage (2017/0094 and 2017/0987). These outbuildings were assessed for their impact on both the protected trees and the listed building and were considered to be acceptable. However, these outbuildings clearly have a subordinate relationship to the main dwelling and do not result in the subdivision of the plot therefore they are not considered to set a precedent for new residential development in this location. In determining whether or not the existing settlement limit could be extended around this plot the Council must have regard to all of these considerations and balance the opportunity for providing an infill plot against the impact that new development may have in this sensitive location. As such, at present the Council does not consider the site suitable for inclusion in the settlement limit. The submitted GNLP includes a Policy for small-scale residential sites outside, but adjacent to, settlement limits; should that policy remain in the adopted plan, an application for this plot would		

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				be able to consider the impact of a specific scheme in greater detail. However, there is no guarantee that an application made under any future Policy would be successful.		
QUESTION 68: Should any rejected sites be allocated?	643	Comment	The Council should consider the development of SN0220SL and SN1018 in combination. The site assessment for SN1018 does not identify any red constraints, although the local highways authority does raise concern over the existing access to Field Lane. It is noted that the Council's own site assessment identifies there are 'potential access constraints but these could be overcome through development'. When considering the two sites in combination this not only provides the delivery of much needed housing but is not considered disproportionate growth for a settlement of this nature and benefiting from a range of services including a primary school, convenience store, post office, garage, butcher, village hall and recreation ground. Whilst the site assessment does state there could be detrimental impacts on the river valley and character of the settlement, an immediate change in site character for a development of this scale is to be expected and somewhat inevitable. Some degree of change is to be supported as a way to sustain and evolve existing villages to meet the needs of future generations and needn't be considered detrimental. Whilst the site assessment says such impacts could be mitigated through a reduced site area, it is suggested that an alternative approach is the use of	The Council acknowledges these comments, as well as the potential merits of a combined site. However, as noted in the site assessments there are constraints that would need to be carefully considered as part of any reassessment of these sites as a combined allocation.	631	Council to review the combination of SN0220SL (preferred) and SN1018 (rejected) in combination.

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			considerate design. An allocation needn't develop the entirety of the site for a dense housing scheme. Instead it is proposed that the two sites in combination would facilitate the opportunity for a softer landscaped edge to the west and south and respect the wider context into which the site falls.			
QUESTION 68: Should any rejected sites be allocated?	1759	Comment	Hempnall Parish Council approves the rejection of all the other sites promoted for development i.e. SN0147, SN0178SL, SN0580, SN1016, SN1017, SN1018, SN2029SL, SN2046, SN2081, SN2146SL, SN4012, SN4083. In relation to the sites in this list that are located in Hempnall we thank the Place Shaping Team for taking on board the concerns we have expressed in previous consultations and for rejecting these sites for development .	Comments noted.	326	No change or action required.
QUESTION 68: Should any rejected sites be allocated?	724	Support	South Norfolk Village Clusters Housing Allocations Plan - Regulation 18 Consultation Councillors discussed and agreed unanimously with SNC's decision that sites SN2029SL (site 1) (assessed with SN2146) (over 3 sites) 0.6ha West of Topcroft Street is unreasonable for a SL Extension.	The Council acknowledge the objection to sites SN2029SL and SN2146 and continues to maintain its own objection to these sites.	325	No action or change required.
QUESTION 68: Should any rejected sites be allocated?	551	Support	Representation does not agree with the rejection of SN2081; site is located in a sustainable location with no physical or environmental constraints. The development can address concerns raised in the initial site assessment with regard to	The Council acknowledges the representation made in support of SN2081, including the proposal to reduce the site area to 0.8ha for approximately 15-20 dwellings. However, the Highways Authority have	324	No action or change.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			scale, access and loss of the hedgerow and thus this site should be allocated for housing in the South Norfolk VCHAP. The site would form a natural extension to the existing settlement boundary and provide infill development between residential properties. The site has strong potential for housing development and would relate better to the village/village envelope than sites SN1015 and SN02220SL.	previously reviewed the site (including the possibility of a reduced scheme) and hold strong objections to this site. They have concerned with the suitability of Field Lane, including the high banks/hedging and no footway. Whilst the representation makes reference to the removal of the hedgerow to provide access, there is no further evidence to suggest that this would overcome the concerns of the highways, nor would this be supported by landscape officers.		

Heywood

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 70: Settlement Limit	1949	Comment	Water management comments: Part of the Parish is located within the Waveney, Lower Yare and Lothingland IDD. The Board's byelaws apply to any new developments within the IDD.	At this stage, no sites have been put forward for consideration within Heywood. However, the comments from the water management team are noted.	404	No action or change required.

Keswick & Intwood

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 72: Should any of the rejected sites be allocated?	1950	Comment	Water management comments: Part of the Parish is located within the Norfolk Rivers IDD. The Board's byelaws apply to any new developments within the IDD.	Water management comments noted.	633	No action or change required.

Ketteringham

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 74: Should any rejected sites be allocated?	1951	Comment	The Parish is outside the IDD boundary and within the Norfolk Rivers watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, it is requested that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).	Note the comments relating to surface water discharges. At this stage, there are no sites preferred within Ketteringham.	28	No action or change required.

Kirby Cane and Ellingham

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 75: Settlement Limit	1060	Comment	Existing roads within the villages are daily reaching their safe limits due to on street parking and lack of adequate footpaths. A considerable number of older properties do not have facilities for parking on their own land.	As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In general, concerns about the impact of alterations to the existing road, as well as the increased traffic movements, parking provision, are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies.	247	No action or change required.
QUESTION 76: Preferred Site - SN0305, Land South of Mill Road, Ellingham	944, 1064	Comment	Concerns raised in relation to highway safety around the School and Mill Road. Comments made in relating to affordable housing provision on site.	The Council acknowledge the safety concerns raised regarding the access and the suitability of Mill and Church Road. As part of the site selection process, NCC Highway officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highway officers consider that the site is suitable for development, subject to achieving satisfactory visibility, including a crossing point. It has also been noted that improvements at Mill Rd junction with Church Rd may be required. With regards to housing mix, the Council will seek to provide new housing development to meet housing needs (using the most up to date Strategic Housing Market Assessment (SHMA)).	265	Policy wording to include highway improvements/requirements in accordance with NCC highway standards.

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				This will ensure that allocated sites provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of their life cycle e.g. first-time buyers, affordable housing, upsizing/downsizing etc.		
QUESTION 76: Preferred Site - SN0305, Land South of Mill Road, Ellingham	1952, 2076	Comment	Comments relating to water management issues: Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, this discharge should be facilitated in line with the non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. The site is adjacent to a flow path.	Comments noted. The Council has since sought further advice from the LLFA with regards to the flowpath to the north (point of access) of the site, where the LLFA have raised no major concern. However, they have advised that consideration will need to be given to the access into the site – e.g., even minor alterations to the kerb heights could alter the existing flowpath and result in on-site flooding.	263	Supporting text/ policy to make reference to discussions with the LLFA about the flowpath along the road frontage
QUESTION 76: Preferred Site - SN0305, Land South of Mill Road, Ellingham	1823	Comment	Comments from Broads Authority: Ellingham is near to the Broads. The site would extend the edge of the settlement towards the BA area to approximately 400m from BA boundary. Visual receptors: Footpath leading from centre of village in a south-westerly direction connects to Lane almost on BA boundary. Site may be visible to users of this path. In addition, this National Cycle Route 1(NCR1) follows Geldeston Road to the south and Church Road west of the site	The Council acknowledge the comments from the Broads Authority (BA); noted that the site is located within 400m from the BA boundary and consideration is required to the impacts of this.	262	Allocation policy to include: Development of the site needs to include adequate screening to protect character. Reference to the proximity and sensitivity of the

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			- 200m at closest point. Due to a lack of screening vegetation the site is clearly visible from the road. There is some intervening vegetation between the site and the BA area but fields to south have little or no vegetation along boundaries. The immediate area is quite flat and open. The site is unlikely to be visible from River Waveney although it should be borne in mind that water-based recreation is popular in this character area, due to the existence of Waveney canoe access agreements which permit canoeing upstream of Ellingham Sluice to Diss. The valley here is fairly narrow and the southern side rises relatively high so there may be distant views of the site from the Shipmeadow/Mettingham area. When writing the policy, please add: - o development of the site needs to include adequate screening - o reference to the proximity and sensitivity of the Broads and NCR1 in the allocation policy.			Broads and NCR1 in the allocation policy.
QUESTION 76: Preferred Site - SN0305, Land South of Mill Road, Ellingham	2257	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Site comprises part of an agricultural field bounded on three sides by hedges which are priority habitat so losses should be minimised (use existing access?), and as a	Note the comments of the NCC ecologist. No major ecology constraints identified.	261	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			last resort compensated for. No priority habitats identified (see MAGIC). Site within green habitat zones for great crested newts, and in SSSI IRZ but residential development does not trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 76: Preferred Site - SN0305, Land South of Mill Road, Ellingham	662	Comment	Traffic from this site on exiting the village would have to negotiate a narrow, blind bend, where the road is very prone to flooding and large vehicles are required to mount the pavement to pass. The present new homes would lose their open aspect and view across fields and The Island could eventually be engulfed.	The Council acknowledge the concerns raised with regards to the suitability of Mill Road for additional traffic. As part of the site assessment process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority who have raised no major concerns with flooding. However, they have advised that consideration will need to be given to the access into the site in relation to the existing flow path along Mill Road. For example, minor alterations to the kerb heights for viability etc could alter the existing flowpath and result in on-site flooding. Access to this site will need to be considered in the design of the drainage	251	No action required

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QUESTION 76: Preferred Site - SN0305, Land South of Mill Road, Ellingham	589, 665	Object	Development of the site could cause some major issues along Mill Road; part of the road is narrow and dangerous, of poor condition, located alongside the entrance to the play area which is partly obstructed by trees and shrubs causing visual obstruction. With the primary school also being in close proximity, this creates a dangerous hot spot. This part of the road is also prone to serious flooding.	The Council acknowledge the safety concerns regarding the access along Mill Road. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, the Highway officers have advised that development would be subject to creating a satisfactory access with sufficient visibility improvement at Mill Rd junction with Church Rd may be required. In addition, the Highways Authority have also requested the provision of a 2m footway at the site frontage to connect existing pathway and crossing points. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority who have advised that with appropriate mitigation measures in place development of this site would be achievable. Wider flooding events in December 2020 were experienced in a large number of localities and have been attributed to saturated catchment flooding due to prolonged rainfall however the comments received relating to the adequacy of the existing drainage network have been noted and will be explored further if appropriate.	250	Ensure that safe access can be achieved - further discussion with the NCC Highways to confirm allocation policy wording.
QUESTION 76: Preferred Site - SN0305, Land	1508	Support	Support of the allocation of SN0305; the site is well related to the existing settlement, providing a logical and	The support for site SN0305 is noted. The representation makes reference to a 25 dwelling scheme on a larger piece of	249	Review revised boundary for the

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South of Mill Road, Ellingham			sustainable extension to the village. The representation includes information regarding the gas pipeline (from Cadent) and also includes additional land to the preferred site, to allow for a larger scheme. It has been advised that the site could be delivered as soon as possible within the Plan period; confirmed that a site of 25 dwellings with current policy level affordable housing would be well received by the local development market.	land (including land to the west of SN0305), whereas the site is currently preferred for up to 12 dwellings due to site constraints. The representation suggests that after exclusion of the gas pipeline and easement, the area of unconstrained land as originally promoted still equates to approximately 1.1 hectares, which could accommodate up to 25 dwellings.		inclusion of up to 25 dwellings.
QUESTION 76: Preferred Site - SN0305, Land South of Mill Road, Ellingham	275, 653	Support	Support for site; close to previous new properties, close to school, it wouldn't restrict or impact on the local village for building purposes. Some concerns with school capacity. I understand the need for new housing but it's a shame it has to be in Ellingham/Kirby Cane.	Support for SN0305 noted.	248	No action or change required.
QUESTION 77: Preferred Site - SN0348, Land to the South of Old Yarmouth Road, Kirby Row, Kirby Cane	395, 437, 654, 667, 797, 1372	Object	Issues raised relating to poor access onto Old Yarmouth Road and the blind junction with Church Road. Concerns with the detrimental effect on the bungalows on Yarmouth Road with regards to losing open view. Concerns also raised with existing flood issues on site, presence of barns own on field and historical interest, Roman artefacts have been found there.	The Council acknowledge the safety concerns regarding the access and the suitability of Old Yarmouth Road. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that development of the site is broadly acceptable in highways terms where the main concern would be visibility and the speed of traffic exiting	270	Subject to further discussions around site viability (if site area is reduced to avoid flood risk) then policy wording will need to include highway mitigation measures.

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				the bypass from the north. However, it has been noted that there appears to be scope to realign the carriageways within the existing highways. Comments about the environmental impact have also been noted, however all development will be required to deliver net-gain on site and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site, such as Barn owls. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. Whilst the historical impact concerns are noted by the Council. Historic England have been consulted and not raised any concerns. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, including those proposed at Kirby Kane. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority (LLFA) who have raised their concerns with the		

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				presence of a flowpath on site which may limit the developable area of land.		
QUESTION 77: Preferred Site - SN0348, Land to the South of Old Yarmouth Road, Kirby Row, Kirby Cane	1953, 2084	Comment	Comments relating to water management: Partly within the Waveney, Lower Yare and Lothingland IDD. Several riparian watercourses are located to the south of the proposed site which feeds into a Board Adopted Watercourse within the Waveney, Lower Yare and Lothingland IDD. Byelaw 3 applies to any proposed discharge of surface water from the proposed site. All other Board Byelaws will also apply to this development. Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. The eastern side of the site partially intersects the Geldeston 1 IDB. Identified as an 'Amber' site by the LLFA: Part of the on-site flood risk forms a moderate flow path in the 0.1% AEP event, dissecting the site west-south in the west, southwest and centre of the site. Flow lines indicate this flood water flows south off of the site, contributing to a larger flow path south of the site. The on-site flow path forms a curve shape. We advise this must be considered in the site assessment. A large area of the site is unaffected by	The comments made in relation to water management are noted. With regards to the concerns of the LLFA and the amber rating, further discussions have been had with the LLFA to further determine the suitability of the site. The LLFA have advised their preference to be total avoidance of the flowpath which would significantly reduce the developable area. It is also noted that a number of drainage ditches immediately to the south of the site, as well as the area being historical marshland. The LLFA have suggested that substantial evidence would be required to demonstrate that the site was suitable for development.	267	Review the inclusion of the site based upon the identified flood risk.

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			flood risk and has the potential to be developed.			
QUESTION 77: Preferred Site - SN0348, Land to the South of Old Yarmouth Road, Kirby Row, Kirby Cane	2258	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Site comprises part of an agricultural field. No priority habitats identified (see MAGIC) but deciduous woodland to north on opposite side of road. Site within green (edge of amber) habitat zones for great crested newts, and in SSSI IRZ but residential development does not trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain	NCC Ecologist comments noted.	266	No action required
QUESTION 77: Preferred Site - SN0348, Land to the South of Old Yarmouth Road, Kirby Row, Kirby Cane	1417	Support	From a traffic point of view if we are to have additional housing in the village it would make sense not to have it in the middle of the village. Also this site affords easy access to the A143.	Supportive comments noted - well located and site provides easy access to A143	264	No action or change required.
QUESTION 78: Preferred Site - SN3018, Florence Way, Ellingham	660	Comment	SN03018: Florence Way, Ellingham. The way to the village, Mill Lane, has no footway. The junction with Mill Road is hazardous if on foot due to cars turning into Mill Lane not being able to see pedestrians, who have to leap onto the	Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. It has previously been identified that there are access and	277	Confirmation of 3rd party land to determine highway improvements.

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			garden of the bungalow on the corner of Mill Close.	highway constraints with Mill Lane and Florence Way. These issues will need to be resolved prior to development of the site; this will include confirmation of 3rd party land.		
QUESTION 78: Preferred Site - SN3018, Florence Way, Ellingham	276, 655, 1062	Object	Not suitable due to existing drainage problems. Traffic/highways impact on Mill Lane and Florence Way - Development here has been previously refused due to road inadequacy. No adequate footpath, concerns with 3rd party land ownership. School is at capacity Overdevelopment of site; area is small for 12 houses TPO in place where path and road is to be widened.	Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. It has previously been identified that there are access and highway constraints with Mill Lane and Florence Way. These issues will need to be resolved prior to development. The concerns raised regarding the capacity of the school, GPs and other resources and facilities are acknowledged. However, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. Some services like shops and pubs may benefit from additional customers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making	276	Confirm 3rd party land ownership in order to determine highway upgrades. Further discussion with NCC highways to confirm policy wording.

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				process. All of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth. It is also acknowledged that development in some cases can involve the removal of trees and hedgerows (whilst not encouraged), where it will be necessary for any planning application on the site to be accompanied by an appropriate assessment, such as an arboricultural impact assessment, that would include an assessment of the site as well as appropriate and proportionate mitigation measures. With regards to the proposed number of dwellings, this is considered to be sustainable and development of this site would represent an efficient use of land, in accordance with the paragraph 124 of the NPPF. The scale of development proposed is in accordance with the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development.		
QUESTION 78: Preferred Site - SN3018, Florence Way, Ellingham	946	Comment	Councillors would support the development of SN3018, subject to road access arrangements being resolved, including immediate access and the corner of Mill Lane and Mill Road.	The support for the site is noted, subject to resolving access and road suitability concerns in the area.	275	Developer to confirm the status of Florence Way as it appears to be not adopted.

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			Reason for support is that there is an existing small development adjacent to this site, and it is more contiguous with the existing development of the village, although it is still outside the Settlement Limit. If site does go forward for development, councillors believe there should be a provision for affordable housing, including a requirement for access for local people.	Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. It has been identified that there are constraints with Mill Lane and Florence Way, of which will need to be resolved prior to development. With regards to the provision of affordable housing on site, the Council will seek to ensure that development meets the affordable housing and housing mix requirements of the most up to date SHMA. The Council will also only consider allocating sites that are capable of delivering the policy standard affordable housing requirements.		
QUESTION 78: Preferred Site - SN3018, Florence Way, Ellingham	1954, 2141	Comment	Water management comments: Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, then this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. The site is also located within Source Protection Zone 3.	The comments made in relation to water management are noted, including the requirement for geotechnical investigation work.	274	Background policy text could highlight Source Protection Zone 3 on the site but no requirements in terms of policy text as this would be covered by existing policies.
QUESTION 78: Preferred Site -	2259	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity	NCC ecology comments noted.	273	No action required

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SN3018, Florence Way, Ellingham			enhancement in accordance with policy required. Field used /formerly used for grazing horses. PROW to site (Ellingham FP2 and FP3). other than hedges, no priority habitats identified (see MAGIC). Site within green habitat zone for great crested newts, and in SSSI IRZ but residential development does not trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 78: Preferred Site - SN3018, Florence Way, Ellingham	977	Support	The promoter of Preferred Site SN3018 - Florence Way, Ellingham continues to support its allocation. Confirmed that the site is available and developable. There are no known drainage constraints (contrary to another representation made). Consultation with NCC Highways has established requisite on and off-site work; the promoter confirms that survey work has been completed, and that all such work can be undertaken/secured.	Support of SN3018 noted.	272	No action or change required.

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QUESTION 78: Preferred Site - SN3018, Florence Way, Ellingham	669	Support	Of all the preferred sites SN3018 seems to have the least impact on the present village layout as would the two rejected sites SN0304 and SN0303SL. It has also been noted there is no longer a pre-school at the village hall and also the present school is running to capacity so any development is sure to make a significant impact on this.	Supports noted for SN3018. Comments related to pre-school and School also noted.	271	No action or change required.
QUESTION 79: Should any rejected sites be allocated?	1505	Comment	Whilst SN0303SL, SN0304 & SN0306 have been rejected, we note the Parish Council's support for development on these sites. It is confirmed that these sites remain available and deliverable within the Plan period, in addition to those already identified as preferred. Our client has previously made submissions that demonstrated the sites were suitable and achievable. We continue to support these previous submissions. In particular, we wish to re-provide the transport related evidence that demonstrates safe access is achievable from Mill Lane to sites SN0303SL & SN0304. Accordingly, our client considers these sites could be considered for some further development.	Comments are noted. However, the representation made in respect of SN0303SL & SN0304 do not change the opinion of the Council. Whilst the representation makes reference to overcoming the highways concerns as part of the summited technical note, the Council note that this was produced in 2013 and there is no further evidence to support this. In addition, these sites also provide attractive rural settings, within the River Valley. Overall, the Council consider these sites to be unsuitable for development.	284	No action or change required.
QUESTION 79: Should any rejected sites be allocated?	1410, 1635, 1665	Comment	Supports site SN0344 -The site assessment confirms that the site is well connected to local services and facilities and is in flood	Comments noted. However, the representation made in respect of SN0344 does not change the opinion of the Council. Whilst the	283	No action or change required.

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			zone1. It therefore performs well against a number of criteria.	representation makes reference to overcoming the highways and landscape concerns, there is no further evidence to support this. Overall, the Council consider this site to be unsuitable for development.		
QUESTION 79: Should any rejected sites be allocated?	949	Comment	SN0303SL & SN0304 Either could take traffic away from busy main village, provided appropriate traffic improvements for Mill Lane/Mill Road junction/corner - councillors couldn't understand why these sites rejected when Florence Way site preferred. SN0306 would support in principle, on existing building line, could make sensible extension to existing nearby development. Any successful site must have provision for affordable local housing SN0019SL (Cllr M Skipper declared interest, took no part in discussion) could see no reason why this site rejected as already has a large garage in regular use so proposed single dwelling would not add traffic to the village.	These comments are noted and whilst the Council welcomes the positive responses to these sites, it does not consider that these sites should be included in the VCHAP for the reasons previously set out in the site assessment forms (including identified highways constraints and landscape concerns).	281	No action or change required.
QUESTION 79: Should any rejected sites be allocated?	878	Comment	Object to "SN4002SL" being put forward as a development site. I cannot understand from an ecological viewpoint how a veteran woodland covered by a TPO could be allowed to be destroyed. There are various species of trees not to mention the wildlife dependant on them. From a modern standpoint, the woodland offers a buffer for noise pollution and also	The Council confirms that SN4002SL is rejected, as shown in the Regulation 18 consultation material.	280	No action or change required.

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			between the bungalows and Ellingham house.			
QUESTION 79: Should any rejected sites be allocated?	661	Comment	Sites SN0304 and 0303SL would be preferable, especially if houses continued the present building line. Although the same highway issues apply. But traffic would not have to negotiate the narrow Florence Way, where children play.	Comments noted. However, the view of the Council is to still reject these sites due to unresolvable highways/access issues and landscape concerns.	279	No action required.

Little Melton and Great Melton

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QUESTION 80: Settlement Limit	1409	Object	In 2014, South Norfolk Council published its local plan suggesting that 10 to 20 houses should be built in Little Melton over the following 10 years, however 110 houses have/will be built instead of the 20 max and local amenities and services are not there to support further development. SN4052 is inside the Southern Bypass Landscape Protection Zone, which should be conserved, not destroyed. Approval could set a precedent for further damage to the green infrastructure and biodiversity along the A47 contravening the priorities set in the Countryside Stewardship statement of priorities for South Norfolk and High Suffolk Claylands (NCA083).	The numbers proposed for the site are considered to be sustainable and development of this site would represent an efficient use of land. The scale of development proposed in Little Melton is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. With regards to existing services, many of the individual allocations proposed within the Village Cluster Housing Allocations Plan are of a relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care System (ICS) and Norfolk County Council in its role as Education Authority. Technical advice has been sought from the Council Landscape officer relating to the Southern Bypass Landscape Protection Zone, and whilst it is acknowledged that the site lies within this Landscape Protection Zone, current policy has its own requirement to retain openness and as such, any proposal will be assessed against this.	437	Allocation policy wording to include landscape mitigation measures.
QUESTION 80: Settlement Limit	1250, 1294	Object	The Settlement Limit for Little Melton should not be extended to accommodate	The Council acknowledges the comments from the Parish Council.	436	No action or change required.

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			any future planning applications either for the Village Cluster Local Plan or any individual developments. It has been a consistent approach by the Parish Council over recent years to object to planning applications outside of the current settlement limit. Approval of the 2 preferred & 2 shortlisted sites would go against this trend and would be in danger of setting a precedent for future larger development applications to be granted. It would result in over development of the village.	Locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services. The provision of several relatively small allocation sites as required by the National Planning Policy Framework means this approach also has the benefit of supporting small-scale builders, providing choice for the market and helping to ensure the delivery of housing in popular village locations. Smaller alterations to existing Settlement Limits reflect changes that have occurred since the last review took place, as well as providing an opportunity for windfall development to take place in accordance with the requirements of the NPPF.		
QUESTION 80: Settlement Limit	16, 59, 368, 383, 396, 405, 467, 696, 1207, 1430	Object	No changes should be made to the existing settlement. Concerns that Little Melton is already over developed, where there is already not enough GP surgeries, dental surgeries or schools and supporting facilities to support the area. In addition, the current shop is unlikely to be open for much longer. Several concerns with highway safety concerns; narrow roads, additional traffic through the village, limited footpaths. Existing issues with flooding along all roads Concerns with the impact on the	Concerns noted with regards to highway safety, local infrastructure pressures, existing flooding issues and the environmental impacts that development may cause.	37	Discussions with NCC Education to review school capacity and implications of housing growth for facilities, plus a review of NCC Highways recommendations for inclusion in policy allocation text.

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			environment i.e. Destruction of wildlife and hedgerows			
QUESTION 80: Settlement Limit	1123	Comment	Please note that 30 houses have been built at the 2015/1697 site, not 27 as stated. Several recent PAs have been turned down as being outside the Settlement Boundary and that has led to debate about the role of the Settlement Boundary. The PC would have preferred there to have been a consultation with parishioners before this current plan was issued.	Comments noted with regards to the total units built out at 2015/1697. This public consultation (under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.) has provided an opportunity for members of the public and stakeholder bodies to provide views on the sites that had been promoted to us, the assessments undertaken so far, our suggestions for overarching policies that would apply to the allocated sites and the supporting evidence that helped us to prepare the emerging plan. During this process we also took the opportunity to review the existing development boundaries (or 'settlement limits') throughout the district and invited comments on these proposed changes. The council is now reviewing the plan in light of the representations received. Once this process is complete the council will prepare the final, proposed submission (or Regulation 19) version of the plan.	36	Update and correct information relating to 2015/1697.
QUESTION 81: Preferred Site - SN1046REV, Glenhaven, Great Melton Road, Little Melton	2260	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required.	NCC Ecologist comments noted.	439	No action required.

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			Site comprises an area of rough grassland bounded on all sides by hedges. Hedges are priority habitat so losses should be minimised (use existing access), and as a last resort compensated for. No priority habitats identified (see MAGIC). Site within amber habitat zones for great crested newts, and in SSSI IRZ but residential development does not trigger consultation with Natural England.			
QUESTION 81: Preferred Site - SN1046REV, Glenhaven, Great Melton Road, Little Melton	722	Object	This site would cause loss of wildlife area. Increase the surface water flooding in the immediate area There will be increased traffic to a narrow road that local population uses as a walking route.	It is acknowledged that development sites can be home to wildlife, and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures. In addition, all development will be required to consider biodiversity net-gain in their proposals. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority who have advised that with appropriate mitigation measures in place development of this site would be achievable. In addition it is considered that on-site drainage solutions can often help to address existing surface water issues and as such it is considered that this issue can be adequately addressed during the planning application stage. With regards to highways safety, the Council has previously met with the Highway Authority, who have raised	438	No action or change required.

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				some concerns whether a suitable access could be achieved. However, given the proposal is for a settlement limit extension, it is considered acceptable that the highways matters are addressed and mitigated through any planning application.		
QUESTION 81: Preferred Site - SN1046REV, Glenhaven, Great Melton Road, Little Melton	44, 1069, 1209, 1254, 1297	Object	Query over why the rear gardens of some neighbouring properties to the south of the site have been included within the 'settlement limit' extension'. Concerns that this land will be Compulsory Purchased.	The site adjoins the existing Settlement Limit (SL) in Little Melton where it has been considered appropriate to include this additional land within the SL, as a SL extension; this area of land includes Glenhaven, plus the northern ends of the three adjoining gardens. Through inclusion of this land within the SL, it will give this land the same status as the surrounding land, including the remainder of the curtilage of those three properties. If the land is included in the Settlement Limit that would mean that any future planning applications would be treated as being part of the settlement of Little Melton, rather than being treated as part of the open countryside. It would be up to the owner of any part of that land to submit a planning application, if they wished to. It is important to note there is no intention for the Council to actively promote development on the land, other than to bring the consideration of any future planning applications on that land in line with the surrounding land and properties (i.e. treating it as part of the settlement of Little Melton, rather	64	No action or change.

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				than the open countryside). There is also no intention to compulsorily purchase any of the land to facilitate development.		
QUESTION 81: Preferred Site - SN1046REV, Glenhaven, Great Melton Road, Little Melton	17, 46, 58, 365, 369, 384, 397, 406, 672, 849, 1151, 1173, 1248, 1432, 1622, 1641, 1643, 1645, 1656, 1688, 1692, 1695, 1700, 1708	Object	Issues relating to the over development of Little Melton, with the fear that the village will have a city feel and lose its village character. The housing being built is of poor quality housing be built in Little Melton. Concerns with the site's boundary including rear gardens of neighbouring properties. Concerns with proposed access off Great Melton Road which is a narrow lane with no footpath. The mini roundabout at the junction of GM Rd, School Lane, Mill Road and Burnthouse Lane is very dangerous with limited visibility. Increase of traffic by large developments surrounding the village. Great Melton Road is popular with locals for walking, but is becoming too dangerous for pedestrians. Limited bus services, lack of cycle lanes and routes. Amenities and facilities are already at capacity i.e. schools and surgery. The only shop is about to close due to owners retiring. Environmental concerns; loss of more open (green) space, Destruction of wildlife	The concerns about the inclusion of this area of land within the existing Settlement Limit are noted however the Council wishes to reiterate that the site is not being allocated for new development. Rather, the inclusion of this area of land within the Settlement Limit simply regularises the land designation and reflects the fact the surrounding areas all lie within the Settlement Limit. Inclusion of land within a Settlement Limit means that should an application be brought forward in the future, the Council will then be able to assess it against the existing Development Management policies that exist within that area. The Council remains of the opinion this area relates well to the existing Settlement Limit and as such should be included within these boundaries. As an extension to the Settlement Limit (as opposed to an allocated site) a site-specific policy would not be prepared and therefore site-specific issues would be addressed at the planning application stage should a proposal for the site be submitted in the future.	62	No further action required.

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			and hedgerow Backland development which creates overlooking concerns for existing properties. Flooding issues; increase in surface water flooding in the immediate area			
QUESTION 81: Preferred Site - SN1046REV, Glenhaven, Great Melton Road, Little Melton	2174	Comment	Officers at NCC Highways do not object to the inclusion of the site within the settlement limit. However, they do raise concerns with access to the site from Great Melton Road, where they are likely to object. NCC Highways consider that it does not seem feasible to provide at Great Melton Road, required carriageway widening and new footway, to ensure it could safely accommodate development traffic. NCC highways have suggested that an alternative access would need to be considered.	The Council acknowledge the concerns of the Highway Authority (HA) with regards to access via Great Melton Rd. It is expected that the HA will provide similar comments at any subsequent planning application and it will be down to the applicant to demonstrate that a suitable and safe access can be achieved.	61	No action or change required.
QUESTION 81: Preferred Site - SN1046REV, Glenhaven, Great Melton Road, Little Melton	1955, 2134	Comment	Comments relating to water management: The site is noted to be outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. Few or no constraints. Standard information required at a planning stage. Infiltration potential is dependent on a complete geotechnical investigation,	The content of the representations is noted and with reference to the requirement for geotechnical investigation will be explored further at the planning application stage.	60	No further action required.

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			including BRE365 Soakaway Testing but where possible surface water infiltration should be utilised.			
QUESTION 81: Preferred Site - SN1046REV, Glenhaven, Great Melton Road, Little Melton	429	Comment	Given the site's location within a residential area, it would be logical to include the site within the Settlement Limit. Development would provide only a limited number of dwellings. Raised concerns surrounding access and the amenity impact of overlooking.	The proposal would include the demolition of 'Glenhaven' dwelling to the south to allow access to the site. The Council has previously met with the Highway Authority, who have raised some concerns whether a suitable access could be achieved. The amenity of existing and future occupiers, with specific regards to overlooking, will be assessed at the planning application, where consideration will be given to the layout.	59	No further action required.
QUESTION 81: Preferred Site - SN1046REV, Glenhaven, Great Melton Road, Little Melton	446	Comment	Error raised; the plan is incorrect and should not include parts of the gardens of three adjoining properties.	The site adjoins the existing Settlement Limit (SL) in Little Melton where it has been considered appropriate to include this additional land within the SL, as a SL extension; this area of land includes Glenhaven, plus the northern ends of the three adjoining gardens. If the land is included in the Settlement Limit that would mean that any future planning applications would be treated as being part of the settlement of Little Melton, rather than being treated as part of the open countryside. It would be up to the owner of any part of that land to submit a planning application, if they wished to. It is important to note there is no intention for the Council to actively promote development on the land, other than to bring the consideration of any future planning	56	No action or change required.

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				applications on that land in line with the surrounding land and properties (i.e. treating it as part of the settlement of Little Melton, rather than the open countryside).		
QUESTION 81: Preferred Site - SN1046REV, Glenhaven, Great Melton Road, Little Melton	1381, 1406, 1742	Support	Development of the site would promote good use of land that would not change the character of the village. The site is located within an existing residential area which would benefit from existing services/infrastructure such as electricity and main drainage. It is considered that there are no issues with access and the noted lack of footpath and can be overcome.	Noted support for development of the site. As a Settlement Limit extension/ addition there would be no specific policy in the final Plan and detailed matters relating to the development of the site would be considered at the planning application stage.	54	No further action required.
QUESTION 82: Preferred Site - SN4052, Land south of School Lane and east of Manor Farm Barns, Little Melton	534, 726	Object	The Joint Core Strategy states small-scale housing growth in Little Melton, which has already been exceeded. South Norfolk Council is neither protecting the character of this village or it's setting, which it claims is one of its objectives. If this plan is allowed to go ahead it will give carte blanche to full-scale development because the Joint Core Strategy will have been rendered utterly meaningless. What is the point of having a Joint Core Strategy if it is then ignored? The Landscape Protection Zone is also being ignored and has already been extensively encroached upon in other areas. Two of the proposed sites in Little Melton are within this - alleged - protected zone. Why designate these areas as protected only to allow them to be densely built on? The Council is not only not protecting the landscape, and therefore the people and the environment in which they live, but contradicting itself.	The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan, which will replace existing requirements in the JCS. The proportion of new development in the Village Clusters is substantially lower than the proportion of the population that currently lives in those parishes. The numbers proposed for the site are considered to be sustainable and development of this site would represent an efficient use of land. The scale of development proposed in Little Melton is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development.	634	Policy wording to reflect Landscape Protection Zone

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			These actions completely erode trust in our elected Council and it's Councillors because of the disparity between what it claims and lays down are it's aims and objectives, and what it then actually does. If these proposals go ahead, coupled with the large scale development at Hethersett, Little Melton and Hethersett will soon be one ill-considered, urban housing sprawl, with few green spaces, an inadequate infrastructure, and unable to cope with a changing climate. Where little thought has been given to the long term effects on the people living there, their needs and the quality of the environment in which they are expected to live. Do you not think people deserve better? Do you ever consider the legacy the council and its councillors are leaving future generations?	Technical advice has been sought from the Council Landscape officer relating to the Southern Bypass Landscape Protection Zone, and whilst it is acknowledged that the site lies within this Landscape Protection Zone, current policy has its own requirement to retain openness and as such, any proposal will be assessed against this. The concerns about the capacity of the school and implications for further resources and facilities are acknowledged. This technical consultation has included discussions with NCC Children's Services, where information was shared on School capacity. It is noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.		
QUESTION 82: Preferred Site - SN4052, Land south of School Lane and east of Manor Farm Barns, Little Melton	2261	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Site comprises part of an agricultural field. Hedges are priority habitat so losses should be minimised (use existing access), and as a last resort compensated for. No priority habitats identified (see MAGIC).	NCC Ecologist comments noted; ecological preference would be for the re-use of the existing access however this may not correspond with the requirements of other technical consultees (e.g. LLFA) and therefore this needs to be carefully considered.	444	Confirm access point with both NCC Ecologist and LLFA.

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			Site within amber habitat zones for great crested newts, and in SSSI IRZ but residential development does not trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 82: Preferred Site - SN4052, Land south of School Lane and east of Manor Farm Barns, Little Melton	449, 964, 1126	Object	Nothing to stop future development coming forward along School Lane, once road has been upgraded. Site is located within Landscape Protection Zone. Increased noise and pollution Pedestrian access to the A47 would have to be reviewed. Other sites rejected for similar reasons. Highway safety concerns Existing Flood issues Impact on wildlife	Sites that are allocated within the Plan will automatically be included within the drawn Settlement Limit for Little Melton. Any future application that may come forward along School Lane, to the east of the site and No115 School Lane, will be outside the settlement limit and will be subject to current planning policies surrounding countryside development. Technical advice has been sought from the Council Landscape officer relating to the Southern Bypass Landscape Protection Zone, and whilst it is acknowledged that the site lies within this Landscape Protection Zone, current policy has its own requirement to retain openness and as such, any proposal will be assessed against this. With regards to amenity, noise, pollution etc., these would all be addressed in detail at the detailed planning application stage.	443	Allocation policy wording to ensure that access is located to the west and for access to be achieved via the area at lowest possible risk. Other site-specific policy matters to include; mitigation within the Landscape Protection Zone and technical highways requirements.

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				NCC Highways officers have been involved with the assessment of the sites prior to consultation and also provided technical advice as part of the Regulation 18. Advice has been sought relating to both site access and the impact of the proposed development on the wider highway network. Mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include carriageway widening to include footpaths. It would also need to be demonstrated that sufficient visibility splays can be achieved, prior to accepting development is acceptable and in allocating the site. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority (LLFA) and it is considered that on-site drainage solutions can often help to address existing surface water issues and as such it is considered that this issue can be adequately addressed during the planning application stage. It has been highlighted that access into this site would need to be to the west to avoid flood areas. Further to the concerns raised around destruction of wildlife, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site.		

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				Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 82: Preferred Site - SN4052, Land south of School Lane and east of Manor Farm Barns, Little Melton	18, 360, 374, 385, 398, 407, 430, 468, 592, 666, 676, 697, 719, 766, 830, 845, 861, 958, 978, 999, 1067, 1077, 1103, 1134, 1152, 1180, 1247, 1258, 1299, 1462, 1615, 1623, 1642, 1644, 1646, 1657, 1689, 1691, 1693, 1697, 1701, 1709, 1744, 1771, 1780	Mixed	Issues relating to highways: extremely busy roads, traffic travels too fast, pedestrian safety, Green Lane is hazardous, visibility is very poor at the School Lane junction. Concerns relating to the existing infrastructure capacity; GPS, schools. The future of Little Melton shop is uncertain. It is felt that Little Melton is already overdeveloped, concerns with out of character development, Little Melton will lose its character feel. Why develop outside settlement limit? Environmental concerns; why build in Norwich Southern Bypass Landscape Protection Zone?, loss of wildlife, noise and air pollution concerns. Concerns with drainage issues in the village; already existing flooding and sewerage issues. Health and Wellbeing concerns; fear that an increased population will dilute community spirit.	NCC Highways officers have been involved with the assessment of the sites prior to consultation and also provided technical advice as part of the Regulation 18. Advice has been sought relating to both site access and the impact of the proposed development on the wider highway network. Mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include carriageway widening to include footpaths. It would also need to be demonstrated that sufficient visibility splays can be achieved, prior to accepting development is acceptable. Whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, on the local ecology are also noted however these matters would be dealt with during the planning application stage. The numbers proposed for the site are considered to be sustainable and	70	Discussions with NCC Education to review school capacity and implications of housing growth for facilities plus a review of NCC Highways recommendations for inclusion in policy allocation text.

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				development of this site would represent an efficient use of land. The scale of development proposed in Little Melton is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. With regards to existing services, many of the individually allocations proposed within the Village Cluster Housing Allocations Plan are of a relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems (ICS) and Norfolk County Council in its role as Education. This will ensure that infrastructure issues are identified and understood as part of the plan making process. It is acknowledged that development sites can be home to wildlife and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures. NCC ecologists and NWT have been invited to make representations on the VCHAP and		

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				the selected sites. These responses will be included in the final site selection process. Technical advice has been sought from the Council Landscape Officer relating to the Southern Bypass Landscape Protection Zone, and whilst it is acknowledged that the site lies within this Landscape Protection Zone, current policy has its own requirement to retain openness and as such, any proposal will be assessed against this. The concerns that have been raised by both local residents regarding the flood risk associated with this site are recognised and will be explored further. Any development on this site would be required to include appropriate mitigation measures and avoid exacerbating the current situation.		
QUESTION 82: Preferred Site - SN4052, Land south of School Lane and east of Manor Farm Barns, Little Melton	2016	Comment	Site is located within 250 metres of an existing landfill that could result in the nearby community being exposed to impacts including odour, noise, dust and pests. The severity of these impacts will depend on the size of the landfill, the nature of the waste it takes and prevailing weather conditions. Planning policy requirements state that new development should integrate effectively with existing businesses and not place unreasonable restrictions upon them. Where the operation of an existing landfill could have significant adverse	The requirements of the NPPF are noted with regard to existing landfill operation and the impact on new development /integrating with existing businesses. If the site remains as a preferred option within the VCHAP the Council should consider further the relationship between the landfill site and residential development. It should be noted however that there are existing sensitive receptors (residential development) in close proximity to this site and it would be useful to understand whether tensions currently exist between these land uses.	69	Prior to allocation confirm with Environmental Protection whether there are any recorded incidents arising from the relationship between the existing residential properties and the landfill site.

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			effects on new development, the applicant should be required to provide suitable mitigation for these effects. Mitigation can be provided through the design of the new development to minimise exposure to the neighbouring landfill and/or through financial contributions to the operator of the landfill to support measures that minimise impacts. Environmental Permitting Regulations require operators to demonstrate that they have taken all reasonable precautions to mitigate impacts of their operations. This is unlikely to eliminate all emissions and there is likely to be residual impacts. In some cases, these residual impacts may cause local residents concern. There are limits to the measures that the operator can take to prevent impacts to residents. Consequently, it is important that planning decisions take full account of paragraph 182 of the NPPF. When a new development is built near to an existing landfill this does not automatically trigger a review of the permit.	Where necessary, a permit will be required.		
QUESTION 82: Preferred Site - SN4052, Land south of School Lane and east of Manor Farm Barns, Little Melton	2043	Comment	Comments from Historic England: Whilst there are no designated heritage assets on the site, the Manor House (grade II listed) lies to the south-west of the site. Therefore, any development of this site has the potential to impact upon the significance of this heritage asset. A Heritage Impact Assessment (HIA) of the site should be undertaken to assess the impact of the proposed development on	The comments from Historic England are noted. An HIA will inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	68	Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.

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			the listed building and determine if allocation of this site is appropriate, and if it is what mitigation may be required.			
QUESTION 82: Preferred Site - SN4052, Land south of School Lane and east of Manor Farm Barns, Little Melton	1956, 2116	Comment	Comments relating to water management issues: Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, this discharge should be facilitated in line with the non-statutory technical standards for sustainable drainage systems (SuDS). The site is adjacent to a flow path, and within a Source Protection Zone 3. The on-site flood risk contributes to an off-site flow path. Flow lines indicate this flood water flows east off of the site.	The comments relating to the flood risk of this site, the flowpath and Source Protection are noted, and these constraints will need to be considered further. As site is located within a Source Protection Zone, any development would need to make sure water is impeccably clean and there would need to consultation with environment agency .	67	Further discussions to be held with the LLFA regarding the identified flood risk.
QUESTION 82: Preferred Site - SN4052, Land south of School Lane and east of Manor Farm Barns, Little Melton	1384, 1407, 1669, 1804	Support	The support for the site is noted: located to major routes, village amenities, not considered to impact on village landscape and flood issue have been assessed. Site is also considered to be readily available. It would be preferred that a small number of houses (25 or below) would be allocated. It has also been noted that action needed towards infrastructure.	The support for this site is noted and the Council confirms that at this time the site is being promoted for up to 25 dwellings.	65	No action or change.
QUESTION 83: Should any shortlisted/rejected sites be allocated?	1633	Comment	Online responses to questions 83/84/85. The Little Melton (LM) Parish Council: offers two proposals for additional housing in Little Melton. I support either. With caveats. At the risk of repeating the views of online	With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale	458	No action or change required.

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			responders I feel LM Village is on the precipice of losing quality of life. Exactly that which 'incomers' are looking for ... • 'Yes' I feel privileged to be living here. • 'Yes' I would like to welcome those who want the same experience. • However, the basic facilities, infrastructure, roads, safe pavements, drains/water supplies, substation, are already under strain. • Increase in traffic flow: popular village school, roadside parking to take/collect children, inevitably there are peak uses of roads/pathways. Online shopping - increase in delivery vehicles - parcels and food. Often large transport delivery vehicles 'get lost negotiating the narrow lanes' trying to find the Industrial Park. 'Local sport' is 'directing' /watching Cars: Speeding I 'rat run'. Particularly parents late in delivering/collecting children from school. And The Environment? Reduction in agricultural land. Higher levels of vehicle fumes? Summary: Little Melton. Too many properties, fractured infrastructure - now. The future - reduction in quality of life?	of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process It is noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth. NCC Highways officers have been involved with the assessment of the sites prior to consultation and also provided technical advice as part of the Regulation 18. Advice has been sought relating to both site access and the impact of the proposed development on the wider highway network. Where appropriate, mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include carriageway widening to include footpaths. It would also need to be demonstrated that sufficient visibility		

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				splays can be achieved, prior to accepting development is acceptable and in allocating sites. With regards to loss of agricultural land, the site is considered as Grade 3 - Good to Moderate (DEFRA). As part of the site assessment process, the Council has taken into consideration the best most versatile land (BMV) by identifying the ALC of all sites submitted. Where possible, the Council will avoid allocating and preferring sites that are of a high grade. Where higher grade land may be present, the Council will need to consider whether the social, economic or environmental benefit outweighs the agricultural and that there is no suitable or available site for the development on land of poorer quality. Further to the concerns raised around destruction of wildlife, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 83: Should any shortlisted/rejected sites be allocated?	1670	Comment	If Little Melton does have to be the subject of further development then it would be preferable to have a site with a small number of houses 25 or below rather than a massive development such as at Hethersett and Cringleford	Comments noted. With regards to the proposed number, at present only one site is preferred for an allocation of up to 25 units (SN4052). The other preferred site (SN1046REV) is for a settlement limit extension, which is not proposed for any exact numbers and	456	No action or change required.

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			As stated earlier if any development does have to be done in Little Melton despite the number of houses already being built is over the agreed number already then our preferred sites would be SN0488, SN4052 and SN3007SL, provided the number of houses was kept to 25 and below on each site. Urgent action needs to be taken with regard to the infrastructure in order for these small sites to proceed i.e. Medical practice, traffic calming, drains etc	would be available for windfall development. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems (ICS), Norfolk County Council in its role as Education, Highway and Lead Local Flood Authorities and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process It is noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.		
QUESTION 83: Should any shortlisted/rejected sites be allocated?	1487	Comment	Our client, who is the owner of site considers that SN0397 could present an option for future growth in Little Melton.	The Council acknowledges the representation made in relation to SN0397. However, as it stands no further information has been submitted	455	No action or change required.

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			As the assessment notes, the site itself has few constraints and it is considered that an appropriate design could be explored that would reflect this edge of settlement location. There is potential for screening and softening this edge of the village through any development scheme. In relation to access, investigations are ongoing to establish whether there is an opportunity for an improved route into the site.	to the Council in relation to the access and the requirement of 3rd party land. Therefore, the Council is still of the opinion that the site is unsuitable for development.		
QUESTION 83: Should any shortlisted/rejected sites be allocated?	1402	Comment	Agree that developments need to go ahead, however do not agree with shortlisted site SN2044. This lane is treacherous at the best of times without further vehicle traffic. It also has poorer access to the major routes and has no street lighting or gas supply. It is one of the few areas in the village that is still left to nature with the views across the fields of the farm. Development here would spoil what little countryside there is left.	Concerns related to SN2044 are noted. Access via Braymeadow Lane will need to be demonstrated achievable prior to allocation. Technical advice has been sought from the Council Landscape officer relating to the Southern Bypass Landscape Protection Zone, and whilst It is acknowledged that the site lies within this Landscape Protection Zone, current policy has its own requirement to retain openness and as such, any proposal will be assessed against this.	454	Further discussions with NCC highways to help inform allocation policy wording.
QUESTION 83: Should any shortlisted/rejected sites be allocated?	364	Object	It is the proposal to the north of Braymeadow Lane that I would particularly object to. Spreading housing outside of the perimeter of the existing village is completely unacceptable. Braymeadow Lane has frequently been used as a diversion route when either the Watton Road or Hethersett Lane have been closed due to accidents or roadworks. Having buses, lorries, emergency vehicles and large numbers of cars along a single track road is dangerous.	Concerns with development off Braymeadow Lane is noted. NCC Highways officers have been involved with the assessment of the sites prior to consultation and also provided technical advice as part of the Regulation 18. Advice has been sought relating to both site access and the impact of the proposed development on the wider highway network. Officers have advised that whilst Braymeadow Lane is narrow with no footways,	452	Further discussions with Highways to inform allocation.

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				improvements to site frontages appears relatively easy Highway issues are to be resolved prior to allocation.		
QUESTION 83: Should any shortlisted/rejected sites be allocated?	2100	Comment	SN0488 Few or no constraints. Standard information required at a planning stage. Source Protection Zone 3. Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. A flow path is present on-site for all AEP events. This is concentrated to the southern boundary. The on-site flood risk contributes to an off-site flow path with flow lines indicating this flood water flows east off of the site. We advise this must be considered in the site assessment. The site is adjacent to a flow path. A large area of the site is not at risk of flooding and has potential to be developed.	The comments made in relation to water management are noted. Further discussions have been had with the LLFA and particular issues are noted with access/ egress to this site due to the extent of the identified flooding. This is likely to be in partly a result of the topography created by the A47. Development of this site would likely require significant road engineering works to create a safe access/ egress point.	450	Discuss with the land owner the potential issues with viability due to the LLFA comments if the site is considered suitable for recategorising.
QUESTION 83: Should any shortlisted/rejected sites be allocated?	2095	Comment	SN2044 Few or no constraints; Standard information required at a planning stage. Infiltration potential is dependent on a	The comments made in relation to water management are noted however at this time the site is not being considered as either a reasonable /	449	No action required.

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			complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised Assessment: Green	reasonable alternative site in the VCHAP.		
QUESTION 83: Should any shortlisted/rejected sites be allocated?	2262	Comment	SN0488 Land north of School Lane (between No115 and No117), Little Melton Site comprises part of an agricultural field adjacent to the A47. Hedges are priority habitat so losses should be minimised (use existing access), and as a last resort compensated for. No priority habitats identified (see MAGIC). Site within amber habitat zones for great crested newts, and in SSSI IRZ but residential development does not trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain. SN2044 Land north of Braymeadow Lane, Little Melton Site comprises part of an agricultural field. Hedges are priority habitat so losses should be minimised (use existing access), and as a last resort compensated for. No priority habitats identified (see MAGIC). Site within amber habitat zones for great crested newts, and in SSSI IRZ but residential development does not trigger	NCC Ecologist comments noted both sites; SN0488 and SN2044. Both sites have hedges that are priority habitat so losses should be minimised (use existing access) Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.	447	Policy wording to require minimal loss of hedgerow along the site frontage should the site be allocated.

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			consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain. Rating for these sites: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required.			
QUESTION 83: Should any shortlisted/rejected sites be allocated?	1137	Comment	Some logic in using part of SN0488 to continue the line of existing houses with sympathetic development. However, the site suffers even worse noise and air pollution than SN4052. Both sites suffer the same problems with drainage and road junction. SN2044 is at least outside the Landscape Protection zone and development there would not set such a dangerous precedent for further development. However, an estate of 25 houses would be overdevelopment and out of character with the neighbouring buildings. Development of SN2044 should require provision of a cycle path to connect to the Hethersett Lane path.	These comments are noted. At this time the Council has considered a small area of SN0488 as being a reasonable alternative site. Should the site be reclassified further discussions should take place with technical consultees regarding the concerns raised, specifically relating to flood risk and highways concerns. SN0244 is currently a rejected site, and the Council does not consider that this assessment should be altered.	446	No action or change required.

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QUESTION 83: Should any shortlisted/rejected sites be allocated?	361, 375, 431, 1071, 1080, 1154, 1463, 1668	Comment	No more development within Little Melton; will destroy local wildlife and the community; the village does not have the infrastructure to cope with significant further development; highway safety concerns; detrimental effect on the village's character and quality of life, increase in flooding; impact on Landscape Protection Zone.	The comments in these representations do not refer to any particular site; however, they appear as overall objections to development within Little Melton. NCC Highways officers have been involved with the assessment of the sites prior to consultation and also provided technical advice as part of the Regulation 18. Advice has been sought relating to both site access and the impact of the proposed development on the wider highway network. Where appropriate, mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include carriageway widening to include footpaths. It would also need to be demonstrated that sufficient visibility splays can be achieved, prior to accepting development is acceptable and in allocating sites. With regards to the concerns raised regarding flooding, discussions have taken place with the Lead Local Flood Authority (LLFA) who have provided feedback on the proposed allocations and made recommendations where appropriate. In addition, further comments are also expected from the Environmental Agency and Anglian Water, who will help inform individual allocation policy wording. Technical consultation has also included discussions with NCC Children's Services,	445	No action or change required.

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				where information was shared on School capacity. However, it has been identified that given that allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, therefore in many instances this type of development is unlikely to have a significant impact on school capacity and other facilities. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems (ICS), Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process It is noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local		

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				infrastructure effectively supports growth. Technical advice has been sought from the Council Landscape officer relating to the Southern Bypass Landscape Protection Zone, and whilst It is acknowledged that the site lies within this Landscape Protection Zone, current policy has its own requirement to retain openness and as such, any proposal will be assessed against this.		
QUESTION 83: Should any shortlisted/rejected sites be allocated?	19, 386, 399, 408, 469, 533, 720, 846, 862, 1105, 1184, 1216, 1275, 1300, 1411, 1619	Object	Objection to all shortlisted sites; no more development within Little Melton. Concerns raised with regards to overdevelopment, sites should be in Settlement Limit, flooding issues, Highway concerns and infrastructure capacity.	NCC Highways officers have been involved with the assessment of the sites prior to consultation, and also provided technical advice as part of the Regulation 18. Advice has been sought relating to both site access and the impact of the proposed development on the wider highway network. Mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include carriageway widening and to include footpaths. It would also need to be demonstrated that sufficient visibility splays can be achieved, prior to accepting development is acceptable. Whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the impact of alterations to the existing	72	No further action required.

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				road, as well as the increased traffic movements, on the local ecology are also noted however these matters would be dealt with during the planning application stage. The numbers proposed for the site are considered to be sustainable and development of this site would represent an efficient use of land. The scale of development proposed in Little Melton is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. With regards to existing services, many of the individually allocations proposed within the Village Cluster Housing Allocations Plan are of a relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems (ICS) and Norfolk County Council in its role as Education. This will ensure that infrastructure issues are identified and understood as part of the plan making process. It is acknowledged that development sites can be home to wildlife and it will		

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				be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures. NCC ecologists and NWT have been invited to make representations on the VCHAP and the selected sites. These responses will be included in the final site selection process. Technical advice has been sought from the Council Landscape officer relating to the Southern Bypass Landscape Protection Zone, and whilst It is acknowledged that the site lies within this Landscape Protection Zone, current policy has its own requirement to retain openness and as such, any proposal will be assessed against this. The concerns that have been raised by both local residents and technical consultees regarding the flood risk associated with this site are recognised and will be explored further. Any development on this site would be required to include appropriate mitigation measures and avoid exacerbating the current situation.		
QUESTION 84: Should any shortlisted sites be rejected?	1634	Comment	At the risk of repeating the views of online responders I feel LM Village is on the precipice of losing quality of life. Exactly that which 'incomers' are looking for ... • 'Yes' I feel privileged to be living here.	With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a	635	No action or change required.

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			• 'Yes' I would like to welcome those who want the same experience. • However, the basic facilities, infrastructure, roads, safe pavements, drains/water supplies, substation, are already under strain. • Increase in traffic flow: popular village school, roadside parking to take/collect children, inevitably there are peak uses of roads/pathways. Online shopping - increase in delivery vehicles - parcels and food. Often large transport delivery vehicles 'get lost negotiating the narrow lanes' trying to find the Industrial Park. 'Local sport' is 'directing' /watching Cars: Speeding I 'rat run'. Particularly parents late in delivering/collecting children from school. And The Environment? Reduction in agricultural land. Higher levels of vehicle fumes? Summary: Little Melton. Too many properties, fractured infrastructure - now. The future - reduction in quality of life?	material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems (ICS), Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process it is noted that the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth. NCC Highways officers have been involved with the assessment of the sites prior to consultation and have also provided technical advice as part of the Regulation 18. Advice has been sought relating to both site access and the impact of the proposed development on the wider highway network. Where appropriate, mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include carriageway widening to include footpaths. It would also need to be demonstrated that sufficient visibility		

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				splays can be achieved, prior to accepting development is acceptable and in allocating sites. With regards to loss of agricultural land, the site is considered as Grade 3 - Good to Moderate (DEFRA). As part of the site assessment process, the Council has taken into consideration the best most versatile land (BMV) by identifying the ALC of all sites submitted. Where possible, the Council will avoid allocating and preferring sites that are of a high grade. Where higher grade land may be present, the Council will need to consider whether the social, economic or environmental benefit outweighs the agricultural and that there is no suitable or available site for the development on land of poorer quality. Further to the concerns raised around destruction of wildlife, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys		
QUESTION 84: Should any shortlisted sites be rejected?	535	Object	The Joint Core Strategy states small-scale housing growth in Little Melton, which has already been exceeded. South Norfolk Council is neither protecting the character of this village or it's setting, which it claims is one of its objectives. If this plan is	The Council recognises the concerns made within the representations. With regards to the distribution of housing, the approach within the South Norfolk VCHAP (to allocate a series of	461	No action or change required.

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			allowed to go ahead it will give carte blanche to full-scale development because the Joint Core Strategy will have been rendered utterly meaningless. What is the point of having a Joint Core Strategy if it is then ignored? The Landscape Protection Zone is also being ignored and has already been extensively encroached upon in other areas. These actions completely erode trust in our elected Council and it's Councillors because of the disparity between what it claims and lays down are it's aims and objectives, and what it then actually does If these proposals go ahead, coupled with the large-scale development at Hethersett, Little Melton and Hethersett will soon be one ill-considered, urban housing sprawl, with few green spaces, an inadequate infrastructure, and unable to cope with a changing climate. Where little thought has been given to the long-term effects on the people living there, their needs and the quality of the environment in which they are expected to live. Do you not think people deserve better? Do you ever consider the legacy the council and its councillors are leaving future generations?	smaller sites, typically within the range of 12 to 50 dwellings) enables as many village clusters as possible to contribute to meeting general and local housing needs, reflected in the Greater Norwich Local Plan (GNLP) housing target, whilst also helping to support and sustain the local services that are essential to securing sustainable futures for rural communities. When adopted the GNLP will supersede the JCS and many of the undeveloped sites previously identified within the JCS and associated Site Allocation documents will be carried forward, either in the GNLP or within the VCHAP. The GNLP sets out the longer-term strategy for the area, keeping policies up-to-date and providing a framework for economic growth in the Greater Norwich area; this is in accordance with the requirements set out in the National Planning Policy Framework (NPPF).		
QUESTION 84: Should any shortlisted sites be rejected?	432	Comment	Object to SN0488 and SN2044; limited development of SN0488 with a single layer of housing along the north side of School	Comments related to shortlisted sites noted. Preference for SN0488 to be frontage development. With regards to the layout of the site, this will be put forward at detailed planning stage.	459	No action or change required.

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			Lane might be acceptable to “fill the gap”, but no more than that.	However, the proposed land will need to be used efficiently making best use of the land available.		
QUESTION 84: Should any shortlisted sites be rejected?	376	Comment	Would like the Council to reject all proposed sites in the village of Little Melton at present, and only consider ones in the future when all other options have been explored. We have already seen developments over and above our allocation and I sincerely doubt that the same can be said for every other village in the county, why not spread development across all villages but in less disruptive way?	Comments noted. With regards to distribution of sites, the main aim of the Plan is to allocate a series of smaller sites, typically within the range of 12 to 50 homes, across the 48 Village Clusters in South Norfolk, to accommodate at least 1,200 new homes in total, which will towards meeting the housing requirements in the GNLP. Therefore, housing distribution throughout the village clusters is a key objective. The scale of development proposed through the VCHAP is considered to be reasonable and appropriate for the village locations.	457	No action or change required.
QUESTION 84: Should any shortlisted sites be rejected?	20, 362, 370, 387, 388, 409, 470, 561, 563, 668, 725, 828, 829, 847, 1070, 1081, 1106, 1127, 1153, 1155, 1213, 1424, 1621, 1624, 1658, 1666, 1690, 1694, 1698, 1710, 1743, 1772, 1773, 1781	Mixed	Shortlisted sites should be rejected; development within Landscape Protection Zone and impact on village character; Impact on wildlife and environment; Over development and concerns with scale and density proposed; Highway safety concerns, limited visibility; Facilities available for Little Melton residents already at capacity; Poor drainage; Noise and air pollution concerns.	Technical advice has been sought from the Council Landscape officer relating to the Southern Bypass Landscape Protection Zone, and whilst it is acknowledged that the site lies within this Landscape Protection Zone, current policy has its own requirement to retain openness and as such, any proposal will be assessed against this. It is acknowledged that development sites can be home to wildlife, and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures. With regards to the proposed number of	451	No action or change required.

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				dwellings for the site, this is considered to be sustainable, and development of this site would represent an efficient use of land, in accordance with the paragraph 124 of the NPPF. The scale of development proposed is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. However, with regards to the design and layout of the site, this will be dealt with at the planning application stage, where consideration will also be had to neighbouring uses and any overlooking issues. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. Highway offices have provided feedback on sites suitability and advised where highway upgrades would be required, including the provision of footpath. These requirements will be included within the site allocation wording. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, including those proposed at Little Melton. Therefore, in many instances this type of development is unlikely to have a		

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				material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems (ICS), Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. With regards to the increased traffic movements, noise and pollution concerns, these concerns are noted and would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies.		
QUESTION 84: Should any shortlisted sites be rejected?	863, 1284, 1301, 1413	Support	The rejection of the sites is supported	Comments noted.	440	No action or change required.
QUESTION 84: Should any shortlisted sites be rejected?	363	Support	Reject all sites within Little Melton; concerns with the loss of character and care for the value of life in smaller communities.	The concerns relating to the loss of existing character within smaller communities is noted and it is recognised that new development can be unsettling for existing residents. However, the scale of growth proposed by cluster as part of the VCHAP is limited, reflecting the objectives of the Plan and the Council's preference to distribute new growth throughout the	73	No further action required.

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				villages to support their vitality, as well as existing services and facilities.		

Morley and Deopham

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QUESTION 86: Should any rejected sites be allocated?	969	Support	Support for site SN4042: Supporting evidence prepared to address matters raised in the site assessment - LVIA Technical Note, Transport Note, Flood Risk Screening and Scoping, Masterplan; well related to Morley, Deopham and Besthorpe; limited and localised landscape impact only demonstrated; pedestrian link between the village and the village hall proposed; access demonstrated as being achievable without loss of trees along site boundaries; and junction improvements at Gold Links Road and Norwich Road and possible additional footway links proposed.	This site is noted as being in good proximity to a number of settlements with existing facilities and services, including Besthorpe, which falls within the neighbouring Breckland District Council area. As a result of the site assessment this site was considered to be subject to a number of constraints which made it an unfavourable option for development and it is acknowledged that the evidence submitted seeks to address these concerns, particularly those relating to highways matters, the landscape impact of development in this location and the on-site and off-site surface water issues. The illustrative masterplan that accompanies this submission indicates that the site would be suitable for up to 49 dwellings. Whilst a scheme of this scale would make efficient use of the land in accordance with national planning policy requirements, the number of units proposed would exceed the objectives set out for the VCHAP. However, the proposal includes a new pedestrian linkage between the main centre of the village and the existing village hall and sports hall which would be a wider benefit to the local community arising from the development of this site. It is also noted that a number of other highway safety improvement measures are suggested for exploration and/or inclusion as part of any planning application should the site be allocated.	194	No action required.

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				At this time the Council has not discussed these additional improvements with the site promoter and there has not been any viability evidence submitted to support the offer of these additional works. Following the submission of the supporting evidence the Council engaged in further discussions with the LLFA regarding the possible allocation of this site. These discussions revealed serious concerns on the part of the LLFA about the allocation of this site due to the existence of an active flowpath that has resulted in both reported internal and external flood events locally. Whilst it was acknowledged that areas of the site fall outside the flowpath the LLFA have advised that all development on this site should be avoided as serious concerns exist about the technical solutions that would be suitable for managing the situation on-site without impacting on, or worsening, existing problems in the wider area. Groundwater floodrisk was also noted as being of concern in this area. For these reasons the Council does not consider allocation of this site to be a suitable option.		
QUESTION 86: Should any rejected sites be allocated?	1957	Comment	Parishes outside the IDD boundary and within the Norfolk Rivers watershed catchment; and if surface water discharges within the catchment area it should be in lines with non-statutory technical standards for SuDS.	These comments are noted however at this time there are no sites currently proposed either for shortlisting or preferred for allocation within these parishes or watershed catchment areas.	184	No action required.

Mulbarton, Bracon Ash, Swardeston and East Carleton

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QUESTION 87: Settlement Limit	1677	Comment	The description of the form and character of Mulbarton is inadequate, wrong, and contains factual errors which should be corrected, including the map on page 347. Services and Community Facilities: This section of the VCHAP also contains errors which should be corrected. The text states “The cluster possesses a good range of facilities which includes infant and junior schools”, where there is only one primary school serving the cluster. Settlement Limit and Constraints: Whilst the settlement limit may be appropriate, with no changes proposed for the village of Mulbarton, the full range of constraints has not been properly identified. The answers already given to Question 2 also apply here.	The Council acknowledges that the descriptive introductory text for Mulbarton requires updating, to reflect the single Primary School, the completion of the previously allocated development and a clearer portrayal of the development of the village. However, the Conservation Area Character Appraisal for Mulbarton does state that 'Mulbarton is a classic example of a settlement around a large green or common'. Also, the level of detail suggested by the Parish Council is not necessarily appropriate in the VCHAP, particularly as there is a Neighbourhood Plan and Conservation Area Character Appraisal in place. In terms of the cross-reference to Q2, the Council would note that there is ongoing dialogue with the County Council in terms of Highways infrastructure and school capacity, and with the local NHS Integrated Care System, regarding Primary Care. Specifically, taking into account falling rolls and out of catchment pupils, there is not considered to be a capacity issue with Mulbarton Primary School. In terms of open space provision, new development is not expected to rectify any previous deficiencies; however, new sites of 15+ dwellings are expected deliver new provision in line with the Council's current open space standards.	828	Update the supporting text for Mulbarton to address any errors/inconsistencies.

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				The Parish Council's response appears to refer to the June 2021 Cabinet Report which signed off the consultation process, rather than the consultation material itself; several constraints referred to by the Parish Council as missing from the maps, such as the Conservation Area and County Wildlife Site, are shown on the Mulbarton Settlement Map in the consultation material.		
QUESTION 87: Settlement Limit	1794	Comment	Hopkins Homes continues to submit that Mulbarton is suitable location to accommodate up to 325 dwellings, however, in order to present various options to the Council, these representations are also supported by a Concept Masterplan which identifies an alternative site area that could accommodate up to 200 dwellings, together with up to 2.35Ha of associated public open space. Mulbarton is wholly sustainable as a location for new development. It has a population in excess of 3,500 residents and approaching 1,500 dwellings. The village is well served by local education, sports and community facilities with good transport links to the nearby city of Norwich, approximately 7 miles to the north-east. The current local plan, together with the adopted Mulbarton Neighbourhood Plan, would see only 20 or so further homes added to the housing stock over a 15-year period, a paltry figure which must be regarded as	The settlement hierarchy and overall housing numbers for growth to 2038 are set out the GNLP. This categorises Mulbarton as part of the Village Clusters in South Norfolk, with allocations for 1,200 new homes under that part of the hierarchy. As such the respondent's suggestion of 200 dwellings at Mulbarton equates to 1/6 of all of the proposed growth in the South Norfolk Village Clusters, not only focused in one of the 48 clusters, but within one village. The approach set in the Village Clusters aims to achieve a number of goals, including supporting services and facilities across a wide range of rural settlements, including those that have not benefited from the support of new development in the recent past. This approach helps to achieve the Government's aim (NPPF para 69) of a proportion of housing on smaller sites. The aim being to diversify the housing market and housing delivery, with the consequent benefit this has to smaller-	822	Confirm with the Highway Authority the maximum acceptable level of development accessed from Bluebell Road. Confirm with Norfolk County Council Children's services the ability to accommodate 200 dwellings in the local school.

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			disproportionately low in the context of the growth aspirations of South Norfolk and the wider Greater Norwich area. In conclusion, Hopkins Homes Ltd therefore requests that the level of growth in Mulbarton is increased to at least 200 and in turn, the residential allocation boundary is amended to accord with the site plan included, with the settlement limit for the village extended to likewise encompass the totality of this site.	scale local builders and supply chains. Whilst the Council does not dispute that Mulbarton is a sustainable settlement, a similar range of services/facilities can be found other larger villages within the South Norfolk Village Clusters; however, the approach advocated by the respondent would limit development to a focused group of clusters. This undermines the ability to support local services and facilities (schools, village/community halls, local shops and pubs, rural bus services, local employment etc.) across a wider rural area. The representation wrongly suggests that only 20 dwellings were allocated through the 2015 Local Plan, whereas an allocation on 180 dwellings was made. However, the Council does not agree that past levels of development, or the size of the settlement per se, should be seen as a primary indicator for future levels of growth. Under the GNLP, other settlements in higher tiers of the hierarchy, such as Wymondham (a Main Town), and Poringland/Framingham Earl (a Key Service Centre) are receiving allocations of fewer than 200 homes, despite having substantially larger allocations over the past two local Plans. Indeed, an allocation of 200 homes at Mulbarton, would be larger than the majority of settlements in the Main Town and Key Service Centre tiers of the GNLP hierarchy, which include a broader		

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				range of facilities, variously including rail connections, secondary schools, libraries, a range of retail services and employment opportunities. Three broad approaches to the distribution of development in the VCHAP are tested in the Sustainability Appraisal, which concluded that the approach being taken is a reasonable option. The respondents have questioned the viability of smaller sites of 15-50 dwellings to deliver affordable housing and other infrastructure, but have not substantiated this with any reference to the many current (2015) Local Plan allocations which fall into this category, or to the viability evidence that supports the GNLP. Indeed, this argument runs counter to the NPPF, which set the level at which affordable housing can be sought at 10 dwellings and also seeks a proportion of sites to be less than 1 hectare, specifically to aid delivery, which in most rural locations will equate to sites of less than 35 dwellings. The fact that the site can only be accessed via Bluebell Road does not appear to be disputed by the respondents, however the appropriateness of adding 200+ dwellings to a single point of access that already serves approximately 200 dwellings is disputed by the Highways Authority, which had initially proposed		

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				that the site be limited to less than 35 units.		
QUESTION 87: Settlement Limit	658, 1504	Object	Comments relating to boundary changes at Bracon Ash: SL includes BRA1 - this should be removed in response to the independent SA report by AECOM which recommended its removal; the SL should include edge of village gardens and small parcels of land to provide opportunities for modest housing growth; Bracon Ash is a sustainable location with good highway and travel standards; and extension of the SL would not result in an erosion of the gap between Bracon Ash and Mulbarton but would provide definition and maintain the gap through appropriate landscaping and development layout.	In response to the comments of Bracon Ash and Hethel Parish Council the Council notes that the comments made in the earlier AECOM SA addendum as part of the 2015 site allocations did not recommend the removal of BRA1 as suggested in this response. Rather, the SA addendum sought to identify alternative options when reviewing the additional 1,800 dwellings target for the South Norfolk part of the Norwich Policy Area. The omission of site BRA1 was considered in the report as one of a number of options that could be taken due to the level of commitment already identified at that time. It was not, however, recommended that BRA1 be removed from the settlement limit and the Council does not consider it to be an appropriate course of action at this time either. At the time of preparing this response BRA1 is the subject to planning application that is pending determination (2021/2579). Additional comments supporting an expansion of the SL at Bracon Ash to include edge of village gardens and parcels of land are acknowledged, as are the site specific representations made in the same representation. These comments relate to existing site SN2087 which has been subject to revision during the Regulation 18 process and will be subject to a new site assessment. As such the Council does not consider it	789	No action required.

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				appropriate to respond further to these comments at this stage but will instead undertake a new assessment to assess the merits of this parcel of land.		
QUESTION 87: Settlement Limit	1114	Comment	Comments relating to sites at Swardeston: Concerns raised at the time of the Bobbins Way development, to which the new allocation would be an extension, have not been addressed.	These comments from Swardeston Parish Council relate specifically to an earlier planning permission adjacent to the preferred allocation site, that was approved in 2014 (2014/1642). This planning application was determined following due consideration and consultation and the scheme was considered to be an acceptable development. Preferred site allocation SN0204 is sited on a former nursery site.	787	No action required.
QUESTION 87: Settlement Limit	2044	Comment	See attachments for full response. Although we understand that changes are proposed to the settlement limits, these are not clearly shown on the maps.	Comments noted.	733	Confirm changes to settlement limits.
QUESTION 87: Settlement Limit	447	Object	School, Preschools and nursery are full - Newton Flotman is not practical as would have to drive there. are full Gp is stretched as it is Pharmacy is stretched as it is Locals sports teams and clubs are at capacity Ruin view subjected to more noise than there	With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority	729	No action or change required.

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			already is. Impact to local wildlife.	and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. With regards to amenity, noise, pollution etc., these will all be addressed at the detailed planning application stage. Further to the concerns raised around destruction of wildlife, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 87: Settlement Limit	445	Object	The village of Mulbarton has already been developed to a point where the local facilities are no longer able to cope with the number of residents. Any new development will only worsen the situation whilst at the same time, the essential nature of the village is being lost as more and more new developments are added. In addition, Bluebell Road was not designed to be as major a route as this development would demand, Rectory Road access would be much more appropriate and less disturbing to the many young families who are currently residents of the Bluebell estate.	Mulbarton is considered to have a good range of basic services, including primary school, surgery, Budgen/post office, village hall, pubs, regular bus service to larger settlements etc. In addition, the scale of development proposed in is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within parish. Whilst it is recognised that rural settlements offer fewer services and facilities than their urban counterparts, a continued concentration of development in these locations will result in the inevitable decline of existing services and facilities within the	728	Further discussion with highways regarding Bluebell Lane.

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				rural areas. Therefore, locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services. With specific regard to school pressures, the County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity issue at the school for local children. With regard to the access and highway safety concerns, officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that access via Rectory Road is not viable and have suggested that access via Bluebell Road should be possible. This will be confirmed prior to allocation.		
QUESTION 87: Settlement Limit	13	Comment	Support the general thrust for the village of East Carleton. Potential concerns would have been raised by grouping Mulbarton and Bracon Ash with EC, as this might attract more potential development. However, it is clear that the proposals have generally been rejected on the basis of lack of amenity, access and impact on rural setting.	Comments noted.	708	No action or change required.
QUESTION 88: Preferred Site -	1678	Object	Object. Where will the children from the new houses on this preferred site go to school? Where will the families access medical facilities? Development on this	The Village Cluster approach is set out in the GNLP, and is based around development within the catchment of Primary Schools, and is designed to	840	Update as necessary following ongoing dialogue with Norfolk County Council

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SN0204, Bobbins Way, Swardeston			site will simply add to the cumulative impacts on the village of Mulbarton, already unacceptable. Our comments on this site include the answers given above for Questions 1 to 4, and 87.	reflect the fact that more than one village will share services and facilities. In relation to the cross-reference to Q1 to 4 and Q87, those issues of principle regarding the Plan Objectives and Core Policies are dealt within the responses to those questions. In terms of the cross-references to specific concerns about the impact of developing this site, the Council would note that there is ongoing dialogue with the County Council in terms of Highways infrastructure and school capacity, and with the local NHS Integrated Care System, regarding Primary Care. Specifically, taking into account falling rolls and out of catchment pupils, there is not considered to be a capacity issue with Mulbarton Primary School. Similarly, the scale of development proposed on this site is considered acceptable in Highways terms, particularly given the improvements to the site access being created by the adjoining development (currently under construction at Feb 2022). In terms of open space provision, new development is not expected to rectify previous deficiencies; however, new sites of 15+ dwellings are expected deliver new provision in line with the Council's current open space standards.		Highways and Children's Services and the NHS Integrated Care Services team.
QUESTION 88: Preferred Site -	1517	Object	This site neither represents the type of new site that the Village Clusters Plan is aiming to deliver, nor would it appear from	It is not clear from the representation why this site would not meet the requirements of the VCHAP. The site is	831	No action required.

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SN0204, Bobbins Way, Swardeston			the reasoned justification to be preferable to other potential sites in this cluster in respect to its viability or deliverability. Objective 2 of the Plan will only be met if residential sites are found across the settlements within a cluster, rather than continuing to expand existing development sites and villages that have undergone considerable recent expansion.	of the scale proposed, is reusing a site previously occupied by buildings related to the former nursery and farm shop, and is adjacent to a 'windfall' site which is already delivering an improved access onto the main B1113. It is also not clear why this site is any less viable/deliverable than other sites in the cluster. At present there are four main settlements in the Mulbarton cluster, with proposed allocations in two of them; Mulbarton and Swardeston. Of the remaining two settlements, Bracon Ash has seen recent development of 15 self-build properties, plus has an undeveloped allocation from the existing (2015) Local Plan, on which there is a current planning application (at February 2022). East Carleton is the smallest settlement, with few facilities and limited opportunities to walk and cycle for everyday journeys.		
QUESTION 88: Preferred Site - SN0204, Bobbins Way, Swardeston	1429	Support	Comments in support of SN0204: Support the allocation but should be worded to accommodate up to 40 dwellings at 25dph; reference to flood risk and associated landscape concerns on this site are incorrect and should be removed from the site assessment; justification for highway improvements to Mulbarton Primary School should be provided - if required they must be	The comments submitted on behalf of Bennett Homes are noted and following a review of this representation the Council considers it appropriate to review the site boundaries for this preferred allocation site. As shown at the Regulation 18 stage of the VCHAP process the preferred allocation site extended beyond the eastern boundaries of the adjacent sites (2014/1642 and SWA1). This could result in an unfortunate relationship between the sites and it may prove to be more appropriate to reduce the	790	The boundaries of the preferred site should be reviewed to ensure the most appropriate alignment with the adjacent sites (SWA1 and 2014/1642) is achieved. The site assessment should be updated to reflect the correct surface water flooding and flood zone data relating to this site and consideration

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			proportionate to the scale of the development; and adjacent land is available if required.	extent of the proposed allocation site. Due to the relatively low density form of development currently proposed on the site it is unlikely that reduction in the site size would impact on the number of dwellings deliverable on this site however overall site numbers should be considered as part of any review of the preferred allocation. Concerns have been raised about both comments made in the conclusion of the site assessment about flood risk and the suggested off-site highway works associated with the development of this site. The respondent has submitted supporting evidence relating to the surface water flood risk on the site and having reviewed this the Council concurs with the comments submitted. The site assessment should be reviewed and updated accordingly to reflect this information. A concern has also been raised about the suggested off-site highway works. As part of a review of the mitigation measures proposed for this site the Council also consider that a review of the current policy requirements and wording for SWA1 is appropriate. Connectivity between these two adjacent sites should also be considered in any site specific policy text.		given to the implications of this update. Existing policy requirements for SWA1 (particularly in relation to highways requirements) should be reviewed as part of the consideration of policy requirements for SN0204. Consideration also to be given to connectivity between the preferred allocation and SWA1.
QUESTION 88: Preferred Site - SN0204, Bobbins Way, Swardeston	1115	Comment	***	These comments from Swardeston Parish Council relate specifically to an earlier planning permission adjacent to the preferred allocation site, that was approved in 2014 (2014/1642). This	788	No action required.

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				planning application was determined following due consideration and consultation and the scheme was considered to be an acceptable development. Preferred site allocation SN0204 is sited on a former nursery site.		
QUESTION 88: Preferred Site - SN0204, Bobbins Way, Swardeston	1958	Comment	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. Major development - If surface water discharges within the watershed catchment of the Board's IDD, this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems.	Comments noted	727	No action required.
QUESTION 88: Preferred Site - SN0204, Bobbins Way, Swardeston	2069	Comment	Few or no constraints. Standard information required at a planning stage. Assessment: Green	Water management comments are noted.	726	No action required.
QUESTION 88: Preferred Site - SN0204, Bobbins Way, Swardeston	2198	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Site comprises a former plant nursery site including grassland, buildings, and glasshouses. MAGIC identifies the presence of priority habitat along the southern boundary (traditional orchard), but this will need to be verified. Hedges are priority habitat so losses should be minimised (use existing access), and as a last resort compensated for. Site within green habitat zones for great crested newts, and in SSSI IRZ but residential	NCC Comments noted; no major ecological constraints identified from desk-top search. It is noted that surveys, and biodiversity enhancement in accordance with policy required.	725	Verify the presence of priority habitat along the southern boundary (traditional orchard). This could impact on design Policy wording required to minimise the loss of the priority habitat hedges.

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			development does not trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 89: Preferred Site - SN2038, South of Rectory Lane, Mulbarton	2149	Comment	Few or no constraints. Standard information required at a planning stage. Assessment: Green	Consider the need to standard requirements regarding flood risk in the Core Policies.	846	No action required.
QUESTION 89: Preferred Site - SN2038, South of Rectory Lane, Mulbarton	1793	Comment	Whilst we support the proposed allocation and welcome the fact the Council has recognised that this site is suitable for development, we nevertheless object to the limited level of growth in Mulbarton, given that this is a sustainable location where additional development should be located. Mulbarton is wholly sustainable as a location for new development. It has a population in excess of 3,500 residents and approaching 1,500 dwellings. The village is well served by local education, sports and community facilities with good transport links to the nearby city of Norwich, approximately 7 miles to the north-east. There are no drainage or physical infrastructure issues which cannot be overcome by standard engineering	The settlement hierarchy and overall housing numbers for growth to 2038 are set out the GNL. This categorises Mulbarton as part of the Village Clusters in South Norfolk, with allocations for 1,200 new homes under that part of the hierarchy. As such the respondents suggestion of 200 dwellings at Mulbarton equates to 1/6 of all of the proposed growth in the South Norfolk Village Clusters, not only focused in one of the 48 clusters, but within one village. The approach set in the Village Clusters aims to achieve a number of goals, including supporting services and facilities across a wide range of rural settlements, including those that have not benefited from the support of new development in the recent past. This approach helps to achieve the Government's aim (NPPF para 69) of a	845	Confirm with the Highway Authority the maximum acceptable level of development accessed from Bluebell Road. Confirm with Norfolk County Council Children's services the ability to accommodate 200 dwellings in the local school.

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			solutions, thus the site is demonstrably deliverable in a sustainable and technically appropriate manner. Hopkins Homes Ltd therefore requests that the level of growth in Mulbarton is increased to at least 200 and in turn, the residential allocation boundary is amended.	proportion of housing on smaller sites. The aim being to diversify the housing market and housing delivery, with the consequent benefit this has to smaller-scale local builders and supply chains. Whilst the Council does not dispute that Mulbarton is a sustainable settlement, a similar range of services/facilities can be found other larger villages within the South Norfolk Village Clusters; however, the approach advocated by the respondent would limit development to a focused group of clusters. This undermines the ability to support local services and facilities (schools, village/community halls, local shops and pubs, rural bus services, local employment etc.) across a wider rural area. The representation wrongly suggests that only 20 dwellings were allocated through the 2015 Local Plan, whereas an allocation on 180 dwellings was made. However, the Council does not agree that past levels of development, or the size of the settlement per se, should be seen as a primary indicator for future levels of growth. Under the GNLP, other settlements in higher tiers of the hierarchy, such as Wymondham (a Main Town), and Poringland/Framingham Earl (a Key Service Centre) are receiving allocations of fewer than 200 homes, despite having substantially larger allocations over the past two local Plans. Indeed, an allocation of 200 homes at		

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				Mulbarton, would be larger than the majority of settlements in the Main Town and Key Service Centre tiers of the GNLP hierarchy, which include a broader range of facilities, variously including rail connections, secondary schools, libraries, a range of retail services and employment opportunities. Three broad approaches to the distribution of development in the VCHAP are tested in the Sustainability Appraisal, which concluded that the approach being taken is a reasonable option. The respondents have questioned the viability of smaller sites of 15-50 dwellings to deliver affordable housing and other infrastructure, but have not substantiated this with any reference to the many current (2015) Local Plan allocations which fall into this category, or to the viability evidence that supports the GNLP. Indeed, this argument runs counter to the NPPF, which set the level at which affordable housing can be sought at 10 dwellings and also seeks a proportion of sites to be less than 1 hectare, specifically to aid delivery, which in most rural locations will equate to sites of less than 35 dwellings. The fact that the site can only be accessed via Bluebell Road does not appear to be disputed by the respondents, however the appropriateness of adding 200+		

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				dwelling to a single point of access that already serves approximately 200 dwellings is disputed by the Highways Authority, which had initially proposed that the site be limited to less than 35 units.		
QUESTION 89: Preferred Site - SN2038, South of Rectory Lane, Mulbarton	1679	Object	Where will the children from the new houses on this preferred site go to school? Where will the families access medical facilities? Development on this site will simply add to the cumulative impacts on the village of Mulbarton, already unacceptable. Having drawn the settlement boundary, why is this proposed development outside of it? • The site extends into the countryside, outside the built area, adding yet more cumulative impact onto the fast disappearing but highly valued rural area surrounding Mulbarton. • It is contrary to the adopted Mulbarton Neighbourhood Plan - not well located in terms of access to services and facilities. Access would be via a narrow road through an existing estate Extra traffic generated would need to exit the site through the existing estate onto Long Lane, and joining the 20mph restricted zone around the primary school. There is already a deficit of amenity land on the Bluebell Road estate. The proposed	Regarding the cross-reference to the Parish Council representations on Q1 to Q4, the strategic issues are dealt with in the responses to those questions. In terms of the elements of the Parish Council's representations that deal with the specific impacts of particular sites, the Council would note that there is ongoing dialogue with Norfolk County Council in terms of Highways infrastructure and school capacity, and with the local NHS Integrated Care System team, regarding Primary Care. Specifically, taking into account falling rolls and out of catchment pupils, there is not considered to be a capacity issue with Mulbarton Primary School. In addition, planned improvements are in place for Hethersett High School, as part of the strategic level growth happening there. In terms of open space provision, new development is not expected to rectify previous deficiencies; however, new sites of 15+ dwellings are expected to deliver new provision in line with the Council's current open space standards. Regarding the current Development	844	Consider the need for the allocation policy to require a design which prevents further development accessed from the Bluebell Road, and consequently further encroachment east.

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			housing density of 23 units per hectare would not reduce the overall density of the estate. The design of the site should be laid out to prevent any further expansion eastward. Mulbarton School is FULL The local secondary school at Hethersett is at present oversubscribed Medical facilities with the village are already overwhelmed Traffic pressures on B1113.	Boundary/ Settlement Limit, this was defined in the 2015 South Norfolk Site Specific Allocations and Policies Document, which covers the period to 2026. Part of the process of preparing the VCHAP is reviewing the Settlement Limits, making amendment to reflect any changes since that boundary was last defined and to accommodate allocations necessary for the additional development requirements across Greater Norwich to 2038. It is acknowledged that this site extends into the countryside; however this is true (to a greater or lesser degree) of all of the sites put forward for consideration around Mulbarton, and across the Village Clusters more generally. Whilst the GNLP aims to maximise the (re)use of brownfield sites in Norwich (and other settlements, where they exist), the scale of development required cannot be accommodated without the use of greenfield land. However, under the GNLP the level of growth proposed in the Village Clusters (9%) is significantly lower than the percentage of the population that already lives in those parishes (25%). The Council is aware that Mulbarton Neighbourhood Plan (Policy HOU1: Location of New Residential Development) seeks sites of 5+ dwellings to be located in the 'Heart of the Village' around The Common.		

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				However, the assessment of the sites that might meet this requirement raised a number of other concerns which are detailed in the site assessments, including heritage, landscape and access/accessibility concerns. The site assessment for this site shows that it is within walking/cycling distance of a number of local services/facilities, with the primary school, GP surgery, village hall and recreation ground, local supermarket and bus services to Norwich within 1km. The Highway authority is satisfied that limited development can be safely accessed via Bluebell Road; however consideration will be given to requiring a layout which prevents further development from this access/encroachment further east. Similarly, the scale of development across the cluster and the impacts on the B1113 have not been raised as a concern by the County Council. In terms of the density of development, it is noted that Mulbarton Neighbourhood Plan (Policy HOU3: Density), seeks development which 'should reflect the overall character of Mulbarton and take account of its rural setting', but also 'on any given site should be consistent and compatible with the existing and prevailing density in that local context'. As the prevailing density and local context includes the		

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				Bluebell Road estate as well as lower density development on The Rosery, the net density of this site is considered to be broadly in keeping with the policy.		
QUESTION 89: Preferred Site - SN2038, South of Rectory Lane, Mulbarton	1523	Object	Providing the necessary access and associated pavement infrastructure, visibility splays, etc, would require removal of hedgerow and probably tree(s) that form important habitat and edge-of-village landscape feature. This is a constraint that needs to be considered with regard to the viability and deliverability of this site, as well as its acceptability in material planning terms. Further, the development outlined would represent a form and density of development that is not in-character with that along The Rosery. These concerns are further to any concern regarding impact on the highway network in the locality.	The respondent appears to be assuming the site will be accessed from The Rosery, when the Regulation 18 document states that the site will need to be accessed from Bluebell Road. As such, this will require the removal of a short length of hedge, the width of the current carriageway and footways, at the end of Bluebell Road, which are not considered to raise the landscape, habitat and deliverability issues suggested by the respondent. The allocation would be a modest extension of the existing Bluebell Road estate, likely to be at a similar or lower density to that development. The size of the site gives the scope to consider lower densities at southern (The Rosery) end of the site.	843	Consider the need for the allocation policy to specify lower densities at the southern end of the site.
QUESTION 89: Preferred Site - SN2038, South of Rectory Lane, Mulbarton	448	Object	This development area is poorly accessible, out of keeping with the area and on land already prone to flooding. The local services are already at capacity and the Bluebell road is often already obstructed by parked traffic causing hazards. The local wildlife and flora would be severely disrupted. As SN0315 has already been excluded as	The assessment of the site has determined that it is within reasonable walking/cycling distance of a variety of local services and facilities, with the primary school, GP surgery, village hall and playing fields, local supermarket and bus services to Norwich all within 1km of the site. The site is of a modest scale compared other estate-scale development in the immediate vicinity and abuts the Bluebell Road estate, which is of a similar (if not higher) density to the proposed allocation.	842	Update as necessary to reflect any ongoing dialogue with service providers, including Norfolk County Council Highways and Children's Services and the NHS Integrated Care Systems team. Allocation Policy for the site to include retention of the trees

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			suitable, how can this small part of SN0315 be annexed off it and classed as viable? This just sounds like some underhanded scheme and the thin end of the wedge to force poorly planned developments forward.	Whilst parts of SN2038 are at flood risk, these are at the northern end of the site, and outside of the proposed allocation; no concerns have been raised by the LLFA or the Environment Agency. In any event, the VCHAP will be supported by a Stage 2 SFRA to identify any potentially vulnerable sites. There has been ongoing dialogue with service providers and no objections have been raised to the allocation of 35 homes at this sites; this has included Norfolk County Council Highways, who do not object to a modest level of further development accessed from Bluebell Road. The site is currently an agricultural field, although there are a number of trees on The Rosery boundary. The site is not considered to be of particular wildlife/biodiversity importance, although appropriate surveys and 'net gain' will be required and the Council will require retention/protection of the trees through the allocation policy. Site SN0315 is a new settlement/urban extension-scale site of 130+ hectares. Development of such a scale would need to be considered through the GNLP or any successor strategic document. It should be noted, in this location SN0315 is actually separated from Mulbarton by the remainder of SN2038, which has		on The Rosery boundary.

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				also been rejected through the VCHAP process.		
QUESTION 89: Preferred Site - SN2038, South of Rectory Lane, Mulbarton	76	Object	Firstly, this would mean more development to the south of the village, further development should aim to address the imbalance and put the common at the centre of the village again. Secondly, the naming of the proposal is misleading. This development would be better named north of The Rosery, as it will not attach to Rectory Lane. Thirdly, the field and footpath around the field is used by many, including local walking groups, development would prevent use of the whole path. Finally, Bluebell Road is poorly lit for further traffic.	The assessment of sites in Mulbarton reflects the land put forward for consideration by site promoters, to ensure sites are deliverable. Those sites to the north of the village have been rejected for a variety of reasons set out in the detailed site assessments, including heritage, landscape and accessibility issues. The wider SN2038 site covers an area of land from The Rosery to the south to Rectory Lane to the north; however, the Council acknowledges that the site title would be better amended to reflect the part of the site which is proposed for allocation, east of Bluebell Road and north of The Rosery. Whilst the current field margins may be used informally for walking, the only Public Right of Way on the County Council's definitive map runs further north, from the northern end of Stile Close, and is not affected by this site. The Highways authority has confirmed that a modest extension to Bluebell Road is acceptable.	841	Update the site name to reflect the part of the site which is considered suitable for allocation.
QUESTION 89: Preferred Site - SN2038, South of Rectory Lane, Mulbarton	1959	Comment	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. Major development - If surface water discharges within the watershed catchment of the Board's IDD, this	Comments noted.	731	No action required.

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			discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuD			
QUESTION 89: Preferred Site - SN2038, South of Rectory Lane, Mulbarton	169	Object	Outside the settlement boundary. Access from Bluebell Road is directly on to Long Lane which is absolute chaos and extremely dangerous on any school day. Doctors can't cope with their existing residents, let alone any more - see statement on their social media page.	The Highway authority has raised no objection in principle to access from Bluebell Road, subject to restriction on numbers of dwellings. Clarification on the specific highways requirements for the site(s) will be sought and taken into account as part of the finalised policy. With regards to infrastructures, the Council is engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process It is noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.	730	No action or change required.
QUESTION 89: Preferred Site - SN2038, South of	2199	Comment	Rating: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required.	NCC Ecologist comments noted; Green no major ecological constraints identified from desk-top search.	724	Policy wording to ensure that the loss of priority hedges are avoided, minimised and

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Rectory Lane, Mulbarton			Site comprises part of an agricultural field on the edge of the village. Hedges are a priority habitat so losses should be avoided, minimised and as a last resort, compensated for. No other priority habitats are identified (see MAGIC). Site within amber habitat zones for great crested newts, and in SSSI IRZ but residential development does not trigger consultation with Natural England.			as a last resort, compensated for.
QUESTION 90: Should any rejected sites be allocated?	1685	Comment	Agree with the reasons given for rejection, and: • Outside the development area and settlement boundary for the parish • Contrary to the Mulbarton Neighbourhood Plan • Further impact on medical and educational provision in Mulbarton. • Added traffic to the already congested B1113 to access Norwich. • Limited access to area due to single track road, which has a width of 2.8 metres, has a weight limit of 7.5T and has dwellings either side. • Access to either B1113 or A140 is poor and both roads running at capacity levels without taking into consideration extra housing at Long Stratton, Hempnall and Swainsthorpe.	Comments noted. The Council would note that Norfolk County Council Highways and Childrens' Services have not raised 'in principle' objections to development in the Mulbarton cluster in terms of the impact on the B1113 and school capacity (although objections may have been raised to specific sites re site access and access to services). The Council is also in ongoing discussions with the NHS Integrated Care Systems team. Issues around the suitability of Rectory Lane are covered in the site assessment.	852	No action required.

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QUESTION 90: Should any rejected sites be allocated?	1684	Comment	Agree with the reasons given for rejection, and: • Diocese objected to the previous planning application re the footpath though the church yard and the possible tarmac and lighting being added which are totally out of context for the village and would be detrimental to Mulbarton Common and the conservation area. • Over 650 residents signed a petition opposing the previous development on this site. • Doctors Surgery was not backed by the Humbleyard Practice for Oakley Park this will probably be no different as the issue is a shortage of doctors, not facilities, at present. • Application SN2020/1499 for three dwellings was recently refused. NCC commented: "there is a possibility that human burials may be present within the development area. In addition, churches were normally located within or adjacent to medieval or earlier settlements and manorial centres, the remains of which may lie within the development area. Likewise, common edges were popular settlement sites from the late Anglo-Saxon period onwards. Consequently there is potential that heritage assets with archaeological interest (buried archaeological remains) will be present at the site and that their significance will be adversely affected by the proposed	Comments noted. The Council would note that Norfolk County Council Highways and Childrens' Services have not raised 'in principle' objections to development in the Mulbarton cluster in terms of the impact on the B1113 and school capacity (although objections may have been raised to specific sites re site access and access to services). The Council is also in ongoing discussions with the NHS Integrated Care Systems team. A number of the other issues relating to the previous application (including access via the churchyard and deliverability of the GP surgery site) are acknowledged in the site assessment and/or in response to the site promoters representation on this site.	851	Consider whether the site assessment for this site needs to be reinforced re. the impact on archaeology.

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			development.” • Unacceptable impact of another road junction onto the B1113 near Catbridge Lane. • Cumulative impact on medical and educational provision in Mulbarton. • Added traffic to the already congested B1113 to access Norwich. • Lack of access to local amenities.			
QUESTION 90: Should any rejected sites be allocated?	1683	Comment	Agree with the reasons given for rejection, and: • Totally inappropriate in the context of the Village Clusters Plan objectives. • Cumulative impact on medical and educational provision in Mulbarton. • Added traffic to the already congested B1113 to access Norwich. • Lack of access to local amenities	Comments noted. The Council would note that Norfolk County Council Highways and Childrens' Services have not raised 'in principle' objections to development in the Mulbarton cluster in terms of the impact on the B1113 and school capacity (although objections may have been raised to specific sites re site access and access to services). The Council is also in ongoing discussions with the NHS Integrated Care Systems team. The issue of scale is already noted in the site assessment.	850	No action required.
QUESTION 90: Should any rejected sites be allocated?	1682	Comment	Agree with the reasons given for rejection, and: • This site is amenity land adjacent to the Lark Rise estate, and should not be considered as available, suitable, or deliverable.	Comments noted. The Council would note that Norfolk County Council Highways and Childrens' Services have not raised 'in principle' objections to development in the Mulbarton cluster in terms of the impact on the B1113 and school capacity	849	No action required.

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			• Cumulative impact on medical and educational provision in Mulbarton. • Added traffic to the already congested B1113 to access Norwich. • Lack of access to local amenities. • No access to south of plot and north access/egress not to Highways standards. • No access to existing infrastructure. • Flood risk.	(although objections may have been raised to specific sites re site access and access to services). The Council is also in ongoing discussions with the NHS Integrated Care Systems team. Issues of site access, flood risk, townscape etc. are already noted in the site assessment.		
QUESTION 90: Should any rejected sites be allocated?	1680, 1681, 1686, 1687	Comment	Mulbarton PC agrees with the Council's decision to reject the listed sites for the reasons given in answer to Questions 1 to 4, Question 88, and the following reasons: Impact on the already full Mulbarton Primary School and on the local secondary school. Medical facilities with the village are already overwhelmed. Current transport infrastructure cannot support more cars using the already congested B1113 with its bottleneck at the Harford Bridge junction.	Comments noted. Strategic issues are dealt with in the responses to Q1 to Q4. The Council would note that Norfolk County Council Highways and Childrens' Services have not raised 'in principle' objections to development in the Mulbarton cluster in terms of the impact on the B1113 and school capacity (although objections may have been raised to specific sites re access to services). With regard to the B1113/A140 junction at Harford Bridge, the current KES 2 employment allocation (which is proposed to be carried forward into the GNLP, taking into account the planning permission for the site), has planned improvements for this junction. The Council is also in ongoing discussions with the NHS Integrated Care Systems team.	848	No action required.

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QUESTION 90: Should any rejected sites be allocated?	1348	Object	We wish to see SN0496REV allocated within the VCHAP. The site provides a suitable, available and deliverable opportunity to supplement housing supply within a sustainably-located settlement. It can accommodate approximately 60 dwellings, including bungalows, a care home for elderly care and a doctors' surgery. Alternatively, up to 95 dwellings could be provided without the care home and doctor's surgery sites. Social benefits of site will outweigh any harm to local heritage. Site is well contained and will be well screened from public view. Not considered that landscape/heritage impacts are so significant that they should preclude development of site. It is otherwise accessible, well located in proximity to services and has no other technical constraints that would prevent its development.	The site of SN0496REV has previously been part of a refused planning application of a more substantial 135 unit scheme. Whilst the site has been reduced in scale, approximately 50% of the land removed was shown as parkland and orchards on the indicative masterplan that accompanied the application. The part of the site that has been retained is the area closest to the Grade II* listed Church and the conservation area. The site access is also opposite the Grade II listed Paddock Farmhouse, at the northern extent of the Conservation Area. The impact on the identified heritage assets was considered in detail in determining the planning application. Whilst the harms were considered to be less than substantial, and the impact on each asset individually was moderate, the cumulative impact was given greater weight in the planning balance and resulted in this being a primary reason for refusal. Other than reducing the northern extent of the site, the site promoters have not indicated why they consider the revised site to overcome the heritage concerns. Indeed, one of the site promoter's options introduces a care home on the southern border of the site, potentially increasing the scale and bulk of development. It should be noted that the care home itself would count as new dwellings, at a ratio of 1 dwelling for every 1.8 care	847	No action required.

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				units. Consequently, a relatively modest new build care home of 25 bedrooms would equate to 14 dwellings. As such, both of the site promoter's scenarios are likely to be above the 12 to 50 dwellings sought in the VCHAP. Those sites at the higher end of the scale of VCHAP allocations have been made where they can provide an additional public benefit that cannot be delivered by a smaller scale site. In view of this, the site promoters have included a potential new GP surgery site within their proposals; however, this element was withdrawn from the 2018 planning application, due to lack of support from the NHS and the local GP Practice to deliver a new surgery. The site promoter's do not appear to have addressed this issue in their Regulation 18 submission, or included a delivery mechanism for a surgery. As a purely housing scheme of 95 units, the site would be delivered at 13 dwellings/hectare, which raises concerns in terms of the efficient use of greenfield land. There are also concerns over how well integrated the site would be with the village. The Highway authority would require improvements at the main site access and to the footways leading back to the village (which has implications in terms of impacts on the conservation area). However the most direct		

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				pedestrian access would be from the south of the site, using the Public Right of Way that runs via the churchyard. This does shorten the walking distances to many local facilities, however at the time of the planning application there was considerable doubt as to whether any upgrades to the width and surfacing of the path could be achieved, or the removal of a stile, that would make the route more attractive for regular use and this issue does not appear to have been resolved in the current submissions. For the reasons set out in the site assessment, the Council considers the preferred site in Mulbarton to have less impact in terms heritage and landscape, have better connectivity to local services/facilities, as well as retaining the other benefits listed by the promoter of this site, such as housebuilder interest, ability to achieve a mix of dwellings and location within the Cambridge-Norwich Tech Corridor.		
QUESTION 90: Should any rejected sites be allocated?	1576	Object	Comments in support of rejected site SN2087: Should be reconsidered as a preferred site to deliver 14 dwellings; and amendments offer improved access and landscaping via inclusion of additional land to the east of the previously promoted site.	The Council notes the additional land that has been promoted in response to the comments made in the site assessment. The Council considers this to be a revision to the original area that was promoted and the most appropriate course of action is to undertake a new site assessment of the site.	786	A new site assessment, including technical consultation, should be completed for the revised site area.

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QUESTION 90: Should any rejected sites be allocated?	1431	Comment	Comments in support of rejected site SN4082: Connects to the existing settlement boundary; proposed reduction in scale of site to 1-3 dwellings - minimise landscape impacts, the rural character and the Norwich Southern Bypass Landscape Protection Zone; site within 1.8km of more than 3 core services and 3km of school and employment areas; and site is located on two popular walking and cycling routes.	The Council notes the proposed reduction in the scale of SN4082 in order to address concerns raised in the original site assessment. The reduction in scale would result in a significantly lower number of dwellings (1-3) and would form an extension to the settlement limit rather than an allocation. Whilst this would address in part the previous landscape concerns the Council maintains that development of this site would have an adverse landscape impact and the site would not represent a suitable addition to the settlement limit in this location. The reduction in site area also fails to address a number of other concerns highlighted in the site assessment including the concerns about the local highway network and the connectivity to local services and facilities. The reduced site area also lies immediately above the approved Orsted Hornsea 3 cable route. For all of these reasons the Council remains of the opinion that this site is not a suitable extension to the settlement limit.	785	No action required.
QUESTION 90: Should any rejected sites be allocated?	651	Comment	Considers that 'rejected' site (SN4086) should be allocated in addition to currently preferred sites SN0204, Swaderston & SN2038, Mulbarton. This site is suitable (sustainable) for allocation within the VCHAP for the reasons outlined within the Supporting Statement that accompanies this	The Council acknowledges the comments made within the representation however the Council is still of the opinion that SN4086 is unsuitable due to highway safety and distance to facilities//services.	709	No action or change required.

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			submission and certainly when assessed against 'Objective 3' of the VCHAP.			

Needham, Brockdish, Starston and Wortwell

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QUESTION 91: Settlement Limit	1133	Support	Starston's limit is appropriate. Starston's heavily trafficked, narrow roads, most of which have no pavement, are used by HGVs and others travelling between A143 and A140. Up to 600 vehicles an hour enter the village (traffic count, village centre 2018). expressed road safety concerns. (Q1 what do you want for Starston? Neighbourhood Plan consultation/ analysis 17/11/18) Only agile adults capable of using PROW / Permissive Paths can walk to Harleston.	Council acknowledges the comments made in relation to Starston; agree that no alterations are proposed to the existing Settlement Limit. The Council acknowledges the highway safety concerns within the Parish. In response to this, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. These comments will help inform the plan and provide any mitigation measures. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies.	711	No action or change required.
QUESTION 91: Settlement Limit	813	Support	Agreed.	Support and agreement to SL extension noted.	710	No action or change required.
QUESTION 92: Preferred Site - SN2036, Land at the junction of High Road and Low Road, Wortwell	2200	Comment	Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. The site is in a SSSI IRZ and development of 10 units or more would require consultation with Natural England. Applications for planning consent should	Comments noted.	858	Given the constraints on the site, consider reverting to the existing Local Plan (allocation WOR 1) wording, for 'approximately 5', which would give scope for a limited increase in numbers, should a

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			be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			suitable proposal come forward, but would remove the requirement to consult directly with Natural England re the SSSI IRZ.
QUESTION 92: Preferred Site - SN2036, Land at the junction of High Road and Low Road, Wortwell	2176	Comment	The existing highway arrangement in vicinity of the site presents with narrow carriageway and footway at Low Road. The Low Road junction with High Road does not conform to current safety standards. Improvements would be required to enable the Highway Authority to support development at this location. The Highway Authority is satisfied that appropriate access can be achieved and would require the following: • Improvement of the Low Road junction with High Road to provide visibility splays within public highway, of 2.4m x 59m in both directions. Note: The give way line will need to be moved forwards to achieve this and kerb realignment will be required at both sides of the junction. • The site shall be accessed at Low Road, which shall be widened to 5.5m between the access(es) and the junction with High Road. • Visibility from the site access(es) at Low Road shall be provided in accordance with the requirements of Manual for Streets. • Forward visibility to the site access(es) at Low Road shall be provided in accordance	Comments noted. Concerns have been raised about the suitability of this site for 10 dwellings, particularly in terms of the character of the area and the impact on nearby heritage assets. It is possible that the required highways works could exacerbate these concerns in terms of urbanising this part of the village. As such, it may be more appropriate to retain a smaller allocation for the site, and ascertain whether the highways requirements would be different for a site of 'approximately 5 dwellings'.	857	Consider reverting to the existing Local Plan (allocation WOR 1) wording, for 'approximately 5', which would give scope for a limited increase in numbers, should a suitable proposal come forward; confirm with the Highway Authority what improvements/standards would be required for development below 10 dwellings.

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			with the requirements of Manual for Streets. The footway at the Low Road frontage of the site shall be widened to a minimum of 1.8m. Please note the highway requirements will necessitate removal of a mature tree. Subject to inclusion of the above requirements in the draft policy, the Highway Authority would support allocation of 10 dwellings.			
QUESTION 92: Preferred Site - SN2036, Land at the junction of High Road and Low Road, Wortwell	2151	Comment	Few or no constraints. Standard information required at a planning stage. The site is adjacent to a flow path. This must be considered in the site assessment. Assessment: Green	Comments noted.	856	Ensure the site assessment adequately reflects the adjacent flow path.
QUESTION 92: Preferred Site - SN2036, Land at the junction of High Road and Low Road, Wortwell	2045	Comment	Whilst there are no designated heritage assets within this site, the grade II listed Bell Inn lies opposite this site. Another grade II listed property, known as Premises of Mr Brown, lies to the north of the site. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and determine if allocation of	Comments noted. The site is currently allocated in the 2015 Local Plan. A Heritage Assessment will be undertaken for the site, taking into account the listed buildings in the vicinity and the role the site plays in the gap between High Road and Low Road.	855	Undertake a Heritage Assessment for the site and reflect any relevant outcomes in the allocation policy for the site.

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			this site is appropriate, and if it is what mitigation may be required. This is an important rural gap site in the village and consideration should be given to that role in combination with the setting of the heritage assets.			
QUESTION 92: Preferred Site - SN2036, Land at the junction of High Road and Low Road, Wortwell	1960	Comment	Within the Waveney, Lower Yare and Lothingland IDD. A Board Adopted Watercourse is located to the east of the proposed site boundary. Byelaw 3 applies to any proposed discharge of surface water from the proposed site. All other Board Byelaws will also apply to this development.	Comments noted.	854	Requirements to be taken into account in any subsequent planning application.
QUESTION 92: Preferred Site - SN2036, Land at the junction of High Road and Low Road, Wortwell	818, 1457, 1659	Mixed	Concerns raised in relation to the increase in numbers from the 'approximately 5' dwellings in the current Local Plan allocation (WOR1) to 'up to 10 dwellings' in the Regulation 18 consultation. Issues raised include: 1. Impact on the character of the area at the heart of the village, including on the Grade II listed Wortwell Bell opposite, taking into account how development has historically evolved in the vicinity (density, plot size, informal layout), and the rural gap between development in Low Road and High Road. 2. Flood risk on the site and the	1. The Council acknowledges that the site is in a sensitive location in the centre of the village, with the Grade II listed Wortwell Bell opposite and additional listed properties both north on High Road and further south on Low Road. However, a development of 5 dwellings on the site would equate to 12.5 dwellings/hectare, half the density of other sites promoted in the Regulation 18 VCHAP. The site is an irregular shape (to avoid those areas identified as being at flood risk), with the potential access offset to south and a Public Right of Way bisecting the site. Development in the immediate vicinity is of mixed densities, ages and styles, and there is a clear gap south of the site,	853	Given the constraints on the site, consider reverting to the existing Local Plan (allocation WOR 1) wording, for 'approximately 5', which would give scope for a limited increase in numbers, should a suitable proposal come forward.

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			surrounding area, including the adjoining highway. 3. Deliverability of the site, which has not been developed since it was included in the 2015 Local Plan.	separating the housing in Low Road. 2. The site itself is currently outside of the areas of identified flood risk, however any planning application would need to demonstrate that it will not worsen the situation on- or -off-site. 3. Whilst the site has not been delivered to date, it is a modest sized site which could realistically be developed within the timescale of the current allocation (to March 2026). In addition, the site promoters have clearly delayed progressing a site, awaiting the outcome of the current Local Plan process.		
QUESTION 93: Preferred Site - SN2065REV, Land north of High Road and Harmans Lane, Needham	327	Object	Summary of comments submitted in relation to SN4069SL in Brockdish: Site has been submitted without reference to flooding; and site lies 6km from primary school therefore outside walking distance.	The Council notes these comments and believes that they relate specifically to Question 94. The Council acknowledges the concerns raised about this site and following receipt of the technical consultee comments further discussions have taken place with the Lead Local Flood Authority to determine the suitability of this site for inclusion in the VCHAP. It was noted that there is a significant active surface water flow path within close proximity of this site and whilst it may not directly impact on the site itself as a result of its proximity the LLFA considers this site unfavourable for development. The Council has also been made aware that active flooding of properties within proximity of this site occurs. As such it is considered appropriate for the Council to review	782	Review of the site to determine whether this site is an appropriate addition to the settlement limit following discussions with the Lead Local Flood Authority. This should also consider the distance of the site to the local primary school.

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				the inclusion of this site within the VCHAP. Concerns about the distance to the local primary school are noted, as are the reasons this was considered to be acceptable at the initial site selection stage of the VCHAP process. However, on balance the Council considers that this should also be reconsidered as part of the overall review of the site.		
QUESTION 93: Preferred Site - SN2065REV, Land north of High Road and Harmans Lane, Needham	2017, 2046, 2201	Comment	Technical comments relating to environmental matters for SN2065REV: This site is within 250m of an existing landfill which could impact on the amenities of residents - odour, noise, dust, pests - regard should be had to para 182 of the NPPF; Potential impact of development upon the significance of identified heritage assets (Grade I Church of St Peter, Grade II boundary wall and Grade II Ivy Farmhouse); HIA required to assess the impact of development on the listed buildings and if appropriate identify mitigation measures - this should inform policy requirements; Green ecological rating based on desktop research - surveys and biodiversity enhancement required in accordance with policy; Loss of priority habitat (hedgerows) should be avoided;	The Council notes the comments of the technical consultees. With regards to the comments relating to the proximity of the site to an existing landfill site the Council should seek further assurances from the Environmental Protection Team regarding any reported incidences from local residential properties. The preferred allocation site lies between existing residential developments therefore it may be reasonably assumed that impacts arising from new development would be similar to those already in existence. The identification of these heritage assets by Historic England is noted. As requested by HE the Council will need to undertake a Heritage Impact Assessment to assess the impact of development on the significance of these heritage assets however the Council does note the intervening development between the heritage assets and the preferred allocation site and considers the impact of development on this site is likely to be	777	Liaison with Environmental Protection to establish whether the landfill site has resulted in issues for existing residents in close proximity to SN2065REV. Undertake a HIA to assess the impact of development on the identified heritage assets, possible mitigation measures and inform policy wording.

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			Site within amber/green zone for GCNs; and site within SSSI IRZ but residential development does not trigger NE consultation.	minimal. The comments of the County Ecologist are welcomed and provide reassurance that development on the site would be achievable without an adverse ecological impact arising. Any future planning application on the site would be required to be accompanied by the appropriate surveys and mitigation strategies that have informed the detailed design of the site, and consideration should also be given to the inclusion of Biodiversity Net Gain in accordance with emerging legislation.		
QUESTION 93: Preferred Site - SN2065REV, Land north of High Road and Harmans Lane, Needham	1961, 2021, 2147	Comment	Technical comments relating to water management submitted in response to Question 93 (SN2065REV): Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment; a riparian watercourse is located to the north of the proposed site and feeds into a Main River; any surface water discharge into the watershed catchment of the Board's IDD should be in accordance with the non-statutory technical standards for SuDS; Site is within FZ3 and would require a site specific FRA at the planning application stage; and LLFA - green rating - the site is adjacent to	The Council notes the technical comments that have been submitted regarding water management issues on site SN2065REV, including those of the Environment Agency concerning an area of the site falling within an area identified as being within FZ3. The promoter of the SN2065REV has previously reduced the scale of the site in order to address the concerns raised about the presence of FZ3 however a small area of FZ3 remains within the northern section of the site. The preferred allocation site forms part of a larger landholding with the current boundaries drawn to reflect the depth of the existing plots immediately adjacent to the north east of the site. However, the site lies between two small existing areas of development with those dwellings to the south west currently included within a shallower settlement limit - it may therefore be	776	Review proposed modified site boundaries to determine whether it is possible/necessary to remove the area of FZ3 from the preferred allocation site in its entirety. Consideration of policy text to include reference to the modelling required by the LLFA.

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			a flowpath and this should be considered in the site assessment.	appropriate to reduce the proposed boundaries of the site and exclude the identified areas of FZ to the north of the site and align the site with the existing settlement limit. This may impact on the number of dwellings that could be accommodated on SN2065REV. The Council has also noted the presence of the surface water flowpath to the north of the site (identified as a watercourse) however this does not significantly affect the site and it is considered that a suitable drainage strategy could be designed to address on-site drainage. The LLFA has not raised an objection to the development of this site in subsequent discussions however the LLFA have advised that modelling would be required for the nearby watercourse to ensure that discharge into this would not increase flood risk downstream. Consideration to the inclusion of this requirement within site specific policy text should be made.		
QUESTION 94: Preferred Site - SN4069SL, Land south of Scole Road, Brockdish	2047	Comment	Heritage comment submitted for SN4069SL: Site lies entirely within Brockdish Conservation Area and opposite Grade II listed White House Farmhouse; and a HIA is required to assess the impact of the proposed development on these heritage assets, identify mitigation and enhancement measures where appropriate and inform policy text.	Previously the site was located within the Brockdish Conservation Area however a review of the boundaries in 2018 led to the removal of this site from within the Conservation Area. However the site lies adjacent to the Conservation Area and the impact of development on the significance of the CA should be included within the HIA for this site.	781	Consider undertaking a Heritage Impact Assessment to determine the impact of development on both the identified listed building and Brockdish Conservation Area, identify mitigation measures (if appropriate) and

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						inform specific policy text where relevant.
QUESTION 94: Preferred Site - SN4069SL, Land south of Scole Road, Brockdish	1962, 2112	Comment	Technical comments relating to surface water management for SN4069SL: Within the Waveney, Lower Yare and Lothingland IDD; There are a series of riparian watercourses to the south of the proposed site; Byelaw 3 applies to any proposed discharge of surface water from the proposed site - all other Board Byelaws will also apply to this development; LLFA green rating; In proximity to a large number of internal flood events associated with Grove Road - this must be considered within the site assessment; On-site flood risk contributes to an adjacent major off-site flowpath - this must be considered within the site assessment; and a large proportion of the site is not at risk of flooding and has the potential to be developed.	These comments are noted. It would be the responsibility of the developer to ensure liaison with the appropriate third party to ensure that an appropriate drainage strategy is incorporated into any forthcoming scheme on the site. The proximity of the site to a significant off-site flow path is acknowledged, as are the comments of the Lead Local Flood Authority, which highlight the proximity of this site to a significant off-site flow path. Subsequent discussions with the LLFA have raised concerns about the development of this site due to the number of reported off-site internal flood events that have occurred in close proximity to the site. Whilst a technical drainage solution may be achievable on the site the Council will need to consider whether this site remains a suitable extension to the existing settlement limit following these discussions.	780	Review whether this site is suitable for a settlement limit extension following continued discussions with the LLFA about the local off-site flood events.
QUESTION 94: Preferred Site - SN4069SL, Land south of Scole Road, Brockdish	328	Object	Support for the rejection of promoted sites SN0385 and SN0464 in Brockdish.	The Council acknowledges that the Parish Council supports the rejection of these sites within the VCHAP process. The Council does not consider it	779	No action required.

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				necessary to review the inclusion of these sites for allocation.		
QUESTION 94: Preferred Site - SN4069SL, Land south of Scole Road, Brockdish	2202	Comment	Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Site comprises small field at edge of settlement. Hedges are a priority habitat so losses should be avoided, minimised and as a last resort, compensated for. No other priority habitats are identified (see MAGIC). Site within amber habitat zones for great crested newts (pond adjacent). Site not within a SSSI IRZ. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain	NCC Ecologist comments noted.	717	Policy wording to include: Hedges are a priority habitat so losses should be avoided, minimised and as a last resort, compensated for. Site is within amber habitat zones for great crested newts (pond adjacent).
QUESTION 95: Should any rejected sites be allocated?	820, 1660	Comment	Rejected site SN4063SL. Support for the site based on: - Providing family homes which are needed in the village on a site with good access to the village hall and playing fields. - a site on the frontage, shielded by the existing trees would be preferable (and is now promoted) and would provide a deliverable and logical complement to the existing pattern of development with direct access onto High Road.	The reasons for rejecting SN4063SL remain valid, in that the site has a poor relationship to the existing linear pattern of development on High Road, sits noticeably higher than the frontage development (with consequent landscape concerns) and appeared to be accessed via a relatively narrow track between existing dwellings. The site was also linked to the provision of a dedicated 'dog walking area' on adjacent land; however the scale of the development proposed would not be sufficient to have an allocation policy	860	Consider the revised proposal (Ref SN5029) to bring this site forward in conjunction with land south of High Road (frontage of SN2121REVA), for an allocation-scale development of 12 dwellings.

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			- provision of a dedicated 'dog walking area' for the village (supported by local consultation).	which would link housing provision with the public open space. During the Regulation 18 consultation the site promoter submitted an alternative proposal for the housing to be developed on the High Road frontage, Ref SN5029, to achieve the benefits listed in the submission.		
QUESTION 95: Should any rejected sites be allocated?	800, 1661	Comment	Rejected site SN2121REVA Support for the site on the basis of: - The western boundary forms a natural extension to the village. - The site will increase the choice and location of sites within the village and is being proposed for four bungalows which would suit local needs. - It is considered that the highways requirements can be met. - No sewer crosses the site as previously suggested by AWA. - The majority of the site is not affected by flood risk.	This site has also been the subject of a recently refused planning application for four dwellings (2021/2140), the main reasons for refusal being that the site is outside the current Settlement Limit would be an extension of linear development along High Road, which is recognised as a vulnerability in South Norfolk Landscape Character Assessment. Prior to the Regulation 18 consultation the site was assessed as a 1 hectare plot for up to 25 dwellings. As such, it was considered to: introduce uncharacteristic estate-scale development on the edge of the settlement; extend development into an area of flood risk; and require significant highways visibility splays at the site entrance, with the consequent loss of hedging/trees. Following discussions between the site promoter and Wortwell PC, the proposal has been reduced to frontage development only, for approximately four dwellings, similar to the recent planning application (2021/2140).	859	Consider the revised proposal to bring the frontage only of this site forward in conjunction with land north of High Road (submitted during the Regulation 18 Consultation Ref SN5029), for an allocation-scale development of 12 dwellings. Confirm with the Highways Authority whether a crossing point is still required for the level of development now proposed.

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				Consideration of the planning application did not raise any fundamental concerns from a highways perspective (and the site could potentially share an access with the three recently constructed dwellings immediately to the east). Frontage only development also removes the area at flood risk from the site. The site would still create linear development on the south side of High Road; however a new site has been submitted on the north side of High Road during the Regulation 18 consultation (Ref. SN5029) and a combined proposal would not extend any further west than the Old School, Wortwell, which represents the last building within the parish, before the open countryside gap to the neighbouring hamlet of Redenhall.		
QUESTION 95: Should any rejected sites be allocated?	510, 1662	Comment	Representations submitted in support of SN2006SL: Infill site for small scale development of 3-4 dwellings; River valley setting (but the entire village is within a RV designation); Development would not impact on- or detract from the meadows opposite the site; Site is set above the road and not liable to flooding;	The Council recognises the support that has been expressed for the development of this site, as well as the planning history of the site which includes the recent dismissal of an outline planning application at Appeal (2019/0911). The current defined settlement limit does not extend as far as SN2006SL and inclusion of this site within the VCHAP would require the introduction of a new area of settlement limit to the north of the existing boundary. The Council maintains that the sporadic housing located in this location is not suitable for a settlement limit and that new development in this	778	No action required.

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			Pedestrian footpath extends into Harleston; Good bus links and on school bus route; Local support including District Member and Wortwell Parish Council; and Suitable location for purchasers seeking a rural setting in close proximity to main road links to larger centres.	location would have an adverse landscape impact, eroding the existing gap which is a characteristic of the rural setting. The Council also notes that although the site was originally promoted for a single dwelling subsequent representations (in addition to the planning application) have indicated that the site would be capable of accommodating in the region of 4 dwellings. Whilst this would represent a more efficient use of land (as required by the NPPF) it would significantly alter the approach into the village from the north. Whilst the Council accepts that the site benefits from reasonable connectivity to the public transport routes and benefits from being located alongside a pedestrian footpath into the centre of village this is not considered to be sufficient to overcome the landscape harm that would arise from the introduction of new development in this location.		
QUESTION 95: Should any rejected sites be allocated?	1632	Comment	Comments relating to development in Starston submitted in response to Question 95: Important to retain a gap between Harleston and Starston; Harleston and Starston complement each other; Support the rejection of SN2001SL; and	The Council recognises the concerns about erosion of the gap between these settlements, as well as the relationship between the settlements in terms of services, facilities and amenities for residents. The Council maintains that SN2001SL is not suitable for allocation for the reasons set out in the initial site assessment. The Council also notes the comments relating to Starston Neighbourhood Plan	775	No action required

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			Concern about the development proposals in Starston NP.	and the support for emerging GNLP Policy 7.5. Starston NP is currently subject to a Regulation 16 consultation and comments relating to the growth of the village as intended by the NP should also be submitted to that consultation for consideration by the Neighbourhood Plan Group.		
QUESTION 95: Should any rejected sites be allocated?	1136	Support	SN2001SL Rejection is appropriate; Cross Road joins Starston's designated HGV route at Railway Hill Due to high traffic volumes and narrow single track roads, (largely without pavements) walking and cycling around the village, amongst large vehicles, can be difficult and dangerous. Lack of agility is more common as we age. 30% of Starston residents are over 65. Just under 10% are aged 0 to 9 (ONS population estimates 2019)	The Council acknowledges the support to reject site SN2001SL .	716	No action or change required,

Newton Flotman and Swainsthorpe

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QUESTION 96: Settlement limit	47, 79, 293, 558, 593, 595, 603, 612, 628, 636, 640, 690, 695, 710, 715, 742, 749, 779, 824, 866, 880, 1052, 1068, 1078, 1097, 1107, 1150, 1165, 1190, 1218, 1229, 1525, 1577, 1586, 1603	Mixed	The following issues have been identified as being of concern in response to Question 96 (changes to the SL): HIGHWAY ISSUES: additional traffic on a very small road (Alan Avenue), the A140 is already a busy and dangerous road, no pedestrian route on Flordan Rd; A140 should not be referred to as a by-pass in the form and character contextual information; SCALE: Not every village needs to be made into a town; the proposed allocation should be considered cumulatively with NEW1 and not in isolation; impact of NEW1 is currently known and needs consideration before further allocations are made; ENVIRONMENTAL ISSUES: impact on countryside; air quality concerns - noise and disturbance resulting from use; nature conservation, wildlife, loss of vegetation; GENERAL AMENITIES: pressure on existing infrastructure (School, Dr surgery, drainage, sewage, waste removal, electricity and communication network): PC object to any further development until the infrastructure is put in place to support it; nearest shops are in Mulbarton or Harford (excluding a corner shop in the village); and concerns about the drainage of rainwater.	The Council considers that these responses to Question 96 (proposed changes to settlement limit boundaries) relate to the principle of new development within the settlement, rather than specific amendments to the existing boundaries. With the exception of the inclusion of any new allocation site the Council is not proposing any additional boundary changes within the Newton Flotman and Swainsthorpe cluster. Having reviewed these comments the Council responds as follows: HIGHWAY ISSUES: The Council has proactively engaged with the Highways Authority about the proposed allocation site (SN4024). In accordance with the agreed site assessment criteria these discussions focused on both the immediate access to the site and the impact of the proposed development on the wider road network. Initial concerns about the feasibility of creating an access into the site have been raised with the promoter of the site who has indicated that third party land would be available to achieve an appropriate second access point to both NEW1 and SN4024 from Alan Avenue. The Council will need to be assured prior to allocation that this proposed solution is both achievable and acceptable in highway terms. The Highways Authority have not raised any concerns about the	527	Confirmation/ evidence to be obtained from the site promoter demonstrating that access into the site(s) can be achieved (via third party land) prior to site allocation; Confirmation from NCC Highways that a proposed second access point from Alan Avenue is an acceptable option in principle prior to site allocation. Consideration to be given in the policy text to the relationship between NEW1 and SN4024, including matters such as connectivity, landscaping and the management of surface water management. Review of existing policy wording for NEW1 to determine whether any amendments are required to this allocation.

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				additional traffic movements on the A140 that would be associated with this development in their responses and whilst the Council recognises the concerns raised it should be noted that the A140 is a main road and the additional number of dwellings proposed will not significantly impact on the flow of traffic on this route. Comments relating to the lack of footway provision along Flordon Road are noted however this is not considered to be a significant consideration in the proposed allocation of the preferred site at Alan Avenue as Flordon Road is not connected to the site and leads in the opposite direction to the key services and facilities within the village. The comments of Newton Flotman Parish Council relating to the A140 being described as a 'bypass' are noted and may be reviewed in future iterations of the contextual information; however, the Council considers that the A140 forms a boundary to the settlement and therefore avoids traffic travelling through the village, thus 'bypassing' the settlement and it is in this context this terminology has been applied. SCALE: The existing allocation NEW1 and the proposed allocation site SN4024 are adjacent to one another and opportunities to explore appropriate connectivity and linkages between the sites should be explored. The relationship between the sites is an		Review of wording of the contextual information for Newton Flotman in relation to the text describing the A140. Liaison with NCC Education to confirm on-school roll numbers and capacity at local primary school.

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				important consideration and the site specific policy text should ensure this is maintained as far as possible. The sites are not being considered in isolation however it should be noted that NEW1 remains an allocation under the preceding 2015 Plan and is therefore not included in the housing numbers proposed for the cluster as part of the VCHAP. The Council understands the concerns of local residents to additional growth in settlements throughout the District and is seeking to distribute the required housing numbers in a balanced manner. This approach is intended to support local communities and the local economy and allow for small scale growth in a sustainable manner. Newton Flotman was previously recognised as a Service Village in the Joint Core Strategy and falls within the Norwich Policy Area. The settlement benefits from a number of key services and facilities as well as good transportation links. The development proposed as part of the VCHAP process is modest in scale reflecting the aspirations of the Plan and is considered appropriate for the village, delivering the required growth whilst protecting the character of the settlement. ENVIRONMENTAL ISSUES: Sustainable development is a key consideration of the VCHAP and an assessment of the environmental impact of the proposed development has been included in the site selection process. This supporting		

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				evidence includes the Sustainability Appraisal and a Habitat Regulations Assessment. Both of these documents have been undertaken by independent consultants and have been key components of the evidence base when selecting sites. Furthermore each shortlisted and preferred allocation site has been subject to technical consultation and has been assessed by the Norfolk County Council Ecologist with subsequent comments and recommendations included in the site selection and emerging policy text as appropriate. Natural England and the Norfolk Wildlife Trust have also been invited to engage with the VCHAP production and have done so in varying degrees. The Council is keen to ensure that wherever possible existing ecological features are retained and maintained and losses are minimised. In accordance with emerging policy and legislation developers will also be encouraged to give serious consideration to Biodiversity Net Gain when developing sites. GENERAL AMENITIES: Concerns about the pressure of new development on existing services and facilities as expressed in response to this question are recognised and are a recurrent concern throughout the Regulation 18 consultation responses. The Council is sympathetic to the concerns of local residents and has actively engaged with the relevant infrastructure and service		

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				providers to ensure that constraints on any local facilities are recognised and development occurs in the most sustainable locations taking into account these discussions. These discussions have not highlighted any particular issues at this time that could not be addressed through appropriate mitigation measures.		
QUESTION 96: Settlement limit	1655	Comment	SN0594 should be allocated for up to 30 residential dwellings and the limit of the main built form of the settlement should at least be extended to include the site. Furthermore, the A140 should not form the settlement limit to the east of the village but rather the limit should be extended to include the existing development to the east of the A140. Residential properties in this location clearly form part of the settlement pattern of the village and would form a logical extension to the settlement limit.	The purpose of the settlement limit is not to define the physical boundaries of the settlement but rather is a planning policy tool that differentiates between those areas in which the principle of development is considered to be acceptable and those in which more restrictive planning policies apply. In this instance the site being promoted falls outside the settlement limit and is separated from the main area of the village by the A140. The Council acknowledges the suggestion that this site, as well as other existing developments to the east of the A140 should be included within a revised settlement limit however for the same reasons set out in the site assessment for SN0594 the Council does not consider that this would be an appropriate amendment to the existing settlement limit. No changes are therefore proposed in response to this representation. (The Council notes that additional evidence has been submitted in support of SN0594 as part of this representation, as well as in response to Question 98. The site specific evidence	84	No action required

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				will be considered more fully in response to Question 98).		
QUESTION 96: Settlement limit	72	Comment	Suggestion to amend settlement land limit towards the railway line to include houses, the field that backs the playing field.	Settlement boundaries are a policy tool to delineate in plan form coherent and established built up areas within which further development will, in principle, be permitted. The land suggested forms an open field where existing development is sporadic and does not follow the existing settlement limit pattern for Swainsthorpe and Newton Flotman. For the purposes of planning policy the areas outside the settlement limit are classified as open countryside and in these areas development is subject to more restrictive planning policies. The Council does not consider that the area proposed for inclusion within the defined settlement limit is suitable for development and as such the existing limits of the boundary are to be maintained.	81	No action required.
QUESTION 97: Preferred Site - SN4024, Land off Alan Avenue, Newton Flotman	2203	Comment	Green no major ecological constraints identified from desk-top search. Site comprises field at edge of Newton Flotman, adjacent to NEW 1 (existing allocation). Bounded by hedges, which are a priority habitat so losses should be avoided, minimised and as a last resort, compensated for. No other priority habitats are identified (see MAGIC). Site within amber/green habitat zones for	Council acknowledge NCC ecologist comments. Development proposals will be required to minimise the loss of priority habitat (hedging) in accordance with policy and legislation. Consideration should be given to including this within the Core Policies/ policy text applicable to all allocated sites in order to avoid unnecessary repetition throughout the final document.	645	Note Priority Habitat (hedgerow) on site which is to be protected/ retained wherever possible. Consideration to be given to including this requirement within Core Policies to avoid repetition throughout the VCHAP.

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			great crested newts. Site not within a SSSI IRZ.			
QUESTION 97: Preferred Site - SN4024, Land off Alan Avenue, Newton Flotman	33, 80, 215, 237, 241, 373, 377, 559, 594, 604, 613, 629, 637, 644, 657, 691, 693, 698, 699, 701, 704, 705, 708, 709, 716, 744, 750, 760, 780, 838, 869, 873, 882, 935, 1053, 1073, 1075, 1096, 1098, 1108, 1146, 1147, 1160, 1188, 1220, 1231, 1286, 1327, 1546, 1553, 1578	Object	Objections submitted in response to preferred allocation SN4024: HIGHWAYS ISSUES: concerns about the suitability of Alan Avenue for additional traffic (narrow width and cars parking on the side of the road); existing congestion problem and any additional traffic entering/exiting Flordon Road/Ipswich Road is a hazard/safety concern; concerns how construction traffic will affect the area; ENVIRONMENTAL ISSUES: Concerns about air quality resulting from increased traffic, noise and disturbance; impact on nature conservation and wildlife; proposals not in accordance with Norfolk Environment Policy/DEFRA 25 year plan to preserve nature/wildlife/quality of life/community; GENERAL AMENITIES: Pressures on existing infrastructure (school, GP surgery, drainage, sewage, waste removal, electricity and communication network); SCALE AND DESIGN: Concerns on the combined impact of NEW 1 and the proposed site; impact on outlook of existing residents as well as impact on skyline.	The Council has considered the representations received in response to Question 97 and has provided a response by topic area (as set out above): HIGHWAYS ISSUES: Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. It has been identified that the estate road serving NEW1 is not suitable to also be the sole means of access to SN4024. A second point of access is required and will require third party land, this will be explored and confirmed as part of the final site selection and the Council will need to be assured that this is an appropriate solution in principle prior to final allocation. It is anticipated that the provision of a second access into NEW1 and SN4024 would address this concern and may also alleviate some of the existing congestion currently experienced by existing residents. With regards to construction traffic, whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage.	88	Discussions with NCC Education regarding school capacity. Consideration to be given to the need to require topographical surveys to support site design due to the topography of the site and its relationship to existing dwellings.

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				ENVIRONMENTAL ISSUES: Concerns about the impact of alterations to the existing road as well as the increased traffic movements on the local ecology and amenity (noise and air pollution) are recognised, as are associated impacts on local wildlife, which the Council accepts can arise from new development. However, in order to minimise the ecological impact of these site allocations the site selection process has been informed by discussions with technical consultees and environmental organisations, as well as the production of a Habitat Regulations Assessment. The County Ecologist was engaged to undertake a desktop assessment on all shortlisted and preferred sites and as such has identified those sites and/or site features considered to be of ecological interest. Where appropriate recommendations and mitigation measures identified at the site selection stage of the VCHAP process will be incorporated into site specific policy text. In addition, developers of sites will be required to have regard to existing and emerging policy and legislation, including the requirement for Biodiversity Net Gain. Detailed ecological surveys would be assessed as part of the assessment of any planning application for the site. GENERAL AMENITIES: The concerns raised regarding the capacity of the school, GPs and other resources and facilities are acknowledged. However,		

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				most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale and therefore in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. Some services like shops and pubs may benefit from additional customers. To address specific local concerns the Council is engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education Authority, Highways and Lead Local Flood Authority, as well as Anglian Water regarding local wastewater infrastructure capacity and constraints. This will ensure that infrastructure issues are identified and understood as part of the plan making process and, where appropriate, may be addressed on specific sites in the individual site allocation policy text. At this time no significant issues have been identified in association with the allocation of SN4024 either on its own or in combination with the existing allocated site NEW1. As such the Council considers that the impacts of any new development in this location may be successfully mitigated via the site specific policy text and the planning application process.		

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				SCALE AND DESIGN: As noted in the response above consideration has been given to the relationship between the existing and preferred allocation site, as well as the resultant quantum of development that would arise on these sites. NEW1 was allocated as part of an earlier Plan and whilst this site has not yet been developed the numbers proposed on this allocation do not contribute towards the numbers of dwellings currently being allocated as part of the VCHAP. Whilst the majority of the 2015 site allocations have now been completed the longer timescale for the delivery of NEW1 has afforded the Council an opportunity to consider the potential relationship and combined impact of these sites. The Council also has an opportunity to consider site specific policy wording to enhance the linkages between these sites. Whilst concerns about the impact of development on existing residents in terms of outlook and existing amenities are noted, these are detailed matters that would be subject to assessment at the planning application stage. Developers will be required to prepare schemes that accord with local and national planning policies which seek to protect the amenities of existing residents. Although the Council is sympathetic to concerns relating to loss of existing views this is not a planning matter and it is not appropriate to prevent development for this reason		

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				unless the landscape impact is significant.		
QUESTION 97: Preferred Site - SN4024, Land off Alan Avenue, Newton Flotman	73, 765, 2163	Mixed	Concerns have been raised about access and highways; only one access road at present and is already serving NEW1 which is not suitable. A second point of access is required and will require 3rd party land. It has been asked that the proposed numbers allocated on the 'NEW 1' site are clarified and whether the development would result in 'planning gain' such as footpaths. It has been noted that the development would support local facilities.	Officers at NCC Highways have provided technical advice relating to both the site access and the impact of the proposed development on the wider highway network. It has been identified that the estate road serving NEW1 is not suitable to also be the sole means of access to SN4024. A second point of access is required and will require 3rd party land. Confirmation that this is both achievable and acceptable in highways terms will be necessary prior to site allocation. The relationship between the preferred allocation site and NEW1 is recognised and that Council is keen to ensure that this is reflected in any site designs/ layouts that may be submitted for development across these sites. This includes connectivity between the sites, landscaping, drainage schemes etc. If appropriate these matters may be incorporated into the site specific policy text of both sites to secure these details (however it should be noted that a planning application on NEW1 may be submitted prior to the adoption of the VCHAP). With regards to NEW 1, under the current South Norfolk Allocations Plan, this site is allocated for approximately 30 dwellings.	87	Review the site specific policy text for NEW1 to determine whether this requires any amendments due to its proximity to SN4024. Consider the relationship between SN4024 and NEW1 to ensure that linkages between the sites are included in site specific policy text (eg, connectivity, landscaping, drainage).

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QUESTION 97: Preferred Site - SN4024, Land off Alan Avenue, Newton Flotman	105	Comment	Please ensure that the sewers on Flordon Road can cope with the additional housing when or if the new developments at the top of Alan Avenue go ahead.	The Council acknowledge the concerns raised with existing sewage capacity and recognise the need to ensure existing services can accommodate additional housing. As such, is engaging with a number of service providers as part of the production of the plan, this includes Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.	86	No action or change required.
QUESTION 97: Preferred Site - SN4024, Land off Alan Avenue, Newton Flotman	679	Support	The development has no specific site constraints and is entirely deliverable. The land will be accessed from Alan Avenue through the development of the adjoining allocated site shown as NEW1 which is being developed by FW Properties. A high quality scheme will be progressed for this land comprising a wide range of house types and sizes. The early scheme plan prepared for the site confirms 25 dwellings can be accommodated together with appropriate access and public open space. FW Properties believe that this development is a viable proposition.	The Council notes that the promoter of the site continues to support its allocation in the VCHAP. It is noted that this representation advises that the site is deliverable and accessible from Alan Avenue via the adjoining existing allocation, NEW1. Following technical discussions with the Highways Authority the Council understands that this route into the site could not be supported for highway safety reasons. Subsequent discussions have suggested a further option for a second access into the site from Alan Avenue. This would utilise third party land and the Council will need to be assured that this is both an appropriate and achievable solution prior to allocation of the preferred site.	85	Confirmation/ evidence to be obtained from the site promoter demonstrating that access into the site(s) can be achieved (via third party land) prior to allocation. Confirmation from NCC Highways in principle that a proposed second access point from Alan Avenue provides an acceptable solution prior to allocation of the site.
QUESTION 97: Preferred Site - SN4024, Land off Alan Avenue, Newton Flotman	1963, 2136	Comment	Comments relating to water management issues: Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD,	The comments relating to the flood risk of this site are noted and the Council is reassured that no significant issues have been identified as part of the technical consultation. It will be the responsibility of the developer of the site to ensure liaison with all relevant third parties	82	No action required

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			we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). The site predominantly has superficial deposits of DIAMICTON. Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing.	when preparing a drainage scheme for the site.		
QUESTION 98: Should any shortlisted / rejected sites be allocated?	842	Object	Object to shortlisted site SN4025. Church Road, which leads to Grove Road, is narrow, unlit and without pavements. It is already a busy road, with speeding cars and a hazard to pedestrians, cyclists and general access. It is also a wild meadow which attracts much wildlife and nature.	The Council acknowledge the safety concerns regarding the access and the suitability of Church Road. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that access via Church Road is not suitable, therefore development of the site would be subject to achieving a suitable and safe access via Alan Avenue.	659	If site becomes preferred, the access requirements will need to be confirmed with NCC highways.
QUESTION 98: Should any shortlisted / rejected sites be allocated?	1654	Comment	Support for SN5094: There are no highway or access constraints to the development of the site and the proposed access solution would bring highway improvements [Transport Technical note submitted as supporting evidence]; NCC Highways have confirmed that the proposed access is acceptable in principle and the site assessment should be updated from red to green to reflect this; submission of Landscape and Visual Appraisal and Illustrative Sketch Layout to	The Council acknowledges the additional evidence that has been prepared and submitted in support of SN0594 and this will be reviewed in due course by the relevant consultees. The promoter of the site has indicated support in principle for access to the site has been obtained from the Highways Authority. However this does not correspond with the Council's understanding of the Highways Authority position and therefore this information should be clarified with NCC Highways. Following receipt of updated technical comments	658	Review technical note with NCC highways authority to confirm access strategy - confirm whether access to sites to the east of the A140 is acceptable in principle. In the event the site is reclassified as part of the VCHAP process confirmation of third party agreement to the

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			support site promotion; no other site constraints to development - site could accommodate up to 30 dwellings with development shown on the illustrative plan lying outside areas identified as flood zone 3; inconsistency noted on site assessment form between landscape assessment and final site recommendation/ conclusion; development of the site would have would have a very limited effect on the landscape or visual amenity beyond the site itself; parts of the site represent brownfield land - residential buildings, disused swimming pool and shed structures; benefits of this site could include assisting with provision of pedestrian access through to Smockmill Common and this should be updated/ reflected on the site assessment form; and note that both the Preferred Site Reference SN4024 and Shortlisted Site Refence SN4025 for Newton Flotman are noted as being subject to achieving safe and suitable access in the Council's Site Assessment Forms, whereas access to our client's site is readily available with an access solution which is considered to be acceptable in principle by the County Highways Authority.	a review of the NCC Highways site assessment rating may be required however the Council notes that additional information is still required to demonstrate acceptability of the proposed access arrangements (stage 1 safety audit and detailed design), as well confirmation of third party agreement to the highway alterations that would affect the garage opposite the site. Should the inclusion of the site in the VCHAP be considered acceptable following a review of the additional evidence submitted then confirmation of this third party agreement would be required prior to site allocation. Similarly, the Landscape and Visual Appraisal should be reviewed as supporting evidence for the site submission. It is noted that the promoter of the site has referred to the site as being, in part, a brownfield site however in accordance with the Annex 2: Glossary the residential gardens/ land is not considered to be brownfield land. SN0594 is therefore considered by the Council to be a greenfield site. The Council has noted the comments relating to the landscape impact in the site assessment form and this should be reviewed and updated if necessary.		proposed highway solution would be required prior to allocation. Review of Landscape and Visual Appraisal to assess landscape impact. Review consistency of landscape comments and conclusion in the site assessment form and update if appropriate. Update of the site assessment form to reflect public benefit now offered - pedestrian connectivity to Smockmill Common.

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QUESTION 98: Should any shortlisted / rejected sites be allocated?	1109	Object	We acknowledge we need more homes but this village simply doesn't have the infrastructure for current capacity. This need in place before plans are agreed	The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. The Council acknowledges that there are some inherent tensions linked to the relative accessibility of a range of higher order services and goods in several locations compared to other. However, the Plan aims to reflect the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages selection of employment opportunities etc. In addition, the Council is engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Highways and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.	657	No action or change required.
QUESTION 98: Should any shortlisted / rejected sites be allocated?	1054	Object	No longer feel safe walking due to current traffic and people parking on the paths. Didn't agree with the Alan Avenue construction. The roads are too narrow, people park on the path, dangerous. A140 / Flordon Road junction is dangerous with the added hazard of cars on the streets. There are no facilities in the village. We don't need any more houses	The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. It has been identified that the estate road serving NEW1 is not suitable	656	No action or change required.

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				to also be the sole means of access to SN4024. A second point of access is required and will require 3rd party land, this will be explored and confirmed as part of the final site selection. With regards to construction traffic, whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements are also noted however these matters would be dealt with during the planning application and it would be necessary for all new development to adhere to existing. Newton Flotman has a basic range of basic services, the parish does have a primary school, village hall, recreation ground, post office and a bus service during peak hours, linking surrounding villages and larger centres. The Council acknowledges that there are some inherent tensions linked to the relative accessibility of a range of higher order services and goods in several locations compared to other. However, the Plan aims to reflect the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of		

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				the villages selection of employment opportunities etc.		
QUESTION 98: Should any shortlisted / rejected sites be allocated?	936	Object	Build on brownfield site - conserve the countryside. There is building going on throughout South Norfolk on green field sites. The demand on housing will reduce as the population is decreasing yet the effects of your insistence on building is putting pressure on the environment.	The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. With regards to the use of Brownfield land, the GNLP priorities the allocation of Brownfield sites in Norwich and other larger settlements; however, the housing requirements of the GNLP cannot be met without the use of Greenfield land.	655	No action or change required,
QUESTION 98: Should any shortlisted / rejected sites be allocated?	74	Comment	Some development has already been permitted on the other side of the A140 SNO594...the road has to be crossed by bus users to the main part of the village. It may secure access to recreation across the river to Smockmill which would be a boon to the village as access on foot to Smock Mill is dangerous along Cargate Lane.	SN0594 is considered to be unreasonable as an allocated site. No evidence has been presented to the Council to change the view of the Council,	654	No action or change required.
QUESTION 98: Should any shortlisted / rejected sites be allocated?	751	Object	None of the sites seem suitable for this type of development. All seem to have serious issues especially around the A140.	The Council acknowledge the safety concerns regarding the impact upon of the A140. However, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. These comments will help inform the plan and provide any mitigation measures. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application, and it	649	No action or change required.

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				would be necessary for all new development to adhere to existing Development Management policies.		
QUESTION 98: Should any shortlisted / rejected sites be allocated?	1583	Object	Village is overdeveloped without the necessary underlying structure, i.e. post office, school, transport, shops - the roads are packed. It is at a critical level the village is not coping.	The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. It is acknowledged that very few of the village clusters include a GP surgery, and are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity issue at the school for local children. The Council is also engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Education and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies. The Plan aims to reflect the way people access services in rural areas and	647	No action or change required,

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				enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages selection of employment opportunities etc.		
QUESTION 98: Should any shortlisted / rejected sites be allocated?	2204	Comment	Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Site comprises field at edge of Newton Flotman., adjacent to village hall. some hedges around perimeter and a small copse onsite. Hedges are a priority habitat so losses should be avoided, minimised and as a last resort, compensated for. No other priority habitats are identified (see MAGIC). Site within green habitat zones for great crested newts and within strategic green infrastructure corridor. Site within a SSSI IRZ but residential development not a trigger for Natural England consultation.	NCC ecologist comments noted.	646	Policy wording to incorporate; hedges are a priority habitat so losses should be avoided, minimised and as a last resort, compensated for. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.
QUESTION 98: Should any shortlisted / rejected sites be allocated?	2081	Comment	Comments relating to water management issues: Few or no constraints. However, located within a Source Protection Zone 3 . Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water	Site is affected by a Source Protection Zone 3 and developers will need to liaise with the Environment Agency to ensure that development / drainage does not adversely affect the water quality.	89	Where relevant, details of the required on-site ground investigation work and liaison with the Environment Agency will form part

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			infiltration should be utilised. The site predominantly has superficial deposits of DIAMICTON.	Detailed on-site ground investigation works will be required to determine whether infiltration is a suitable/ viable option on a site and if necessary to explore alternative solutions. With regards to Diamicton, this means that the ground condition is of a variable quality that can frequently provide poor infiltration opportunities.		of the site allocation policy text.
QUESTION 99: Should any shortlisted sites be rejected?	881	Comment	I think the council ought to be looking at brownfield sites on the edges of busier towns with better infrastructure rather than tagging houses onto areas where there is already a dearth of decent services. These shortlisted sites will just end up full of houses where residents need to drive to local amenities, leisure activities, schools, dentists, doctors, shops.	With regards to the use of Brownfield land, the GNLP priorities the allocation of Brownfield sites in Norwich and other larger settlements; however, the housing requirements of the GNLP cannot be met without the use of Greenfield land. Newton Flotman has a basic range of basic services, the parish does have a primary school, village hall, recreation ground, post office and a bus service during peak hours, linking surrounding villages and larger centres. The Council acknowledges that there are some inherent tensions linked to the relative accessibility of a range of higher order services and goods in several locations compared to other. However, the Plan aims to reflect the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages selection of employment opportunities etc.	667	No action or change required.

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QUESTION 99: Should any shortlisted sites be rejected?	1055, 1092, 1093, 1110	Object	SN4025; the site is unsuitable because access to the site would be via Church Road, which is a narrow one-car-at-a-time road, no foreseeable ability to widen the road or even add a footpath. Limited services, school and the GP Surgery is full.	The Council acknowledge the safety concerns regarding the access and the suitability of Church Road. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that access via Church Road is not suitable, therefore development of the site would be subject to achieving a suitable and safe access via Alan Avenue. Newton Flotman has a range of services including a primary school, village hall, recreation ground, post office, shop and a bus service during peak hours that links to surrounding villages and larger centres. The Council acknowledges that there are some inherent tensions linked to the relative accessibility of a range of higher order services and goods in several locations compared to others. However, the Plan aims to reflect the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages selection of employment opportunities etc. It is also noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions	666	No action or change required.

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				can be used to help ensure local infrastructure effectively supports growth.		
QUESTION 99: Should any shortlisted sites be rejected?	781	Comment	SN4025 The Parish Council agree that this would be an unsuitable site for all the reasons listed for site SN4024. SN0594 The Parish Council would not support this site unless the A140/Flordon Road junction was improved.	Comments noted. At this stage SN4025 is a shortlisted site. Development of the site is subject to achieving a suitable and safe access via Alan Avenue. At this stage SN0594 is considered to be unreasonable as an allocated site.	665	No action or change required,
QUESTION 99: Should any shortlisted sites be rejected?	1580	Support	Village is overdeveloped without the necessary underlying structure, i.e. post office, school, transport, shops - the roads are packed. It is at a critical level the village is not coping.	Newton Flotman has a basic range of basic services, the parish does have a primary school, village hall, recreation ground, post office and a bus service during peak hours, linking surrounding villages and larger centres. The Council acknowledges that there are some inherent tensions linked to the relative accessibility of a range of higher order services and goods in several locations compared to other. However, the Plan aims to reflect the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages selection of employment opportunities etc. It is also noted that all of the planned developments will also need to	664	No action or change required.

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				contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.		
QUESTION 99: Should any shortlisted sites be rejected?	937	Support	Unless it is on brown field sites they should all be rejected. You are not preserving the community and environment for future generations with this form of environmental vandalism.	Comments noted. With regards to the use of brownfield land, the GNLP priorities the allocation of brownfield sites in Norwich and other larger settlements; however, the housing requirements of the GNLP cannot be met without the use of Greenfield land.	663	No action or change required.
QUESTION 99: Should any shortlisted sites be rejected?	752, 870	Object	SN4025 Should be rejected. The village cannot cope with any more housing. The access to Alan Avenue is already hard due to off road parking. Concerns with Health provisions, schooling, air pollution, the environment, lack of services, drainage is poor and sewer system already struggles to cope.	The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. It is acknowledged that very few of the village clusters include a GP surgery, and are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity issue at the school for local children. The Council is also engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Education and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. The Council acknowledge the safety concerns	662	No action or change required.

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				regarding the access and the suitability of Church Road. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that access via Church Road is not suitable, therefore development of the site would be subject to achieving a suitable and safe access via Alan Avenue.		
QUESTION 99: Should any shortlisted sites be rejected?	605	Support	Both SN4024 and SN4025 should be rejected based upon lack of detail regarding access and impact upon the existing infrastructure and wildlife of the village. The village already lacks some key services (shop, full time GP, pub) and has narrow roads unsuitable for extra traffic. It is a quiet village providing a, much needed, contrast between Norwich and Long Stratton and any major growth will dilute the relatively tranquil nature of Newton Flotman	The Council acknowledge the safety concerns regarding the access and the suitability of both SN4024 and SN4025. However, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In both cases, NCC Highways have advised that safe access will need to be demonstrated prior to development and further discussions will be help prior to allocation.	660	Further discussions with NCC highways with regards to highway requirements.
QUESTION 99: Should any shortlisted sites be rejected?	560	Object	There is no adequate access. Alan Avenue is not suitable and was never designed for an additional volume of traffic. Church Road is not suitable either. Concerns with sewerage capability and drainage from the site. There are already issues in the village which will be exacerbated by any new developments.	The highways safety concerns are noted with specific regard to Alan Avenue and Church Road. Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. It has been identified that the estate road serving NEW1 is not suitable	653	No action or change required.

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			Concerns about the safety of pedestrians as the area around SN4025 is used by most residents in the village to exercise, walk to the mobile library, walk to the Village Centre and Playgroup, cycle, walk dogs, and visit the children's play area.	to also be the sole means of access to SN4024. A second point of access is required and will require 3rd party land, this will be explored and confirmed as part of the final site selection. With regards to construction traffic, whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the planning application stage. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, sewage and drainage capacity are also noted however these matters would be dealt with during the planning application and it would be necessary for all new development to adhere to existing.		
QUESTION 99: Should any shortlisted sites be rejected?	692	Support	Alan Avenue - Newton Flotman Inferior GP provision with Newton Flotman closed, operating only as a dispensary. Long Stratton struggling and already at capacity. Mulbarton practice has publicly admitted to struggling. Concerns with sewerage, the pumping station regularly needs pumping out. Drainage is a common issue during heavy rain. Dangerous Flordon Road/A140 junction unable to cope with current traffic volume. No engagement with Highways and Parish Council since 2019. School is already at	The Council acknowledge the safety concerns regarding the impact upon of the A140. However, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. These comments will help inform the plan and provide any mitigation measures. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing	652	No action or change required.

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			capacity with temporary classrooms. The infrastructure needs to be in place first.	Development Management policies. It is acknowledged that very few of the village clusters include a GP surgery, and are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity issue at the school for local children. The Council is also engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Education and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.		
QUESTION 99: Should any shortlisted sites be rejected?	75	Comment	Requirement for well planned development; access does and on street parking of existing residents will cause issues, down the road so this needs addressing/managing. Another access road via the playing field and Grove Way could be considered - not through the playing field - drainage issues. Also drainage needs to be looked at carefully- needs to be separate to the exiting drainage running 'under' Alan Avenue.	Comments relate to SN4024, Land off Alan Avenue, Newton Flotman. Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. It has been identified that the estate road serving NEW1 is not suitable to also be the sole means of access to SN4024. A second point of access is required and will require 3rd party land, this will be explored and confirmed as part of the final site selection. With regards to construction traffic, whilst it is acknowledged that there would be some disruption and additional vehicular movements during the construction phase, this would be for a temporary period only and could be managed by a Construction Management Plan at the	651	No action or change required.

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				planning application stage. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority who have advised that with appropriate mitigation measures in place development of this site would be achievable.		
QUESTION 99: Should any shortlisted sites be rejected?	242	Support	The shortlisted sites should be rejected. Newton Flotman has already been developed (current Alan Avenue development) which adversely affects my home. The additional traffic joining/exiting the A140 has caused the junction to become extremely dangerous. More pollution, increased traffic generation and noise, increased risk of accident, loss of greenspace and agricultural land, loss of biodiversity/wildlife/trees/hedging. Reduced safety for pedestrians in the village. Increased pressure on already pressurised facilities (doctors/sewers/communications etc).	The Council acknowledge the safety concerns regarding the impact upon of the A140. However, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. These comments will help inform the plan and provide any mitigation measures. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, pollution etc are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies. With regards to pressure on existing facilities, the Council is also engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Education and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.	650	No action or change required.

Pulham Market and Pulham St Mary

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QUESTION 100: Settlement limit	599, 671, 1162	Mixed	Comments on the proposed changes to the settlement limit: support the proposed alterations; and support the extent of the SL as shown but no further extension of the SL to the southern boundary towards Guildhall Lane (beyond the gardens of Copperfield Court).	The concerns about the potential landscape impact of further southerly extension of the SL, as well as the possible pressures on Guildhall Lane, are recognised and noted by the Council. At this time the Council is not proposing any additions to the existing settlement limits (with the exception of allocations made in the VCHAP).	229	No action required.
QUESTION 101: Preferred Site - SN1024, Ladbrookes, Tattlepot Lane, Pulham Market	2205	Comment	Comments on the ecology of SN1024: NCC Ecology rating - green with no major ecological constraints identified; surveys and enhancement in accordance with policy requirements; some priority hedgerows identified around the site and the loss of these should be avoided; and green habitat zone for GCN and within a strategic green infrastructure corridor.	All applications for development on allocated sites will be required to submit appropriate surveys and enhancement in accordance with policy requirements. The ecological features within the site should be identified within this evidence base at an early stage in the site design in order to ensure that appropriate enhancement and mitigation measures are included within the development of the site. These measures would then be subject to assessment and review as part of the detailed planning application.	255	No action required
QUESTION 101: Preferred Site - SN1024, Ladbrookes, Tattlepot Lane, Pulham Market	2048	Comment	Heritage (HE) comments relating to SN1024: Development of this site has potential for impact on the significance of the CA; and HIA is required to assess this impact, determine whether allocation is appropriate and possible mitigation and/or enhancement measures, as well as possible policy criterion wording.	The site assessment for the site fails to make reference to the proximity of the site to the Conservation Area although the relationship with a listed building to the east is noted. The potential impact of the allocation of this site on the significance of the Conservation Area will be assessed via the Heritage Impact Assessment with any mitigation or enhancement measures noted. It is noted that the adjacent parcel of land which lies within the Conservation Area	254	Preparation of a Heritage Impact Assessment to determine the scale of the impact proposed development may have on the significance of the Conservation Area.

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				was previously an allocated site in the 2015 Site Specific Allocations and Policies Document and has subsequently been developed for residential use. It is anticipated that with suitable design an appropriate scheme could come forward on this site without resulting in a significant impact on the adjacent Conservation Area.		
QUESTION 101: Preferred Site - SN1024, Ladbrookes, Tattlepot Lane, Pulham Market	1964, 2133	Comment	Comments relating to surface water and water discharge for SN1024: Outside the IDD boundary but within the Waveney, Lower Yare and Lothingland IDB watershed catchment; any surface water discharges within the watershed catchment should be line within the non-technical standards for SuDS; and LLFA rating - green.	These comments are noted and it will be for the developer of the site to engage with the appropriate organisations when developing their drainage strategy for the site. For this site, this would require engagement with both the Lead Local Flood Authority and the IDB.	253	No action required.
QUESTION 101: Preferred Site - SN1024, Ladbrookes, Tattlepot Lane, Pulham Market	1790	Comment	Comments for SN1024: Do not support the name 'Ladbrookes' for the preferred site and hope that a new name will be considered; and would like to see a high percentage of affordable housing on the site.	The emerging GNLP includes a policy setting out the minimum requirements for affordable housing on each development site. Any subsequent applications for development will need to be policy compliant unless robust viability evidence clearly illustrates that the site would not be viable. The name 'Ladbrookes' refers to the existing site identifier and is not indicative of the name of any future development on the site. The marketing name for a site may also differ from the final site name and/or road names	252	No action required

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				within a development; these are typically determined by either the site developer or the Parish Council.		
QUESTION 101: Preferred Site - SN1024, Ladbrookes, Tattlepot Lane, Pulham Market	673, 1167	Support	Support for SN1024: PC support the preferred site but request no southerly extension of the boundary towards Guildhall Lane due to the landscape impact this would have as well as this potentially encouraging applications for access onto Guildhall Lane; Guildhall Lane is a safe place to walk for all ages; the site should include a high percentage of affordable housing that the younger generation can afford to buy; the village needs young families to ensure it's future development; and any new development should ensure the integrity of the open space in the village.	The preferred allocation extends in a southerly direction as far as the adjacent development. It is not considered appropriate to extend the allocation site beyond this line for the reasons set out above in these representations. Additional development to the south of this site would result in encroachment into the landscape whilst the current proposed allocation effectively forms a 'rounding off' of the settlement. Any future application for access onto Guildhall Lane would be subject to detailed consideration by NCC Highways however these concerns are recognised.	231	No action required
QUESTION 102: Preferred Site - SN1052REV, Land at Norwich Road, Pulham St Mary	1965, 2135	Comment	Comments relating to surface water for site SN1052REV: Site is adjacent to the Waveney, Lower Yare and Lothingland IDD - if surface water discharges within the watershed catchment of the IDD then this discharge should be in accordance with the non-technical standards for SuDS; and LLFA rating - green - a large area of the site	Subsequent technical discussions have taken place between the Council and the LLFA relating to the possible allocation of this site, reflecting the technical comments received during the Regulation 18 consultation. The flow path located to the south of the site is noted, as is the policy requirement to ensure that development of the site does not result in off-site surface water issues. Discussions with NCC Highways regarding access to this site have indicated that associated highway	258	Review of site boundaries in response to the comments of the LLFA (and the NCC Highways comments) to consider whether site-specific policy text is required regarding the form and location of development on this site, as well as the

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			is unaffected by flood risk and has the potential to be developed.	improvement works could include drainage solutions to improve the existing off-site situation. Recognising the identified constraints of the site, as well as the wider area, the Council remains of the opinion that this site is suitable for allocation however further consideration should be given to the areas of the site to be avoided by development and whether any site specific policy text is required to secure this.		location of the access point(s) into the site.
QUESTION 102: Preferred Site - SN1052REV, Land at Norwich Road, Pulham St Mary	1394, 2050, 2206	Comment	Landscape and ecological comments relating to SN1052REV: support the recommendation for development to be focussed to the east of the site to maintain distance from the adjacent woodland to reduce impacts caused by noise and landscape, as well as damage to the tree root structure; no major ecological constraints identified - surveys and enhancements in accordance with policy will be required; amber site for GCNs and some priority hedgerows around the site; and Grade II listed building Hill House lies to the north of the site but is screened by the intervening woodland and therefore no impact would be had on the significance of this woodland.	The reference to the impact of development on the adjacent woodland is noted, as are the comments of the NCC ecologist. The site assessment recognised the proximity of this site to the woodland to the north of the site and these additional comments have highlighted the impact residential development could have on this woodland if development is sited in close proximity to this area. As noted in the site assessment, and as a result of subsequent technical discussions, it is anticipated that development on this site would be focussed to the south east of the site and a buffer between the housing and woodland would remain. However, should the boundaries of this preferred allocation site be subject to amendment further consideration would need to be given to the impact of the development on the woodland to ensure a site layout with appropriate mitigation measures is achieved. In terms of the impact of development	257	No action required.

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				on local heritage assets the comments of Historic England are noted. It is not considered necessary to undertake a Heritage Impact Assessment to inform this site selection, and a report has not been requested by Historic England either.		
QUESTION 102: Preferred Site - SN1052REV, Land at Norwich Road, Pulham St Mary	600, 1557	Support	Support for SN1052REV: PC support this site but request provision be made to manage surface/ drainage water through the creation of an alternative drainage route; historic problems with drainage route via Norwich Road/ Mill Lane with flooding still occurring at Mill Lane despite recent improvements; the current drainage route adds pressure to flooding around the crossing at the beck; and site is well related to the existing settlement and the facilities and services within it.	These comments and concerns are noted. Technical discussions have taken place with the LLFA who have advised that the site is situated at the head of a 0.1% AEP (formerly referred to as a 1 in 1000 year flood event). Discussions with the LLFA have indicated that vehicular access into the site via the existing Poppy's Lane/ Norwich Road access could be affected by this flowpath however it is also noted that highways engineering works proposed to improve this junction could include a water management scheme which may result in betterment locally. Consideration should be given however to an alternative access point into the site. Notwithstanding this point, in accordance with current policy and legislation it will be necessary for the drainage scheme to ensure that this does not discharge off-site and add to existing flowpaths. Discussions with the LLFA have noted that ground conditions may not be suitable for infiltration and it would be for the site developer to ensure that site-wide infiltration testing is undertaken to inform the design of an appropriately robust design strategy.	256	Possible further discussions with NCC Highways about an alternative access point into the site and the implications this could have junction improvement works followed by consideration of the site specific policy wording relating to the access to the site (if appropriate).

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QUESTION 103: Should any shortlisted / rejected sites be allocated?	2096, 2267	Comment	Comments relating to SN1027: Hedges around field are a priority habitat so losses should be avoided; Amber habitat zone for GCNs; Site within SSSI IRZ but residential development not a trigger for consultation with NE; Ecological surveys and mitigation measures should inform site design; and Site rated green by LLFA.	These comments are noted but it is not considered that any further action is required at this time.	330	No action required.
QUESTION 103: Should any shortlisted / rejected sites be allocated?	2207	Comment	Comments relating to SN0417: Hedges around perimeter are priority habitats and loss should be avoided; Amber habitat zone for GCNs; Strategic GI corridor; Site within SSSI IRZ but residential development not a trigger for development; and Ecological surveys and mitigation required in site design.	These comments are noted however it is considered that these comments should relate to site SN0418 rather than SN0417. Clarification should be sought from the technical consultee.	329	Confirm with NCC Ecologist that the site reference for these comments should in fact be SN0418.
QUESTION 103: Should any shortlisted / rejected sites be allocated?	1540, 1602	Comment	Comments in support of SN2095: This site should be reconsidered - consider there to be an inconsistency in the assessment of the impact and mitigation of development on heritage assets when compared with alternative site SN1024;	The key issues identified in this representation are the consistency of site assessments, the impact of development in this location on the significance of heritage assets in proximity to the site, the townscape impact of development, the presence of	316	No action required

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			LBs are already compromised by existing development that has been approved - additional sympathetic development cannot detrimentally impact the setting; linear infill plot is a sympathetic form of development in SN; dispute the identification of surface water flow paths on site; footpath linkages could be provided to the rear of the site or in the frontage carriageway; and this site falls into the opportunity for limited infill development as identified in the wider village cluster commentary.	surface water flow paths on the site and the opportunities for highways improvements associated with the delivery of this site. In relation to the impact of development on the significance of heritage assets in proximity to potential allocation sites the Senior Heritage & Design Officer has commented as follows: "the two sites [SN1024 and SN2095] have different contexts and the harm to the setting of the listed buildings/conservation areas depends on the character of heritage assets and how the setting contributes to that character in terms of significance. Mitigation can vary and there will be instances where mitigation can overcome or substantially reduce the harm, whereas in other cases mitigation is not able to overcome the resulting level of harm". A further review of these two sites has concluded that the site referred to within this representation (SN1024) was considered as a brownfield site with the setting of a LB on site being a consideration in the design approach during the redevelopment of this site. In contrast, promoted site SN2095 has a number of listed buildings within close proximity with the open countryside forming an important element of their rural character. It is not considered that it would be possible to mitigate the loss of the rural setting, spacious character and views that form part of the significance of these heritage assets therefore the		

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				Council does not consider it necessary to amend this part of the initial site assessment. The Council recognises that a linear form of development is a key feature of development within many villages in South Norfolk. In this setting however it is considered that ribbon development would have a detrimental impact on the landscape and townscape, resulting in the loss of the open views and rural character that form an important feature of the approach and views into the Conservation Area, as well as in the setting of the identified listed buildings. Surface water flowpaths throughout the VCHAP area have been identified during the technical consultation with the Lead Local Flood Authority. The identified surface water flowpath is part of a larger flowpath and wider discussions with the LLFA have noted that the preference would be to avoid development occurring within a flowpath, although there could be design and technical solutions to address this constraint. Due to the relatively small area on site affected by the surface water flowpath it is considered likely that a suitable design solution would be possible to overcome this constraint. Notwithstanding this point, the surface water flow path is present on the site and therefore remains as part of the site assessment. Comments relating to the provision of a		

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				footpath are noted with site connectivity and highways improvement works being an important consideration in the site selection process. There would be a clear preference for a footway along the site frontage to improve wider connectivity in the village (rather than to the rear of the site) however it is suggested that in order to facilitate this part of the existing carriageway could be utilised. This has not been subject to discussions with the highways authority and as such it is unclear whether this would be an appropriate solution. Despite a careful review of the comments submitted in support of the site the Council considers that the issues identified as part of the initial assessment remain valid and as such the site remains unsuitable for allocation.		
QUESTION 103: Should any shortlisted / rejected sites be allocated?	746	Comment	Support for rejected site SN0363SL: Do not agree with the rejection of this site; access is not problematic as there are two established accesses off Station Road which enable parking for the Maltings and other on site car parking; two dwellings were recently constructed opposite the Maltings with no mention of detrimental impact on the Maltings or the townscape.	Whilst these comments are noted the Council remains of the opinion that this site is not suitable either for shortlisting, as a preferred site or as an extension to the existing settlement limit. Access to site has not been demonstrated with the access points referred to in this representation being either private accesses to the Maltings or constrained by protected trees. It is noted that this site is included within a wider area that is covered by a group Tree Preservation Order. Reference has been made to two recently constructed dwellings to the	291	No action required.

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				north of the promoted site however the circumstances relating to these properties were unusual and do not set a precedent for further development in this location. For the purposes of clarification, these dwellings were originally granted approval in 1973 as part of a larger planning permission for 5 dwellings (DE\10130). Three of the five units were constructed, and the planning consent remained extant. Following redevelopment of the Maltings planning permission was granted in 2008 to allow for the final two dwellings to be constructed on site following an updated design and layout that was considered to be more appropriate to their context than the earlier approved and implemented scheme (2008/0157). This planning application was noted at the time as being contrary to planning policy, but approval of an enhanced and updated design was considered to be justified in these circumstances. It does not however set a precedent for further development in this location.		
QUESTION 103: Should any shortlisted / rejected sites be allocated?	639, 2101	Comment	Comments relating to SN0418: Site is suitable for residential development - it is in a sustainable location and would support the social sustainability of the village; Acknowledge 'pinch point' north of junction with Jocelyn Close but landowner controls land to the west of Mill Lane which would allow for highway works to	The additional comments and evidence submitted in support of this shortlisted site are acknowledged. The earlier site assessment recognised that a small area of this site could be developed sensitively to avoid a detrimental impact to the wider landscape, setting of the settlement or significance to nearby heritage assets. This representation makes reference to the detailed design and layout of the site and whilst the	290	No action required at this time.

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			be delivered; Submitted illustrative masterplan demonstrates highways works as well as provision of a connecting footway along Mill Lane; New residents would support the local economy due to the accessibility of the site; Existing hedging to the wider site constrains views in and out of the site, additional hedging would enhance the screening; Sensitive site design could create a 'feathered' edge to the village; A 2018 Preliminary Ecological Assessment required further surveys on site but indicated the site is unlikely to support protected species. Boundary hedgerows recognised as habitat of importance on site; Proposed development would not result in harm to the significance of the closest listed building or its setting due to the separation and careful design; Development would respect nearby listed buildings and the CA through the design, materials and landscaping; and LLFA rating 'green'.	importance of this is recognised these details would be considered at the planning application stage unless site specific requirements required specific policy text. Similarly an updated ecological assessment and arboricultural report would be required at the planning application stage. The reasonable connectivity of this site to the wider settlement was noted in the site assessment and the provision of a connecting footway as shown on the illustrative masterplan would address a current constraint to the development of this site, as would the proposed highway works. However whilst these suggestions have been acknowledged it is also noted that these options have not been discussed with NCC Highways at this stage. Furthermore, no viability information has been received at this time confirming that a policy compliant site could be delivered alongside these highways works. Should the site subsequently be considered as a preferred site a review of the additional supporting evidence submitted will be undertaken by the relevant technical consultees however at this time the Council remains of the opinion that this site should continue to be considered as a shortlisted site and not a preferred site.		
QUESTION 103: Should any	601, 674	Comment	Pulham St Mary PC support preferred site SN1052REV and do not think any of the	The support of the Parish Council's for the preferred sites within Pulham St	289	No action required.

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shortlisted / rejected sites be allocated?			shortlisted or preferred sites should be allocated in addition to or instead of the preferred site. Pulham Market PC support preferred site SN1024 and do not think any of the shortlisted or preferred sites should be allocated in addition to or instead of the preferred site.	Mary and Pulham Market are noted. It is acknowledged that no additional sites are supported instead of SN1052REV and SN1024.		
QUESTION 104: Should any shortlisted sites be rejected?	602	Object	Comments on shortlisted site SN1027: Site should be rejected due to the unsuitability of Poppy Lane and Goldsmith Way to provide a suitable access; and detrimental impact on the current townscape arising from carrying out the required improvements.	The site has been shortlisted, but it is recognised that the current highway network does not afford appropriate access to the site via Poppy Lane. It is anticipated that junction improvement works identified as being necessary for the development of preferred site SN1052REV would improve the access to this site. However, it is recognised that this site could not be achieved without improvements to Poppy Lane therefore this site could not come forward in advance of these improvements.	260	No action required
QUESTION 104: Should any shortlisted sites be rejected?	78, 675	Object	Comments relating to sites SN0418 and SN2096 (Pulham Market): SN0418 - although a small development is proposed this would put more pressure on Mill Lane and Grays Lane; also concerns raised by NCC Highways about the creation of an appropriate access into this site and the unsuitability of the local road network. SN2096 - support for the rejection of this site due to highway safety reasons (Mill Lane, Grays Lane and the junction at Grays Lane and Tivetshall Road).	SN0418 is currently considered as a shortlisted site and potential highways issues were identified at the time of the site assessment. Further detailed technical discussions took place with NCC Highways but did not include this particular site. Therefore, this site will need to be subject to further discussion with NCC Highways should it be considered as a preferred allocations site in the future. The concerns raised within these representations are noted.	259	Site SN0418 should be referred back to NCC Highways for a further technical review if its status is amended to a preferred allocation site during the ongoing site selection process.

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				The comments relating to SN2096 are acknowledged.		

Rockland St Mary, Hellington and Holverston

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QUESTION 105: Settlement Limit	1149, 1371	Object	Concerns with impacts on listed buildings; Eel Catcher Close isn't a precedent future development, highway safety concerns, distant from village amenities.	Whilst the historical impact concerns are noted by the Council. Historic England have been consulted on the and not raised any concerns. Where appropriate, a Heritage Impact Assessment (HIA) will be required to inform the allocation of the site including any mitigation, enhancement and policy wording. Whilst the Council understands the concerns with regards to a further exception scheme being proposed (due to a revised boundary), this is beyond the scope of what is being proposed. The Council will deal with any subsequent planning applications in the context of their own merits and relevant planning policy and legislation. With regards to village amenities, whilst it is recognised that rural settlements offer fewer services and facilities than their urban counterparts, a continued concentration of development in these locations will result in the inevitable decline of existing services and facilities within the rural areas. Therefore, locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services.	435	No action or change.
QUESTION 105: Settlement Limit	926	Object	This is outside the revised settlement limit. If granted planning permission it may set a precedent for further development on agricultural land, destroying the rural village charm. The Parish Council supports brownfield sites being developed before	The Council acknowledges the concerns of the Parish Council. If site preferred sites were to be allocated and adopted as part of the Village Clusters Plan, the settlement limit will only include land that has been allocated. Whilst the	434	No action or change required.

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			greenfield. Parishioners are against large commuter-type executive housing. The Orchids is not a precedent to accept more linear or back development. Parishioners feel strongly that Rockland St Mary has had its fair share of growth in Eel Catcher Close and the completion of The Orchids as part of Bee Orchid Way. The Parish Council does not accept any further revision to adopt site SN2064REV.	Council understands the concerns with regards to future schemes coming forward, this is beyond the scope of what is being proposed and as such, any future application will be dealt with in the context of current planning policy.		
QUESTION 105: Settlement Limit	1139	Object	The proposed sites (SN2007 and SN0531) are unsuitable, at every level, for development. They would be contravening the National Planning Policy Framework as well as the South Norfolk Place-Making Guide. The developments would have a total and unnecessary catastrophic impact on adjacent significant listed buildings and heritage assets, integral to the history of the village, as well as on the landscape, utilities, highways, ecology and biodiversity of the area. The sites are outside the historic settlement boundary and there is nothing to be gained, and all to be lost, by their development.	Whilst the historical impact concerns are noted by the Council. Historic England have been consulted on the preferred and shortlisted site and have not raised any concerns. Where appropriate, sites will be required to submit a Heritage Impact Assessment (HIA) to inform the allocation of the site including any mitigation, enhancement and policy wording. Comments about the environmental impact have also been noted, however all development will be required to deliver net-gain on site and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site, such as Barn OWLS. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. Whilst the historical impact concerns are noted by the Council. Historic England have been consulted and not raised any concerns. The scale of development proposed in is	433	No action or change required.

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				within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, including those proposed at Rockland St Mary. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Service, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.		
QUESTION 105: Settlement Limit	591	Object	• Development of the sites would cause harm to designated heritage assets by disrupting their setting and the ability to understand their historical significance. • There is inadequate evidence that the council have given this issue the 'considerable weight or importance' national policy demands for decision making in the plan thus far. • Legal precedent for rejecting such proposals citing Paragraph 185 of the	Whilst the historical impact concerns are noted by the Council. Historic England have been consulted on the preferred and shortlisted site and have not raised any concerns. Where appropriate, sites will be required to submit a Heritage Impact Assessment (HIA) to inform the allocation of the site including any mitigation, enhancement and policy wording.	432	No action or change required.

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			National Planning Policy Framework has been set.			
QUESTION 105: Settlement Limit	119	Object	Strongly object to this planning application as it detracts from the linear design of the village and If agreed it will create a precedent for further developments nearby. This development involves the removal of pasture and is detrimental to the rural nature of the village. The increase in population, vehicle movements etc will add to the already busy road and impact on the infrastructure, GP surgery, school etc. This development is a contradiction of the Prime Minister's statement that there should not be developments on agricultural land, developing brownfield sites first.	The Council acknowledges the comments made within these representations. With regards to the existing landscape, whilst Rockland is characterised by mostly linear development, there are existing examples of small development clusters to the east and west, including the current development to the east of the village, The Orchard, which is at the time of preparing this response is being developed for 21 houses. The Council therefore considers that a well-designed scheme would not be inappropriate in this location. A landscape plan will help mitigate any impact that the proposed development may have on the surrounding area, including any designated areas. With regards to infrastructure, the Council is engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Highways and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. The Council notes the concerns regarding the loss of good quality agricultural land. According to the DEFRA Provisional Agricultural Land Classification (ALC) (England), the site is	431	No action or change required.

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				considered as Grade 3 - Good to Moderate. As part of the site assessment process, the Council has taken into consideration the best most versatile land (BMV) by identifying the ALC of all sites submitted. Where possible, the Council will avoid allocating and preferring sites that are of a high grade. Where higher grade land may be present, the Council will need to consider whether the social, economic or environmental benefit outweighs the agricultural and that there is no suitable or available site for the development on land of poorer quality.		
QUESTION 105: Settlement Limit	121, 143, 172, 685, 711, 831, 1028, 1312, 1336, 1459, 1556, 1573, 1574, 1594, 1598	Object	Summary of comments relating to the SL and further development; do not want to see the settlement limit extended or any further development within the cluster; development would detracts from the linear design of the village which would have an affect on the small village feel and character, as well as imposing on the countryside. Concerns have also been raised with regards to the impact development would have the increase in vehicle movement, on an already dangerous roads with narrow pavements and the impact on infrastructure capacity. Concerns also raised with the impacts on heritage assets, ensuring affordable housing, no plans for green offset and endangering environment of local wildlife.	The Council acknowledges the concerns raised within these representations, In the first instance, with regards to the potential negative affect on small villages, locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services. The provision of several relatively small allocation sites as required by the National Planning Policy Framework means this approach also has the benefit of supporting small-scale builders, providing choice for the market and helping to ensure the delivery of housing in popular village locations. With regards to the safety concerns regarding the access and the suitability of surrounding road networks. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the wider highway network. Where highway	363	No action required.

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				improvements are required, these will be required as part of the allocation and in certain circumstances some sites will need to demonstrate safe access can be achieved and the necessary road upgrades are viable, prior to allocation. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, including those proposed at Rockland St Mary. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. With regards to overlooking and amenity concerns, these will be addressed at the detailed design stage and any planning application would be subject to planning policies surrounding amenity etc. The technical design details relating drainage schemes would be assessed through the detailed planning application stage. Affordable housing:		

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				concerns about the cost of affordable housing are noted. Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time. In addition, with regards to heritage asset concern, English Heritage have been consulted and where appropriate have advised that Heritage Impact Assessments will be required to inform whether a site should be allocated or not. Comments raised about the environmental impact have also been noted, however all development will be required to deliver biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site.		
QUESTION 105: Settlement Limit	94	Object	Concerns that the new housing would not be for affordable rent and there is no guarantee it would bring families even to benefit schools.	With regards to housing mix, the Council will seek to provide new housing development to meet housing needs (using the most up to date Strategic Housing Market Assessment (SHMA)). This will ensure that allocated sites provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of their life cycle e.g. first-time buyers, affordable	362	Policy wording to include tenure mix in accordance with SHMA.

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				housing, upsizing/downsizing etc. In addition, the Council will only consider allocating sites that are capable of delivering the policy standard affordable housing requirements.		
QUESTION 105: Settlement Limit	41	Object	Suggested that the settlement boundary should be extended to include the proposed site 'SN2007 & SN0531' and also the cluster of houses that are close to the New Inn Pub and staithe.	If the preferred site SN2007 & SN0531 were to be allocated and as such adapted, as part of the VCHAP, then the settlement limit would be extended to include the boundary of the allocated site. With regards to any further proposed amendments, a settlement boundary review has already taken place and at this stage no further alterations are proposed.	361	No action or change required.
QUESTION 105: Settlement Limit	104	Comment	The development on SN2064REV should not be seriously considered given the size of access, proximity of said access road to current housing . The road opposite the proposed development is home to the village shop as such regularly has cars parked on the road outside directly opposite the proposed access. This leaving one side blocked; development here would be unsuitable. However the proposal for SN2007 should be considered, subject to access and road upgrades.	The representation makes reference to two sites; SN2064REV and SN2007. Specific concerns and comments have been raised with regards to the sites access points. It should be noted that NCC Highways officers have provided technical advice on both these sites, relating to both site access and the impact of the proposed development on the wider highway network. Highway officers have advised that for both sites, it would need to be demonstrated to the satisfaction of the Highways Officer that appropriate access into the sites access with adequate visibility, can be achieved.	343	Evidence to demonstrate access is achievable. SNC to contact FW Properties to see what arrangements they have re accessing the SN2064REV.

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QUESTION 105: Settlement Limit	64	Comment	Object; already far too many houses in this tiny village, do not have the infrastructure to support more, resulting in over crowding and road use would be unacceptable, Increase in noise and pollution from more dwellings, possible crime & anti-social behavior levels will increase.	The concerns have been noted with regards to any further development with the area.	342	No action or change required.
QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary &(Part of) SN0531, Land west of Lower Road, Rockland St Mary	5, 53, 54, 70, 88, 126, 135, 145, 173, 232, 236, 278, 300, 315, 371, 389, 392, 417, 428, 443, 471, 476, 481, 509, 528, 549, 569, 574, 622, 650, 652, 678, 682, 686, 694, 712, 721, 733, 827, 837, 877, 930, 993, 1131, 1135, 1234, 1235, 1237, 1251, 1260, 1265, 1266, 1292, 1298, 1333, 1369, 1374, 1415, 1460, 1470, 1503, 1513, 1526, 1551, 1565, 1570, 1572, 1599, 1600, 1702, 1749	Mixed	Summary of objects to SN2007 and (part of) SN053; development of this site would result in highway safety issues; development in this location would endanger the environmental and local wildlife, including impacting upon the surrounding Broads Park and Conservation Area; development in this location would result in an urbanised character and not be in keeping with the character of the settlement; detrimental impact on the landscape given (2017/0638/0 was refused) its location on an open agricultural field; there is not enough services and infrastructure to support further development; any additional local housing needs were met by recent developments; development of the site would cause potential overlooking issues, increased noise and pollution for existing residents; development of the site would have a detrimental impact on listed buildings; and affordable housing needs to be actually be affordable for first time buyers or families with a lower income.	The Council acknowledge the safety concerns regarding the access and the suitability of The Street and New Inn Hill. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that development of the site is broadly acceptable in highways terms and that the combination of both sites has the potential to offer for an additional footway access back to the main village. However, development will be subject to subject to achieving a suitable and safe access, including the provision of a second pedestrian access point. This will be determined prior to allocation. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements are also noted however these matters would be dealt with during the planning application and it would be necessary for all new development to adhere to existing Development Management policies relating to the environment, as well as emerging Policy 2 of the GNLP.	367	Further discussion with NCC Highways. Council to confirm secondary pedestrian access. Consideration to be given to the inclusion of site specific landscaping requirements for this site in the site allocation policy text due to the open nature of the allocation site.

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				Concerns regarding the impact upon the local environmental have also been noted, however all development will be required to consider biodiversity net-gain (as advised by NCC ecologists) and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site, as well as significant on-site features (e.g., trees and hedgerows). Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. These will be dealt with during the planning application stage. Further to the impact upon the wider landscape, it is considered that a landscaping scheme would provide some screening of the site and would help mitigate impact on the surrounding open countryside. These details would need to be considered in detail during the subsequent planning application stage. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the		

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				NHS Integrates Care System, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. The technical design details relating drainage schemes would be assessed through the detailed planning application stage. The concerns about the cost of housing are noted and whether these homes will be affordable. Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time. In addition, the Council will only look to consider allocating sites that are capable of delivering the policy standard affordable housing requirements. With regards to overlooking and amenity concerns, pollution (noise and air) and impact on surrounding uses, these factors will be addressed at the detailed design stage and any planning application would be subject to planning policies surrounding amenity etc. Further to the impact upon heritage		

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				assets, Historic England have been consulted with and provided their comments; Whilst there are no designated heritage assets within the site boundary, three grade II listed buildings (Old Hall and two barns) lie around the western end of the site. As part of their response, they have requested that an Heritage Impact Assessment is undertaken to inform the allocation of the site including any mitigation, enhancement and policy wording. Finally, the Council note that many of the representations refer to a recent planning approval and that this site provides enough housing for the area. In response to this, there is an overall need and government requirement for more housing and the principal aim of the Village Cluster Housing Allocation Plan (VCHAP) is to allocate a series of smaller sites to accommodate a minimum of 1,200 new homes across the villages within the South Norfolk District, in accordance with the requirements of the GNLP. The GNLP requirements derive from the Government's method for calculating Local Housing Need for the area. If the site is allocated and adopted as part of the Villages Clusters plan, then the settlement limit would be amended to include the land of the allocated site. If any further schemes were to come forward in the future, they would be dealt with in the context of the current planning policies. With		

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				regards to previously refused application, 2017/0638/0, located opposite the site, this site is situated outside any development boundary where the presumption is against new residential dwellings under policy DM1.3. Therefore, this proposal was contrary to housing policy and the aims of the NPPF meaning the principle of the development is unacceptable.		
QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary &(Part of) SN0531, Land west of Lower Road, Rockland St Mary	2271	Comment	LLFA comments: Infiltration potential will be dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised.	The comments made in relation to water management are noted and the requirement for geotechnical investigation these issues will be explored further with the LLFA	365	Policy wording to include requirement for geotechnical investigation.
QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary &(Part of) SN0531, Land west of Lower Road, Rockland St Mary	92	Comment	As a potential site for further development, site SN2007 would be slightly better than proposed SN2064REV. However, object to this site as the access is not suitable either. The road is on a bend, at the top of a hill and at the end of the village where majority of passing vehicles do not adhere to the speed limit and it could create potential accidents. Object to SN0531, as a huge development will create a precedent to bung hundreds of houses in to our village which we do not have facilities or infrastructure for.	The Council acknowledges the concerns raised with site access for SN2007 and SN0531 and the impact that development would have on local facilities and infrastructure. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that development of the site is broadly acceptable in highways terms. However, this will be subject to achieving a suitable and safe access. This will be determined prior to development.	356	No action or change required.

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				With regards to infrastructure, a key objective of the VCHAP is the distribution of new development throughout the rural areas of the District to support the existing facilities and services within existing communities. Whilst it is recognised that rural settlements offer fewer services and facilities than their urban counterparts, a continued concentration of development in these locations will result in the inevitable decline of existing services and facilities within the rural areas. This Plan seeks to address this issue and also offer an opportunity for new services and facilities to emerge within local communities. As part of the Plan preparation infrastructure providers have been invited to review the proposals and make representations. These comments are also important in shaping the site selection process.		
QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary & (Part of) SN0531, Land west of Lower Road, Rockland St Mary	63, 144, 219, 807, 1811	Comment	Comments and concerns have been raised to the number of houses proposed on site and that this would result in overcrowding and place greater pressure on existing infrastructure and local amenities. The representation also makes reference to the provision of affordable homes and ensuring that this is enforced. As a result increased numbers, concerns have also been raised to the include in pollution, crime and anti-social behavior and overlooking.	The Council acknowledges the concerns and comments raised within these representations. With regards to the proposed number of dwellings for the site, this is considered to be sustainable and development of this site would represent an efficient use of land, in accordance with the paragraph 124 of the NPPF. The scale of development proposed in is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and	355	Development of the site will be subject to achieving a suitable access.

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			There is also concerns with the the road capacity and increased traffic; the road narrows at Bramerton, and it is an awkward place for buses to pass any oncoming traffic. More cyclists and there's no provision for pedestrians either leaving the village.	services within the development. With regards to housing mix, the Council will seek to provide new housing development to meet housing needs (using the most up to date Strategic Housing Market Assessment (SHMA)). This will ensure that allocated sites provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of their life cycle e.g. first-time buyers, affordable housing, upsizing/downsizing etc. In addition, the Council will only consider allocating sites that are capable of delivering the policy standard affordable housing requirements. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, including those proposed at Rockland St Mary. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making		

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				process. With regards to overlooking and amenity concerns, these will be addressed at the detailed design stage and any planning application would be subject to planning policies surrounding amenity etc. The Council acknowledge the safety concerns regarding the access and the suitability of The Street for further development. As part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that development of the site is broadly acceptable in highways terms. However, this will be subject to achieving a suitable and safe access. This will be determined prior to development.		
QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary & (Part of) SN0531, Land west of Lower Road, Rockland St Mary	1412	Comment	Notwithstanding concerns raised by other respondents regarding wildlife present on the site, given the site's proximity to the Broads Special Area for Conservation and Broadland Special Protection Area, the Village Cluster Plan will need to demonstrate that adverse effects on these sites (for example due to increased water demand and demand on waste water disposal capacity at the nearest waste water treatment works) can be avoided in order to ensure compliance with the Habitats Regulations.	The comments from Norfolk Wildlife Trust are noted and reference to proximity to the Broads Special Area for Conservation and Broadland Special Protection Area.	354	The Plan will need to demonstrate that adverse effects on these sites can be avoided in order to ensure compliance with the Habitats Regulations.

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QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary &(Part of) SN0531, Land west of Lower Road, Rockland St Mary	1826	Comment	Site: SN2007 & (Part of) SN0531 The site extends beyond the eastern extent of the main village and is fairly prominent being on a ridge, and is only approx. 150m from BA boundary. Also close by are RSPB Rockland Marshes, Rockland Staithe and visitor car park. Wherrymans Way runs close to the site (closest point 10- 20m). National Cycle Route 1 follows New Inn Hill Rd and Green lane close to the site, and a footpath runs through the field to the east. There is a possibility the development could break the skyline in views from the Broads area - the skylines in views out of the area are remarkably free of development of any form adding to the sense of isolation. Much of the land within this area is subject to many nature conservation designations covering most of the area. Comments on this site: - o Taking these factors together suggests that this site has some potential to adversely affect the local landscape character and the setting of the Broads. Therefore we ask that the allocation policy includes a requirement for Landscape & Visual Impact Assessment and that the Broads Authority are consulted on the selection of viewpoints. - o SN2007 says 'Whilst the site extends beyond the eastern extent of the main village and is fairly prominent as it is on a ridge, the precedent for development has	The comments made by the Broads Authority are noted. A number of the issues raised by the Broads Authority in terms of landscape impact are reflected and responded to in the public comments above. As is the possibility of a second access for pedestrians and cyclists.	352	Allocation policy to include a requirement for Landscape & Visual Impact Assessment and that the Broads Authority are consulted on the selection of viewpoints.

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			been established by the adjoining Eel Catcher Close development'. I don't think that conclusion can be reached. You could say that about any settlement fringe site – that because there is development there already, and a site may be adding onto that, development is ok. The proposed site is further east and further south than the existing development. o The policy is called SN2007, but the text refers to SN0531 and the map shows the sites joined. This could do with being a bit clearer. Either call the policy both site numbers or delineate the two sites and say that they will be considered as one. o Says 'appears to offer the potential for an additional footway access back to the main village' – so will it or won't it? Will that requirement be part of the policy wording?			
QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary & (Part of) SN0531, Land west of Lower Road, Rockland St Mary	1914	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application	351	A Phase One Land Contamination Report (Desk Study) should be required as part of any planning application

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			approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, then an alternative condition could be attached to any approval requiring its implementation.			
QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary &(Part of) SN0531, Land west of Lower Road, Rockland St Mary	2051	Comment	Site: SN2007 & (Part of) SN0531, Land west of Lower Road, Rockland St Mary Whilst there are no designated heritage assets within the site boundary, three grade II listed buildings (Old Hall and two barns) lie around the western end of the site. We therefore have concerns about built development of the western end of the site. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	Historic England comments noted,	350	Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.
QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary &(Part of) SN0531, Land west of Lower	1966, 2154	Comment	Water management comments: Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, then this discharge should be facilitated in line with the Non-statutory	Water management comments noted.	349	The comments made in relation to water management are noted and the requirement for geotechnical investigation these issues will be explored

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Road, Rockland St Mary			technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised.			further with the LLFA. The comments relating to the flood risk of this site are noted and the inclusion of this site within the VCHAP will need to be reassessed. Site is affected by a Source Protection Zone 3 and developers will need to liaise with the Environment Agency to ensure that development / drainage does not adversely affect the water quality; however Zone 3 is the lowest risk. Background policy text could highlight this identified constraint on the site but no requirements in terms of policy text as this would be covered by existing policies.
QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary &(Part of) SN0531, Land west of Lower Road, Rockland St Mary	1593	Support	Support site SN2007 and agree that this site should be considered suitable for allocation. Suitable access can be achieved and the site is well related to the services and facilities in the village. The landowners of site SN2007 and SN0531 have agreed to work in collaboration to allow the development of the allocated site to take place as preferred.	Support for site SN2007 and SN053 noted.	348	No action or change required.

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QUESTION 106: Preferred Site - SN2007, Land south of New Inn Hill, Rockland St Mary &(Part of) SN0531, Land west of Lower Road, Rockland St Mary	42	Support	Support site SN2007 and SN0531; Logic location. Suggestion to include more of SN0531. Building more homes in Rockland St Mary we will increase the viability of our local shop and post office as well as our primary school.	The support of the site is noted. With regards to a larger part of SN0531 being included, this was considered as part of the site assessment process, but concerns were raised with the impact upon landscape and townscape. The proposal for 25 dwellings on a site of 1ha is consistent with the aim of the VCHAP.	340	No action or change required.
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	687	Object	Objections: 1. Significant and detrimental impact on Bio and Geo diversity including pondlife and protected species 2. Insurmountable 'Access to Site' issues 3. Flood Risk 4. Conflict with keeping a Linear Pattern development 5. Conflict with an 'Area of High Landscape quality' as per Local plan 1997 5. Site visit observation omissions/inaccuracies 6. Townscape-losing rural scale 7. Proposed alternative site-Oaks->RSM centre	Comments regarding the environmental impact have been noted, however all development will be required to deliver net-gain on site and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site, as well as significant on-site features (e.g., trees and hedgerows). Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. In addition, the NCC Ecologist has raised no major concerns. NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have raised awareness with the access and advised that if 3rd party land is needed for appropriate visibility splays, then this will need to be demonstrated prior to allocation as this affects the ability to create a safe access. With regards to the increased traffic movements, these concerns are noted and would be dealt	668	Policy wording to ensure appropriate landscape measures.

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				with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority who have advised that with appropriate mitigation measures in place development of this site would be achievable. Rockland St Mary is made up a variety of development densities and styles, and new development does not necessarily need to repeat what is adjacent. Local Plan policies, including those on design, landscaping and amenity, are in place to guide the from of development.		
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	511, 713, 826, 923, 931, 979, 1239, 1240, 1273, 1281, 1302, 1303, 1334, 1368, 1461, 1558, 1568, 1571, 1581, 1597, 1607, 1613, 1748, 1778, 1805	Object	Development of the site would raise highway safety concerns with particular concerns for footpath provision. The central area of the village is linear, where development would impact on historic features and would impact on the long views to the south and overall landscape. Such a site will set a precedent in this village for further backland development. Negative impact on climate and wildlife which would also take out arable Grade 2 agricultural land. Impact of the amenity of current and future residents Impact on infrastructure and concerns	The Council acknowledges the objections made within these representations. With regards to site access, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, highways have advised that if 3rd party land is needed for appropriate visibility splays, then this will need to be demonstrated prior to allocation as this is affects the ability to create a safe access. With regards to increased traffic movements, these concerns are noted and would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development	419	Confirm access and third party issue for visibility.

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			whether the site will deliver any affordable housing provision.	Management policies. With regards to the existing landscape, whilst Rockland is characterised by mostly linear development, there are existing examples of small development clusters to the east and west, including the current development to the east of the village, The Orchard, which is currently developing 21 houses. The Council therefore considers that a well-designed scheme would not be inappropriate in this location. A landscape plan will help mitigate any impact that the proposed development may have on the surrounding area, particular to the south. Further to the concerns raised around destruction of the environment, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. The Council notes the concerns regarding the loss of good quality agricultural land. According to the DEFRA Provisional Agricultural Land Classification (ALC) (England), the site is considered as Grade 3 - Good to Moderate. As part of the site assessment process, the Council has taken into consideration the best most versatile land (BMV) by identifying the ALC of all sites submitted. Where		

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				possible, the Council will avoid allocating and preferring sites that are of a high grade. Where higher grade land may be present, the Council will need to consider whether the social, economic or environmental benefit outweighs the agricultural and that there is no suitable or available site for the development on land of poorer quality. With regards amenity concerns, these will be addressed through the detailed planning application stage. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. With regards to the provision of affordable housing on site, the Council will seek to ensure that development		

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				meets the affordable housing mix requirements of the most up to date Strategic Housing Market Assessment (SHMA). The Council will also only seek to consider allocating sites that are capable of delivering the policy standard affordable housing requirements;(Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.		

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				Further to the concerns raised around destruction of the environment, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. With regards to the proposed number of units to be allocated, it is considered that this number demonstrates a sustainable use of land that would also represent an efficient use of land, which in accordance with the National Planning Policy Framework (NPPF). In addition, the scale of development proposed in is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. Whilst it is recognised that rural settlements offer fewer services and facilities than their urban counterparts, a continued concentration of development in these locations will result in the inevitable decline of existing services and facilities within the rural areas. Therefore, locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services.		

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				With regards to the provision of affordable housing on site, the Council will seek to ensure that development meets the affordable housing mix requirements of the most up to date Strategic Housing Market Assessment (SHMA). The Council will also only seek to consider allocating sites that are capable of delivering the policy standard affordable housing requirements;(Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time.		
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	550	Object	Should not be building on the farmland in Norfolk and Suffolk. This land is prime farmland and usually provides us with two crops a year. Concerns over where food will be cropped when this important land is gone. Concerns over greed and careless decisions could destroy our potential to feed ourselves in the future. Wildlife will also disappear as a result of this development, including adders, blue holly butterflies, dragonflies, damselflies. Field mice and honey bees are getting very scarce, although there are many types of bird (including red kites). These and many	The Council notes the concerns regarding the loss of good quality agricultural land. According to the DEFRA Provisional Agricultural Land Classification (ALC) (England), the site is considered as Grade 3 - Good to Moderate. As part of the site assessment process, the Council has taken into consideration the best most versatile land (BMV) by identifying the ALC of all sites submitted. Where possible, the Council will avoided allocating and preferring sites that are of a high grade. Where higher grade land may be present, the Council will need to consider whether the social, economic or environmental benefit outweighs the agricultural and that there is no suitable	416	No action or change required.

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			more are all at risk due to their habitats potentially being destroyed.	or available site for the development on land of poorer quality. Further to the concerns raised around destruction of wildlife, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	218, 372, 808, 1812	Comment	The representations raised concerns with the existing water management and drainage issues within the area. Concerns that more development would cause highway safety concerns with increased volume of traffic. Development would overload existing village amenities; water, sewage, electricity etc. Concerns with the capacity of existing infrastructure to serve more housing. Destruction of environment; countryside needs to be protected; the area is outside the development boundary Development of 50 houses is too many; could this be reduced. Concerns that the dwellings wouldn't be affordable.	With regards to the concerns raised regarding flooding, discussions have taken place with the Lead Local Flood Authority (LLFA) and it is considered that on-site drainage solutions can often help to address existing surface water issues and as such it is considered that this issue can be adequately addressed during the planning application stage. In addition, further comments are also expected from the Environmental Agency and Anglian Water, who will help inform individual allocation policy wording. With regards to site access, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have raised awareness with the access and advised that if 3rd party land is needed for appropriate visibility splays, then this	415	SNC to contact FW Properties to see what arrangements they have re accessing the SN2064REV.

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				will need to be demonstrated prior to allocation as this affects the ability to create a safe access. With regards to the increased traffic movements, these concerns are noted and would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. Further to the concerns raised around destruction of the environment, all development will be required to consider biodiversity net-gain and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected		

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				species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. With regards to the proposed number of units to be allocated, it is considered that this number demonstrates a sustainable use of land that would also represent an efficient use of land, which in accordance with the National Planning Policy Framework (NPPF). In addition, the scale of development proposed in is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. Whilst it is recognised that rural settlements offer fewer services and facilities than their urban counterparts, a continued concentration of development in these locations will result in the inevitable decline of existing services and facilities within the rural areas. Therefore, locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services. With regards to the provision of affordable housing on site, the Council will seek to ensure that development meets the affordable housing mix requirements of the most up to date Strategic Housing Market Assessment (SHMA). The Council will also only seek to consider allocating sites that are		

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				capable of delivering the policy standard affordable housing requirements;(Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time.		
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	301	Object	Access from the road is difficult. There are already lots of cars parked around the post office and with a junction joining the road immediately opposite Highway safety concerns for the safety of pedestrians, cyclists and vehicles. Building behind the surgery creates a precedent for development away from the road in the village. There were reasons to reject other development applications in the village based on the fact they altered the character of the village. How is a development behind the surgery any different?	With regards to access, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that if 3rd party land is needed for the access visibility splay, then this should be demonstrated prior to allocation. The principal aim of the Village Cluster Housing Allocation Plan (VCHAP) is to allocate a series of smaller sites to accommodate a minimum of 1,200 new homes across the villages within the South Norfolk District, in accordance with the requirements of the GNLP. The GNLP requirements derive from the Government's method for calculating Local Housing Need for the area. Locating this level of growth in village clusters aims to promote social	385	No action or change required.

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				sustainability by supporting rural life and services. With regards to future applications within Rockland, these will be assessed individually and against current planning policies and legislation at such time.		
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	393	Object	Development of this site detracts from the linear nature of the village and could create a precedent for further build. Access is tight and dangerous given current on street parking for the shop. On street parking is likely to increase for the school, shop and surgery with no scope for alternative parking. There will be increased pressure on utilities and services including the school and surgery.	Whilst Rockland is characterised by mostly linear development, there are existing examples of small development clusters to the east and west, including the current development to the east of the village, The Orchard which is currently developing 21 houses. The Council therefore considers that a well designed scheme would not be inappropriate in this location. With regards to access, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that if 3rd party land is required for the access and sufficient visibility splay, then this should be demonstrated prior to allocation. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue	375	Developer/landowner to demonstrate that a safe access is achievable i.e. confirm 3rd party land ownership.

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				for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. It is noted that all of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.		
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	52, 56, 60, 61, 71, 89, 90, 100, 122, 136, 147, 174, 229, 348, 444, 564, 683, 688, 689, 732, 835, 994, 1007, 1027, 1206	Mixed	Summary of concerns raised; the development would intrude on open landscape, affect the character of the village and significantly affect the landscape of the Hellington valley; development will have an impact on local wildlife; concerns raised with highway safety and the proposed narrow access; development would increase traffic (increased pollution and congestion); further development would impact on the already stretched infrastructure; the local area already has existing flood issues flood area; concerns that the proposed houses will not be affordable.	The Council acknowledges the comments made within these representations. With regards to the existing landscape, whilst Rockland is characterised by mostly linear development, there are existing examples of small development clusters to the east and west, including the current development to the east of the village, The Orchard, which is currently developing 21 houses. The Council therefore considers that a well designed scheme would not be inappropriate in this location. A landscape plan will to help mitigate any impact that the proposed development may have on the surrounding area, including any	374	Confirm that access and visibility can be achieved in accordance with NCC highway requirements. Site allocation policy to include landscape mitigation plan.

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				designated areas. With regards to infrastructure, the Council is engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Highways and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. It is acknowledged that development sites can be home to wildlife, and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures. With regards to access, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that if 3rd party land is required for the access and sufficient visibility splay, then this will need to be demonstrated prior to allocation. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority (LLFA) and it is considered that on-site drainage solutions can often help to address existing surface water issues and as such it is considered that this issue can be adequately addressed during the planning application stage.		

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				With regards to the provision of affordable housing on site, the Council will seek to ensure that development meets the affordable housing and housing mix requirements of the most up to date SHMA. The Council will also only seek to consider allocating sites that are capable of delivering the policy standard affordable housing requirements;(Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time.		
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	43, 48	Object	Summary of concerns: Takes away from the linear nature of the village allocation could set a precedent of building more properties behind the existing row of houses along the street. Highway safety: The proposed access through the Doctors surgery is at the most congested part of The Street with the Post office and shop directly opposite.	Whilst Rockland is characterised by mostly linear development, there are existing examples of small development clusters to the east and west, including the current development to the east of the village, The Orchard which is currently developing 21 houses. The Council therefore considers that a well designed scheme would not be inappropriate in this location. With regards to access, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have advised that if 3rd party land is required for the access and	373	Access to be confirmed suitable and achievable.

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				sufficient visibility splay, then this should be demonstrated prior to allocation.		
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	230	Comment	This proposed housing development should reflect the local need, affordable housing to allow families to stay connected in their own communities. South Norfolk should be ambitious in this development, using interesting architecture to build passive houses that are cheap to run. It would also be good to see some housing that would be suitable for the needs of older people in the community. Executive boxes are not needed. Access would be an issue, as the proposed access would be 'tight' especially if the site was to have further development in the future.	The Council acknowledges the comments made within the representation. The provision of affordable housing and the concerns about the cost of affordable housing are noted. Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time. With regards to type of houses, including passive housing, emerging GNLP Policy 5: 'Homes' has a specific requirement for development proposals (for major housing development) to provide at least 20% of homes to the Building Regulation M4(2)[1] standard or any successor. The Council will also ensure that the need for specialist housing for the elderly and other needs is considered on all housing schemes and advise applicants on the most up-to-date evidence of need. With regards to access, as part of the site selection process, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on	372	To confirm 3rd party land and the ability to achieve satisfactory access and visibility.

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				the wider highway network. In this instance, Highways have advised that if 3rd party land is needed for the access visibility splay, then this should be demonstrated prior to allocation.		
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	1915	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, then an alternative condition could be attached to any approval requiring its implementation. I would offer the following comments in respect of question 108 to Chapter 43 of the VCHAP relating to the Rejected Sites in Rockland St Mary, Hellington and Holverston in the event that one or more of them be allocated instead of, or in	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	371	A Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.

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			addition to, the preferred sites as a result of the consultation process.			
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	1967, 2148	Comment	Water management comments; outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, then this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Only the northwest corner of the site is within a SPZ 3.	The comments made in relation to water management are noted and the requirement for geotechnical investigation these issues will be explored further with the LLFA.	370	Allocation policy wording to include LLFA requirement. With regards to the Source Protection Zone 3, developers will need to liaise with the Environment Agency to ensure that development / drainage does not adversely affect the water quality; however Zone 3 is the lowest risk. The LLFA have advised that background policy text could highlight this identified constraint on the site but no requirements in terms of policy text as this would be covered by existing policies.
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	2211	Comment	NCC Ecologist comments: Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Site comprises field south of village, behind dwellings. Hedges are a priority	NCC Ecologist comments noted.	369	Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together

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			habitat so losses should be avoided, minimised and as a last resort, compensated for. No other priority habitats are identified onsite although deciduous woodland to east of site (see MAGIC). Site within amber habitat zones for great crested newts. Site within a SSSI IRZ 0 allocation of 25 dwellings would fall below the trigger for consultation with Natural England if allocated (trigger is 50 units plus). Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.
QUESTION 107: Preferred Site - SN2064REV, Land to the south of The Street, Rockland St Mary	2164	Comment	NCC Highways comments: It is believed that 3rd party land is needed for the visibility splay to the west of the proposed site access. Particularly as the highway requirements relate to the ability to provide a safe access, the ability for them to be met should be demonstrated prior to allocation.	NCC highway comments noted.	368	Developer to demonstrate that safe access can be achieved. As such, allocation policy wording to reflect highway requirements.
QUESTION 108: Should any rejected sites be allocated?	734	Comment	Regarding site SN2063 I find it hard to understand that the reasons for rejecting are obviously the same reasons that the site to the south side should be rejected also. The comment regarding school lane taking the line back for the south makes not sense, when the same could be said for large development behind Broadfields Way?	The alternative location suggested is not considered suitable for various reasons; Development to the north of the Street would intrude into the open landscape to the north, this is considered to be detrimental to the character and appearance of the area, access concerns.	669	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 108: Should any rejected sites be allocated?	1919	Comment	SN2070 - West of the Oaks, Rockland St Mary The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval.	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application	430	A Phase One Land Contamination Report (Desk Study) should be required as part of any planning application
QUESTION 108: Should any rejected sites be allocated?	1918	Comment	SN2063 - Land north of The Street (behind Post Office), Rockland St Mary The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	429	A Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			Management Plan be attached to any approval.			
QUESTION 108: Should any rejected sites be allocated?	1917	Comment	SN2061REV - North of The Street, Rockland St Mary (access between No101 and 103 The Street) The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	428	A Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.
QUESTION 108: Should any rejected sites be allocated?	1916	Comment	SN0165 - Land north of Bramerton Lane & Rookery Hill, Rockland St Mary The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	The comments made by the Environmental Protection Team are noted; due to site size and sensitivity of proposed development, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application	427	A Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.
QUESTION 108: Should any rejected sites be allocated?	427	Object	There is no footpath between The Oaks and the Village Shop or School. The road is narrow and bends. Dangerous to those people who walk and to others who use the road	No site reference is given within this representation. However, the Council acknowledges the concerns made in relation to highway safety in the village.	426	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 108: Should any rejected sites be allocated?	231	Comment	The rejected sites should be reviewed again. It seems illogical to be considering site reference SN2064REV, which has access issues and would change the linear nature of The Street, which has been used as a reason for rejecting these sites. If sites were considered on both sides of The Street it would make for more balance through the village.	The Council notes the concerns regarding the allocation of SN2064REV. Whilst Rockland is characterised by mostly linear development, there are existing examples of small development clusters to the east and west, including the current development to the east of the village, The Orchard which is currently developing 21 houses. Whilst other sites were rejected due to their impact on this linear character, this was not a stand alone impact and other factors have also been assessed to determine whether the sites were suitable. On balance, the council consider that the development of SN2064REV is favorable and the pros outweighed cons.	425	No action or change required.
QUESTION 108: Should any rejected sites be allocated?	302, 714, 928, 1466, 1567, 1569, 1590, 1609	Mixed	Support the rejection of the sites.	Comments noted.	424	No action or change required.
QUESTION 108: Should any rejected sites be allocated?	575	Support	This is the only sensible site, being close to the shop, post office and school. The site would not intrude on present housing at all. The other proposal at Eel Catcher Close is almost a mile from the village amenities.	The representation doesn't reference a particular site or road name, however reference to the proximity of the school is made so it is assumed the representation is made in regard of SN0165. The Council acknowledges the support for this site.	423	No action or change required.
QUESTION 108: Should any rejected sites be allocated?	464, 466, 472, 723, 1419	Support	Support for SN0165 (land north of Rookery Hill); closer to village amenities, no overlooking issues.	Support for SN0165 noted.	422	No action or change required.

Roydon

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 109: Settlement Limit	2052	Comment	English Heritage will consider sites as part of the Diss & District Neighbourhood Plan.	Noted that comments will be made as part of the Diss & District Neighbourhood Plan.	403	No action or change required.
QUESTION 109: Settlement Limit	1968	Comment	IDB comments will be made via the Diss and District Neighbourhood Plan consultation.	Noted that comments will be made as part of the Diss and District Neighbourhood Plan.	402	No action or change required.
QUESTION 109: Settlement Limit	1194, 1226, 1230, 1332, 1469, 1509, 1543, 1554, 1610	Mixed	Concerns with why SN0526 has been promoted.	Site SN0526 falls within the Diss and District Neighbourhood Plan area which includes the following settlements that are, or form part of, a South Norfolk Village Cluster: Burston, Shimpling, Diss, Roydon and Scole. These Neighbourhood Plan documents sit alongside the Local Plan and when adopted are also taken into account in determining planning applications. Most of these Neighbourhood Plans include more detailed Development Management policies that aim to shape development proposals to better reflect local circumstances. Decisions relating to the allocation of these sites will be undertaken through the relevant Neighbourhood Plan. Sites promoted to SNC within Roydon have been forwarded to the Neighbourhood Plan Steering Groups Please note that to ensure transparency, the Council has identified, within this document, the sites in Roydon that have been promoted to the Council for consideration.	401	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 109: Settlement Limit	1210	Comment	This site had been rejected on several occasions but still gets put forward which is wrong on all levels of democracy.	Decisions relating to the allocation any sites within these areas, will be undertaken through the Diss and District Neighbourhood Plan (DDNP). However, to ensure transparency, the Council has identified the sites in Roydon, that have been promoted to the Council for consideration.	400	No action or change required.
QUESTION 109: Settlement Limit	8	Comment	The blue hatched area (not labelled SN0526, formerly GNLP0526?) is outside the Roydon development boundary and unsuitable for residential housing. It encroaches into the Waveney Valley with difficult highway access, infrastructure loading, negative environmental effects on Roydon Fen, destroying amenity assets for Roydon Village and location. The site has received many disapproving comments from the Roydon Community during DDNP surveys, and was also rejected from earlier GNLP consultations, involving public bodies representing both Suffolk and Norfolk. Any need to allocate housing development beyond 1-2 per year in Roydon over the next 15 years needs serious re-appraisal.	The blue colouring of SN0526 on the plan indicated that the site is located within a Neighbourhood Plan area; the Diss and District Neighbourhood Plan covers an area that includes the following settlements that are, or form part of, a South Norfolk Village Cluster: Burston, Shimpling, Diss, Roydon and Scole. Decisions relating to the allocation any sites within these areas, will be undertaken through the Diss and District Neighbourhood Plan (DDNP). However, to ensure transparency, the Council have identified the sites in Roydon that have been promoted to the Council for consideration.	396	No action or change required.

Saxlingham Nethergate

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 111: Should any rejected sites be allocated?	1969	Comment	Water Management comments: Part of the Parish is located within the Norfolk Rivers IDD. The Board's byelaws apply to any new developments within the IDD.	The comments from the Water Management Alliance have been noted. However, at this stage no sites within Saxlingham Nethergate have been identified as preferred or shortlisted site.	97	No change or action required at this stage.
QUESTION 111: Should any rejected sites be allocated?	1601	Object	It has been suggested that site SN4005 should be allocated or an allowance for a settlement limit extension to the north of the village. The site would allow for an extension of the linear development pattern of Norwich Road and would match the development to the south of the road. Mitigation to allow for a safe walking route to the centre of the village could be included and the site appears to be a clear extension to the village to round off the settlement limits. The landowner would look at a smaller scale development if a settlement limit extension was preferred.	At this stage the site has been rejected. The site has been reviewed by the Highway Authority who have advised that they would not be supportive of an allocation in this location; there is a lack of contiguous footpath where there is no opportunity to link into existing. This would result in no safe walking route to the school, which is problematic as the School is located some distance from the site at the opposite end of the village. The Highways issues are considered to not be resolvable in this instance. In addition, the site has been assessed by the Councils Landscape officer, who has identified that development of the site would not be acceptable due to the open nature of the site to the north. Significant hedgerow would also need to be removed in order to create a safe access, this is also not considered to be acceptable.	96	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 111: Should any rejected sites be allocated?	1766	Comment	Site SN4034SL: Wish to see this as a preferred site. The site is not in a conservation area, is not opposite any listed buildings and is within close range of a pub and other services (shops in Newton). It is situated in the school catchment for Saxlingham Nethergate and Newton Flotman. The site has been listed as garden/amenity - this should be amended to garden land only. Also note that there is an access to the front of the plot as originally submitted. Please consider for an allocation for affordable housing of 2 units.	Given the small scale size of the site, the site has been considered by the council for inclusion in the existing settlement limit, as a settlement limit extension. However, the site is located a considerable distance from the existing settlement limit and is considered detached from the village. In addition, the site is considered to be very rural in character with large open views of agricultural fields and paddock surrounding the site, where development of the site would have a negative impact on these views and would be out of character. Further to this, there is mature boundary hedging surrounding the site where if development was to occur, significant parts of these hedges would need to be removed in order to achieve access. This would have an impact on the surrounding rural character as these contribute positively to the area. In addition to the landscape issues, the site has also been assessed by the Highway Authority who have considered the site to be unacceptable due to the inability to creating a suitable access or safe walking route. Therefore, the proposed site is not considered suitable for an extension to the settlement limit.	90	No action or change required.

Scole

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 112: Settlement Limit	1723	Comment	It is acknowledged that the proposed site allocations for Scole are suggested to be deferred to the emerging Diss & District Neighbourhood Plan, and whilst in dialogue with both Scole Parish Council and the Neighbourhood Plan Steering Group regarding potential development options, the Plan is considered to be unsound on the basis that it does not contribute towards the achievement of sustainable development. Nor is it positively prepared in a way which is aspirational but deliverable. Object to the limited level of development being proposed. It is unclear as to why only 25 dwellings are being proposed for allocation. Scole has previously been classified as a Service Village but more readily functions as a 'Key Service Centre' village, whereby day to day services and facilities are close at hand. Development here would be in tune with the Core Planning Principles of the NPPF. Hopkins Homes Ltd therefore requests that the site is proposed as a residential allocation within the emerging South Norfolk Village Clusters Housing Allocations Document, with the settlement limit for the village extended to encompass the totality of this site.	In the first instance, Sites promoted to SNC within Scole have been forwarded to the Neighbourhood Plan Steering Groups. Decisions relating to the allocation of these sites will be undertaken through the Diss and District Neighbourhood Plan (DDNP). With regards to the housing requirement identified for Scole, this is indicative, and 25 homes has been set by South Norfolk Council as a minimum in accordance with the aims of the Village Clusters Plan. In some areas the new allocations will deliver in excess of the quantum of development required, though only marginally. This 'over-allocation' provides a useful buffer to ensure delivery of new housing remains on track, and also helps to meet specific local need for housing. Scole has decided to allocate for more than its 25 dwellings to help meet the local housing need and enable younger residents to remain in the village. In addition, housing over and above this is likely to be delivered as part of unplanned or windfall developments across the Neighbourhood Plan area. Policy 1: Scale and Location of Growth of the current Reg 14 Pre-Submission DRAFT version of the DDNP sets out the spatial distribution of growth across the DDNP.	99	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 112: Settlement Limit	1970	Comment	Water Management comments: IDB comments were made via the Diss & District Neighbourhood Plan consultation.	At present, sites put forward within Scole are to be considered and allocated as part of the Diss & District Neighbourhood Plan. The Council acknowledge that the Water Management Comments were made direct to the NP.	98	No action or change required.

Seething and Mundham

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 113: Settlement Limit	458	Comment	Seething Parish Council are reassured that the settlement limit does not extend west along Wheelers Lane beyond Barn Cottage (see comments regarding SN1035). We are however opposed to the proposed settlement limit including SN0406SL (see below). Otherwise no major issues - in keeping with linear character of Seething village.	Comments noted. The Council will review the comments made by the Parish Council on specific site allocations and respond accordingly.	740	No action or change required.
QUESTION 113: Settlement Limit	541	Support	Otley Properties Ltd support the proposed Seething Settlement Limit extensions. However, some parts of the existing Settlement Limit do not appear to follow logical boundaries (i.e. areas of domestic gardens; half of the primary school; and certain properties within the village (such as properties on Wheelers Lane) are excluded. Consideration should be given to a thorough review of Settlement Limits to properly encompass and reflect the 'built up' areas of the village (including, properties, domestic gardens etc.) and follow logical and defensible boundaries. More detailed comments are provided on specific Settlement Limit extensions in the preferred and shortlisted sites section.	The Council acknowledges the comments made in relation to the Settlement Limit extensions. With regards to the comments made on 'logical boundaries', the Council considers that the proposed Settlement Limit extensions to be well related to the existing pattern of development and would form a natural extension to the existing Settlement Limits. The proposed extension to north is drawn around existing linear development, this would not necessary include the rear gardens of the properties included, as this could have impact on the countryside. It should be noted that any land that is included in the Settlement Limit that would mean that any future planning applications would be treated as being part of the settlement of Seething, rather than being treated as part of the open countryside.	739	No action or change required.
QUESTION 114: Preferred Site - SN0405, Land to North and South of	542	Support	The proposed allocation is supported. However, the suggested site area (1.25 hectares) is incorrect. The actual proposed area of land available for residential	Comments noted. In the first instance, the VCHAP is looking at a 25 dwellings per hectare ratio which is not considered inappropriate in a rural	766	Review developable area of land; agent has

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Brooke Road, Seething			development (north of Brooke Road) is approximately 0.75 hectares. It is unlikely that 20 dwellings can be accommodated on the proposed allocation and the number of units will be significantly less. If 20 dwellings are required, the allocation should revert to the original 'call for sites' submission and include land to north of the Cart Shed/Church Farm House. A sensitive scheme incorporated this land that respects the non-designated heritage asset and Conservation Area setting is considered possible.	context. It is noted that the developable area of land may change due to site constraint's		suggested that only 0.75ha is suitable.
QUESTION 114: Preferred Site - SN0405, Land to North and South of Brooke Road, Seething	700, 856, 1111, 1672	Object	1. The site adjoins conservation land and any development runs counter to SNDC's own planning policy in respect conservation area and historic setting. 2. Dwellings on this site would be hugely detrimental to the character of Seething village and would significantly impair views across open farmland. 3. There are significant traffic issues concerning a very busy corner on which the proposal would sit. 4. NCC Highways department have expressed related concerns in respect of traffic (shown in the site assessment document). Specific local concerns regarding Brooke Road. 5. The proposal would run counter to and take away from the current linear nature of dwellings in the village SN0405	1. Conservation and Heritage assets were considered as part of the site selection process. In addition, a Heritage Assessment will be undertaken to a format agreed with Historic England, this will inform the site allocation and any subsequent mitigation measures. 2. Technical advice has been sought from the Council Landscape officer relating to the wider landscape and potential impact. Whilst landscape concerns are noted, the Council considers that a well-designed scheme would not be inappropriate in this location. A landscape plan will also help mitigate any impact that the proposed development may have on the surrounding area, including any designated areas. 3/4. NCC Highways officers have been involved with the assessment of the sites prior to consultation and also provided technical advice as part of the Regulation 18. Advice has been sought	747	Further landscape input required to help mitigate concerns.

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			6. Furthermore, the basis on which the application is submitted is to create homes for those in greatest need, but there are no policies or measures which will ensure that those most in housing need will actually have access to the houses built.	relating to both site access and the impact of the proposed development on the wider highway network. To ensure that a suitable and safe access can be achieved, the Highways Authority require confirmation that a safe access and sufficient visibility splays can be achieved, prior to accepting development is acceptable and in allocating the site. 5. Whilst Seething is characterised by linear development there are existing examples of small development pockets to the north of the village. The council considers that a well designed scheme would not be considered to be inappropriate in this location. 6. With regards to housing mix, the Council will seek to provide new housing development to meet housing needs (using the most up to date Strategic Housing Market Assessment (SHMA)). This will ensure that allocated sites provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of their life cycle e.g. first-time buyers, affordable housing, upsizing/downsizing etc. In addition, the Council will only consider allocating sites that are capable of delivering the policy standard affordable housing requirements		
QUESTION 114: Preferred Site - SN0405, Land to North and South of	459	Comment	Development of the green field site north of Brooke Road with 20 or more dwellings would be hugely detrimental to the character of Seething village and impair	The Council acknowledges the concerns of the Parish Council. With regards to the proposed numbers, at this stage the proposed allocation is for up to 20	746	Consider landscaping and mitigation; further conversations required with SNC landscape

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Brooke Road, Seething			views across open farmland. Furthermore, a 20+ dwelling development at this site necessitates that this would not be linear single property depth and does not therefore meet our previously agreed criteria for any further village development. We also express significant concern regarding highways/traffic impact on a dangerous corner. Finally, such a development would not strictly be infill; Seething Old Hall Park is not acknowledged within the settlement limit.	dwelling on a site of 1.25 hectares and this is not considered inappropriate in a rural context. However careful consideration will be given to the landscaping and further conversations with SNC landscape officers will be required. A Heritage Assessment will also be undertaken to a format agreed with Historic England. With regards to highway safety concerns, the Highways Authority have advised that access arrangements and any mitigation measures will need to be confirmed prior to allocation.		officer. Further discussions with highways required prior to allocation.
QUESTION 114: Preferred Site - SN0405, Land to North and South of Brooke Road, Seething	2213	Comment	Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Allocation split between two agricultural fields, northern edge of village. (Prow offsite site through Church Farm yard). Site in amber habitat zone for great crested newts and residential development not identified as a trigger for consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.	Comments noted. A number of the requirements will be standard across all developments, and can be reflected in the core policies as necessary.	745	Consider the need to reflect the protection of Prow in any Policy for the site.
QUESTION 114: Preferred Site - SN0405, Land to North and South of	2165	Comment	NCC Highways: An off-carriageway pedestrian route between the site and	Comments noted	744	Further Highway discussion required; Discussions regarding the required highway

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Brooke Road, Seething			pedestrian access at the school would be required for the site to be acceptable.			mitigations should be concluded and the necessary land / agreements secured prior to allocation of the site.
QUESTION 114: Preferred Site - SN0405, Land to North and South of Brooke Road, Seething	2091	Comment	LLFA: Few or no constraints. Standard information required at a planning stage. Infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised Assessment: Green	Comments noted.	743	No action required.
QUESTION 114: Preferred Site - SN0405, Land to North and South of Brooke Road, Seething	2053	Comment	Historic England: A significant portion of this site lies within the Seething Conservation Area. Therefore, any development of this site has the potential to impact upon the significance of the Conservation Area. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	Heritage assets were considered as part of the assessment of sites; however a Heritage Assessment of the site will be undertaken, to a format agreed with Historic England, which will document how these issues have been considered.	742	Complete the Heritage Assessment of the site, and reflect the outcomes in the Regulation 19 version of the VCHAP.
QUESTION 114: Preferred Site - SN0405, Land to	1971	Comment	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment.	Comments noted.	741	No action required.

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North and South of Brooke Road, Seething			Major development - If surface water discharges within the watershed catchment of the Board's IDD, if this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).			
QUESTION 115: Preferred Site - SN2148, Land to the west of Mill Lane, Seething	460	Comment	Although this site extends beyond the existing development boundary and is not therefore in keeping with the principle of infill, Seething Parish Council do not think that this would detrimentally affect the character of the village; indeed, it may be an ideal location for further development at a density equivalent to existing properties in Mill Lane. We do not identify any obvious major traffic or highway issues. The site is however, quite distant from the village centre.	Parish Council comments noted. With regards to the distance from the village centre, the Highways Authority would require that a frontage footway is provided as part of any development, this will help to connect the site to the village.	753	No action required.
QUESTION 115: Preferred Site - SN2148, Land to the west of Mill Lane, Seething	543	Support	Confirmation that Site SN2148 Land to the west of Mill Lane, Seething remains available for development and the proposed allocation can be supported.	Comments noted	752	No action required.
QUESTION 115: Preferred Site - SN2148, Land to the west of Mill Lane, Seething	2214	Comment	Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Allocation to left of road, in agricultural field. No priority habitat identified e.g. hedges) (and see MAGIC). Site in amber risk zone for great crested newts. Site in SSSI IRZ but residential development does not trigger NE consultation.	Comments noted.	751	Consider the need to reflect the protection of great crested newts in any Policy for the site.

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QUESTION 115: Preferred Site - SN2148, Land to the west of Mill Lane, Seething	2166	Comment	NCC Highways - Frontage footway along with carriageway widening would be required.	Comments noted.	750	Include the need for site frontage footway along with carriageway widening in any Policy for the site.
QUESTION 115: Preferred Site - SN2148, Land to the west of Mill Lane, Seething	2144	Comment	Few or no constraints. Standard information required at a planning stage. Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Assessment: Green	Comments noted.	749	No action required.
QUESTION 115: Preferred Site - SN2148, Land to the west of Mill Lane, Seething	1972	Comment	Water Alliance comments: Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. Major development - If surface water discharges within the watershed catchment of the Board's IDD, this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).	These comments are noted.	748	No action required.
QUESTION 116: Preferred Site - SN0406SL, Land to the west of Seething Street, Seething	461, 465	Comment	Although this would be infill, this site has a variety of mature trees and a pond: these were noted to be significant and in need of restoration in TPO survey (see email to PC 14.07.2020 from Imogen Mole; Conservation and Tree Officer). We think the development would be detrimental to the character and ecology of Seething village. This area of the village, extending north to Well Cottage has unique wooded	Comments noted. With regards to the impacts upon ecology and trees, it is acknowledged that development sites can be home to wildlife, and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures. Similarly with tree	758	No action required.

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			character (noted in “form and character”) that would be adversely affected by development. The northern limit of this “southern component” of proposed new settlement boundary should be at Orchard Cottages.	impacts, any future application will be subject to a arboricultural tree assessment to assess and determine the quantum of development on site. It is anticipated that development will be restricted to 1 or 2 dwellings.		
QUESTION 116: Preferred Site - SN0406SL, Land to the west of Seething Street, Seething	2054	Comment	Historic England comments: This site lies within the Seething Conservation Area. Therefore, any development of this site has the potential to impact upon the significance of the Conservation Area. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	Heritage assets were considered as part of the assessment of sites; however a Heritage Assessment of the site will be undertaken, to a format agreed with Historic England, which will document how these issues have been considered.	757	Complete the Heritage Assessment of the site, and reflect the outcomes in the Regulation 19 version of the VCHAP.
QUESTION 116: Preferred Site - SN0406SL, Land to the west of Seething Street, Seething	1973	Comment	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. Minor development - No further comments	Comments noted.	756	No action required.
QUESTION 116: Preferred Site - SN0406SL, Land to the west of Seething Street, Seething	2092	Comment	See attachments for full response. Few or no constraints. Standard information required at a planning stage. Infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing.	LLFA comments noted.	755	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			Where possible, surface water infiltration should be utilised. Assessment: Green			
QUESTION 116: Preferred Site - SN0406SL, Land to the west of Seething Street, Seething	545	Support	Confirmation that Site: SN0406SL, Land to the west of Seething Street can be supported and agree that any development is likely to be small scale (up to 5) and linear in form to reflect the character and appearance of the area. The intention remains to bring forward the site within 5 years of the Plan's adoption. It is suggested that the Settlement Limit is extend around the site (identified brown in the Plan) to enable future garden land associated with new properties to be included within the Settlement Limit.	Comments noted.	754	No action or change.
QUESTION 117: Preferred Site - SN0587SL, Land to the west of Seething Street, Seething	462	Comment	Seething Parish Council agree this would be infill equivalent to development on the East side of Street (Hawthorne House, Portelet, Mallards, Fieldfare and Fallowfield) and West side of Street between Holmlea and The Cottage. We have no major objection provided that the large, healthy mature Oak within hedge midway along site is wholly protected; the Little Mere should be similarly protected.	Comments noted. Any subsequent application/development will be subject to specialist reports/surveys such as arboricultural assessment. This will ensure appropriate development and any mitigation measures are in place.	765	No action required.
QUESTION 117: Preferred Site - SN0587SL, Land to the west of Seething Street, Seething	546	Support	Seething can be supported, and agree that any development is likely to be small scale (up to 5 dwellings) and linear in form to reflect the character and appearance of the neighbouring area. The intention remains to bring forward the site within 5 years of the adoption of the plan.	Support noted.	764	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 117: Preferred Site - SN0587SL, Land to the west of Seething Street, Seething	2217	Comment	Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Allocation to left of road, in agricultural field (wide field margin). hedge along eastern boundary (priority habitat), but no priority habitat identified see MAGIC). Site in amber risk zone for great crested newts (pond adjacent). Site in SSSI IRZ but residential development does not trigger NE consultation. Consideration should be given to delivering Biodiversity Net Gain. PROW along southern boundary.	Comments noted. A number of the requirements will be standard across all developments, and can be reflected in the core policies as necessary.	763	Consider the need to reflect the protection of hedgerows, great crested newts and PROW in any Policy for the site.
QUESTION 117: Preferred Site - SN0587SL, Land to the west of Seething Street, Seething	2055	Comment	This site is adjacent to the Seething Conservation Area and close to the grade II listed Breydon Cottage and The Walnuts. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	Heritage assets were considered as part of the assessment of sites; however a Heritage Assessment of the site will be undertaken, to a format agreed with Historic England, which will document how these issues have been considered.	762	Complete the Heritage Assessment of the site, and reflect the outcomes in the Regulation 19 version of the VCHAP.
QUESTION 117: Preferred Site - SN0587SL, Land to the west of	2131	Comment	See attachments for full response. Few or no constraints. Standard information required at a planning stage.	LLFA comments noted.	761	No action required.

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Seething Street, Seething			Infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised.. Assessment: Green			
QUESTION 117: Preferred Site - SN0587SL, Land to the west of Seething Street, Seething	1974	Comment	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. Minor development - No further comments	Comments noted.	760	No action required.
QUESTION 117: Preferred Site - SN0587SL, Land to the west of Seething Street, Seething	1550	Support	Supported on the basis of any development being linear in form to reflect the character and appearance of the neighbouring area.	Support noted. With regards to the design, layout and appearance of the site, this will be dealt with at the planning application stage and in accordance with current local planning policies.	759	No action required.
QUESTION 118: Should any rejected sites be allocated?	547	Object	SN1035: Development of two frontage 'infill' properties on this site would not erode the rural character of Wheelers Lane. The site, along with the recently constructed houses to the west already reflects the character and appearance of the village and appears more related to the village than it does the open countryside and should be included within the Settlement Limit. The three properties to the west of the proposed site were considered acceptable in highways terms, and a further two frontage dwellings would not cause a severe impact on the operation or safety of the public highway.	Support for the allocation of rejected site SN1035 is noted. However, no evidence has been submitted to alter the opinion of the Council that the site is suitable for development.	768	No action required.

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QUESTION 118: Should any rejected sites be allocated?	463	Comment	This site must not be developed. The three existing new properties were approved solely on the basis of development limited specifically to the brown field component of the Seething Motors site. This brown field development was acknowledged to be outside the development boundary and therefore the greenfield SN1035 site cannot be considered as infill.	Comments noted.	767	No action required.

Spooner Row and Sutton

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QUESTION 119: Settlement Limit	2269	Object	Comments on alterations to the Spooner Row settlement limits: Do not consider an extension to SLs to allow for future housing - without proposing a specific number of units on these sites - to be a sound approach; the NPPF does not advocate the use of development limits and sets out that a windfall allowance should only be allowed where there is compelling evidence; the Council's current approach shows insufficient land to meet the housing need - this document proposes the allocation of 1,178 dwellings of the 1,200 dwellings required; windfall allowance cannot make up for the shortfall in dwellings and the Council should allocate housing sites rather than make room for new housing in the settlement limits; by extending settlement limits the Council are effectively allocating land for housing without undertaking the necessary tests to ensure that the land is suitable; to ensure the plan is found sound the options are (1) allocate at least 1,200 homes in the VCHAP; or (2) amend the approach to allow development in or adjacent to settlement boundaries provided there are no adverse impacts (as	This representation is concerned largely with the principle of extensions to settlement limits throughout the VCHAP area although it does also refer to site specific alterations in the Spooner Row settlement. Whilst a number of objections are put forward there are a number of inaccuracies within this commentary that indicate a misunderstanding of the Council's proposals. To clarify, the VCHAP is not proposing to include the dwellings on sites proposed as Settlement Limit extensions towards the 1,200 dwelling total. The VCHAP does not include a windfall assumption to reinforce the number of dwellings allocated within the document. Extensions to settlement limits have only been suggested where either (a) the proposed site is too small to allocate, but which would form a 'rounding off' to an existing boundary or logical small extension, or (b) where these rationalise existing planning consents. For Spooner Row, a review of the existing settlement limit concluded that no amendments to the settlement limit were required at this time and the Council remains of this opinion. Notwithstanding the fact that sites proposed as Settlement Limit extensions do not count towards the 1,200 dwelling target, contrary to the respondent's assertion, they have been through the same site assessment and consultation process as the allocation-scale sites.	357	No action required

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			introduced by a number of authorities); notwithstanding the above, if the Council pursues its current approach, the settlement boundary around Spooner Row should be amended as shown on the submitted plan - this would allow for an appropriate windfall allowance within Spooner Row on smaller sites and linear development could be brought forward on sites SN0446 and SN0448 in the future.	The respondent has also suggested that the VCHAP fails to make provision for the 1,200 dwellings identified for delivery in the South Norfolk village clusters by the GNLP. For clarification purposes, the VCHAP is intending to make provision for at least 1,200 dwellings across the plan area including those site allocations identified by those Neighbourhood Plans currently seeking to make their own housing allocations in parallel with the VCHAP. These NPs are considered to be progressing well and once completed would form part of the Development Plan. In accordance with guidance the NP groups have been provided with housing numbers for allocations within their Plan areas and with the addition of these sites the VCHAP is expected to exceed the 1,200 dwelling target. Notwithstanding this point, in the eventuality the VCHAP failed to meet this housing requirement figure, the village clusters remain part of the GNLP and any shortfall in delivery would be met elsewhere within the GNLP area. As such, the Council considers that its approach to both the extension of the existing settlement limits throughout the VCHAP area, as well as the number of dwellings proposed throughout the plan area, are correct. Furthermore, it is not considered appropriate to extend the settlement limits around the sites suggested above as these extensions would not be in accordance with the		

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				approach to settlement limit extensions identified by the Council. Lastly, a policy for allowing small scale development adjacent to Settlement Limits is being proposed for inclusion in the GNLP, currently at Examination, and would cover the settlements in the VCHAP area; therefore it is not necessary to repeat that in this document.		
QUESTION 119: Settlement Limit	1370	Object	Summary of comments relating to the SL: Do not support the extent of the SL - the JCS stated SR could accommodate 15-20 dwellings but due to the lack of 5-year land supply approximately 60 new dwellings have been granted planning permission. What improvements have been made to address inadequate infrastructure (particularly highways and flooding) to enable a further 40 dwellings?; Station Rd can get very busy with HGVs and has no significant footpath for a significant stretch and no pathway across to the nearest bus stop in Sutton; SR rail station has been incorrectly described as a halt (as in the previous plan) but has not operated as such for decades - the station provides an extremely limited public transport service and there is no bus service serving the village; and more houses will increase the car usage	Spooner Row was classified in the JCS as a Service Village but was also noted as being a settlement within the Norwich Policy Area that could accommodate additional development to help meet identified growth requirements as necessary within the JCS Plan area. Consideration of these earlier planning applications will have included an assessment of the impact of these developments on the form, character, infrastructure and services within the village. Similarly, as part of the site selection process for the VCHAP all sites have undergone a site assessment which, for preferred and shortlisted sites, has also included technical consultation with a range of technical consultees. These discussions have focused on both the specific sites as well as the wider area as appropriate. For example, highways discussions have included consideration of the connectivity of the site to the wider settlement, immediate access considerations and the impact of	332	Update the supporting text for Spooner Row in the main VCHAP document to note that the rail station is no longer operates as a 'halt' and supports a sparse service only. Review bus service links through the Spooner Row and Sutton cluster and update if appropriate.

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			and contradicts the Council's transport policies.	additional development on the wider highway network. Similarly discussions with the Lead Local Flood Authority have reviewed on site flood risk as well as the impact new development could have on existing off-site flowpaths. In terms of flood risk, all new development is required to accommodate it's own surface water on site and neither contribute to or exacerbate existing off-site risks. In many instances new development provides an opportunity for 'betterment' of existing conditions (subject to the scale of development proposed). The site assessment for SN0567 and SN2082 noted that should these sites be preferred for allocation highway improvement works would be required, including both widening of the carriageway and the provision of the footpath link to connect with the existing footpath to the east. Comments relating to a public transport service within the cluster are noted and details relating to the services at the railway station will be updated in the policy text as appropriate. A Parish Services Audit was undertaken prior to completion of the site assessments and it was noted at that time that there was a limited rail service only and no bus service. It is recognised that the VCHAP objectives, most specifically allocation of smaller sites dispersed widely throughout the Plan area, will result in		

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				new homes in settlements with limited or no- public transport links. This is acknowledged as an inherent tension arising from supporting new development within rural areas rather than in established urban settings but has been balanced against maintaining and supporting existing smaller settlements and their facilities and services.		
QUESTION 120: Preferred Site - SN0444, Land west of Bunwell Road, Spooner Row	1648	Support	Comments in support of SN0444: The Council's assessment does not take into account all of the services and facilities within SR; Support partial allocation of SN0444 but the full parcel should be allocated for either up to 65 dwellings or up to 40 dwellings (illustrative layouts submitted); Site is more enclosed by existing development than preferred site SN0567/SN2082; Unnecessary to exclude the areas of flood risk from allocation as the indicative masterplan shows these areas reserved for flood attenuation measures and open space - these areas would be retained as non-developable areas but would be landscaped to improve the integration of the site within the wider area and provide open space for the village; a large area within flood zone 1 has been excluded from the allocation and this should be included given it is not subject	Comments relating to the services and facilities within SR are noted however these have been included within the Parish Services and Facilities Audit record (with the exception of the public house which has subsequently been updated but was included in the initial site assessments). Additional comments relating to the public transport services within SR were submitted during the Regulation 18 consultation highlighting the infrequency of stopping services at SR and the infrequent bus services. Reference to the services within the site assessment forms was only made where these facilities were within the distance set out within the HELAA however in light of the comments received during the Regulation 18 consultation a review of the site assessment forms will be undertaken to ensure the accuracy of these scores. The promotion of SN0444 for an increased number of dwellings on a site area exceeding 1ha fails to meet the key objectives of the VCHAP for allocating smaller sites with lower numbers of	338	A review of the site assessment forms for sites within the Spooner Row and Sutton cluster with particular emphasis on the access to existing services and facilities section. The Parish Council Audit record of local services and facilities has been updated to include the public house (although this had been included in the initial site assessments).

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			to flood risk constraints; landscape impacts have been cited as a justification for excluding the area to the north however this is adjacent to existing housing and there is a landscape buffer along the western boundary which would reduce the impact; the site is largely enclosed by development and development of SN0444 would not result in the merging of the significant settlement groupings in SR; logical infill site in the village that can accommodate more numbers than those proposed - the SN0567/SN2082 allocation should be redistributed to this site; and an increased allocation on this site would allow for a number of benefits - provision of open space, including a play area, retention and enhancement of the majority of hedgerows and the planting of wildflower and trees to contribute to biodiversity net gain and an increase in the number of affordable homes on site.	dwellings. In addition the assertion that SR should accommodate in the region of 90 dwellings has not been supported by evidence and is in conflict with the identified VCHAP strategy. It is suggested that this site should be allocated for both a larger number of dwellings and to include areas that would support flood attenuation measures and public open space for the village. No evidence has been submitted to support a local requirement for open space, or to suggest that this would be an appropriate location. The smaller scheme that is preferred for allocation by the Council would not necessitate the significant area of flood attenuation measures proposed and it is not considered either appropriate or necessary on the basis of the preferred site area to allocate these additional areas as non-developable areas for these suggested purposes. The Council's preferred option for development on this site has been identified in order to avoid a significant landscape impact arising from substantial development in this location. A linear form of development on this site would reflect the existing linear pattern of development that is in evidence in SR without resulting in the loss of a significant area of agricultural land to the north and west, and the subsequent loss of the gap between Bunwell Road to the east and Queen's		

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				Street to the west. The Council considers that the scale of development that continues to be promoted on this site would have a greater landscape impact than the current preferred allocation (and the additional preferred site at SN0567/SN2082). Those benefits that have been noted as arising from the development of this site are not considered to be so overriding as to justify the significant proposed increase in numbers on this site.		
QUESTION 120: Preferred Site - SN0444, Land west of Bunwell Road, Spooner Row	1711, 1746	Object	Summary of objections to SN0444: Surface water concerns: site is uphill from areas that have suffered recent flooding and would either drain into the water table or the river and contribute to further drainage/ flood issues; surrounding fields and ditches suffered significant flooding in Dec 2020 resulting in significant damage to neighbouring properties. Affordable Housing: ah should be suitable for purchase by housing associations and be affordable at a cost appropriate for first time buyers or families with lower incomes. Highways: development would be within a 40mph zone and be incompatible with road safety; development in this location would result in additional traffic through the village and past the school. Landscape impact: the proposed site contributes to the character of the village	In response to the objections raised to SN0444: Surface water concerns: the LLFA have provided comment on the reduced parcel currently preferred for allocation and has not raised an objection to development in this location. It is understood that recent off-site flood events during the Dec 2020 resulted from a combination of a 'saturated catchment flooding' event and poor ditch maintenance within the local area. All development is required to address surface water flooding on-site without adversely impacting on the local area. Wherever possible 'betterment' of existing scenarios is also required and this could include ditch management. The technical design details relating drainage schemes would be assessed through the detailed planning application stage. Affordable housing: concerns about the	337	Discussion with the LLFA to obtain an understanding of flood events mentioned in the comments; Completion of a Heritage Impact Assessment to determine the impact of development on the significance of The Orchards.

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			by providing a clear separation between the existing linear developments along the east side of Bunwell Rd and Queen's St; loss of this open space would have an adverse impact on form and character; access to the site would require loss of most or all of the roadside hedgerow; potential for impact on the nearby heritage asset The Orchards.	cost of affordable housing are noted. Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time. On the majority of sites SNC secures affordable housing affordable housing at 75%, below the 80% definition set out in Annex 2 of the NPPF. Local house prices will determine the market cost of affordable housing products in individual areas. Highways: Technical advice has been obtained from officers at NCC Highways and a number of highway improvement works have been identified, including an amendment to the existing speed restrictions along the site frontage. Landscape: Concerns about the landscape impact of development in this location are acknowledged however as noted in the initial assessment it is considered that with careful design the development of this site could complement the existing pattern of development that has emerged in Spooner Row. A significant area of open space between the existing form of development, this proposed allocation site and the new development on approved site 2016/2424.		

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QUESTION 120: Preferred Site - SN0444, Land west of Bunwell Road, Spooners Row	2056, 2219	Comment	Summary of technical heritage and ecology comments for site SN0444: No designated heritage assets within the site but the site lies immediately n-e of Grade II listed The Orchards; development of this site has the potential to impact on the significance of this heritage asset; appreciate that the property is well screened by existing landscaping; a HIA should be undertaken to assess potential impact of development, suitability of an allocation and appropriate mitigation measures; no major ecological constraints identified; and surveys and biodiversity enhancement to be in accordance with policy requirements.	The proximity of The Orchards to the site was noted in the initial site assessment but no further assessment was considered to be necessary at that time. The comments of Historic England have been noted - including reference to the established landscaping between the listed building and proposed allocation site - and a Heritage Impact Assessment will be prepared accordingly to determine the impact of development on the significance of this heritage asset and whether the preferred status of the site should be reviewed as a result. The comments of the NCC Ecologist have also been noted.	336	Preparation of a Heritage Impact Assessment to determine the possible impact of development on this site on the significance of The Orchards. If the site remains appropriate to allocate, consideration of possible mitigation measures to be included in the site specific policy text.
QUESTION 120: Preferred Site - SN0444, Land west of Bunwell Road, Spooners Row	1975, 2119	Comment	Technical comments relating to water issues on SN0444: Site lies outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment; if surface water discharges within the watershed catchment of the Board's IDD, request that this is in line with non-statutory technical standards for SuDS; and	The comments of the IDB are noted, as are the detailed comments of the LLFA. Should the site be allocated it will be the responsibility of the developer to liaise with the relevant water management body in order to ensure an appropriate site design and drainage strategy are developed.	335	No action required.

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			LLFA rating green.			
QUESTION 121: Preferred Site - SN0567, Land south of Station Road and west of Queensland, Spooner Row & (Part) SN2082, Land south of Station Road and east of Top Common	1480, 1559, 1765	Mixed	Comments in support of SN0567 and SN2082 (part): GENERAL: the identified site area measures approximately 1.6ha (not 1ha as referred to in the document) - 1.6ha is considered to be the minimum site area required to accommodate 25 dwellings on this particular site allowing for development at 16dph; an area of the site has previously been granted planning permission which demonstrates no insurmountable physical or material constraints; principle of frontage development was established by the lapsed planning permission; FORM, CHARACTER & DESIGN: The site has a good relationship with the existing settlement with a linear form of development along the frontage complementing the existing pattern of development; site is immediately adjacent to the settlement and is a logical extension in keeping with the locality; LOCATION: sustainable location with excellent accessibility to rural services and facilities and public transport links; the village does not have all services to	The planning history of the site is acknowledged however it is also noted that the approved scheme was at a reduced scale being for 8 dwellings only. This site was identified during the assessment process as a preferred site within Spooner Row and as suggested in these representations a linear form of development in this location would complement the existing form of development in the settlement. Two alternative design solutions have been submitted for the site by two different respondents and whilst these should be considered as illustrative schemes only they do demonstrate that a design solution to accommodate the number of dwellings proposed on this site would be achievable. A detailed assessment of these illustrative schemes has not been undertaken but it is acknowledged that the indicative plans address the issues identified during both the VCHAP site assessment process, as well as during the previous planning application discussions. A scheme that minimises the loss of the existing landscaping along the site frontage would be welcomed and whilst both representations refer to replacement planting as mitigation it should be noted that retention of existing trees and hedgerows is always preferable. Finally, a number of references have been made throughout these representations to work previously undertaken to support the	353	No action required

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			meet the day-to-day needs of future residents but these are only a short distance away in Wymondham; HOUSING MIX: the landowner has sought advice and believes a scheme of 2, 3,4 and 5- bed dwellings would be the most desirable and viable; housing mix would broadly be in accordance with the current SHMA with any updates to this reviewed; anticipate delivery of 8 affordable housing units in accordance with the emerging requirement in the GNLP with tenure and mix to be agreed; HIGHWAYS: principle of access to the site from Station Road already established by previous planning permission; some hedgerow and tree removal along the frontage will be necessary to facilitate the visibility splays however the arboricultural impact of this could be mitigated by replacement planting; CONNECTIVITY: site has access to more services and facilities than usually available for a village of this scale; new footpath connections resulting would improve access for future residents; UTILITIES: no issues emerged for consented scheme in terms of Anglian Water and foul sewer capacity;	earlier planning applications on this site and whilst this is recognised it is also worth noting that this was for a smaller number of dwellings on a site of a reduced scale therefore should the site be allocated any subsequent planning application would need to be fully supported by up-to-date surveys and supporting evidence in accordance with planning policy requirements.		

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			FLOOD RISK: previous SFRA to support the planning application found that the risk of surface water flooding can be managed by setting the scheme slightly back from Station Road thereby avoiding any changes to the existing ditch being required; previous scheme also demonstrated site access could be achieved whilst managing the surface water flood risk; LANDSCAPING (IW MASTERPLAN): design principles shown to be similar to the previously approved scheme which had assumed the removal of the majority of the frontage hedgerow; opportunities to address the minor landscape impacts arising from development through a landscaping scheme; HERITAGE: development would not impact on the significance of the closest heritage assets; INDICATIVE MASTERPLAN (SUBMITTED BY INGLETON WOOD): no absolute on-site constraints; to achieve frontage development along this site a deeper site is required than may otherwise be necessary; masterplan shows a footpath along Station Road with dwellings set slightly back behind private drives to reduce the number of individual access points onto Station Road; the set back softens the impact of development and allows for landscaping along the frontage; potential for two adoptable accesses into the site from Station Rd, subject to discussions with NCC Highways; footpath			

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			improvements are recognised and shown connecting to the primary school and the existing footway to the east; INDICATIVE MASTERPLAN (SUBMITTED BY BROWN & CO.): a single centralised road access would be provided - this was previously acceptable in the approved scheme; footpath with crossing point included to allow for connection to the existing footpath network; development would incorporate SuDS and would reduce the risk of flooding in this location; proposed design would seek to conserve and enhance the character of the neighbourhood; there would be a loss of uninterrupted views across the countryside from Station Road but this would balance with other such development in SR; retention of trees and hedgerows as far as practicable with additional landscaping introduced; overall a limited impact on the landscape setting of the village arising; development material to be complementary and a range of dwelling types and scales and orientated to remain in keeping with the character of the village.			
QUESTION 121: Preferred Site - SN0567, Land south of Station Road and west of Queensland, Spooner Row & (Part) SN2082, Land south of Station	2220	Comment	Summary of technical ecological comments for SN0567: Green - no major constraints identified; surveys and enhancement to be in accordance with policy requirements; loss of hedgerow (priority habitat) should be avoided, (possibly through the use of	The comments of the NCC Ecology Officer are noted. Any applications coming forward on this site would be required to be policy compliant and accompanied by the appropriate ecological surveys and identified mitigation measures. A query relating to the possible relationship between the identified site and a traditional orchard priority habitat is noted and further	347	Contact NCC Ecology to determine whether the site is next to a traditional orchard priority habitat and determine whether this would have any site specific policy implications.

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Road and east of Top Common			the existing access), minimised or as a last resort compensated; possibly adjacent to traditional orchard habitat but this would need to be confirmed; site located within a SSSI IRZ but residential development would not require consultation with NE; and amber and green zone location for Great Crested Newts.	clarification should be sought regarding any site specific policy requirements arising.		
QUESTION 121: Preferred Site - SN0567, Land south of Station Road and west of Queensland, Spooner Row & (Part) SN2082, Land south of Station Road and east of Top Common	1976, 2129	Comment	Summary of technical surface water management comments on SN0567 and SN2080 (part): LLFA - green rating; and Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment - if surface water discharges within the watershed catchment of the Board's IDD it is requested that this is facilitated in line with the non-statutory technical standards for SuDS.	These comments are noted, including the detailed technical comments of the Lead Local Flood Authority. It will be for the developer of the site to liaise with the appropriate water management body to ensure an appropriate drainage solution is incorporated into the design of the site.	346	No action required.
QUESTION 121: Preferred Site - SN0567, Land south of Station Road and west of Queensland, Spooner Row & (Part) SN2082, Land south of Station	1379, 1647, 1712	Object	Summary of objections to SN0567 & SN2082 (part): this site was only granted pp due to the Council's lack of 5-year housing land supply; the Council's preference for linear development and the provision of 25 dwellings can not be achieved on this site.	The principle of residential development along the road frontage in this location has been established. Whilst the representations correctly note the number of units previously approved along the site frontage is significantly lower than the proposed allocation, the preferred allocation site is of greater depth than the current approved site and the layout plan for 2017/1321 indicated large detached dwellings in	339	Consideration to be given to the inclusion of site specific landscaping requirements for this site in the site allocation policy text due to the open nature of the allocation site.

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Road and east of Top Common			development of this site would result in highway safety issues; development in this location would result in an urbanised character when approaching from the A11 and not be in keeping with the character of the settlement; detrimental impact on the landscape given its location on an open agricultural field; this site is at the elevated end of Spooner Row and would likely result in an increased flood risk to the lower parts of Station Road and beyond; ditches and drains are insufficient and frequently flood, as evidenced by serious flooding of fields and properties in recent months - the site would drain into the water table or river and contribute to further issues; and affordable housing needs to be actually be affordable for first time buyers or families with a lower income.	plots of significant size. With an appropriate design solution it is considered that this site would be capable of accommodating a greater number of dwellings whilst incorporating a linear form of development along Station Road. A landscaping scheme would provide screening of the site in wider views and would careful design of the site would allow for the transition between the settlement and the surrounding open countryside. These details would need to be considered in detail during the subsequent planning application stage. Consideration has been given to the management of surface water and the impact development in this location could have through technical consultation with the LLFA. The presence of an existing surface water flowpath within the settlement is noted however this site is not considered to be significantly affected by identified surface water issues and all new development will be required to manage all surface water on-site and, wherever possible, result in improve the existing off-site scenarios. Technical drainage solutions are considered to be available to mitigate any on-site risks. These details would be explored in detail during the site design and application process. Maintenance of the existing ditch network in and around SR has been identified as a reason for recent flood events within the wider village.		

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				concerns about the cost of affordable housing are noted. Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site. Once adopted departure from this policy requirement would need to be fully justified at the time of any planning application and would be subject to scrutiny at that time. On the majority of sites SNC secures affordable housing affordable housing at 75%, below the 80% definition set out in Annex 2 of the NPPF. Local house prices will determine the market cost of affordable housing products in individual areas.		
QUESTION 122: Should any rejected sites be allocated?	2270	Object	Summary of comments objecting to the omission of sites SN0445 and SN0447: SN0445 - the main constraint identified is the location of FZs 2 and 3 but this only covers a small area in the northeastern corner of the site; the submitted illustrative masterplan and updated layout show this area as being retained for open space and the proposed housing located in FZ1; landscaping could create a green infrastructure corridor through the village allowing public access where currently none exists; the Council concludes a detrimental landscape impact associated with the development of the site however the indicative masterplan shows a green buffer along the western part of the site to prevent the merging of the settlement groupings in keeping with the character of	This support for SN0445 is noted, as well as the comments that have been made about the Council's assessment of the site, however despite a review of the site the Council remains of the opinion that this site is not suitable for allocation. The submission of an illustrative masterplan to demonstrate the design / layout solution for the site is acknowledged. The respondent has suggested that development would be sited outside the FZ2 and 3 areas within the site and that these areas comprise a small area of the site only. Whilst this is an accurate representation of the areas of identified flood zone these comments fail to make reference to the significant surface water flowpath that also runs through the site. The illustrative layout however suggests that development has	366	No actions required

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			the village; this could be a community orchard if required; significant off-site highway works have been noted but it is unclear what it meant by this - vehicular access is proposed off Station Road and the provision of the access is not considered to involve any significant off-site highway works; we object to the omission of SN0445 and the Council's assessment of the site. SN0447 - we do not consider the location of the flood risk areas to be a significant constraint that would prevent development on the site; housing could still be accommodated through an appropriate layout, landscaping and drainage solution; the Council confirm that locating the development in the northern part of the site would lessen the erosion of the gap between the two distinct areas of the settlement; the illustrative masterplan shows POS on the southern half of the site with a vehicular access off Chapel Lane - with a suitable design and appropriate materials the impact of development of the setting of the identified heritage assets can be suitably managed; the location of these buildings is therefore not considered to overly constrain the development potential of the site and should not be used as a reason to discount the site as a housing allocation; the Council also identified a requirement for off-site highway works but other than an access off Chapel Lane no further highway works will be required; object to the omission of SN0447.	been concentrated outside of this area, reducing the developable area of the site and resulting in a site layout that does not reflect the existing linear frontage form of development that is characteristic of the development pattern in Spooner Row. This representation suggests that an area of public open space would be incorporated into the site layout for the benefit of the whole village. The illustrative masterplan also includes a multi-purpose building within the area that cannot be utilised for residential development however no supporting evidence has been submitted to indicate either a requirement for, or a support of, these site features by the residents and/or Spooner Row Community Council. It is also unclear how/what the proposed green infrastructure corridor would connect to beyond the boundaries of the site as the site is constrained on three sides by residential development, Station Road and a railway line. These benefits are therefore afforded limited weight only when considering the allocation of this site for residential development. This representation suggests that the addition of a green buffer to the western edge of the site would address the landscape concerns previously identified in the site assessment. The Council acknowledges the presence of this landscape mitigation but does not		

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				consider that this addresses the concerns raised. Furthermore, even taking into account the recognised constraints and the reduced developable site area, the illustrative masterplan submitted to support the site indicates that development in this location would in fact result in a coalescence of two distinct parts of the settlement. Whilst an alternative site layout may be possible the Council considers that development on this site would result in an uncomfortable relationship arising with the existing linear patterns of development in evidence in Spooner Row. We therefore remain of the opinion the landscape impact arising from the allocation of this site would be significant. Comments relating to the site access are noted however the Council asserts that the Amber score reflects the comments of NCC Highways Officers who identified a number of highway improvements that would likely be required to facilitate the delivery of this site. The Amber score reflects that until such time a detailed consideration of the works considered to be likely is undertaken access to the site is not confirmed. It is accepted however that whilst there may be potential constraints to access these could be overcome through development. This is the basis for the Amber score. The site also continues to be promoted		

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				for housing numbers in excess of the objectives of the VCHAP. Following the preferred distribution strategy for allocating residential sites the VCHAP identifies allocations for 1,200 dwellings in accordance with the identified targets in the GNLP. The Council does not therefore consider it either necessary or appropriate to allocate sites larger than those identified without substantial justification. For all of the reasons set out above the Council remains of the opinion that site SN0445 is not suitable for allocation. The comments submitted in support of the allocation of SN0447 are noted as are the mitigation measures that have been identified as being possible design solutions to reduce the impact of development on the identified constraints. Notwithstanding this the Council remains of the opinion that this site is not the optimal location for new residential development in Spooner Row and that alternative sites within the settlement offer preferable options for allocation. For this reason it is not considered either appropriate or necessary to allocate site SN0447.		
QUESTION 122: Should any rejected sites be allocated?	1747	Support	Comments submitted in support of SN0404: Strongly disagree with the conclusions of the site assessment and some of those included on the site assessment;	The Council has reviewed the original site assessment form and as a result has updated the Historic Environment and Flood Risk scores to 'Green' and the Site Access score to 'Amber'. In terms of the Historic Environment it is recognised that development of the site would not	360	Corrections made to the HELAA to reflect a 'Green' score for the impact of development in this location on heritage assets, an 'Amber' score for

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			One of the reasons for rejection of the site would be that it comprises backland development and would have an adverse impact on the form and character of the existing linear pattern of development; The site sits behind allocation SPO1 which was granted planning permission for 13 dwellings – development is expected to commence on this site in late 2021; It is acknowledged that there is a single row of frontage development opposite the site but there are examples of backland sites in this part of the village – Chapel Loke immediately to the southwest is a classic backland site and Pilgrim’s Farm to the south comprises a cluster of buildings set well back from Chapel Road; The depth of the proposed site resulting from SN0404 and SPO1 would mirror the depth of development on the opposite side of the road; The landowner owns the surrounding farmland and it would be possible to plant a substantial landscape buffer along the northeastern boundary of the site to ensure views are suitably screened and reduce the landscape impact of the development; A landscape buffer could also be provided along the southeastern boundary to soften views from Guiler’s Lane to the south; Access would be provided through the	have an impact on any nearby designated or non-designated heritage assets. The Site Access score has been amended to 'Amber' to reflect the evidence submitted by the respondent however it is not considered appropriate to amend this to a 'Green' rating as suggested in this submission as the access and footpath connections referred to in association with SPO1 have not yet been delivered. The Flood Risk score has been amended to 'Green' to reflect that the area of surface water flooding identified within the site assessment form lies outside the boundaries of the promoted site. It should be noted however that the area of surface water flooding referred to on the site assessment forms includes the potential access point to the site and this would need to be considered in any subsequent proposal for the site. Turning to the comments relating to the backland form of development proposed the Council considers that the original conclusions remain of key relevance to the final assessment of this site. Two separate areas of development have been referred to in this representation - dwellings at Chapel Loke and the development at Pilgrim's Farm - however the Council contends that neither of these are comparable to the development that would arise from a further allocation in this location. Chapel Loke is well screened by existing mature vegetation and as a result is not		access to the site and a 'Green' score for Flood Risk.

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			existing allocation and it is not understood why this would be unreasonable – transport evidence has been prepared which outlines that the access consented for the approved scheme would be suitable to cater for the additional 12-15 dwellings on this site and the minor increase in traffic from an additional 15 dwellings in not seen as severe in highway terms; There would be no additional hedgerow loss required over and above that needed for access to the consented development; The red rating in the site assessment is disingenuous as it indicates no possibility of creating an access and this is not correct – it has been made clear in previous representations that access would be via SPO1; The consented scheme for SPO1 includes the provision of a footway, including tactile crossing across Chapel Road, which links to the existing footpath provision leading to the village centre; It is therefore considered that the access rating should be corrected to green as access by all means is possible; Also disagree with the amber flood risk - the site is on flood zone 1 and is not at risk of surface water flooding; The site has been given an amber rating relating to the Historic Environment – the	visible on the approach into the village. It also comprises significantly fewer dwellings than proposed on this site and has developed incrementally reflecting the scale of development in this location. With regards to Pilgrims Farm, this cluster of dwellings comprises barn conversions - a common form of development in evidence throughout the South Norfolk countryside – is reflective of the heritage of the site and maintains a strong relationship with Pilgrim's Farmhouse. Neither of these examples are therefore considered to be comparable to a new site allocation on SN0404. For transparency the Council recognises that the preferred allocation site SN0567 and SN2082 on Station Road could result in a tandem form of development however the Council considers that there are key differences arising between the sites. Of key importance is the allocation of the preferred site as a single site which will enable the evolution of a design/ layout scheme that reflects the site specific policy requirement. Site SN0404 has been promoted entirely separately to SPO1, which as clearly stated in the representation already benefits from planning permission, and as such the relationship (in terms of design and layout) between these sites on a key approach into the settlement could prove difficult to deliver in harmony. Comments relating to the depth of the proposed site (in-combination with		

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			site abuts Grade II Listed Pilgrim's Farmhouse but there is extensive mature boundary screening and the site does not contribute in anyway to the setting of the Listed Building; An archaeological desk based assessment was undertaken on the adjacent land and concluded there were no features of archaeological interest and it is assumed that it would be the same for this site – there are no likely impacts on the Historic Environment and this score should be amended to green; The site is in single ownership and is available for immediate development and there are no constraints that would threaten delivery of the site – the landowner has a proven track record of delivering new homes in the village.	SPO1) and the possibility of the creation of a landscape buffer on land outside the promoted area are noted but do not alter the Council's position. A requirement for substantial landscape mitigation measures to screen the development in views along both Chapel Road and Guiler's Lane, as promoted in this representation, indicate that the form of tandem development proposed on this site is not appropriate in this location. For clarity, whilst a consideration of the landscaping mitigation is likely to be included in any site allocation for SN0567/SN2082 this is considered to be less critical than a requirement for significant landscaping on SN0404 would be. Finally, it is suggested that site SN0404 is viable, free of constraints and deliverable however the Council has concerns about this arising from the issues that currently remain outstanding on SPO1. This specifically relates to the viability of SPO1 and the significant reduction in affordable housing below current planning policy requirements that has been sought. This reduction in affordable housing arises from on-site gas pipe constraints not previously identified that may also affect the viability and deliverability of SN0404. It is currently unclear how the promoted site could be a viable option and deliver affordable housing in accordance with the required planning policy when these other sites have failed to do so and no		

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				supporting evidence has been submitted on this matter in support of SN0404.		
QUESTION 122: Should any rejected sites be allocated?	2268	Comment	Support for the rejected part of site SN0282: PRINCIPLE OF DEVELOPMENT: the remainder of SN0282 is located immediately to the south of preferred development site SN0567 and SN2082 and remains available for development, either in full or part; the identification of the combined site to the north, as well as the planning history on the land to the north, demonstrates that the site is technically capable of development; based on the remaining site area the site could deliver 52 dwellings at 25dph or 35 dwellings at 16dph - whilst this exceeds the objectives of the VCHAP the site has clear capacity to allow a sustainable extension to the preferred site; this site could either be included as an extension to the existing preferred site, or as a second allocation site for up to 35 dwellings which would be in accordance with the objectives of the VCHAP; the village provides an opportunity to expand upon the 40 dwellings already identified to compensate for there being no suitable sites identified in other nearby settlements; Spooner Row has the existing local services to facilitate development and provides an opportunity for additional growth - the village has a range of services not available in villages elsewhere in the District and is accessible to nearby Wymondham and Attleborough and the services found there;	During the initial site assessment consideration was given to the suitability of the larger site area for allocation but it was considered most appropriate to allocate a smaller parcel to the north of the site in combination with the adjacent site SN0567. The Council remains of the opinion that this is the most appropriate area of land to allocate for development. The respondent has stated within this representation that the site is technically capable of development as has been demonstrated by both the planning history for the frontage site to the north of the preferred allocation and the Council's choice of preferred allocation site immediately to the north. The approved scheme however was for a significantly lower number of dwellings and on a much smaller parcel of land therefore whilst the supporting documentation for the earlier planning application may provide an indication of issues that could be encountered on the site it should not be assumed that the extended site would not result in additional constraints being identified. In terms of the housing numbers on the site the Council would not wish to see a phased approach to development across the preferred site and the remainder of SN2082 - a coherent and integrated scheme to enable the appropriate	359	No action required

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			HOUSING MIX: site considered viable to provide 33% affordable housing; LOCATION: the site is in a sustainable location with good access to rural services and facilities - no absolute on-site constraints have been identified; HIGHWAYS: new footpath connections through the preferred site could connect dwellings to Station Road and the existing footpath; the highways infrastructure required to serve the extended site would already be delivered through the preferred site thereby avoiding additional access from the existing highway and minimising the impact on the local road network; no anticipated reason to create any further accesses via either Station Road or Top Common; NCC Highways have not identified any capacity issues that would limit the ability of more than 15 dwellings to be served from a new access road from Station Road; ACCESSIBILITY: sustainable location with access to more services than would usually be available for a village of this scale; development of the site would be result in improved footpath connectivity; UTILITIES: the work for planning applications on site SN0567 indicated sufficient AW capacity for foul sewer; if any issues are subsequently identified an increased site allocation has the potential to improve viability of the overall scheme and offer opportunities to provide	delivery of infrastructure across the site would be expected. Notwithstanding this point, the delivery of the entire site (including the preferred site) would exceed the objectives of the VCHAP. Whilst the accessibility of services and facilities within Spooner Row and the wider area is recognised, it is not considered necessary to allocate numbers in excess of the Plan's objectives to meet the overall allocation target because sufficient sites have been identified within the VCHAP area to meet the 1,200 dwelling target. Throughout this process a small number of sites that exceed the identified threshold for either site size or housing numbers have been considered as preferred allocation sites however these sites have been limited to those that are able to deliver additional identified infrastructure or benefit to the wider community. No such infrastructure has been identified as being either necessary or appropriate via the delivery of this extended site therefore there is no sound justification for the allocation of a larger site area. The respondent has provided comments on those issues assessed as being 'Amber' within the site assessment process. Whilst these representations are acknowledged they do not alter the opinion of the Council about the allocation of this expanded site. Notwithstanding this point, should the site be considered for further allocation,		

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			additional infrastructure to contribute towards enhancing utilities capacity; FLOOD RISK: site is within FZ1; small isolated area of surface water flooding have been identified along the western boundary with Top Common - the site area provides an opportunity to avoid these areas; an acceptable drainage scheme can be prepared incorporating the principles of the previous planning permissions on SN0567; LANDSCAPE: development of this site would only come forward with, or after, the preferred site to the north and at that stage development would be adjacent to a built-up settlement and form a logical extension to the village; existing development to the east extends as far south as this proposal therefore development would be consistent with the neighbouring pattern of development; any changes to existing hedgerow and tree loss along the site frontage would be addressed by development on the preferred site; there is no requirement or expectation for access from Top Common therefore the existing hedgerow along the western boundary of the site can be retained; development of the whole site may provide opportunities to improve the landscaping scheme associated with the delivery of the site as a whole; ample opportunities for landscape mitigation; HERITAGE ASSETS: there would be no	it would need to be subject to further technical consultation including on matters such as highways to consider in more detail the impact of a site of larger scale in this location. In terms of the site layout the comments above note that due to the size of the site a suitable design solution could be achieved that would avoid development in those areas identified as being at risk of surface water flooding and this is considered to be a reasonable assumption. With regards to the landscape impact of residential development on the extended site, this support for the site suggests that an extended development site would be consistent with the development to the east of the site that extends further south than the current preferred allocation. The Council disputes this and considers that the development to the east is a more open/spacious layout that results in an effective transition between the open countryside and the settlement. The development at The Ridings also respects the linear form of development that prevails in Spooner Row and allocation of SN2082 in its entirety would not be consistent with this established development pattern. For these reasons the Council does not consider it appropriate to allocate a larger site area within SN2082.		

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			additional heritage impact other than that assessed for the preferred site;			
QUESTION 122: Should any rejected sites be allocated?	1380, 1420	Support	Support for the rejection of sites SN0448 and SN2181: current allocation SPO2 cannot deliver the required footpath due to the narrowness of the lane and current flooding issues are unlikely to be resolved to meet the planning conditions and allocation of SN0448 would have exacerbated this situation further; and Site SN2181 is an unsuitable site which has previously been subject to a refused planning permission and a dismissed Appeal.	These comments are noted. The issues identified in these responses were noted within the initial site assessments and the sites have not been considered suitable for allocation at this time. Comments relating to the existing allocation SPO2 relate to the associated planning permissions on that site but are acknowledged for the purposes of the VCHAP site assessment process.	358	No action required

Stoke Holy Cross, Shotesham and Caistor St Edmund & Bixley

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QUESTION 123: Settlement Limit	1518	Comment	Support for SN2091 as an extension to the settlement limit: seek an extension to the SL to include an additional 0.7ha along Norwich Rd to the south of the existing settlement; the subject site forms part of a wider land parcel submitted for allocation but rejected; in response to the Council's reasons for rejection a much reduced site is promoted as a minor extension to the existing settlement limit; extension of the settlement in the manner shown will reinforce the traditional linear form of development along the eastern banks of the River Tas; propose that the wider land ownership be safeguarded or designated for public accessible habitat improvement area; and small scale residential development - up to 3 dwellings - would include the potential for self-build dwellings.	These comments relate directly to the submission of existing site SN2092 and the promotion of a revised site area for consideration in response to the Council's assessment of the original submission. It is considered most appropriate to consider this representation as an amended site submission. The merits of this site will therefore be considered in detail during the site assessment process and no further comment is considered to be necessary in response to Question 123. The suggestion the SL should be extended further to the south along Norwich Road is noted however.	378	No action required
QUESTION 123: Settlement Limit	986	Object	Comments relating to Harrold Place, Stoke Holy Cross: Entrance to Harrold Place is owned by the residents of Harrold Place and not the Council; the entrance to Harrold Place and Long	These comments appear to relate more generally to sites that have been considered during the VCHAP process as opposed to a specific response to an extension to the settlement limit at Stoke Holy Cross (Question 123). Harrold Place is a recent development	377	Review the comments received from Anglian Water in relation to water supplies to determine whether there are any identified issues in this location.

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			Lane become very congested at school drop-off and pick-up times and further development would exacerbate this; existing problems with effluent and fresh water supplies; and suggested site is frequented by grey partridges and newts in the area adjacent to Harrold Place which tends to be wet and has had historic flood problems.	and is in close proximity to 3 sites promoted to the VCHAP - one of these sites lies to the north of Harrold Place (SN0197), one adjacent to the east (SN0202) and the third is located on the opposite side of Long Lane (SN0524). As SN0202 is the Council's preferred allocation site it is assumed that these comments relate primarily to this site although they are noted as a general concern about further development in this location. In terms of the site specific issues raised about Harrold Place it would be important to ensure that any new development did not exacerbate existing issues that may have arisen. Concerns about the water supplies are noted and the response of Anglian Water will be reviewed to determine whether any further actions/ mitigation measures would be required for development in this location. Comments relating to the congestion relating specifically to the school are acknowledged however as any development on the sites referenced above would be in very close proximity to the school it would be reasonable to assume that additional housing in this location would not worsen the situation and may result in an improvement as an increased number of local children attend the school (as opposed to travelling from out of catchment). Technical consultations have involved a review of the promoted sites by colleagues in the		

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				Lead Local Flood Authority and NCC Ecology - these comments have addressed matters such as flooding and ecological mitigation and have informed the site selection process as well as any appropriate site specific policy text to be included in the final document.		
QUESTION 123: Settlement Limit	630	Comment	SN0202 is outside the existing SL - if this is was drawn up for valid reasons why are these now being ignored?; Stoke Holy Cross is an attractive village which already has a high proportion of new housing development, much of which has been completed recently; more new houses would lead to an imbalance, the village losing its character and suburban sprawl; and it may be said that it is only a few houses but the settlement limit can be easily changed.	These concerns are recognised, as is the level of growth that has taken place in recent years within Stoke Holy Cross which has been in part attributable to the sustainable location of the village and its position within the Norwich Policy Area. The Council is required to maintain a supply of sites identified as being suitable and available for residential development in order to meet its obligations. The overall housing target figure of 1,200 dwellings was provided by the GNLP and the VCHAP seeks to distribute these new sites in the most appropriate locations throughout the District having regard to matters such as sustainability and on-site constraints. Settlement limits are drawn around existing development in order to protect the character of an area whilst allowing limited growth to occur within the boundaries. Periodically it is necessary to review these boundaries in order to rationalise them and include any planning permissions that may have been granted and/or to allow a settlement to expand as appropriate. In this instance no additional alterations	376	No action required

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				are proposed to be made to the settlement limit aside from the inclusion of any site allocated via the current VCHAP process. Alterations to settlement limits are subject to scrutiny through the current process. A relatively small number of sites were promoted for development in Stoke Holy Cross and the current preferred allocation site is considered to be the most appropriate location having regard to its impact on the historic core of the settlement, the existing townscape and the landscape.		
QUESTION 124: Preferred Site - SN0202, Land north of and adjoining Long Lane, Stoke Holy Cross	483	Object	Comments of Stoke Holy Cross Parish Council: The PC considers that the village has had more than its fair share of development over the last few years; development has greatly exceeded that set out in the JCS; the PC feels let down that insufficient provision was made in relation to these developments; this is particularly the case regarding a replacement village pavilion which is totally inadequate for the size of village as it is now; the PC would support a limited amount of development if it facilitated the provision of a fit for purpose community hall that	The comments of the Parish Council are acknowledged, including the support for SN0202 as the most logical site for the modest growth proposed. However, in accordance with the objectives of the VCHAP the site is currently preferred for an allocation of 25 dwellings and it is unlikely that a development of this scale would fund the provision of a new village hall, as suggested by the Parish Council. The recent growth in Stoke Holy Cross is recognised, as are the concerns raised by the Parish Council about the scale of the development and the provision of infrastructure to support this. The Joint Core Strategy identified Stoke Holy Cross as being a service village and as such it would typically be allocated small-scale housing. However, the JCS also identified the settlement as being within the Norwich Policy Area (NPA) and	384	No action required

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			could accommodate the pre-school; and SN0202 appears to be a logical choice - it is accessible by foot to the main services, has potentially good highway and services connections and would represent a 'squaring off' of the settlement.	therefore suitable for consideration as a location for additional growth to deliver the housing in the NPA allowance. Reflecting this the allocation to the south of Long Lane, adjacent to the school, was identified for approximately 100 dwellings. In association with the development that has occurred within Stoke Holy Cross the Parish Council has received both S106 and CIL funding payments which are intended to fund/ contribute towards the provision of infrastructure identified by the Parish Council as being required in the village. The Council has been engaged in discussions with the Parish Council regarding this, as well as exploring opportunities for other grant funding opportunities, and continues to be able to offer advice and support as required.		
QUESTION 124: Preferred Site - SN0202, Land north of and adjoining Long Lane, Stoke Holy Cross	633, 1063, 1072	Object	Objections to SN0202: RELATIONSHIP TO EXISTING DEVELOPMENT - Site is not well related to the form and character of the existing village; local facilities score amber, not green; SURFACE WATER ISSUES - surface water run-off would significantly increase with the potential to exacerbate an existing problem; no flood risk has been identified but surface water flooding was a frequent occurrence to some of the gardens of Harrold Place until the developer undertook significant works to address it; the field's natural slope channels surface water run-off towards 2 - 12 Harrold Place	The objections and concerns raised by local residents to the allocation of SN0202 are recognised and the Council has sought to respond to the concerns raised by subject area below. The site would represent a continuation of the existing form of development that has emerged in recent years to the east of the settlement. The site would not extend beyond either the northern boundary of the adjacent site or the eastern boundary of the developments on the opposite side of Long Lane and is well connected to the existing services and facilities within the village. The Council considers that this location has	383	Review of the comments of Anglian Water in light of the concerns raised about the sewerage at Harrold Place; confirm the details of the additional drainage measures required at Harrold Place and any implications for a drainage strategy on SN0202; contact the site promoter for clarification regarding a possible ransom strip between SN0202 and Harrold Place;

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			resulting in flooded gardens whenever there was meaningful rain; FOUL WATER ISSUES - sewerage would need to be addressed; frequent noxious smell when sewerage is being pumped and increased housing numbers would exacerbate this; Long Lane is frequently closed due to maintenance/ repairs required by Anglian Water suggesting significant issues for the current housing; SITE ACCESS - visibility at the 's' bend at Harrold Place is blind and the addition of a side road here would make this even more dangerous; too little room to accommodate a new road access in this location; the site assessment score is amber and not green; HIGHWAYS - cars frequently parked along Long Lane and the entrance to Harrold Place, particularly during school drop-off and pick-up times, making it dangerous; village access is via narrow lanes and roads which have frequent congestion; no cycle paths in the village; dangerous situation along Long Lane is compounded by the junction at Broomefield Road; LAND OWNERSHIP - a strip of land required for access is in the ownership of the residents of Harrold Place who would not allow access; road widening of Harrold Place would require resident's consent which would not be given; LANDSCAPE IMPACT - the site is prominent	the strongest relationship to the main settlement of all the sites promoted for allocation. Comments relating to both surface water and foul sewerage issues are acknowledged and if appropriate discussions will take place with the developer of the adjacent site to understand the issues that occurred on that site and identify any potential implications for SN0202. In more general terms, in accordance with current guidance and legislation new development should not exacerbate any existing issues off-site, should not result in an increase in off-site flood issues and should, where possible, result in a 'betterment' of the existing position. The detailed technical comments received from the Lead Local Flood Authority have not identified any issues on the preferred allocation site. The comments of Anglian Water are anticipated shortly and will be considered in light of the above representations with further discussions taking place with the relevant consultees if appropriate. Detailed discussions have taken place with NCC Highways Officers who are of the opinion a technical solution is available for the creation of a suitable access to the site, without endangering highway safety, and that the local highway network can accommodate the modest increase in traffic movements		consideration to be given to site specific policy wording relating to measures to minimise the landscape impact of the allocation; undertake a landscape review of the impact of this allocation site.

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			and would spoil overall views in the valley in both directions as it is elevated; the last 16months have demonstrated the importance of the countryside for wellbeing; overall landscape score is red which is at odds with the preferred status of the site; ECOLOGY - noted as being a 'habitat risk zone' for newts which is at odds with its preferred status; and OVERALL ASSESSMENT - do not understand how the site is scored as reasonable and then preferred; the conclusion does not stack up with the identified amber and red scores.	that would be associated with this development. As set out in the site assessment NCC Highways considered that an improvement in the existing situation along Long Lane could be achieved through the creation of a small number of accesses from this site, resulting in a reduction in traffic speeds within this area. However, comments relating to the land ownership and the possibility of a ransom strip existing between SN0202 and Harrold Place will be explored with the promoter of the site as the Council will need to be confident that there is achievable for development. A number of comments have been received about the existing situation regarding local traffic congestion and parking issues during school drop-off/collection periods. Due to the close proximity of the preferred allocation site to the local primary school it is not anticipated that housing in this location would have an adverse impact on this situation and may in fact improve the current position as an increase in the number of local children attending the school would reduce the number of places for pupils attending from outside the catchment area. The landscape concerns about development in this location are recognised and have been clearly set out in the site assessment form however on balance it is considered that a modest amount of additional development in this location would be seen in the		

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				context of the existing developments adjacent to and opposite the site and as such with appropriate landscape mitigation measures in place development in this location would be acceptable. These measures could include landscape planting as well as the scale and form of development on the site, details of which could be included as part of the specific site allocation policy. Notwithstanding this conclusion, the Council considers that it may be appropriate to undertake a review of the landscape impact of this site allocation. A desktop ecological assessment of the site has been undertaken and has not identified any significant issues that would prevent development in this location. Any subsequent planning application on this site would need to be supported by the appropriate detailed surveys and assessments, as well as any mitigation measures identified. Reference is made to the site being within a green and amber zone for Great Crested Newts. This means that the site could be developed in accordance with the District Level Licensing scheme operated by Natural England. Finally, it is noted in these representations that SN0202 has been identified as being a preferred site for allocation despite scoring amber in a number of the site assessment criteria, as well as red in landscape impact. For		

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				clarity, in accordance with the site assessment criteria an amber score indicates that some issues/ constraints may have been identified either on/ in proximity to the site but that either they are not so significant as to prevent development or that mitigation measures are considered achievable to address the matters raised. The red score for landscape impact has been considered as part of the overall site assessment, as well as the availability of suitable alternative sites for development, and the Council remains of the opinion that on balance the allocation of this site for residential use can be justified in the context of the existing developments.		
QUESTION 124: Preferred Site - SN0202, Land north of and adjoining Long Lane, Stoke Holy Cross	1354	Comment	Support the allocation of the preferred site; impact on landscape setting can be mitigated by planting; the site falls away to the north and is at a considerably lower level than development on the south side of Long Lane; the housing mix would contain a significant number of single storey dwellings; and the north boundary of SN0202 should align with the northern boundary of the recently completed development adjacent to the site but is shown south of this.	The agent comments in support of this site are noted, including those specifically relating to the change in land levels both within and opposite the site and reference to mitigation landscape planting. Whilst it is acknowledged that both the changes in ground levels and planting will partially mitigate the landscape impact arising from the development of this site the Council remains of the opinion that there will still be some landscape impact arising. However this is not considered to be so severe as to preclude the development of this site. Comments relating to the housing mix are also noted and it is recognised that single storey dwellings would also reduce the landscape impact of development, particularly in longer views of the site. The overall housing	382	The northern boundary of the preferred allocation site to be checked and corrected if necessary.

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				mix would be expected to accord with the latest evidence and the site design/ layout would need to reflect the setting and constraints of the site. Finally, the northern site boundary will need to be reviewed to ensure that the correct site boundaries are drawn as the VCHAP progresses.		
QUESTION 124: Preferred Site - SN0202, Land north of and adjoining Long Lane, Stoke Holy Cross	2221	Comment	Ecological comments on SN0202: No major ecological constraints identified from desk-top research; bounded on several sides by hedgerows (priority habitat); no other priority habitats identified; sites in amber and green habitat zones for GCNs; Site is SSSI IRZ but residential development does not trigger development with NE; and Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA).	These ecological comments are noted. Any application submitted for development on the site would be expected to address the ecological issues identified on the site and the site design should be informed by appropriate assessment, guidelines and identified mitigation measures	381	No action required.
QUESTION 124: Preferred Site - SN0202, Land north of and adjoining Long Lane, Stoke Holy Cross	1977, 2068	Comment	Technical comments relating to surface water matters on SN0202: Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment; If surface water discharges within the watershed catchment of the Board's IDD	These comments are noted. If the site is allocated for development it will be the developer's responsibility to ensure that the surface water drainage scheme is agreed with the appropriate third party and in accordance with current guidance and legislation.	380	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			the discharge should be facilitated in line with non-statutory technical standards for SuDS; and LLFA rating - Green.			
QUESTION 124: Preferred Site - SN0202, Land north of and adjoining Long Lane, Stoke Holy Cross	789	Support	Comments in support of SN0202: Consider that this site would provide much needed bungalows for the village and the area; the proposed builder is a high quality small developer; the site would provide mainly smallish bungalows for retired people so would not put pressure on the local schools; and villages like Stoke Holy Cross need small scale quality developments by smaller housebuilders rather than larger scheme by national builders.	The support for this site is noted, as is the general support for small scale developments constructed by smaller developers. These form some of the key objectives of the VCHAP. However at this stage it should be noted that the developer of the site is unknown, as is the proposed mix of dwellings on the site which would be expected to be in accordance with the latest housing mix requirements, unless strong evidence suggested otherwise. As such the assumption that the site would comprise small bungalows only is not correct.	379	No action required
QUESTION 125: Should any sites be rejected?	1521	Comment	Support for SN2091: Proposed revision to promoted site SN2091 to reduce the site to 0.7ha and request inclusion within the settlement limit instead of as an allocation.	The Council recognises that the promoter of the site has sought to address the concerns identified in the site assessment form and has revised their aspirations for the site accordingly. This representation significantly amends the scheme promoted for the original site and as such will be considered in detail within the next tranche of site assessments as a revised site. The merits of this site as included in this representation will therefore be considered separately in due course and it is not considered appropriate to	421	The site will be assessed as a revised site as part of the Regulation 18 Call for Sites process.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
				comment further in response to Question 125.		
QUESTION 125: Should any sites be rejected?	1356	Comment	Support for SN0197: Believe that this site should be considered further; the landowner has confirmed with their solicitor that there is no ransom strip and they retain full access rights to their land; and the landowner's highways consultants also believe that NCC Highways concerns could be addressed, and that landscape mitigation measures could be considered.	A number of concerns were identified during the site assessment process which resulted in the site not being considered suitable as either a shortlisted or a preferred allocation site. The respondent has sought to address the highway concerns and the clarification regarding the site access and the possible existence of a ransom strip is welcomed. However, notwithstanding this update, the Council remains of the opinion that even at a reduced scale the landscape impact of development on this site would be greater than the landscape impact of the preferred site due to the prominent extension into the open countryside that would result from the development of this site. For this reason the Council does not consider SN0197 to be suitable for allocation.	420	No action required
QUESTION 125: Should any sites be rejected?	1604	Comment	Disagree that a development on these sites would have an impact on the landscape character of the area; there are numerous dwellings on this road and this site would effectively infill two parts of the settlement limit; it is adjacent to the settlement limit and would be a sensible extension to the SL; and the site is within relatively close proximity	The respondent has not referred to a specific site number within this comment however as they were the promoters of SN4013 it is a reasonable assumption that these comments should be related to this site. It is also assumed that the second site referred to in this representation is SN4028 which although promoted independently is adjacent to SN4013. Both sites are within Shotesham. The site was considered to be unsuitable for allocation due to the landscape	418	No action required

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			to the rest of the village and any landscape or townscape impacts could be mitigated.	impacts identified within the site assessment form. A review of these sites confirms these concerns and whilst the comments relating to the relationship between these sites and the existing settlement limit are noted the Council remains of the opinion that SN4013 and SN4028 are not suitable for either allocation or inclusion in the existing settlement limit. The site is within a sensitive location and it is not considered appropriate to extend the settlement limit to include these parcels of land.		
QUESTION 125: Should any sites be rejected?	433, 2172	Comment	Comments relating to SN0532: Caistor St Edmund & Bixley PC agrees with the rejection of this site; the Mineral Planning Authority note the reasoned justification for the sites does not include reference to mineral safeguarding - this needs to be addressed within the requirement's of the respective site allocation's policy; the site assessment for this site does not include reference to the active mineral extraction site within 250m of this site which we previously made reference to - the site assessment should be revised to include this information; and there are existing residential properties closer to the active mineral site that the proposed housing location - this has not led to complaints regarding amenity impacts from the existing operation and it	Site SN0532 was not considered to be suitable for allocation for the reasons set out in the site assessment form. The support for this conclusion is acknowledged. The comments from the Mineral Planning Authority are noted, as are the additional notes relating to the proximity of the site to an active mineral extraction site. It is agreed that the site assessment form should be updated to reflect this. The MPA has also advised that specific site allocation's should include reference to mineral safeguarding where appropriate and this is noted as a general comment for all site allocations within the VCHAP.	417	Update the site assessment form for SN0532 to include reference to the proximity of the proposed site to an active mineral extraction site (Contamination and Ground Stability section).

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			is therefore not expected that the proposed site would experience unacceptable impacts.			

Surlingham, Bramerton and Kirby Bedon

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 126: Settlement Limit	170	Object	Surlingham has lack of infrastructure so no preferred sites correct. Flood zone and a religious retreat need protection	Comments noted; at this stage none of the sites submitted have been identified as preferred or shortlisted sites. However, with regards to the concerns raised, the Council is engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Highways and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.	408	No action or change required,
QUESTION 126: Settlement Limit	1468	Object	Surlingham has suitable services and infrastructure to support small scale carefully designed additional housing without adversely affecting the character of the village.	Comments noted; at this stage none of the sites submitted were identified as preferred or shortlisted sites.	406	No action or change required.
QUESTION 126: Settlement Limit	303	Comment	To summarise Bramerton Parish Council recognises the current need for a small number of low cost/social dwellings, within the parish for Bramerton residents and/or those who have familial links to this area. These new dwellings would merely replace three so-called social housing properties recently sold on the open market. In addition, we are concerned about the impact of the increased volume of traffic through Bramerton as a result of the proposed 25-50 properties for the neighbouring parish of Rockland St Mary, particularly with regards to the safety of pedestrians, as existing footpaths are very narrow or in places non-existent.	The comments from Bramerton Parish Council are noted. Concerns raised about the increased traffic movements, are also noted however these matters would be dealt with during the planning application, and it would be necessary for all new development to adhere to existing Development Management policies.	405	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 127: Should any rejected sites be allocated?	1472	Comment	SN2010REV should be preferred for allocation. The proposed allocation would follow the linear pattern of development without significant extension into the countryside. There are houses opposite part of the site already and as such there would be limited impact on the landscape. There are some trees along the road, however a viable access solution is likely to be available to address this.	The Council acknowledges the support made for the development of SN2010REV. However, the reasons for rejections are still relevant; access and highway requirements would require the removal of several mature trees situated along Mill Road, where their removal would not be considered acceptable. Whilst linear development in this location would be consistent with rest of Mill Road, development in this location would be detrimental to the landscape characteristics, where open views to the east would be interrupted resulting in a negative impact upon the Broads Authority.	476	No action or change required.
QUESTION 127: Should any rejected sites be allocated?	684	Comment	SN2010REV and SN2045SL are highly suitable for small development and a natural extension to existing housing on Mill Road. A precedent exists here for linear pattern development which would not have a major impact on the countryside. Surlingham Primary school is half full and needs more children to ensure its future. Surlingham has had no development in the past 20 years but has a school, a shop, transport and other facilities that are key factors in assessing sites. The sites is ideal for starter homes/ smaller retirement properties where people wish to remain in the village but need to downsize.	The Council acknowledges the support made for two of the rejected sites, SN2010REV and SN2045S. However, the reasons for rejections are still relevant; access and highway requirements would require the removal of several mature trees situated along Mill Road, where their removal would not be considered acceptable. Whilst linear development in this location would be consistent with rest of Mill Road, development in this location would be detrimental to the landscape characteristics, where open views to the east would be interrupted resulting in a negative impact upon the Broads Authority.	475	No action or change required.
QUESTION 127: Should any rejected sites be allocated?	531	Comment	Surlingham Parish Council would consider planning applications for sites - SN2010REV and SN2016SL. The Parish	Comments noted.	413	No action or change required.

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			Council supports SNDC's decision to reject all 4 remaining sites.			
QUESTION 127: Should any rejected sites be allocated?	6	Comment	The infrastructure in the village cannot take any more traffic, i.e more housing cannot be created without addressing all of the road infrastructure. Current traffic and speeding is already dangerous for walkers (only a short pavement near school) and bicycles.	At this stage, no sites have been considered suitable within this cluster. With regards to ensuring highway safety, the Council confirms that as part of the site selection process NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network.	412	No action or change required.
QUESTION 127: Should any rejected sites be allocated?	171	Object	Agree no sites suitable	Comments noted.	411	No change or action required.
QUESTION 127: Should any rejected sites be allocated?	507, 959, 961	Support	Support the rejection of the sites within the cluster.	Comments noted.	410	No action or change required.
QUESTION 127: Should any rejected sites be allocated?	1978	Comment	See attachment for full response. Part of the Parishes are located within the Broads IDD. The Board's byelaws apply to any new developments within the IDD.	Comments noted.	409	No action or change required.

Tacolneston and Forncett End

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 128: Settlement Limit	570, 1156	Mixed	Objections to the Tacolneston settlement limit: The SL should be extended along the eastern side of the B1113 Norwich Road to encompass [my client's site]; objection to the form and character summary - the post war secondary development is Tacolneston and the school/ amenities are here; and the main development is having a detrimental impact on the Conservation Area - major traffic/ safeguarding concerns, vibration, parking, air quality, habitat, visual, traffic noise.	A review of the existing settlement limit for Tacolneston and Forncett End has not resulted in any additional areas being proposed for inclusion in the defined settlement limits (with the exception of any new sites allocated as part of the VCHAP process). As there are no other additions proposed to the SL the Council has assumed that the wider comments relating to the impact of development on the Conservation Area relate to preferred allocation site SN1057 which is to the north of the village and in closest proximity to the Conservation Area. The site assessment has included a review of the impact of additional development in this location and has not raised significant concerns in any of these areas. The inclusion of an allocated site within settlement limits is intended to regularise the allocation process. The site to the east of the B1113 (Norwich Road) is site SN2031. This site was promoted for an area in excess of 1ha and therefore would be considered too large to be considered as a small-scale extension to the existing settlement limits. A full response to the representation received in relation to SN2031 has been provided to Question 130.	442	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 128: Settlement Limit	108	Comment	Forncett PC agree with the extent of the settlement boundary (as far as the parish Forncett is concerned).	There are no amendments proposed for the Forncett End settlement limit and the support for this stance is noted.	441	No action required
QUESTION 129: Preferred Site - (Part of) SN1057, Land to the west of Norwich Road	1435	Support	Support for SN1057: Representation submitted in support of the allocation of SN1057; however the preferred allocation refers to 20 dwellings whereas recent discussions between [the respondent] and Council Officers has concluded that the site could accommodate 25 dwellings in addition to the 3 permitted self-build dwellings on the site frontage; no explanation has been provided explaining why 25 dwellings would not be appropriate - the allocation area is capable of accommodating at least 25 dwellings of a mix of sizes and types, including single storey along the site frontage; the site can deliver the following: up to 25 dwellings; pedestrian access to the primary school; mix of housing types and tenures; an attractive sized site for small-medium housebuilders; and the site has received strong interest from a number of housebuilders.	The support for the allocation of this site by the promoter of the site is noted, as are the comments made regarding the numbers of dwellings the Council considers to be acceptable on the reduced site area. At various points the site has been promoted for either a minimum of 25 dwellings or up to 25 dwellings the Council considers the former unlikely to be achieved. The respondent has made reference to advice received from Development Management colleagues advising of the acceptability of 25 dwellings on this site however these discussions took place outside the VCHAP process and centred on a specific proposal put forward by the agent. This advice will be reviewed and reflected in the VCHAP if appropriate.	464	Amend the preferred allocation boundary reflect permission for three self-build units and consider the site promoters evidence for accommodating 25 dwellings.
QUESTION 129: Preferred Site - (Part of) SN1057, Land to the west of Norwich Road	571, 1158	Object	Objections to SN1057: Failure to submit permitted development area rather than greenfield; allocated landscape area;	The Council acknowledges the objections received to the proposed allocation of SN1057, as well as the associated support for an alternative site SN2031 which will be responded to in detail in response to Question 130.	463	Consideration to be given to the site specific policy wording and the requirement for a pedestrian crossing as part of the

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			pedestrian safety - no footpaths on west side of the road; parking issues around the school and amenities which results in restricted access and single file traffic causing vibrations, air/noise pollution and danger; school is at capacity therefore combination of this site and TAC1 will contribute detrimentally to school expansion (already in 16 metres of listed buildings) and objection on the basis SN2031 is a more suitable and sustainable option for allocation.	Concerns have been raised about the loss of a greenfield site and whilst these concerns are recognised, due to the scale of development proposed through the VCHAP area as well as the rural nature of the Plan area it is accepted that the majority of new development will occur on greenfield sites. It is unclear what the respondent is referring to when commenting on the failure to submit a site within the permitted development area however it is assumed that this refers to the defined settlement limits of Tacolneston. Development within the existing settlement limits would allow limited infill opportunities only and would not be sufficient to meet the objectives of the VCHAP or the identified housing targets. The respondent has also referred to the site lying within an allocated landscape area. Again it is unclear what this refers to as the preferred site does not lie within any designated landscape areas. The Tacolneston Conservation Area is to the north of the site. The site assessment recognises that there are a number of trees subject to Tree Preservation Orders along the site frontage and that the site layout and design would need to have regard to these. The Council acknowledges that provision of an adequate visibility splay for site access may result in the loss of some of the existing landscaping.		highway works required for the delivery of this site.

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				NCC Highways Officers have provided technical comments that have informed the site selection process. As with many village schools it is recognised that parent parking at school drop-off and collection times can cause concerns for local residents however in this instance it is not considered that additional development in this location would exacerbate / significantly alter the existing situation. Due to the proximity of this site to the primary school it is reasonable to assume that development of this site would not result in additional vehicle parking associated with the school. NCC Officers have suggested that development of this site may necessitate the provision of a pedestrian crossing for the B1113. This would not only improve pedestrian safety for existing and new residents but would also serve as a traffic calming measure. These comments also refer to the school operating at capacity and that the pressure of new development would result in further expansion of the school to the detriment of the nearby listed buildings. NCC Education Officers have not raised concerns about the capacity of the school, with many schools noted as having reduced pupil numbers. Parental choice has meant that many children travel to schools from outside catchment areas therefore in the instance the school is operating at capacity places for out-of-catchment		

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				pupils would be limited to ensure children within the catchment area could be accommodated. This could also have the benefit of reducing traffic at these peak times. There are no plans to extend the school to accommodate increased pupil numbers and the significant costs associated with such an expansion mean that this would be unlikely in the future. However, if such an instance did occur, the assessment of any application to extend the school would need to take into consideration the impact of development on the nearby listed buildings.		
QUESTION 129: Preferred Site - (Part of) SN1057, Land to the west of Norwich Road	109	Comment	Comment on SN1057: Forncett Parish Council do not want to suggest any amendments to the recommendations for preferred or shortlisted sites.	The Council acknowledges these comments.	462	No action required.
QUESTION 129: Preferred Site - (Part of) SN1057, Land to the west of Norwich Road	2222	Comment	Comments relating to the ecology for SN1057: Green rating - no major ecological constraints identified from desktop assessment; hedgerow boundary identified as priority habitat but no other priority habitats identified; amber habitat zone for great crested newts; site within SSSI IRZ but residential development does not trigger NE	The comments of the NCC Ecological Officer are noted. Any subsequent planning application for development on this site would need to ensure compliance with current guidance and legislation and ensure that appropriate mitigation strategies are designed and implemented on site accordingly.	453	No action required

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			consultation; and applications to be accompanied by ecological appraisal and mitigation strategy.			
QUESTION 129: Preferred Site - (Part of) SN1057, Land to the west of Norwich Road	1979, 2011, 2137, 2156	Comment	Summary of comments relating to surface water drainage and foul water capacity matters for SN1057: Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment; if surface water discharges within the watershed catchment of the Board's IDD, this should be facilitated in line with the Non-statutory technical standards for SuDS; LLFA - green rating; Forncett has some capacity for foul water flows but does not have capacity for all of the sites that could be allocated within the developments identified; discussions will need to be held with AW if all of the identified development is to go ahead; and development must be phased in line with Water Recycling Centre treatment capacity being made available.	These comments are acknowledged. If SN1057 is allocated it will be the responsibility of the developer to ensure liaison with the correct third party regarding surface water drainage. The drainage strategy for the site will need to ensure compliance with the relevance legislation and guidance. The comments relating to the foul water capacity at Forncett WRC are noted, as is the suggestion that a phased approach to development may be required to ensure sufficient capacity. The comments of Anglian Water will be incorporated in the updated Water Cycle Study and will inform this matter. However it should also be noted that the Environment Agency have referred to a number of shortlisted sites as well as preferred sites within their capacity calculations and as such it is not anticipated that all of these sites will be allocated (and therefore capacity at the WRC would not be exceeded).	448	Review the Water Cycle Study (including the comments of Anglian Water) regarding the WRC capacity at Forncett. Consideration of whether site specific policy text is appropriate regarding the phasing of developments that would be accommodated by the Forncett WRC.
QUESTION 130: Should any shortlisted/rejected sites be allocated?	1161	Comment	Comments in support of SN2031: provision of evidence of mitigation measures to inform a reassessment of the site - including access (visibility), flood risk	The submission of additional evidence in support of SN2031 is acknowledged and should be reviewed by the appropriate technical consultees as part of further consideration of this site. However at	470	Review of the evidence and mitigation measures submitted by technical consultees - NCC Highways,

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			and impact on character and appearance - demonstrates that SN2031 is more suitable for allocation than preferred site SN1057; FLOOD RISK: Flood Risk and Drainage Strategy Initial Assessment (submitted) indicates surface water flood risk is not as extensive as shown on the EA maps and surface water drainage can be managed within the site; sketch plan demonstrates that 15 dwellings can be accommodated on land at low risk of flooding; SN2031 performs well against SN1057 in the SA/SEA with the exception of flood risk but it is considered this constraint can be mitigated and the SA/SEA score can be reassessed in light of the submitted evidence; LANDSCAPE: sketch demonstrates development can be achieved in a sympathetic manner to the prevailing character and appearance of this part of the village; locating development to the north of the site and retaining open space to the south would retain the 'green break' between the two parts of the settlement; the open space would be publicly accessible and a benefit of this site; existing boundary hedgerows would be	this time the Council remains of the opinion that residential development between the two distinct parts of the settlement would have an adverse impact on the verdant character which is considered to be an important feature of the village in this location.		Landscape Officer and LLFA. Review of the site classification if appropriate.

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			retained and enhanced where necessary to screen views of the development in the wider landscape; HIGHWAYS/ SITE ACCESS: submitted Visibility Splay drawings demonstrate Access A and B options meet the requisite visibility standards and can be achieved without the need to remove significant boundary trees or vegetation along the B1113; GENERAL: indicative scheme demonstrates a mix of dwelling sizes and tenures; confirmation that the site is suitable, available and achievable for residential development, either as an allocation or as an extension to the settlement limit; delivery of the site is economically viable;			
QUESTION 130: Should any shortlisted/rejected sites be allocated?	1721	Comment	Comments in support of SN4019: Concern that the offer of land for car parking associated with the school has not been considered in the site assessment; current school parking arrangements cause major traffic problems and potential dangers; the additional allocations proposed in the village would increase this problem; a new designated car park and pedestrian	This site was rejected during the site assessment process for a number of significant reasons which were set out in the site assessment form. These reasons included the impact of development on the townscape and landscape (including the adjacent Conservation Area), the potential impact of development on the area-TPO adjacent to the site and there being no suitable site access due to the highway constraints along Hall Road. Whilst it is recognised that the provision of a public car park associated with the delivery of	469	Update the site assessment form to reflect the offer of a public car park associated with the allocation of this site.

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			crossing would address these problems; and therefore request that this site is reconsidered as part of the VCHAP.	this site may be considered as a public benefit and the site assessment form should be updated accordingly it is not considered that this would address the significant constraints previously identified. The Council remains of the opinion SN4019 is unsuitable for allocation.		
QUESTION 130: Should any shortlisted/rejected sites be allocated?	1545	Support	Support for SN0016REV: GENERAL COMMENTS: the original site promotion details cannot be accessed to review and there is therefore a reliance on SNDC and consultees interpretation of the HELAA and site assessment document only and this is not always accurate and transparent; planning permission has been granted for an annex and works to 122 Norwich Road (2021/1044); SNDC had opportunity to consult with the landowner in relation to the site but chose not to - the description and area were not open for interpretation and a fair assessment of the site clearly did not happen; a phone call with SNDC confirmed that a site visit did not take place and I request that this is addressed. PROMOTED USE: this site has been considered unjustly and the assessment does not reflect the submission - submission was for 1 self-build dwelling on a 0.12ha plot with the site assessed for 24 dwellings on 0.95ha; disagree with the SNDC interpretation of the proposed orchard and ecology area as shown within the redline; disagree that the site could	A number of concerns have been raised in this representation about the accuracy of the assessment process for this site. As such the Council considers it appropriate to complete a new assessment for SN0016SLREV to review the findings of the initial assessment. However, without prejudice to a further assessment of the site, the Council remains concerns that there are fundamental heritage issues associated with the development of this site.	468	Undertake a reassessment of SN0016SLREV - with the corrected site area - to review the concerns raised by the landowner in this representation.

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			come forward for a larger number of dwellings due to the location of the site and its restrictions; subsequent planning permission has been granted for an annex and works to 122 Norwich Road; OBJECTIONS TO THE SITE ASSESSMENT: objection to the amendment of the site address (land is not to the rear of 122 (Norwich Road); the site plan promotes an area of 0.12ha, including two separate vehicle access points - the site is not 0.95ha as stated in the HELAA and site scores; the submission was for 1x self-build which reflects the form and character of the area - I object to the density being inflated without consultation; failure to identify two outbuildings on the site - I consider this to be previously developed land, not greenfield; two accesses to the site are available and the site assessment does not reflect this; robust objection to the NCC Highways RED score as the site was assessed for 24 dwellings - a previous application carried no highways objection and the footways are well maintained; NCC Highways and SNDC have failed to observe direct access from the southern linked area of the site to public footpath 5;			

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			Tacolneston and Forncett have two schools therefore this is an error in the data and maps; Anglian Water have confirmed a mains connection available to the south of the site and a third party landowner has 'in principle' granted access to the mains drainage system; object to an amber flood risk score as the site is confirmed in flood zone 1 and the HELAA score is green - piped drainage is available to the west, a ditch to the south and a betterment of drainage could accommodate one dwelling; objection to the landscape assessment - the site does not impact on the landscape or the setting of the listed buildings; development of this site would not introduce development to the rear of any property but this is a characteristic of the Conservation Area; a Conservation Appraisal needs to exist to understand the form and character of the area - SNDC website confirms this does not exist therefore I object on the grounds that no consideration has been given to existing structure on the site, the linked areas of the site and the benefits that the site could offer; the site could offer an ecological net gain;			

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			being in close proximity does not demonstrate an amber rating; COMMENTS ON THE SITE VISIT OBSERVATIONS: whilst undeniable the site forms part of the setting of the listed building but the site was promoted for 1x dwelling, not 24, therefore should have been less than substantial harm; the impact of the school (including possible future expansion) as well as a transmitter pole would have a greater detrimental impact on the listed buildings; disagree with the garden land/ curtilage description - SNDC officers previously described the land as undeveloped; partially disagree with the description of the boundary treatments around the site; disagree with the observation re. utilities on/adjacent to the site - the answer to this should be 'yes'; COMMENTS ON CONCLUSION: object to the comments made in the conclusion and consider this site to be suitable for inclusion in the settlement limit; and the public and heritage benefits of the site were not recognised; and			

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			refer to the site north of 59 Norwich Road which was previously considered to be acceptable due to the public and heritage benefits.			
QUESTION 130: Should any shortlisted/rejected sites be allocated?	110	Comment	General comment: Forngett Parish Council do not suggest any changes to the recommendations for the preferred or shortlisted sites; and Forngett PC do not wish to propose any changes to the rejected sites in Forngett End.	These comments are acknowledged	467	No action required
QUESTION 130: Should any shortlisted/rejected sites be allocated?	2097, 2224	Comment	Comments relating to shortlisted site SN0602: LLFA - green rating; and Ecological rating - green; no major ecological constraints identified from a desktop search; bounded on three sides by hedgerows (priority habitats); no other priority habitats identified; amber habitat zone for great crested newts; site in SSSI IRZ but residential development does not trigger consultation with Natural England; and planning applications should be accompanied by an appropriate ecological	These technical comments from the LLFA and the NCC Ecologist are noted. If allocated, it will be for the developer of the site to ensure that the required ecological assessments are undertaken and that the site design and mitigation measures are implemented in accordance with the recommendations of the appraisal.	465	No action required

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			appraisal and mitigation strategy which should inform the site design.			
QUESTION 131: Should any shortlisted sites be rejected?	111	Comment	General comment: Forncett Parish Council do not suggest any changes to the recommendations for the preferred or shortlisted sites; and Forncett PC do not wish to propose any changes to the rejected sites in Forncett End.	The comments of Forncett Parish Council are acknowledged.	466	No action required

Tasburgh

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QUESTION 132: Settlement Limit	1587	Support	Support for the proposed Settlement Limit shown on the Map Booklet for Tasburgh as it includes Land north of Church Road and west of Tasburgh School that is allocated for development by Policy TAS1 of the Site Specific Allocations and Policies Document (2015). Confirmation that that site is deliverable for the level of development now proposed.	Support the proposed changes to the Settlement Limit (to include TAS1)	479	No action or change required.
QUESTION 132: Settlement Limit	971	Comment	Agree with the extent of the settlement limit and changes	Support noted.	478	No action or change required.
QUESTION 132: Settlement Limit	330	Support	Agree with the extent of the settlement limit as shown in the policies map.	Support noted.	477	No action or change required.
QUESTION 133: Preferred Site - SN4079, Land north of Church Road and west of Tasburgh School	331	Object	In the previous Site Specific Allocations and Policy Document (Section 5) published in 2015 this site was allocated for development within the range of 10-20 dwellings. The site size remains at 1.14 hectares, a 50% increase in dwellings to 30 is far too dense and not justified. The previous 10-20 dwelling range should be retained with a mix of housing sizes to reflect existing development in Tasburgh. Existing constraints with regard to safe vehicular access, pedestrian and cycle access and allowance for any expansion or improvement to the school facilities to be factored into any proposed housing development.	The Council acknowledges the concerns raised within the representation. In the first instance with regards to number and density; the uplift in up to 10 dwellings is considered sustainable and would represent an efficient use of land. The site is 1.14ha where the scale of development proposed in is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. However, the Council will consider how capacity is reflected in the VCHAP policy for this site. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan	487	Review the capacity of the site.

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				are relatively small scale, including those proposed at Tasburgh. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care System, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. With regard to the access concerns, Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways would like to see a road linking Church Road and Henry Preston Road.		
QUESTION 133: Preferred Site - SN4079, Land north of Church Road and west of Tasburgh School	1750	Support	Support the preferred allocation of site 4079 in principle, but wish to make the following comments over the details suggested and ask that they be included in the allocation policy and guide for the site. • I am concerned that the acceptance of a high density will result in a development uncharacteristic of the area. The development on Church Lane must follow the pattern of single storey dwellings on	The Council acknowledges the comments made within the representation. Further to the proposed number of dwellings for the site, this is considered to be sustainable and development of this site would represent an efficient use of land, in accordance with the paragraph 124 of the NPPF. However, the Council will	486	Review the capacity of the site and the outputs of the HIA for this site.

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			this stretch of the road. Any attempt to repeat the form of dwellings on the Henry Preston estate would be totally out of keeping. • Dwellings along Church Road could be served by a single access at the east end enabling a continuous grass verge and hedge to be planted on the road side. • I think it would be a mistake to upgrade the lode to a road and connect it to Henry Preston Road. The junction with Church Road is not good enough to cope with additional traffic as this road will lead to a rat run of traffic heading to and from the school. I imagine the owners of the bungalow on the corner and the converted barn would also object to such an increase in use and impact. A footpath connection alone would be an improvement. • The development should take account of the setting of the listed barn. • Two storey dwellings could be built on the extension of Henry Preston Road but it would be an opportunity to create a village green type space to compliment the school fields, help with the turning and parking of cars used by the parents of the school children, and provide amenity space that is lacking on the present estate.	consider how capacity is reflected in the VCHAP policy for this site. The scale of development proposed in is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. With regards to the design and layout of the site, this will be dealt with at the planning application stage, where consideration will also be had to neighbouring uses and any overlooking issues. With regard to the access concerns, Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways would like to see a road linking Church Road and Henry Preston Road. With regards to the listed buildings, Historic England have been consulted with and have requested a Heritage Impact Assessment (HIA) to help inform the allocation and provide (if relevant) mitigation measures.		
QUESTION 133: Preferred Site - SN4079, Land north of Church Road and	2018	Comment	Sites SN0412REV, SN4052, SN2065REV and SN4079 are located within 250 metres of an existing landfill that could result in the nearby community being exposed to impacts including odour, noise, dust and	The Environment Agency comments are noted. The site is located within 250 metres of an existing landfill that could result in the nearby community being exposed to impacts including odour,	485	Consideration is required towards the affects of the proximity of the landfill.

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west of Tasburgh School			pests. The severity of these impacts will depend on the size of the landfill, the nature of the waste it takes and prevailing weather conditions. Planning policy requirements (paragraph 182 of the National Planning Policy Framework (NPPF)) state that new development should integrate effectively with existing businesses and not place unreasonable restrictions upon them. Where the operation of an existing landfill could have significant adverse effects on new development (including changes of use), the applicant should be required to provide suitable mitigation for these effects. Mitigation can be provided through the design of the new development to minimise exposure to the neighbouring landfill and/or through financial contributions to the operator of the landfill to support measures that minimise impacts. Environmental Permitting Regulations require operators to demonstrate that they have taken all reasonable precautions to mitigate impacts of their operations. This is unlikely to eliminate all emissions and there is likely to be residual impacts. In some cases, these residual impacts may cause local residents concern. There are limits to the measures that the operator can take to prevent impacts to residents. Consequently, it is important that planning decisions take full account of paragraph 182 of the NPPF. When a new development is built near to an existing	noise, dust and pest. These impacts will need to be considered and mitigated against. Planning decisions take full account of paragraph 182 of the NPPF. When a new development is built near to an existing landfill this does not automatically trigger a review of the permit.		Mitigation can be provided through the design of the new development to minimise exposure to the neighbouring landfill and/or through financial contributions to the operator of the landfill to support measures that minimise impacts

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			landfill this does not automatically trigger a review of the permit.			
QUESTION 133: Preferred Site - SN4079, Land north of Church Road and west of Tasburgh School	2057	Comment	Historic England comments: While there are no designated heritage assets within the site, the grade II listed Old Hall Farmhouse lies immediately to the north west of the site. In addition, the scheduled monument (a hillfort, known as 'Camp in Village', lies to the north of the site, which also includes the grade I listed Church of St Mary, and grade II listed war memorial and Rectory. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets. We are particularly concerned about the potential impacts on the Farmhouse, given its proximity. We do however appreciate this is seeking to increase the density of an existing allocation. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	Historic England comments noted.	484	Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.
QUESTION 133: Preferred Site - SN4079, Land north of Church Road and	1980, 2110	Comment	Water management: Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, it should be	The comments made in relation to water management are noted and the requirement for geotechnical	483	Detailed on-site ground investigation works will be required to determine whether infiltration is a suitable/

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west of Tasburgh School			facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised.	investigation these issues will be explored further with the LLFA.		viable option on a site and if necessary to explore alternative solutions. Developers must work in accordance with the requirements of the NPPF and supporting guidance"
QUESTION 133: Preferred Site - SN4079, Land north of Church Road and west of Tasburgh School	2225	Comment	NCC Ecologist comments: Amber - measures required - priority habitat onsite or proximity to SSSI (recreational impact concerns) and or buffer required Application to increase density of allocated site. Amber habitat zone for great crested newts. Site includes land identified as deciduous woodland (priority habitat (see MAGIC). Loss of priority habitat should be avoided - increase in density should avoid land identified as priority habitat. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain. (Southern field/hedge boundary forms parish boundary). Although site in SSSI IRZ, increasing density of dwellings would not trigger NE consultation.	Comments noted.	482	Policy wording to reflect the priority habitat.
QUESTION 133: Preferred Site - SN4079, Land north of Church Road and	1588	Support	Support the re-allocation of this site for up to 30 dwellings. Points for further consideration:	support for the allocation of SN4079 is noted.	481	No action or change required.

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west of Tasburgh School			1. NCC Highways access recommendations - we can confirm that these are deliverable. 2. We disagree that an increase in dwellings is dependent on there being no requirement for school expansion. JCS only allocated 10-20 dwellings to each Service Village, therefore site was allocated at low density. Would expect any requirement for school expansion as a result of proposed development to be small. Density of c.35 dph is achievable on site with similar levels of building coverage to surrounding area. Design would reflect local character and use land efficiently. 30 dwellings could be delivered on the site, whilst retaining sufficient land for any small school expansions that are required.			
QUESTION 133: Preferred Site - SN4079, Land north of Church Road and west of Tasburgh School	973	Support	Supportive of site SN4079 and the increased numbers. If planning is approved would reiterate concerns raised in previous consultations that sole vehicle access to the development should be from Church Road, as vehicle access from Henry Preston Road would cause considerable danger to school children attending Preston Primary School. The development should also host a housing mix that includes affordable housing and bungalows in keeping with the design and character of the nearby area.	The support for the allocation of SN4079 is noted. With regard to the access concerns, Officers at NCC Highways have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways would like to see a road linking Church Road and Henry Preston Road. With regards to housing mix, the Council will seek to provide new housing development to meet housing needs (using the most up to date Strategic Housing Market Assessment (SHMA)).	480	Allocation policy wording to include the of linking Church Road and Henry Preston Road.

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				This will ensure that allocated sites provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of their life cycle e.g. first-time buyers, affordable housing, upsizing/downsizing etc. In addition, the Council will only consider allocating sites that are capable of delivering the policy standard affordable housing requirements (Emerging Policy 5 of the GNLP requires that all major development sites (defined as 10 or more dwellings) are required to provide at least 33% affordable housing on-site).		
QUESTION 134: Should any rejected sites be allocated?	1589	Comment	On review of the three other sites submitted for residential development in Tasburgh and it is clear that none of them are suitable for residential development due to their distance from the settlement, access and highways issues and their impact on the historic environment and local townscape and landscape. We therefore agree with the Council's assessment of these sites.	Comments noted; agrees with the conclusions of the rejected sites, as set out by the Council.	490	No action or change.
QUESTION 134: Should any rejected sites be allocated?	975	Comment	Tasburgh Parish Council comments; The rejected sites are not suitable for reconsideration for the same reasons as outlined at the time of original assessment.	Comments noted.	489	No action or change required.
QUESTION 134: Should any rejected sites be allocated?	332	Support	Rejected sites should not be allocated instead of, or added to the preferred site SN4079.	Comments noted.	488	No action or change required.

Tharston, Hapton and Flordon

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 135: Settlement Limit	1531	Object	Sequence are promoting land South of Station Road, Flordon for a residential development of approximately 12 new homes. The site is partly within the Settlement Limit and, therefore, additional new homes could be brought forward through an appropriate extension of the Settlement Limit to include all or part of the site being promoted.	Council is unable to confirm which piece of land the developer is referring too without any site details.	879	Confirm land which is to be included within SL.
QUESTION 135: Settlement Limit	1019	Object	Tharston and Hapton parish Council is two villages making up one parish, near Long Stratton, with Hapton suffering from no amenities except a school. They have no bus service and are only served by a garage, mobile library, and mobile food truck. Tharston is closer to Long Stratton but also suffers with little in the way of infrastructure except the new housing estate of Tharston Meadows but in general most residents need transport to access the local shops, Doctors, Library and bus routes. We cannot comment for Flordon Parish Council	Comments noted. The Council acknowledges that there are some inherent tensions linked to the relative accessibility of a range of higher order services and goods in several locations compared to other. However, the Plan aims to reflect the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages selection of employment opportunities etc. The Settlement Limit for Tharston is linked to that for Long Stratton, covered by the Long Stratton Area Action Plan and GNLP.	670	Review the suitability of defining a Settlement Limit for Hapton.
QUESTION 136: Preferred Site - SN4048, Land to	565, 762, 867, 1061	Object	SN4048 Hapton - Objections: flooding concerns, dangerous increase in traffic, Cow Lane is already a danger spot for pedestrians, amenity and lack of privacy concerns (change in site levels),	With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority (LLFA) who have raised no major concerns with the development of the site, The technical	672	Review the appropriateness of allocating a site at Hapton, given the

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the north of The Street, Hapton			development hugely inappropriate and disproportionate for such a small village with no amenities and small village school.	design details relating drainage schemes would be assessed through the detailed planning application stage. The scale of development proposed in is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, including that proposed at Hapton. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care System, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. With regards to overlooking due to site levels, a requirement to ensure the site is subject to a topographical survey which will identify the levels across the site can be included in a VCHAP policy. This will then feed into the detailed design of the site would be subject to the planning application which would		limited local services within this cluster.

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				take into consideration the position of all plots and would be sensitive to levels. The Council has engaged with officers at NCC Highways prior to the consultation and as part of the site selection process. They have provided their technical advice on highway matters relating to each site and the wider highway network. In this instance, officers have considered the site to be suitable given its proximity to the School. It is noted that development of the site would be subject to creating a satisfactory access, including achieving the correct visibility splays. With regards to the impact on increased traffic movements/safety matters, these are also noted however these matters would be dealt with during the planning application stage, and it would be necessary for all new development to adhere to existing Development Management policies The Council does acknowledge that, aside from the School, Hapton and the remaining parishes in this cluster have very limited services. As such, as benefit to other local services will be to those in Long Stratton, which is already subject to significant growth proposals under the Long Stratton Area Action Plan.		
QUESTION 136: Preferred Site - SN4048, Land to the north of The Street, Hapton	343, 566, 567, 568, 572, 585, 763, 886, 903, 989, 990, 991, 1020, 1087, 1091, 1124,	Object	Concerns relating to highway safety; unsuitable access, Cow Lane and The Street are both very busy, often used by large farm vehicles or HGVs, drivers exceed speed limit, limited visibility due to dangerous bend in road, future residents	The Council has engaged with officers at NCC Highways prior to the consultation and as part of the site selection process. They have provided their technical advice on highway matters relating to each site and the wider highway	103	Review the appropriateness of allocating a site at Hapton, given the

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	1140, 1494, 1538, 1761		may have to cross the road near this blind corner, Footpath from site to school does not exist - only from corner of No. 3, The Street. Overdevelopment of site; 12 houses would exceed the usual density for the village. Landscape issues: the site sites much higher than the road and therefore the development would be visible from the beginning of the village, changing linear format of Hapton. Minimal amenities and services, lack of infrastructure to support further housing Development has no value to the village Detrimental impact on the residential amenities of the properties to the south, concerns with loss of privacy of a number of residents and overlooking concerns Flooding and drainage concerns; the site levels are varying which could create surface water runoff. The site also has three-phase 11,000 volt cables buried along the frontage and beside the footpath.	network. In this instance, officers have considered the site to be suitable given its proximity to the School. It is noted that development of the site would be subject to creating a satisfactory access, including achieving the correct visibility plays. With regards to the impact on increased traffic movements/safety matters, these are also noted however these matters would be dealt with during the planning application stage and it would be necessary for all new development to adhere to existing Development Management policies. With regards to the proposed number of dwellings for the site is considered to be sustainable and development of this site would represent an efficient use of land, in accordance with the paragraph 124 of the NPPF. The scale of development proposed in is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. With regards to infrastructure, most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, including those proposed at Hapton. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to		limited local services within this cluster.,

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				be an issue for energy suppliers. The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. With regards to overlooking due to site levels, a requirement to ensure the site is subject to a topographical survey which will identify the levels across the site can be included in a VCHAP policy. This will then feed into the detailed design of the site would be subject to the planning application which would take into consideration the position of all plots and would be sensitive to levels. The Council does acknowledge that, aside from the School, Hapton and the remaining parishes in this cluster have very limited services. As such, as benefit to other local services will be to those in Long Stratton, which is already subject to significant growth proposals under the Long Stratton Area Action Plan.		
QUESTION 136: Preferred Site - SN4048, Land to the north of The Street, Hapton	2226	Comment	No major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. 12 dwellings - part of agricultural field off 'the Street' bounded partly by hedge	Comments relating to ecology noted; no major constraints identified from desk top search It is acknowledged that at the planning application stage, a Preliminary Ecological Appraisal/Ecological Impact	102	Comment noted.

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			(priority habitats) - loss (for access) should be avoided (use existing?) minimised, and as a last resort, compensated. No other priority habitats identified (see MAGIC). Site in green habitat zones for great crested newts. Site in SSSI IRZ, but residential development doesn't trigger consultation with Natural England unless over 100 dwellings if allocated. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain. (southern field/hedge boundary forms parish boundary).	Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. It is also noted that consideration should be given to delivering Biodiversity Net Gain. (southern field/hedge boundary forms parish boundary).		
QUESTION 136: Preferred Site - SN4048, Land to the north of The Street, Hapton	1981, 2125	Comment	Comments relating to water management issues: Site is adjacent to the Norfolk Rivers IDD; if surface water discharges within the watershed catchment of the Board's IDD, it is requested that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). The site predominantly has superficial deposits of diamicton (a ground condition of variable quality that can frequently provide poor infiltration opportunities) where comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. In addition, The on-site flood risk	The comments relating to the flood risk of this site are noted. However it is considered that the identified flowpath does not affect the site in a way that restricts any development. As such, development should be designed in a way to avoid interruption of a flowpath.	101	Comments noted and relevant wording in any site allocation policy as appropriate.

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			contributes to a major off-site flow path where it is advised that this must be considered in the site assessment.			
QUESTION 137: Should any rejected sites be allocated?	1021	Object	SN0255. The Laurels, Land north of The Street SN1051. Land at The Street, Tharston None of these sites is suitable for development and again the Parish Council would oppose any such development in the village of Tharston due to the lack of infrastructure and amenities for our parishioners to enjoy.	Comments noted.	671	No action or change required.
QUESTION 137: Should any rejected sites be allocated?	864	Object	Support for the development of Ref SN0566 - application ref 2020/1920 Historic England, FPC, PCC & the Ward members support the development; with new church access, lychgate, open views to church/community centre, village green, glades, children's play area. It will provide extensive benefits for church and community, and link the south and north settlements, encouraging social cohesion. This, together with the future occupants of the dwellings, will contribute towards the vitality and vibrancy of the community. Mulbarton, Hapton, Tasburgh, Newton Flotman and Long Stratton are all within 3 miles of Flordon and offer significant facilities. Wymondham also provides a rail link to Cambridge and London.	The Council acknowledge the support for the allocation of site SN0566 within Flordon. The Council will take into consideration the comments received as part the consultation and re-assess the site for potential development. It is acknowledged that Historic England would be supportive, as seen through previous application 2020/1920. However, further confirmation would need to be sought from Historic England to ensure that they would be happy with an allocation. However, the issue surrounding highways would need to be resolved and development of the site would be subject to this.	125	Site has now secured a resolution to permit at Development Management Committee, although the issuing of the permission is subject to addressing Nutrient Neutrality.

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QUESTION 137: Should any rejected sites be allocated?	1539	Comment	Sequence do not consider that any of the rejected sites should be brought forward for allocation.	The Council acknowledge the comments relating to the rejected sites.	114	No action or change required.
QUESTION 137: Should any rejected sites be allocated?	344	Comment	SN0566 - Has a fantastic footpath through Redwings that is quiet and would allow walking/cycling to school. Environmentally friendly and reducing traffic in the village of Hapton. SN2147 - as would not impact on the layout of the village of Tharston	The comments relating to site SN0566 (Flordan) have been noted, with specific regard had towards the identified Public Right of Way (PROW) which runs from the site to Hapton (and the School). As a result of this consultation, the preferred site within Hapton will be reassessed in light of the comments received in terms of a more suitable location for development. The review of SN0566 will be subject to highways satisfaction as a safe crossing point will also need to be achieved from the PROW to the site access. Consideration towards the impact of St Michaels Church (Grade I LB) will also need to be reviewed in terms of impact of setting and mitigation measures. Site SN2147 is still considered to be unsuitable for development due to its physical separation from the main settlement. It also heavily constrained by highways where no safe and suitable access is achievable. With regards to the impact on the village, the site is opposite an agricultural fields which appear open; development of the site would impact negatively.	112	SN0566 has now secured a resolution to permit at Development Management Committee, although the issuing of the permission is subject to addressing Nutrient Neutrality. No change or action required for site SN2147.

Thurlton and Norton Subcourse

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QUESTION 138: Settlement Limit	504, 819, 1827	Mixed	Comments relating to the Thurlton and Norton Subcourse settlement limit: The Thurlton SL differs from the boundaries of the village; main built form is varied and irregular and not suited to uniform housing lacking in private amenity land; this area would not accommodate 12 units with substantial private amenity space; Thurlton PC do not support the change in settlement limits to include SN0149; Thurlton has provided 250% of it's proposed allocation- 30 dwellings constructed in contrast with 12 suggested by the GNLP; 15 additional properties will impact on the services available - the nearest GP is in Loddon and buses are infrequent; and typographical error noted.	The Council considers that these comments relate to the principle of further development in Thurlton and the potential impact of new residential development on existing facilities and services. The Council acknowledges the differences between the boundaries of the village and the existing settlement limits. The settlement limit denotes areas within which less restrictive planning policies apply and in which new development would be acceptable in principle. For this reason the settlement limit boundaries are drawn more tightly around the existing built form than the wider boundaries of the village. This approach is intended to prevent the encroachment of development into the wider countryside. Additional comments raise concerns about the scale of development proposed on SN0149. The number of dwellings proposed on this 0.5ha site (up to 12) equates to 25dph, a density considered to be acceptable in the rural areas of South Norfolk. Detailed site design will determine the most appropriate number of dwellings for the site and will take into consideration the context of the site as well as site constraints. Whilst this may result in a lower number of dwellings on the site at this stage the Council considers SN0149 to be an appropriate number in	907	Correct the text error in the text to read Beccles Road provides a relatively good link to Beccles and the A143 to the south.

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				principle. The Council notes the comments of the Parish Council about the quantum of development experienced within the village. Thurlton was classified as a Key Service Centre in the JCS and as such a site for 20 dwellings was allocated in the most recent site allocations document. Subsequently the site progressed for a larger number of dwellings and followed due process through the planning application. The increased density on the site was considered to be acceptable in the context of the site, an appropriate use of the land and reflective of the Key Service Centre status of Thurlton. The VCHAP allocations remain in addition to previous allocations and seek to allocate appropriate sites for the 1,200 dwelling figure identified by the GNLP. Therefore, whilst the scale of the previous planning permission is acknowledged it does not negate future site allocations in the village. Reference has also been made to the limited services available to residents of Thurlton. The assessment of sites in Thurlton has included a review of the services and facilities. The distance to the nearest GP surgery is noted however this is not considered to be unusual within rural communities and is not considered to be an appropriate reason to reject further development within this village cluster. The limited bus service is recognised but the village		

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
				benefits from a number of other services and facilities that would be attractive to residents.		
QUESTION 139: SN0149, Land adjacent to Holly Cottage, west of Beccles Road, Thurlton	2227	Comment	NCC Ecology comments submitted in relation to SN0149: Green rating - no major ecological constraints identified from desktop research; surveys and enhancement in accordance with policy required; rough grassland partly bounded by hedgerows (priority habitat); green habitat zone for GCNs; and Site within SSSI IRZ but residential development does not trigger consultation with Natural England.	These comments are noted and the Council welcomes the confirmation that there are no significant ecological issues identified on this site. Any forthcoming development on this site would need to be informed by the appropriate ecological surveys and mitigation measures with consideration also given to Biodiversity Net Gain in accordance with emerging policy and legislation.	911	No action required
QUESTION 139: SN0149, Land adjacent to Holly Cottage, west of Beccles Road, Thurlton	1982, 2067	Comment	Summary of water management comment received in relation to SN0149: Within the Waveney, Lower Yare and Lothingland IDD; there are a series of riparian watercourses to the south and east of the proposed site; byelaw 3 applies to any proposed discharge of surface water from the proposed site - all other Board Byelaws will also apply to this development; LLFA rating - green; and	The Council welcomes these comments relating to the water management across this site. The comments of the Internal Drainage Board are noted and it will be for the developer of the site to ensure liaison with the appropriate third parties when preparing a drainage scheme for the site. The Council also notes the presence of the surface water flowpath adjacent to the site and has explored the potential impact of this further with the LLFA who have confirmed that development on this site is considered to be achievable. Reference has been made in discussions with the LLFA about the presence of a pond in the southern corner of the site and this should be acknowledged in the	910	Consideration to be given to making reference to an on-site pond in the supporting text for this site allocation.

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			the site is adjacent to a flowpath and this must be considered in the site assessment.	background information for this site allocation.		
QUESTION 139: SN0149, Land adjacent to Holly Cottage, west of Beccles Road, Thurlton	899, 924	Mixed	Comments submitted in support of SN0149: support the allocation of the site - no specific site constraints that cannot be addressed; the site would deliver a high quality development with the concept plan indicating that the development can be accommodated with access onto Beccles Road, pedestrian footway and landscaping; the site is available immediately and is viable; SN0149 is a proposed extension to 2016/2904 - is in the village and has good access to services; limited landscape impact with additional landscaping proposed to the north-east and south-east of the site and staggered building heights to utilise existing site levels; demolition of the unit constructed under 2016/2904 would allow for the creation of an appropriate access road into the site; proposed highway design includes an adoptable standard road with visibility splays, correct alignment of the road, a footway and an internal turning head; and	These comments of support submitted by the site promoters are noted, as is the submission of an illustrative layout indicating a proposed access and visibility splay solution. This plan should be considered by NCC Highways to determine whether this solution would be acceptable in highway terms. The Council notes the proposed relationship between the site already benefiting from planning permission (2016/2904) and SN0149. To ensure a coherent development the Council will need to give consideration to the relationship between these sites, including the possibility of allocating both sites as a single site as well as the total number of units that may be achievable in this location. These comments include reference to site levels and landscaping and the Council is mindful that these have formed planning conditions on earlier planning permissions. It is therefore appropriate to consider whether these matters should be included in any site specific policy text at this time. Similarly reference is made to successful soakaway testing on the site and whilst the Council welcomes confirmation that no issues were encountered during these trials it should be noted that the appropriate testing and evidence will be	909	NCC Highways to consider the proposed access arrangements and visibility splay submitted on the illustrative site layout plan; Consideration to be given to combining sites 2016/2904 and SN0149 in a single allocation to ensure a coherent scheme emerges; Consideration to site specific policy wording to include the requirement for a topographical survey to inform the site design, as well as landscaping on site.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			on-site soakaway testing has been successful.	required as part of any subsequent planning application for this site.		
QUESTION 139: SN0149, Land adjacent to Holly Cottage, west of Beccles Road, Thurlton	505, 822	Object	Objections submitted in relation to SN0149: Access issues: concerns about the access visibility splays across neighbouring properties and land in control of third parties; impact of increased traffic between existing properties; insubstantial site access would be unsafe for the additional traffic generated by additional development; increase of traffic joining Beccles Road; Scale and design: proposed density (15 plus 7 with existing permission) would create an estate-like development on a site that is a fraction of the size of Blacksmiths Gardens; and site is on a hill which is c. 3-4 metres above the surrounding homes.	The Council acknowledges the concerns that have been raised in respect of preferred allocation site SN0149 and responds as follows: Access: As part of the site assessment process the Council has consulted with NCC Highways as the technical consultee. NCC Highways was asked to comment on both the immediate site access as well as the suitability of the wider road network. Where appropriate ongoing discussions have taken place with NCC Highways to clarify matters raised in the initial responses. As part of these discussions the highways authority raised a query about how the site would achieve a satisfactory access onto Beccles Road but considered that it should be achievable. It is noted that earlier planning applications associated with this site have achieved adequate access and visibility splays and therefore it would be unreasonable to discount this site without considering this matter in further detail. The Council also recognises however that an increased number of dwellings would likely impact on the requirements of the highways authority. As part of their representations the site promoter has submitted a suggested site layout with access and visibility splays shown to demonstrate how the site could accommodate both the existing planning permission (2016/2904) and the	908	Review of the site and its relationship with existing planning approval 2016/2904, including a consideration of appropriate numbers for the combined sites; Consideration to be given to specific policy wording relating to topographical surveys and landscaping of the site; Policy wording to specify access to Beccles Road; and NCC Highways to review the indicative access layout submitted in support of the site.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
				proposed allocation. At this time the Council will ask NCC Highways to review this proposal to determine whether the access for a greater number of dwellings on the site is considered to be achievable. NCC Highways have also confirmed that access must not be via Sandy Lane and if the site continues to progress in the VCHAP then this should be included within the site specific policy text. Scale and design: The site has been preferred at this stage for up to 12 dwellings, with a further 5 dwellings already benefiting from planning permission on the site (a total of 17 dwellings, as opposed to the total of 22 units referred to in the response of the Parish Council). It is noted that the indicative plan submitted in support of this site shows 15 dwellings in total being accommodated on the site. Due to the interdependence between the sites the Council considers that should SN0149 continue to be considered as a preferred option for allocation the entire site should be allocated including the area previously granted planning approval for 5 dwellings. This would enable a coherent scheme to be brought forward and improve the relationship between the sites. Consideration will need to be given to an indicative total number of dwellings that could be accommodated on this site. Noting the comments of the Parish Council about the gradient of the site the Council		

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				recognises that planning permissions for the smaller site have included planning conditions requesting slab levels to be agreed as well as landscaping schemes. Due to the topography of the site the Council continues to be of the opinion that these requirements would be appropriate as part of any site specific policy allocation.		

Thurton and Ashby St Mary

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 141: Settlement Limit	649	Comment	SN0585 -Land opposite Hill Top Barn, Mill Common, Ashby St Mary. I have been advised that the decision on this proposed plan is being appealed. I live near opposite the site and would like to register my objection due to the dangerous nature of the access. Being on the opposite side of the road from current properties there would be zero visibility of traffic coming from the sharp bend to the right making it very dangerous to all road users, walkers, cyclists and motorists. There is no footpath so walkers have no choice but to use the road.	As part of the consultation, site promoters are welcomed to provide their comments on any of the sites put forward, including those that have been rejected. The Council will take into consideration all comments received and where it is sufficiently material to change the position of the Council, this will be considered in further detail.	495	No action or change required.
QUESTION 141: Settlement Limit	176, 379, 778, 897, 1130	Mixed	The representations made support the view of the Council to reject all of the sites promoted within Thurton and Ashby St Mary. Reasons mentioned within representations; poor road infrastructure, unable to cope with increased traffic; highway safety concerns; environmental impacts; limited amenities and services; negative affect on rural character of village, flood risk.	The Council notes the comments made within the representations.	494	No action or change required.
QUESTION 142: Should any rejected sites be allocated?	245, 354, 452, 562, 588, 663, 664, 825, 841	Mixed	The representations received support the Councils decision to reject all of the sites that were promoted for allocation. The main areas of concerns as to why development should not be supported within the village are as follows: highway safety and capacity, existing drainage and flood issues, negative impacts on existing devilling's, impacts on amenity, and infrastructure capacity.	The comments are noted.	529	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 142: Should any rejected sites be allocated?	482	Support	Support site in Ashby St Mary (SN0585) being included in the allocation for housing. We have responded to the rejection of this site in the attached challenge document, commenting on each constraint or impact identified in the assessment and stating how these would be mitigated or why we think the assessment is incorrect.	The Council acknowledges the points raised within the representation; however, the Council still considers that development of site SN0585 would not be considered acceptable, and no evidence has been provided that would suggest otherwise. The site remains removed from the main part of the settlement and located along a narrow country lane, resulting in a poor relationship to services. In addition, development of the site would have an adverse impact on setting of non-designated heritage assets.	528	No action or change required.
QUESTION 142: Should any rejected sites be allocated?	1129, 1217	Object	Object to the development of SN4038 and SN4039 for the following reasons: . Too many vehicles trying to access the already too busy A146. . Poor access to the site from Mill Road . Flooding risk on Mill Road. . Lack of amenities in the village. . The building of Industrial units would also impact on the number of vehicles trying to access the A146. This may require additional traffic management systems such as traffic lights or a roundabout on an already extremely busy road. -development on both sites would have a negative impact of the overall amenities within Ashby	The Council acknowledge the objection to development within Thurton and Ashby St Mary. At this stage, whilst 9 sites were promoted to the Council for consideration none were identified as preferred or shortlisted sites. With regards to the concerns for industrial development, the Village Clusters Plan is only looking to allocate residential uses.	507	No action or change required.

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			-The village does not have the facilities in place to cope with an increase in housing or industrial use,			
QUESTION 142: Should any rejected sites be allocated?	645	Object	The suggested development would have an adverse effect enjoyment of the properties on Mill Common. Any new structures would potentially overlook our garden, and be visible from the rear of our property. We strongly object to the proposal.	The Council acknowledge the objection to development along Mill Common, Ashby St Mary. At this stage, whilst 9 sites were promoted to the Council for consideration none were identified as preferred or shortlisted sites.	506	No action or change required.
QUESTION 142: Should any rejected sites be allocated?	351	Support	Ref: SN 0029 The applicant never envisaged having access onto the A146, it was always planned to access the site from Vale Road. Access had already been left for future development into the site, when planning was granted in 1990 for the three bungalows on Vale Road, between the bungalow Sunflower and the existing bungalow Meadow Vista. New proposal is for ten (10) properties on the site. The reduced number of properties, would substantially reduce the number of vehicles, from possibly 90 to 20. In addition there would be less demand on the service utilities. These properties having their own garage and garden. Very aware that Vale Road is a rural road, but does have a reasonable amount of local traffic. This was not an issue when	The Council has reviewed larger sites for a range of dwelling numbers reflecting the range of proposed allocations from 12 units upwards and discussions with Norfolk County Council as highways authority have taken place on that basis, but NCC remains of the view that Vale Road is ' <i>narrow, with poor alignment, and no obvious opportunity to improve</i> '.	505	No action or change required.

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			previous development opposite St Ethelberts Close was granted a few years ago.			
QUESTION 142: Should any rejected sites be allocated?	1983	Comment	Part of the Parishes are located within the Waveney, Lower Yare and Lothingland IDD. The Board's byelaws apply to any new developments within the IDD.	Water management comments noted.	493	No change or change required.
QUESTION 142: Should any rejected sites be allocated?	1893, 1894, 1895, 1896, 1897, 1898, 1899, 1900, 1901	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Sites adjacent to the A146 have the potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise and air pollution. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site if the form of an air quality and noise assessment which demonstrates that an acceptable level of residential amenity can be provided for residents and that it is practicable and affordable to do so	At this stage, no sites within Thurton and Ashby St Mary have been considered suitable. However, the Environmental Protection Team comments are noted.	491	In the event that any of the rejected sites come forward for allocation, a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. In addition, consideration will be required to noise and air pollution.

Tivetshall St Mary and Tivetshall St Margaret

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 143: Settlement Limit	227	Object	It has been suggested that the settlement boundary be extended to encompass site SN3006, either 'option A' or 'option B'. Either option would constitute a logical extension to the existing settlement boundary. The settlement boundary could be further extended along the eastern site of The Street to accommodate SN3006 and the existing development (built form) to the south of the site and potentially including the Grade II Listed Croft Cottage.	The Council acknowledge the request to include site SN3006 within the settlement boundary. However, both parcels of land (option A and B) of SN3006 have already been assessed by the Council and considered unsuitable. Whilst both sites are located adjacent to the existing settlement limit, development of option B would appear detached from the existing linear development off The Street and to the north of the site and as such would intrude into the open countryside. The extent of option B would also appear out of character, as the eastern boundary extends beyond the existing building line to the north. In addition, access to both sites would require the removal of large areas of hedgerows which would have an adversely impact on the biodiversity of the area and the Listed Building.	145	No action or change required.
QUESTION 143: Settlement Limit	1786	Object	I object to the changes proposed to the settlement limit to incorporate SN0319 because it is not in keeping with the linear form of housing within the villages.	Whilst the site would not be in keeping with linear form of development which is predominant in the village, some small pockets of development in depth already exist. The site is at the junction of The Street and Mill Road, which has development facing both roads, and there are several existing structures on site which sit behind the frontage development. As such allocation of this site is considered acceptable.	143	No action or changed required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 143: Settlement Limit	1017	Comment	Tivetshall Parish Council agree in principle with the proposals they are also in agreement with the sentiments of CPRE response to the Village Clusters. The Parish Council would like to see all new development kept within the linear layout of the village with open space at the front and behind properties. The Parish Council would want to follow the recommendations of the Housing Needs Assessment of starter homes and affordable family housing incorporated in any new developments. The Parish Council is also worried that unless extra development in keeping with our village is provided they would lose many of their local services including our preschool, primary school and the mobile library that is welcomed by so many parishioners.	The comments made by Tivetshall PC have been noted. With regards to concerns about layout, whilst the site would not be in keeping with linear form of development which is predominant in the village, some small pockets of development in depth already exist. The site is at the junction of The Street and Mill Road, which has development facing both roads, and there are several existing structures on site which sit behind the frontage development. As such allocation of this site is considered acceptable. The concerns raised by CPRE are addressed elsewhere.	135	No change or action required.
QUESTION 143: Settlement Limit	22	Support	Support the existing Settlement Limit boundary	The Council acknowledge the support of the existing Settlement Limit boundary (with no proposed alterations).	131	No changes are required.
QUESTION 143: Settlement Limit	411	Support	Agree with the proposed extension of the settlement boundary to encompass their site SN3002SL (0.18 hectares) for the reasons outlined within the Supporting Statement that accompanies this response. Indeed, site SN3002SL is 'suitable', 'available' and 'achievable' for allocation and/or a settlement boundary extension within the context of the VCHAP. Furthermore, the selection of my client's	The comments in support of SN3002SL are noted. SN3002SL has been preferred as a settlement limit extension, and as such if the site is preferred as part of the VCHAP, it will be included within the settlement limit of Tivetshall.	130	No change or action required.

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			site as a 'preferred option' in the consultation draft document is appropriately evidenced within the context of (among other) the HELAA and Interim SA/SEA processes.			
QUESTION 144: Preferred Site - SN0319, Pear Tree Farm, West of The Street, Tivetshall St Margaret	21	Object	Tivetshall is not suitable for increased traffic; soil is unsuitable, requiring larger foundations and resulting environmental impact; parents/children and horses use the main road through village; impact to local school and GPs; local amenities (shop, etc.) do not exist; bus services are intermittent; environmental and health impacts; affects to wildlife, including protected species; water, sewerage & drainage systems inadequate to support extra housing; flood risk; what green spaces will be incorporated; land is contaminated (South Norfolk Environmental Services already aware)	NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. Mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include carriageway widening from The Street in order to create access (through the demolition of the old disused barn). Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application and it would be necessary for all new development to adhere to existing Development Management policies. The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. It is acknowledged that very few of the village clusters include a GP surgery, and are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity	683	No action or change required.

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				issue at the school for local children. The Council is also engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Education and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. Concerns regarding the environmental impact have also been noted, however all development will be required to consider net-gain on site and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site, as well as significant on-site features (e.g., trees and hedgerows). Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. The technical design details relating drainage schemes would be assessed through the detailed planning application stage. South Norfolk Environmental Services have also been consulted and will provide their comments and any appropriate guidance/mitigation measures with regards to safe guarding development.		
QUESTION 144: Preferred Site - SN0319, Pear Tree Farm, West of The	2228	Comment	NCC Ecologist: No major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required.	NCC Ecologist comments are noted - no major concerns.	180	VCHAP text to reflect these issues, as appropriate

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Street, Tivetshall St Margaret			rough grassland bounded on two sides by dwellings. Peartree farm on southern boundary. No other priority habitats identified onsite but adjacent too (see MAGIC). Site mostly in amber habitat zones for great crested newts. Site in SSSI IRZ, but residential development doesn't trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 144: Preferred Site - SN0319, Pear Tree Farm, West of The Street, Tivetshall St Margaret	1984, 2082	Comment	Water management responses: Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Site is affected by a Source Protection Zone 3	The comments are noted and the requirement for geotechnical investigation these issues will be explored further with the LLFA. With regards to Source Protection Zone, developers will need to liaise with the Environment Agency to ensure that development / drainage does not adversely affect the water quality; however Zone 3 is the lowest risk.	179	VCHAP text to reflect these issues, as appropriate.
QUESTION 144: Preferred Site - SN0319, Pear Tree Farm, West of The	1016	Comment	Tivetshall Parish Council objects to the proposed 25 dwellings on this site. It would support the building of 12 properties. The site will back on to homes on The Street which are all single storey bungalows. When surveyed in relation to	These concerns have been noted by the Council. With regards to the proposed number of units on site, these are considered to be sustainable and would represent an efficient use of land (in accordance with Section 11 of the	147	Review the capacity of the site in light of the constraints identified.

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Street, Tivetshall St Margaret			our emerging Neighbourhood Plan all parish residents have expressed a strong desire that new properties should be in keeping with adjacent homes in terms of height and distance thus protecting privacy and in keeping with the existing format of the village. A development of 12 properties would provide for affordable homes to be included. Roads within the Tivetshall are narrow. A number requiring passing places. There is no through-village bus service and residents have to rely on private vehicles. The Street is a two lane road with no pavements except a very short distance near the Green. It is lined by existing homes with driveways. The Parish Council is very concerned that the safety of residents could be seriously compromised by the addition of vehicles from a further 25 properties accessed directly onto The Street. They believe that dispersing the village cluster allocation onto several smaller sites would provide less risk to other road users, pedestrians, cyclists and horse riders which use our village roads. When the last development of 16 properties (Thwaites Oak Close) was built its roadway was designed to be a significant distance away from any other accesses with open space views to through routes of The Street or Green Lane.	National Planning Policy Framework). The scale of development is consistent with the objectives of the VCHAP in promoting social sustainability by supporting rural life and services. However, the Council will review the capacity of the site in relation to the various constraints identified. In relation to the number of affordable homes provides, the VCHAP seeks to ensure that development should meet the affordable housing and housing mix requirements of the most up to date SHMA. The Council will only consider allocating sites that are capable of delivering the policy standard affordable housing requirements. With regards to overlooking concerns, 'in keeping' development, in general terms it should be noted that detailed site design and layout would be a matter for a future planning application. It would be necessary to ensure that there was not an undue loss of residential amenity for existing properties and that building design, styles, materials etc match the characteristic of the village. NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. Mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include carriageway widening from The Street in		

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				order to create access (through the demolition of the old disused barn). Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application and it would be necessary for all new development to adhere to existing Development Management policies.		
QUESTION 144: Preferred Site - SN0319, Pear Tree Farm, West of The Street, Tivetshall St Margaret	1787	Object	Objection to the preferred site SN0319; the number of proposed dwellings is not in keeping with the rural nature of the villages, other newer developments have been much smaller and followed the linear style of building; the number of cars would significantly increase (safety concerns) with no footpaths; overlooking concerns to neighboring bungalows and existing issues with low water pressure.	These concerns have been noted by the Council. With regards to the proposed number of units on site, these are considered to be sustainable and would represent an efficient use of land (in accordance with Section 11 of the National Planning Policy Framework NPPF)). The scale of development is consistent with the objectives of the VCHAP in promoting social sustainability by supporting rural life and services. With regards to concerns about layout, whilst the site would not be in keeping with linear form of development which is predominant in the village, some small pockets of development in depth already exist. The site is at the junction of The Street and Mill Road, which has development facing both roads, and there are several existing structures on site which sit behind the frontage development. As such allocation of this site is considered acceptable. With regards to overlooking, in general terms it should be noted that detailed	146	No action or change required.

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				site design and layout would be a matter for a future planning application. It would be necessary to ensure that there was not an undue loss of residential amenity for existing properties.		
QUESTION 144: Preferred Site - SN0319, Pear Tree Farm, West of The Street, Tivetshall St Margaret	82	Object	All the houses are bungalows and no other houses have other properties right behind them in the village. I'm happy with mill lane being finished along the road but NOT behind my property its what makes tivetshall so lovely not being over looked. I have small children and don't want to be over looked	The Council recognise the concerns raised with regards to overlooking and privacy loss. The layout and design of the site has not yet been considered in detail and any potential issues with overlooking/amenity will be addressed at the detailed design stage and any planning application would be subject to planning polices surrounding amenity etc.	144	Layout to consider overlooking concerns.
QUESTION 144: Preferred Site - SN0319, Pear Tree Farm, West of The Street, Tivetshall St Margaret	32	Object	Concerns raised with affecting value of my property, privacy and business located at the bottom of garden.	Concerns about the impact of existing neighbouring properties, including different uses such as businesses are noted, however these matters would be dealt with during the planning application and it would be necessary for all new development to adhere to existing Development Management policies relating to amenity, environment etc. as well as GNLp policies (subject to being adopted).	132	No action or change required.
QUESTION 145: Preferred Site - SN3002SL, Land south of Green Pastures, west of The Street, Tivetshall St Margaret	412	Support	My client agrees with the 'use' of site SN3002SL as constituting a settlement boundary extension to potentially facilitate an element of 'windfall' development in the future. My client would also be agreeable to the 'allocation' of their site within the context of the VCHAP. See Supporting Statement submitted alongside this response for further details.	Support for SN3002SL noted.	530	No action or change required.

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QUESTION 145: Preferred Site - SN3002SL, Land south of Green Pastures, west of The Street, Tivetshall St Margaret	2229	Comment	NCC Ecologist comments: Amber - measures required - priority habitat onsite or proximity to SSSI (recreational impact concerns) and or buffer required application site within curtilage of dwelling - bounded on three sides by hedge (priority habitat) - loss to be minimised and compensated for if allocated. MAGIC indicates presence of a small orchard onsite - which is a priority habitat - this would need to be verified but aerial images are suggestive of an orchard of maybe 11 trees (part of the vegetable garden). Site within amber zone for great crested newts. Application should demonstrate net biodiversity gain. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) (verify orchard against JNCC criteria) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.	NCC Ecologists comments noted.	187	VCHAP text to reflect these issues, as appropriate
QUESTION 145: Preferred Site - SN3002SL, Land south of Green Pastures, west of The Street, Tivetshall St Margaret	2058	Comment	There are no designated heritage assets on the site. There are two grade two listed buildings, Croft House and Croft Cottage to the south east of the site. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and determine if allocation of this site is appropriate, and if it is what	The HE comments are noted; HIA required to inform whether the site is allocated, including any mitigation measures.	186	Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.

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			mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.			
QUESTION 145: Preferred Site - SN3002SL, Land south of Green Pastures, west of The Street, Tivetshall St Margaret	1985, 2142	Comment	Water management comments: Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. Considered minor development – no further comments. Infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Site is affected by a Source Protection Zone 3	The comments made in relation to water management are noted and the requirement for geotechnical investigation these issues will be explored further with the LLFA.	185	VCHAP text to reflect these issues, as appropriate
QUESTION 145: Preferred Site - SN3002SL, Land south of Green Pastures, west of The Street, Tivetshall St Margaret	1015	Comment	Tivetshall Parish Council also supports the building of properties on this site but as above if at all possible they should provide starter homes and affordable housing for local parishioners and be in keeping with the layout of the village. This site is in the midst of two storey dwellings and the Parish Council is in support of similar height buildings on this site.	Support from PC noted. In relation to the number of affordable homes provides, the VCHAP seeks to ensure that development should meet the affordable housing and housing mix requirements of the most up to date SHMA. However, the scale of this site will limit the potential to deliver a mix of housing.	183	No action or change required.
QUESTION 145: Preferred Site - SN3002SL, Land south of Green Pastures, west of The Street, Tivetshall St Margaret	1788	Support	Question 145 – I support site SN3002SL. This site is a natural continuation of existing development along the western side of The Street and mirrors development on the opposite side of the road.	Support for SN3002SL noted.	182	No action or change required.

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QUESTION 145: Preferred Site - SN3002SL, Land south of Green Pastures, west of The Street, Tivetshall St Margaret	83	Support	This plot would finish the road off nicely with properties and wouldn't over look anyone in the village. I think this would be a nice addition to the street	Support for SN3002SL noted.	181	No action or change required.
QUESTION 146: Should any shortlisted / rejected sites be allocated?	1014	Comment	Parish Council comments submitted in response to Questions 146 and 147: SN3018 [note: this should be SN0318] - The Parish Council represents the residents of the Tivetshalls, in line with a larger than average response to the consultations to-date on the emerging Neighbourhood Plan where strong opinions were expressed of the need to protect the linear style of the village with homes facing or backing on to open land and not detracting from the same conditions for existing homes. SN2103 - The site is located close to the school and village hall and adjacent to the settlement limits. Development in this location would read as part of the existing village and is visually contained with limited open space to the north. There would be some impact on Elm Farm and its approved planning permissions to the east which would be mitigated if the eastern hedgerow and trees were retained and enhanced. NCC highways to confirm if could turn road into site making this the primary road and make remainder of School Road to the east into a side road.	The Council welcomes these responses from the Parish Council which comment on the current shortlisted sites in Tivetshall St Margaret. The Council does not consider these comments to include a clear support/ reject stance towards either of these sites, rather it provides a commentary about their possible suitability for allocation. In response the Council acknowledges the concerns that have been expressed about development of SN3019 / SN3018 and its location to the rear of properties set along The Street. The existing linear form of the village is recognised and the site assessment form acknowledged that the form of development proposed would not be characteristic of the existing built form. However, development of this parcel of land would allow for a small development in the settlement without intruding into the countryside. The detailed site layout and design would be assessed at the planning application stage but would be required to comply with existing planning policies and avoid an adverse impact on the amenities of existing residents.	912	No action required

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				In regards to SN2103 the Parish Council has set out a number of positive attributes identified for this site including its connectivity to local services and facilities. However, development of this site would have a landscape impact arising from the loss of the boundary trees and hedgerows along School Road and there would be a need to ensure that a suitable highways solution would be achievable to facilitate access into this site. As such the Council remains of the opinion that this site is suitable for shortlisting but in acknowledging these matters does not consider that the site should be re-categorised as a preferred allocation site in the VCHAP.		
QUESTION 146: Should any shortlisted / rejected sites be allocated?	1789	Comment	My view is that shortlisted sites SN0318 and SN2103 should be allocated instead of site SN0319. These two sites would still meet the allocation for the parish of 25 dwellings, whilst being smaller developments. Having two sites in different parts of the village would result in the extra traffic using varying routes in and out of the village. The shortlisted site of SN0318 for up to 10 dwellings is more in keeping with the size of previous developments and whilst it does not follow the existing linear pattern of development it would have far less impact on adjacent properties and the volume of traffic. The shortlisted site SN2103 is in close proximity to the school and would allow	Comments noted; SN0318 (shortlisted) and SN2103 (shortlisted) should be allocated instead of site SN0319 (preferred). See response to the Parish Council comments above.	880	No action required at this stage.

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			easy pedestrian access to the school along paved roads. I agree with the rejected sites.			
QUESTION 146: Should any shortlisted / rejected sites be allocated?	413	Comment	My client does not consider that any site should be considered as an allocation and/or inclusion within the settlement boundary instead of theirs. The selection of their site as a 'preferred option' is based on appropriate evidence. See Supporting Statement submitted alongside this response for further details.	Comments noted in relation to site SN3002SL. At this stage this site is preferred. The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan and its commitment to deliver 1200 homes.	687	No action or change.
QUESTION 146: Should any shortlisted / rejected sites be allocated?	228	Comment	My client considers that their 'rejected' site (SN3006) should be allocated instead of, or at the very least, in addition to, currently preferred site SN0319. Indeed, it is their view that their site (options A or B) is inherently more suitable (sustainable) than site SN0319 for the reasons outlined within the Supporting Statement that accompanies this submission.	Comments noted; The agent has submitted a revised scheme to be considered (option a) and requests option b be reassessed.	686	To review the amended proposal.
QUESTION 146: Should any shortlisted / rejected sites be allocated?	2104	Comment	SN0318: Few or no constraints. Standard information required at a planning stage. Source Protection Zone 3 Comments on infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Assessment: Green	Comments noted.	684	No action or change required.

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QUESTION 146: Should any shortlisted / rejected sites be allocated?	2230	Comment	SN3018 - Smaller part of SN0319. - Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Rough grassland bounded on two sides by dwellings. Peartree farm on southern boundary. No other priority habitats identified onsite but adjacent too (see MAGIC). Site mostly in amber habitat zones for great crested newts. Site in SSSI IRZ, but residential development doesn't trigger consultation with Natural England. SN2103 - Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Shortlisted for up to 15 dwellings on a site of 0.9 hectares. Site bounded partly by hedges (priority habitats) which would mostly need to be removed for access (Highways comments) - the loss should be minimised and compensated for onsite through creation of new hedges. No other priority habitats identified onsite but adjacent too (see MAGIC). Site in green habitat zones for great crested newts. Site in SSSI IRZ, but residential development doesn't trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, should inform the design.	Shortlisted sites - Green no major ecological constraints identified from desk-top search. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.	673	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 146: Should any shortlisted / rejected sites be allocated?	2093	Comment	Water management comments: SN2103 Infiltration potential are dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. Site affected by Source Protection Zone 3	The comments made in relation to water management are noted and the requirement for geotechnical investigation these issues will be explored further with the LLFA.	188	No action or change required.
QUESTION 146: Should any shortlisted / rejected sites be allocated?	24	Object	Tivetshall is not suitable for increased traffic; soil is unsuitable, requiring larger foundations and resulting environmental impact; parents/children and horses use the main road through village; impact to local school and GPs; local amenities (shop, etc.) do not exist; bus services are intermittent; environmental and health impacts; affects to wildlife, including protected species; water, sewerage & drainage systems inadequate to support extra housing; flood risk; what green spaces will be incorporated; land is contaminated (South Norfolk Environmental Services already aware)	The Council acknowledge the general and overall concerns raised with regard to development within Tivetshall. With regards to traffic concerns, NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. Mitigation measures have been identified and would be incorporated into specific site allocation policy text. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, environmental and health are also noted, however these matters would be dealt with during the planning application and it would be necessary for all new development to adhere to existing Development Management policies, including providing additional surveys/reports to support development. It is also acknowledged that development sites can be home to	173	No action or change required.

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				wildlife and it will be necessary for any planning application on the site to be accompanied by an ecological survey which would include an assessment of the site as well as appropriate and proportionate mitigation measures. Comments relating to both on-site drainage and surface water, as well as wider drainage issues within the village have been noted. Consultation responses have been received the Lead Local Flood Authority (LLFA) who have advised that with appropriate mitigation measures in place development at the preferred/shortlisted sites is achievable.		
QUESTION 147: Should any shortlisted sites be rejected?	1013	Comment	Parish Council comments submitted in response to Questions 146 and 147: SN3018 [note: this should be SN0318] - The Parish Council represents the residents of the Tivetshalls, in line with a larger than average response to the consultations to-date on the emerging Neighbourhood Plan where strong opinions were expressed of the need to protect the linear style of the village with homes facing or backing on to open land and not detracting from the same conditions for existing homes. SN2103 - The site is located close to the school and village hall and adjacent to the settlement limits. Development in this location would read as part of the existing village and is visually contained with limited open space to the north. There would be some impact on Elm Farm and its	The Council welcomes these responses from the Parish Council which comment on the current shortlisted sites in Tivetshall St Margaret. The Council does not consider these comments to include a clear support/ reject stance towards either of these sites, rather it provides a commentary about their possible suitability for allocation. In response the Council acknowledges the concerns that have been expressed about development of SN3019 / SN3018 and its location to the rear of properties set along The Street. The existing linear form of the village is recognised and the site assessment form acknowledged that the form of development proposed would not be characteristic of the existing built form. However, development of this parcel of land would allow for a small development in the settlement without intruding into	913	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			approved planning permissions to the east which would be mitigated if the eastern hedgerow and trees were retained and enhanced. NCC highways to confirm if could turn road into site making this the primary road and make remainder of School Road to the east into a side road.	the countryside. The detailed site layout and design would be assessed at the planning application stage but would be required to comply with existing planning policies and avoid an adverse impact on the amenities of existing residents. In regards to SN2103 the Parish Council has set out a number of positive attributes identified for this site including its connectivity to local services and facilities. However, development of this site would have a landscape impact arising from the loss of the boundary trees and hedgerows along School Road and there would be a need to ensure that a suitable highways solution would be achievable to facilitate access into this site. As such the Council remains of the opinion that this site is suitable for shortlisting but in acknowledging these matters does not consider that the site should be re-categorised as a preferred allocation site in the VCHAP.		
QUESTION 147: Should any shortlisted sites be rejected?	25	Comment	SN0318 same reasons as Q144 (see below) Tivetshall is not suitable for increased traffic; soil is unsuitable, requiring larger foundations and resulting environmental impact; parents/children and horses use the main road through village; impact to local school and GPs; local amenities (shop, etc.) do not exist; bus services are intermittent; environmental and health impacts; affects to wildlife, including protected species; water, sewerage &	NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. Mitigation measures have been identified and would be incorporated into specific site allocation policy text - these measures include carriageway widening from The Street in order to create access (through the demolition of the old disused barn). Concerns about the impact of	685	No action or change required.

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			drainage systems inadequate to support extra housing; flood risk; what green spaces will be incorporated; land is contaminated (South Norfolk Environmental Services already aware). With regards to housing mix, the Council will seek to provide new housing development to meet housing needs (using the most up to date Strategic Housing Market Assessment (SHMA)). This will ensure that allocated sites provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of their life cycle e.g. first-time buyers, affordable housing, upsizing/downsizing etc. Council will only consider allocating sites that are capable of delivering the policy standard affordable housing requirements.	alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application and it would be necessary for all new development to adhere to existing Development Management policies. The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. It is acknowledged that very few of the village clusters include a GP surgery, and are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity issue at the school for local children. The Council is also engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Education and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. Concerns regarding the environmental impact have also been noted, however all development will be required to consider net-gain on site and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site, as well as significant on-site features (e.g., trees and		

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				hedgerows). Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys. The technical design details relating drainage schemes would be assessed through the detailed planning application stage. South Norfolk Environmental Services have also been consulted and will provide their comments and any appropriate guidance/mitigation measures with regards to safe guarding development.		
QUESTION 147: Should any shortlisted sites be rejected?	91	Comment	SN2103 Concerns regarding limited access and flooding, should insufficient drainage be put in as the area suffers from flooding at present.	Concerns regarding access and flooding are noted. NCC Highways officers have provided technical advice relating to the site access. It has been confirmed that all/most of the frontage hedge/trees would need to be removed to achieve an access into the site. Mitigation measures have also been identified where School Road narrows to the; these will need to be confirmed with NCC Highways. NCC highways to confirm if could turn road into site making this the primary road and make remainder of School Road to the east into a side road.	189	Further discussions with NCC Highways to road upgrade/configuration along School Road, these would need to be confirmed prior to development. Site allocation wording to include NCC highways requirements.

Toft Monks, Aldeby, Haddiscoe, Wheatacre and Burgh St Peter

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QUESTION 148: Settlement Limit	1828	Comment	Broads Authority comments: Part of the parish is the Broads – you might want to mention that.	Comments noted.	800	Include reference to Broads in introduction
QUESTION 148: Settlement Limit	1418	Comment	No comment on specific site but please consider infrastructure implications in East Suffolk.	These comments are noted and it will be necessary initially to determine whether these third parties provided representations to the Regulation 18 consultation.	191	Review whether the Norfolk and Waveney Clinical Commissioning Group and Suffolk County Council provided representations during the Reg 18 consultation and if not engage with these parties as appropriate.
QUESTION 149: Preferred Site - (Part of) SN0414, Land south of Beccles Road, Haddiscoe	871	Comment	1 This site appears the most suitable option of those listed in that it lies within the heart of the village and would provide an infill of linear development adjacent existing housing. 2 It is important that suitable provision is made to deal with local infrastructure and environmental issues; particularly surface water and foul water drainage disposal. 3 The development requires a high standard of design, of suitable scale and form, in keeping with the South Norfolk rural village setting. 4 The use of sustainable, sympathetic construction materials is essential.	The Council notes the comments in relation to the site being the most suitable and would provide an infill of linear development adjacent existing housing. With regard to infrastructure provision, the Council is engaging with a number of service providers as part of the production of the plan, this includes the NHS Integrated Care Systems, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. The development of certain sites will require some local infrastructure upgrades, for example an extension of a footway to link the site to the village.	200	No action or change required.

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			5 Affordable social housing should be included if possible.	In relation to the number of affordable homes provides, the VCHAP seeks to ensure that development should meet the affordable housing and housing mix requirements of the most up to date SHMA. The Council will look to only consider allocating sites that are capable of delivering the policy standard affordable housing requirements With regards to design, materials etc, in general terms it should be noted that these details would be a matter for a future planning application and would be subject to existing planning policies.		
QUESTION 149: Preferred Site - (Part of) SN0414, Land south of Beccles Road, Haddiscoe	1986, 2108	Comment	Water Management comments: Site outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment. A series of riparian watercourse are located to the south of the proposed site. If surface water discharges within the watershed catchment of the Board's IDD, then this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. The LLFA have unconfirmed records of flooding within ~500.00m of the site boundary.	The comments made in relation to water management are noted, a number of these will be relevant to the planning application stage.	199	No action or change required.
QUESTION 149: Preferred Site -	2170	Comment	The Mineral Planning Authority is pleased to note the inclusion within the site	Comments from Minerals and Waste are noted and that the reasoned	198	No action or change required.

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(Part of) SN0414, Land south of Beccles Road, Haddiscoe			assessments of its previous comments on the potential allocation sites regarding mineral resource safeguarding. Currently, the reasoned justification for the sites does not include reference to mineral resource safeguarding. We would like to reiterate from our previous comments that the need for mineral resource safeguarding to be addressed needs to be included within the requirements of the respective site's allocation policy. The Site assessments for SN0414 and SN0392, both at Haddiscoe do not contain reference to the proposed mineral extraction site MIN 25 at Haddiscoe, which was mentioned in our previous response. The site assessments should be revised to contain this information. There are existing residential properties at least as close to the potential mineral site allocation MIN 25 as the proposed housing locations. In accordance with the site assessment for MIN 25, the draft site allocation policy includes a requirement for suitable mitigation measures to be included in a future planning application, to ensure that there would be no unacceptable amenity impacts for these properties from the operation of the mineral extraction site.	justification for the sites does not include reference to mineral resource safeguarding.		
QUESTION 149: Preferred Site - (Part of) SN0414, Land south of	2231	Comment	No major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Agricultural field to south of A143 -	NCC Ecologists comments noted.	197	No action or change required.

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Beccles Road, Haddiscoe			defunct hedge along road. Adjacent to candidate county geodiversity site (to the south east), and adjacent to priority habitats (deciduous woodland) (see MAGIC). Site within amber habitat zones for great crested newts. Site in SSSI IRZ, but residential development doesn't trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 149: Preferred Site - (Part of) SN0414, Land south of Beccles Road, Haddiscoe	2059	Comment	Historic England comments: Whilst there are no designated heritage assets on site, the grade I listed St Marys Church, together with a War Memorial and monument to William Salter, both of which are listed at grade II, lie to the west of the site. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets through development within the setting of the assets. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	The HE comments are noted; HIA required to inform whether the site is allocated, including any mitigation measures.	196	Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.			
QUESTION 149: Preferred Site - (Part of) SN0414, Land south of Beccles Road, Haddiscoe	1902	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	The Environmental Protection Team comments have been noted.	195	No action or change required.
QUESTION 149: Preferred Site - (Part of) SN0414, Land south of Beccles Road, Haddiscoe	1145	Object	The proposed southern boundary will spoil my view from the rear of my property. Where is access on the main Road is certainly not a safe turning point. Possibly turning in from the rear of my property? Regards sewerage and rain fall collected by new properties this will then drain to Low Road and onto Broadland marshes. Fewer houses set back would be acceptable but can I be assured that no further development would be allowed on this land??	NCC Highways officers have provided technical advice throughout the site selection process and in relation to the sites access, it has been advised that development of the site will be subject to achieving a suitable access via Beccle Road to the north. The access will need to be in accordance with Highway standards. With regards to the layout and orientation of development, in general terms it should be noted that detailed site design and layout would be a matter for a future planning application. It would be necessary to ensure that there was not an undue loss of residential amenity for existing properties. Comments relating to both on-site drainage and surface water have been noted; the Council will be guided by water management consultees such as the Lead Local Flood Authority and Anglian Water.	193	Access arrangements to be confirmed and details of any mitigation measure/upgraded to be included in site policy allocation policy text.

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QUESTION 149: Preferred Site - (Part of) SN0414, Land south of Beccles Road, Haddiscoe	1086, 1088, 1148, 1563	Support	Support for site SN0414; an ideal location for housing in Haddiscoe. The site is within walking distance to the village hall, play park and school. Conveniently located on the A143 gives easy access to all amenities in Beccles, Loddon and the city of Norwich Satisfactory access could be reasonably achieved and mitigation measures could be incorporated into the layout and design of the site to mitigate and potential landscape and heritage issues raised	Support for site SN0414 noted.	192	No action or change required.
QUESTION 150: Preferred Site - SN4017, Land north of Staithe Road, Burgh St Peter	529, 530	Comment	Concerns raised regarding the existing poor infrastructure in terms of sewage, water and electricity.	These concerns are noted. With regards to infrastructure, the Council is engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Highways and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process. Any future application will be expected to ensure that development does not cause flood risk on or off site and will be expected to provide a suitable drainage strategy, which will be assessed by professional bodies to ensure compliance with government standards.	206	No action or change required.
QUESTION 150: Preferred Site - SN4017, Land north	1903	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed	Environmental Protection Team comments noted.	205	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
of Staithe Road, Burgh St Peter			development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. The site is adjacent to a sewage pumping station which has a potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to odour. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site. It is recommended that Anglian Water are consulted with regard to their recommended cordon sanitaire for such sites to protect residents. The site is adjacent to a commercial premises which has a potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise, etc. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the			

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			submitted Construction Management Plan is adequate, then an alternative condition could be attached to any approval requiring its implementation.			
QUESTION 150: Preferred Site - SN4017, Land north of Staithe Road, Burgh St Peter	1987, 2138	Comment	Water management comments: Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment; if surface water discharges within the watershed catchment of the Board's IDD, then this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS); Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised.	The comments made in relation to water management are noted and the requirement for geotechnical investigation these issues will be explored further with the LLFA.	204	No action or change required.
QUESTION 150: Preferred Site - SN4017, Land north of Staithe Road, Burgh St Peter	2232	Comment	NCC Ecologist comment: No major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Agricultural field - hedge on three sides- no other priority habitat onsite but close to deciduous woodland (priority habitat see MAGIC)- losses impacts should be avoided - minimised and, as a last resort, compensated. Site within amber habitat zones for great crested newts. Site in SSSI IRZ, but residential development doesn't trigger consultation with Natural England. Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with	NCC Ecology comments noted.	203	No action or change required.

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			the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.			
QUESTION 150: Preferred Site - SN4017, Land north of Staithe Road, Burgh St Peter	249, 250, 526, 608, 670, 1511, 1544, 1734	Object	Concerns relating to traffic increase and safety concerns for children as no footways, road suitably, spoiling views, overdevelopment, existing surface flood issues and environmental impacts.	With regards to the highway concerns, the Council have received comments and advice from NCC Highways officers, in relation to access and the wider road network; it has been suggested that access is achievable via Staithe Road. However, this is subject to the removal of existing hedgerows to create a suitable visibility splay; this will be investigated further. Concerns about the impact of alterations to the existing road, as well as the increased traffic movements, are also noted however these matters would be dealt with during the planning application and it would be necessary for all new development to adhere to existing Development Management policies. With regards to the proposed number of units on site, these are considered to be sustainable and would represent an efficient use of land (in accordance with Section 11 of the National Planning Policy Framework). The scale of development is consistent with the objectives of the VCHAP in promoting social sustainability by supporting rural life and services. Comments relating to both on-site drainage and surface water, as well as	202	No action or change required.

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				wider drainage issues within the village have been noted and the Plan will be subject to a Water Cycle Study and consultation with Anglian Water. Consultation responses have been received the Lead Local Flood Authority (LLFA) who have advised that with appropriate mitigation measures in place development of this site would be achievable. Wider flooding events in December 2020 were experienced in a large number of localities and have been attributed to saturated catchment flooding due to prolonged rainfall however the comments received relating to the adequacy of the existing drainage network have been noted and will be explored further if appropriate. With regards to environmental impact, the NCC Ecologist has advised that there are major no ecological constraints onsite, however a preliminary Ecological Appraisal/Ecological Impact Assessment (EclA) with be required at the planning application stage.		
QUESTION 150: Preferred Site - SN4017, Land north of Staithe Road, Burgh St Peter	1561	Support	Support the preferred site SN4017 and agree that this site should be considered suitable for allocation. The site is relatively well contained within the existing pattern of development within the settlement. Drainage and footpath issues raised can be reasonably mitigated.	Support noted.	201	No action or change required.
QUESTION 151: Preferred Site -	2233	Comment	NCC Ecologist comments: No major ecological constraints identified from desk-	NCC ecologist comments noted; including the requirement of a	211	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
SN4015SL, Land west of Mill Road, Burgh St Peter			top search. Surveys, and biodiversity enhancement in accordance with policy required. Part of agricultural field adjacent to dwelling, on Mill Road. - no priority habitats onsite (see MAGIC). Site within amber habitat zones for great crested newts. Site in SSSI IRZ, but residential development doesn't trigger consultation with Natural England (unless 50 units of more). Applications for planning consent should be accompanied by a Preliminary Ecological Appraisal/Ecological Impact Assessment (EcIA) which, together with the mitigation hierarchy, should inform the design. Consideration should be given to delivering Biodiversity Net Gain.	Preliminary Ecological Appraisal/Ecological Impact Assessment at planning application stage and consideration should be given to delivering Biodiversity Net Gain. It is noted that residential development doesn't trigger consultation with Natural England (unless 50 units of more).		
QUESTION 151: Preferred Site - SN4015SL, Land west of Mill Road, Burgh St Peter	1988, 2139	Comment	Water management comments: Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment (minor development – no further comments); Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised.	The comments made in relation to water management are noted and the requirement for geotechnical investigation these issues will be explored further with the LLFA.	210	No action or change required.
QUESTION 151: Preferred Site - SN4015SL, Land west of Mill Road, Burgh St Peter	1904	Comment	The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is recommended that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application.	Environmental Protection Team comments noted.	209	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			I would offer the following comments in respect of question 152 to Chapter 43 of the VCHAP relating to the Rejected Sites in Toft Monks, Aldeby, Haddiscoe, Wheatacre and Burgh St Peter in the event that one or more of them be allocated instead of, or in addition to, the preferred sites as a result of the consultation process.			
QUESTION 151: Preferred Site - SN4015SL, Land west of Mill Road, Burgh St Peter	1562	Support	We support the proposed extension of the settlement limit for site SN4015SL. Satisfactory access could be reasonably achieved and would allow for a continuation of the linear pattern of development.	Support noted.	208	No action or change required.
QUESTION 151: Preferred Site - SN4015SL, Land west of Mill Road, Burgh St Peter	1735	Support	Wheatacre Parish Council support the development of the site.	PC support noted.	207	No action or change required.
QUESTION 152: Should any rejected sites be allocated?	1740	Comment	Site SN0014SL The trees on the site were planted in 1980/81 either as apple trees or windbreaks. The fruit trees are now at the end of their productive life. The number of dwellings proposed is 1-2. A small development would retain the nature of the area without causing a 'drift' away from a rural settlement. The type of housing is left open for discussion. Planning envelopes should not constrict logical development. Our proposal is to develop a small piece of land that is too	Comments noted and support for a small development of 1- 3 houses, however the site assessment remains valid.	225	No action or change required.

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			small for agriculture. Given the current great demand for new homes it would be a shame to refuse an alternative to the somewhat characterless new housing developments.			
QUESTION 152: Should any rejected sites be allocated?	1905	Comment	SN0014SL - Land to the east of Rushley, Station Road, Aldeby The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, then an alternative condition could be attached to any approval requiring its implementation.	Comments noted.	224	No action or change required.
QUESTION 152: Should any rejected sites be allocated?	1906	Comment	SN0392 - Land at the junction of the A146 and B1136, Haddiscoe The Environmental Protection Team are	Comments noted.	223	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. The site is adjacent to the A143 and the B1136 which has a significant potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site if the form of a noise assessment which demonstrates that an acceptable level of residential amenity can be provided for residents and that it is practicable and affordable to do so. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, then an alternative condition could be attached to any approval requiring its implementation.			

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 152: Should any rejected sites be allocated?	1907	Comment	SN0518 - Land at the post office and Beccles Road, Toft Monks The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Part of the site is adjacent to the A143 which has a significant potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site if the form of a noise assessment which demonstrates that an acceptable level of residential amenity can be provided for residents and that it is practicable and affordable to do so. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan	Comments noted.	222	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			is adequate, then an alternative condition could be attached to any approval requiring its implementation.			
QUESTION 152: Should any rejected sites be allocated?	1908	Comment	SN1031 - Land to the south / east of Bulls Green Lane, Toft Monks The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, then an alternative condition could be attached to any approval requiring its implementation.	Comments noted.	221	No action or change required.
QUESTION 152: Should any rejected sites be allocated?	1909	Comment	SN2005SL - Land off Bulls Green Lane, Toft Monks The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land.	The Environmental Protection Teams comments are noted.	220	No action or change required.

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			However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, then an alternative condition could be attached to any approval requiring its implementation.			
QUESTION 152: Should any rejected sites be allocated?	1910	Comment	SN4003 - Land to the east of Common Road, Aldeby The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to	Environmental Protection Team comments noted.	219	No action or change required.

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			attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, then an alternative condition could be attached to any approval requiring its implementation.			
QUESTION 152: Should any rejected sites be allocated?	1911	Comment	SN4010 - Land to the south of Beccles Road, Burgh St Peter The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Part of the site is adjacent to the Aldeby Busines Park and Grebe Coaches which have the potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise, dust, odour, artificial light, etc. In addition, placing sensitive receptors close to these business could impact there future viability. It is therefore considered that this will need to be addressed as part of any application for dwellings on this site.	Environmental Protection Team comments are noted. With regards to the location and proximity of the site to to the Aldeby Busines Park and Grebe Coaches, the Council acknowledge the potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise, dust, odour, artificial light, etc. This will be assessed as part of the planning application stage.	218	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, then an alternative condition could be attached to any approval requiring its implementation.			
QUESTION 152: Should any rejected sites be allocated?	1912	Comment	SN4014 - Land to east of Common Road and south of Beccles Road, Burgh St Peter The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Part of the site is adjacent to the Aldeby Busines Park and Grebe Coaches which have the potential to have a negative impact on the amenity of the residents of any dwellings constructed on the site due to noise, dust, odour, artificial light, etc. In addition, placing sensitive receptors close to these business could impact there future viability. It is therefore considered that this will need to be addressed as part	Environmental Protection Team comments are noted,	217	No action or change required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			of any application for dwellings on this site. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, then an alternative condition could be attached to any approval requiring its implementation.			
QUESTION 152: Should any rejected sites be allocated?	1913	Comment	SN4016 - Land to the east of Mill Road, Burgh St Peter The Environmental Protection Team are not aware of any significant land quality issue with this site or adjacent land. However, having regard to the size of the site and sensitivity of the proposed development it is considered that a Phase One Land Contamination Report (Desk Study) should be required as part of any planning application. Due to the size of this development and its proximity to existing dwellings, an application to develop this site is likely to attract the recommendation that standard planning condition AM05 Construction Management Plan be attached to any approval. It may be worth highlighting to	Environmental Protection comments noted.	216	No action or change required.

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			applicants that to avoid any delay in discharging this condition, they may wish to include a Construction Management Plan with their application. If the submitted Construction Management Plan is adequate, then an alternative condition could be attached to any approval requiring its implementation.			
QUESTION 152: Should any rejected sites be allocated?	2171	Comment	The Mineral Planning Authority is pleased to note the inclusion within the site assessments of its previous comments on the potential allocation sites regarding mineral resource safeguarding. Currently, the reasoned justification for the sites does not include reference to mineral resource safeguarding. We would like to reiterate from our previous comments that the need for mineral resource safeguarding to be addressed needs to be included within the requirements of the respective site's allocation policy. The Site assessments for SN0414 and SN0392, both at Haddiscoe do not contain reference to the proposed mineral extraction site MIN 25 at Haddiscoe, which was mentioned in our previous response. The site assessments should be revised to contain this information. There are existing residential properties at least as close to the potential mineral site allocation MIN 25 as the proposed housing locations. In accordance with the site assessment for MIN 25, the draft site allocation policy includes a requirement for suitable mitigation measures to be included in a future planning application,	The Mineral Planning Authority comments are noted.	213	No action or change required.

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			to ensure that there would be no unacceptable amenity impacts for these properties from the operation of the mineral extraction site.			
QUESTION 152: Should any rejected sites be allocated?	1736	Comment	SN4010 Land to the south of Beccles Road Burgh St. Peter SN4014 Land east of Common Road & south of Beccles Road SN4016 Land east of Mill Road Burgh St. Peter. Councillors and residents agreed these sites should be rejected.	The council acknowledges the support for the rejection of sites: SN4010, SN4014 and SN4016.	212	No action or change required/

Wacton

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 153: Settlement Limit	1023, 1025	Support	Happy with the finds; no development is proposed so no comment.	The Council acknowledges the support for no development within Wacton.	525	No action or change required.
QUESTION 154: Should any rejected sites be allocated?	1724	Comment	Ref SN4029SL Reasons the site has been considered unreasonable: 1. Access/Highways - an enclosed note from Schema Engineering advises that a new footpath will be required to link the site to the village. A footpath could be provided from the site westwards on the northern side of Stratton Road. There are limited existing footpath links within most villages and a more flexible approach may be needed in assessing sites. 2. Historic Environment - SNC Heritage Officer states that they consider there will be minimal impact on the setting of Wacton Hall. The scheme is considered unreasonable due to impact on historic character, but this is not reflected in the comments from SNC's Heritage Officer.	The Council note the representation made in relation to access/highways and the historic environment. Whilst it is acknowledged that a footpath could be provided, there is still uncertainty as to whether this would be achievable. The Highway Authority have also raised other safety concerns with regards to visibility and accessing the site, the site is located on a sweeping bend. The Highway Authority have concerns that development of the site would require significant highway works/ improvements, causing concerns with viability for a small scheme as part of a Settlement Limit Extension. With regards to the historic environment comments, there is still concerns with how Wacton House and its setting within the Conservation Area (CA) would be impacted upon, given its current positive contribution to the landscape. In addition, there is also further site constraints highlighted that raise concerns with the viability and suitability for development of the site, inducing surface water flood and accessibility to services. Together with the representations made, these do not change the Councils view and conclusions to reject the site.	230	No action or change required.

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QUESTION 154: Should any rejected sites be allocated?	1989	Comment	Water management comments: Part of the Parish is located within the Norfolk Rivers IDD. The Board's byelaws apply to any new developments within the IDD.	Comments noted. The Council confirm that no sites are currently preferred or shortlisted within Wacton.	228	No action or change required at this time.
QUESTION 154: Should any rejected sites be allocated?	1026	Support	Wacton Parish Council are happy with the findings in the draft VCHAP for Wacton.	Parish Council comments noted.	227	No action or change required.
QUESTION 154: Should any rejected sites be allocated?	1024	Support	Wacton Parish Council are happy with no development planned as submitted within draft.	Wacton Parish Council comments noted.	226	No action or change required.

Wicklewood

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 155: Settlement Limit	10, 207, 435, 484, 494, 737, 745, 754, 768, 790, 803, 907, 925, 954, 1042, 1047, 1089, 1305, 1324, 1396, 1485, 1522, 1533, 1813	Mixed	Comments received relating to Question 155: Concerns about the impact of development on the form and character of the village; concerns about the implications for further expansion in the future, as well as the risk of merging with other villages; concerns about potential future growth along The Green and Wymondham Road; infill development would be sufficient to meet the needs of the village - unnecessary to allocate additional land for development; previous allocations and planning permissions are sufficient; concern that the existing settlement limit is being challenged and/or ignored; preferred sites fall outside the existing settlement limit therefore the demand for them should be demonstrated; settlement limit should be extended to include land in the centre of the village; numbers proposed exceed the objectives of the VCHAP; protection should be made to prevent	A review of the existing settlement limit as part of the VCHAP process did not identify any permitted or infill sites suitable for inclusion in the existing defined boundaries. Therefore proposed changes to the settlement limit at this time are limited to the addition of sites allocated during the VCHAP process. A number of comments have raised general concerns about the validity of alterations being proposed to existing settlement boundaries. The Council would respond that settlement limits have been drawn to respond to the historic form of development, the geographical features of a settlement and the existing spatial pattern of development. Settlement limits direct the majority of development to existing settlements whilst at the same time protecting the open countryside from unsustainable development. As such, in order to meet identified housing need and to facilitate growth opportunities throughout the District, it is both appropriate and necessary for existing settlement boundaries to be subject to periodic review and rationalisation. It is not possible to meet the District's housing need through infill development only as suggested in these comments. Typical site allocations within the VCHAP are between 12-50 dwellings per cluster, as set out in the consultation material,	471	No action required

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			development in the centre of the village; village does not need a gateway entrance site; village is not suitable for large housing estates; insufficient infrastructure and services in the village and surrounding areas; concerns about existing and future highway safety; environmental and landscape impact of development; impact on the existing primary school site; concerns about the potential risk of flash-flooding; concern about housing mix and tenure based on recent executive developments in the village; and significant site specific objections relating to preferred allocation sites SN0577REVA and SN4045SL.	in order to meet the identified housing need throughout the VCHAP area. Varying opinions exist within the representations about the suitability of the central area of the village for residential development. This is currently excluded from the settlement limit, and it is difficult to see how development in this area could be achieved. The Council is also of the opinion that significant residential development in this location would have a greater impact on the form and character of the settlement than the proposed allocation sites. Wider concerns about the capacity of the local infrastructure and services to preferred housing allocation sites (including impact on the primary school and highways matters) have been submitted in response to this question, as well as landscape and environmental concerns. The Council acknowledges these comments but considers that these matters are best addressed in response to the site specific proposals to which they relate.		
QUESTION 156: Preferred Site - SN0577REVA and REVB, Land to the south of Wicklewood Primary School	208, 314, 322, 394, 436, 455, 485, 497, 532, 747, 753, 755, 757, 769, 793, 794, 805, 854, 910, 917, 927, 953, 1048, 1094, 1095,	Object	Summary of objections to SN0577REVA by subject area: HIGHWAY ISSUES – dangerous double bend in close proximity to the site and primary school; existing road network at capacity; existing problems with both speeding and dangerous driving and parking on local roads; existing congestion	A substantial number of comments were submitted in response to this preferred allocation site during the Regulation 18 consultation and the Council acknowledges this. Responses to the matters raised have been grouped by topic area to address the issues identified in the representations.	531	Raise the concerns of the school with NCC Education to determine whether there is a capacity issue at the school; consideration to be given to amending the form/shape of the

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	1125, 1219, 1306, 1315, 1321, 1326, 1422, 1514, 1520, 1534, 1535, 1549, 1802, 1815		at peak school times; development would result in increased traffic on single track roads; issues arising from conflict between existing agricultural traffic, HGVs and delivery vehicles on local roads; improvements would be required to pavements as well as the addition of crossing points. IMPACT ON FORM AND CHARACTER OF THE EXISTING VILLAGE – development would result in sprawl of the village and is detached from the main built form; development in this location would not reflect the rural character of the village; existing village lacks a focal centre and this would not improve its character; concerns about the potential future development/ expansion of the site; proposed estate development would not reflect existing character of Wicklewood; small development – infill, road frontage – would integrate with the village better; unnecessary to create a gateway to the village; development should not be located to the south of Hackford Road; site is the historic centre of the village with views of the school buildings. IMPACT ON THE PRIMARY SCHOOL – school is operating at capacity; increased numbers would result in the loss of the ‘small village style’ school; development of this site would prevent the long-term expansion of the school site; expansion of the school not possible on the school fields; loss of the rural outlook of the school; safeguarding concerns resulting	HIGHWAY ISSUES – the technical comments of the highways officers have informed the overall site assessment. It was recognised that some highways improvement works would be necessary should this site be allocated, including connecting footpaths and the provision of a crossing point to create a safe access to existing services and facilities to the north of the site. The addition of these highway improvements may have the added benefit of acting as traffic calming measures, reducing the speed of traffic and addressing some of the concerns raised in these responses. Discussions have also highlighted that vehicular access to the site should be restricted to The Green only to ensure the ongoing safety of the highway network. Concerns have been raised about existing congestion on the local road network, including the presence of delivery vehicles, HGV and agricultural traffic within the area. NCC Highways have not raised a concern about the capacity of the local road network, nor the type of vehicle movements which are considered to be fairly typical within a rural environment. Congestion around the primary school is noted as being of particular concern, particularly around the peak school drop-off and pick-up times, and is noted as causing a hazard and road safety issue by some respondents. Development of a site adjacent to the primary school would not be anticipated to result in significant additional pressures relating to traffic		proposed allocation to better reflect the contours of the site, as well as the presence of the village sign along the site frontage; consideration to be given to including specific policy text relating to the highway improvement works, landscaping and site layout/orientation.

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			from the proximity of the site to the school playground and playing fields; disruption to pupils during the construction phase. LOCAL INFRASTRUCTURE AND SERVICES, INCLUDING SURFACE WATER DRAINAGE – increased traffic pollution due to lack of local shops in the village; connections to existing services would mean crossing a busy road; existing broadband infrastructure issued would be exacerbated; civic building should be provided within the village (for example, small shop/ library/ café); school grounds have previously flooded; The Green has been subject to flooding; existing surface water drainage issues within the village should be investigated and remedied. OTHER ISSUES IDENTIFIED – loss of irreplaceable views across the site; loss of green space; loss of agricultural land; intrusion into the open countryside; impact on wildlife; recent development has not been sympathetic to existing development in the village; little provision has been made for green energy sources in recent developments; light pollution; concern about the housing mix; recent development in 2020 along the High Street meets the requirements of the village; numbers proposed exceed the objectives of 12-25 dwellings per site; numbers proposed are excessive; numbers proposed on the site would result in a development that is too dense; impact on the existing sewerage system.	movements and/or parking at these times and may actually result in an improvement in the current situation as an increased number of local children would be expected to attend the school on foot. Matters that relate to speeding vehicles and dangerous driving and/or parking that result in highway safety concerns should be reported to the relevant authorities. IMPACT ON FORM AND CHARACTER OF THE EXISTING VILLAGE – the impact of the development of this site on the form and character of the existing village form has emerged as a key concern locally, particularly the scale of the site proposed, its relationship to the existing settlement and the loss of views into and across the proposed allocation site. The Council acknowledges these concerns but remains of the opinion that with a sensitive site layout and design, as well as appropriate mitigation measures (including highways improvements works and landscaping) development in this location would be acceptable at this scale. However, on reflection the Council considers that a revision to the proposed extent of the site currently preferred may be appropriate. Whilst this would not affect the numbers of dwellings proposed on this site it may be possible to alter the boundaries of the allocation on this site to better reflect the field boundaries to the north and east whilst continuing to meet the requirements of		

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				NCC Highways. The Council also considers that a design solution that sets development behind an area of open space around the existing village sign could create an interesting feature on the site and result in a focal point for the site/ village. This should be explored further as the Plan process progresses. Reference to smaller infill development and road frontage development being preferable is noted however at this time no sites have been promoted and/or identified that would be suitable for meeting the objectives of the VCHAP. IMPACT ON THE PRIMARY SCHOOL – a number of concerns related to the impact of this preferred site on the adjacent school. Whilst the Council understands the concerns that have been raised recent discussions with NCC Education did not indicate that capacity at this school would be a particular issue however in light of the representations received this should be explored further with the relevant parties to confirm this. It is the Council's current understanding that the pressure on school places stems from parental choice and children attending schools outside their catchment areas. On this basis the opening of two new primary schools locally is anticipated to ease the number of children attending Wicklewood Primary School. Furthermore, school places are allocated in accordance with the County Council's agreed procedure and therefore children within the		

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				catchment area of the primary school would continue to have the first opportunity for school places. Discussions with NCC Education have not indicated that an expansion of this school is considered to be appropriate although clarification of the comments made relating to school expansion on the school playing fields should be sought. Whilst the Council recognises the concerns raised about the proximity of the preferred site to the school and its grounds this is not considered to be unusual in either a rural or urban setting and concerns about overlooking may be addressed most appropriately through the detailed application stage and the site design and layout. It may be appropriate to include site-specific policy text that includes a consideration of this relationship. LOCAL INFRASTRUCTURE AND SERVICES, INCLUDING SURFACE WATER DRAINAGE – Development in this location is considered to meet the accessibility requirements set out in the agreed site assessment criteria. The Council recognises that Wicklewood does not currently have a local retail facility however this is not unusual within rural communities and the village does benefit from a number of other facilities and services and is located in reasonably close proximity to larger centres such as Wymondham. As stated in the VCHAP objectives the Council is seeking to ensure that existing facilities and		

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				services within rural communities can be sustained whilst also potentially providing new opportunities. However, the scale of development proposed on this site would be unlikely to directly result in a new community building as part of the scheme. NCC Highways have advised that a pedestrian crossing would be a requirement of development in this location resulting in improved connectivity of the site to the existing facilities in the village. Some respondents have referred to flood events within proximity of the site, most notably within the school boundaries and along The Green. The Lead Local Flood Authority have not raised any concerns about surface water flooding on this site. All new development must make provision for its own surface water drainage without impacting off-site therefore it is not considered that development in this location would adversely affect any existing issues that have been raised and may in fact offer opportunities to improve the existing situation via the on-site drainage scheme. OTHER ISSUES IDENTIFIED – The Council recognises the concerns that have been raised about the impact on the local landscape, the loss of agricultural land and the potential ecological impact of development in this location. The site assessment form considered the impact of development in this location and recognised the prominence of this site		

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				within the landscape however it was also concluded that with careful design the development of this site could be a positive addition to the local landscape. Development of the site would afford the opportunity to reinstate hedgerows and trees that have been lost from the local landscape and could therefore result in Biodiversity Net Gain. A number of respondents have referred to the scale of development proposed on the site exceeding the agreed site allocation numbers. As stated in the consultation the 12-25 site size threshold is considered to be a 'typical' site size however it may be appropriate and/or necessary to increase site numbers either to facilitate improvements that would benefit the existing community or to contribute to the overall housing numbers. The Council considers SN0577REVA to be suitable for 30 dwellings. Recent development within the village is recognised however the VCHAP seeks to allocate numbers in addition to these sites/ housing numbers. Concerns about the form, design, green credentials and quality of recent development are noted. Detailed design matters are typically considered at the planning application stage and are can be viewed subjectively however the Council expects a high standard of design in accordance with adopted planning policy. Site SN0577REVA is recognised as having potential to be a gateway site to the village and as such it may be appropriate to consider site		

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				specific design text for this site as part of the allocation process. Comments have also been received about the housing mix on the site – this would be in accordance with the latest housing evidence figures and would include a mix of tenures and property types in accordance with up to date evidence requirements.		
QUESTION 156: Preferred Site - SN0577REVA and REVB, Land to the south of Wicklewood Primary School	1990, 2130	Comment	Technical comments relating to surface water matters on SN0577REVA: LLFA - green rating; site is outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment; and if surface water discharges within the watershed catchment of the Board's IDD, this should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).	These comments are noted, as are the detailed technical comments of the LLFA. It will be the responsibility of the developer to ensure liaison with the correct third party agency to ensure an appropriate drainage strategy is designed for the site.	474	No action required
QUESTION 156: Preferred Site - SN0577REVA and REVB, Land to the south of Wicklewood Primary School	2234	Comment	NCC Ecology comments on SN0577REVA: Rated green with no major ecological constraints identified from desk-top research; hedge along northern boundary (along the school boundary) is a priority habitat - no other priority habitats identified on site; green habitat for Great Crested Newts; site within SSSI IRZ but residential development does not trigger consultation	The comments of the NCC Ecologist are noted and are not considered to raise any issues that cannot be addressed through ecological assessments and the identification of appropriate mitigation measures. This should occur at the outset of the site design/ layout process.	473	No action required

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			with Natural England; applications to be accompanied by ecological appraisal and mitigation strategy which have informed the site design; and consideration to be given to Biodiversity Net Gain.			
QUESTION 156: Preferred Site - SN0577REVA and REVB, Land to the south of Wicklewood Primary School	11, 1035	Support	Support for SN0577REVA: development in this location would be similar to that on the north of Hackford Road and would be within an enclosed existing boundary so future development would not be possible; and development of this site will breathe new life into the village and provide employment for local builders; the village needs affordable homes for younger residents to be able to remain in the village; this site would be the least disruptive to the village as it would put the least amount of pressure on the High Street and surrounding lanes; close to a bus stop - promoting green travel; and request provision of traffic calming measures and drainage enhancements from the developer.	The comments submitted in support of SN0577REVA are acknowledged. Development proposals would be expected to be in accordance with the latest evidence relating to both housing mix and tenure, as well as meet the affordable housing requirement. Matters relating to mitigation and/or improvement works associated with the development of the site would be considered in further detail in the site specific allocation text, in liaison with technical consultees. Any infrastructure requirements or off-site works identified must be proportionate and directly relate to the development to which they are associated.	472	No action required

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QUESTION 157: Preferred Site - SN4045SL, Land south of Hackford Road	209, 289, 316, 456, 486, 495, 736, 738, 748, 771, 795, 796, 801, 806, 851, 913, 920, 929, 952, 957, 1049, 1122, 1307, 1322, 1328, 1423, 1491, 1516, 1537, 1552, 1816	Object	Summary of objections raised to SN4045SL: IMPACT ON FORM AND CHARACTER OF WICKLEWOOD – development would result in the sprawl of the village and would fail to consolidate the village core; development of smaller infill sites would be more appropriate; development should be to the north of Hackford Road, not the south; development in this location is effectively backland/ garden land development; development would have a poor relationship with the existing surroundings; excessive numbers proposed on a small site resulting in inappropriate scale and density; houses would be separated from the village by Hackford Road. HIGHWAYS – development would generate additional traffic in a dangerous location; access would be located between two bends that are dangerous; existing high traffic levels and speeding vehicles; existing narrow roads and footpaths, as well as surrounding single width lanes; traffic calming measures and crossings would be necessary; existing issues with congestion around the school; additional traffic would result in increased conflict with large vehicles on the rural road network. IMPACT ON THE PRIMARY SCHOOL – development on the preferred sites would prevent the future expansion of the school; potential safeguarding issues	The Council acknowledges the number of objections received to the preferred status of this site, as well as the issues that have been raised. Responses to the matters raised have been grouped by topic area to address the issues identified in the representations. IMPACT ON FORM AND CHARACTER OF WICKLEWOOD – Whilst the Council understands the concerns that have been expressed about the impact of development in this location on the existing form and character of the village it remains of the opinion that housing in this location would be acceptable. Development on SN4045SL would be read in the context of the existing built form, including residential development to the east and west of the site and Wicklewood Primary School to the south. The Council does not consider development of this site to be backland development. The density proposed is considered to be acceptable in this location with 12 dwellings resulting in a density of approximately 25dph which is considered to be an appropriate use of the land. HIGHWAYS – Subject to the creation of a satisfactory access and the provision of a footway to the primary school to the south NCC Highways have not raised a technical objection to the development of this site. However, the Council recognises the concerns of local residents about the access to this site	536	Clarification to be sought about the capacity of the primary school as well as possible restrictions on the expansion of the school site; confirmation required regarding the possible need for a crossing point as an off-site highway work associated with the delivery of this site.

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			arising from the proximity of the school to these sites; school already operates at capacity; possible drainage issues on the school playing fields. OTHER ISSUES IDENTIFIED – loss of a natural site as well as a wildlife habitat; loss of the green centre which is the heart of the village; this site is a valuable open break in the village and affords views of the Church; site adds to the character of the village; inevitable loss of the frontage hedgerow; lack of facilities within the village and those that exist are on the opposite side of Hackford Road; existing Broadband services are inadequate; concerns about the implications for future development; insufficient evidence for these housing numbers; growth has already taken place within the village; there are more sustainable locations to meet the demand within the District; there should be an increased emphasis (and provision for-) cycling and walking locally.	and considers it appropriate to (re)confirm the acceptability of a site access in this location for this number of dwellings. As noted in the site assessment, development of this site would require the provision of an extended footway to the adjacent school site. Confirmation should be sought from NCC Highways about the requirements for a crossing point associated with the delivery of this site as this could inform site-specific policy text. Whilst the concerns about the impact of additional development on the congestion currently experienced around the school are noted due to the proximity of this site to the school it is not considered that this would result in additional vehicular movements to/from the school and could ease some of the parking issues currently experienced along this stretch of road. Concerns have been raised about existing congestion on the local road network, including the presence of delivery vehicles, HGV and agricultural traffic within the area. NCC Highways have not raised a concern about the capacity of the local road network, nor the type of vehicle movements which are considered to be fairly typical within a rural environment. IMPACT ON THE PRIMARY SCHOOL – as noted in the Council's response to representations received to Question 156 the Council has not been made aware of either a current long-term		

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				capacity issue, or future expansion intentions, at Wicklewood Primary School however for clarity this understanding should be confirmed as accurate. Similarly, a detailed response to the relationship between the school and the preferred development site has been set out in response to Question 156. OTHER ISSUES IDENTIFIED – the Council remains of the opinion that development in this location would be acceptable and whilst recognising the concerns that have been raised about the loss of the ‘open break’ in the village. New development in this location would be read in the context of the existing built form around the site and the Council does not agree that the change in outlook across this site would result in an adverse impact so great as to discount the site from allocation. Historic England have provided a technical response to the preferred status of this site and whilst they have not raised an objection to the allocation of this site they have requested that a Heritage Impact Assessment is completed to inform the final site selection. This is with particular reference to the identified heritage assets and may inform the evolution of a site layout/ design if the impact of development on these heritage assets is considered to be acceptable. It is unclear how the site could be further developed in the future as suggested in		

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				the comments received as the site is bounded by existing development and infrastructure. Comments have also been received about the existing services and facilities, as well as overall housing numbers proposed for Wicklewood. As above, these matters have been responded to in detail in the response to Question 156 and therefore is not repeated in this response.		
QUESTION 157: Preferred Site - SN4045SL, Land south of Hackford Road	2002	Comment	Inaccuracy in the definition of this site which has been labelled as a 'settlement limit extension' (-SL suffix) but is referred to as an allocation.	This representation raises wider concerns about the site allocation process but as these same comments have also been submitted in response to Question 1 of the VCHAP Regulation 18 consultation and responded to accordingly it is not considered appropriate to repeat that response here. This site was promoted to the VCHAP with a site area of 0.49ha and was therefore originally considered to fall below the agreed allocation site size of 0.5ha and labelled accordingly with a -SL suffix. However as a result of the site assessment the Council considered that the site could accommodate the 12 dwelling threshold set for allocated sites. As such the site has subsequently been considered as an allocation and the labelling of this site should be updated/ amended to reflect this.	535	Update the labelling and site specific policy text for this site if appropriate to remove the 'SL' suffix. The site is considered to be suitable as an allocation rather than as an amendment to the existing settlement limit. (the site has subsequently been expanded in size to above 0.5ha)
QUESTION 157: Preferred Site - SN4045SL, Land	2060, 2235	Comment	Landscape comments relating to SN4045SL: Although no designated heritage assets on	The Council acknowledges these comments. A Heritage Impact Assessment should be undertaken to assess the potential impact of	534	Production of a Heritage Impact Assessment to determine the impacts

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south of Hackford Road			this site the Grade I listed Church of All Saints and Grade II listed war memorial are to the north of the site; Intervening trees provide an effective screen of the site but we [Historic England] suggest additional planting along the north boundary of the site; An HIA should be undertaken to assess the inform whether the site is suitable for allocation; No major ecological constraints identified on the site; Surveys and biodiversity enhancement in accordance with policy is required; Loss of hedgerows (priority habitat) should be avoided; Green habitat zone for GCNs; and Site in SSSI IRZ but residential development does not trigger consultation with Natural England.	development on the significance of the listed buildings referred to in the representation submitted by Historic England. Special consideration should be given to including a policy requirement for planting along the northern boundary of the site in recognition of the proximity of the site to these identified heritage assets.		and/or mitigation measures for this site including - but not constrained to - planting along the northern boundary of the site.
QUESTION 157: Preferred Site - SN4045SL, Land south of Hackford Road	1991, 2126	Comment	Comments relating to surface water on SN4045SL: LLFA - green rating; Outside the IDD boundary but within the Norfolk Rivers IDB watershed catchment; and If surface water discharges within the watershed catchment of the Board's IDD,	These comments are noted. It will be for the developer of the site to ensure liaison with the correct third party to agree an appropriate drainage strategy for the site if allocated.	533	No action required.

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			this should be facilitated in line with the Non-statutory technical standards SuDS.			
QUESTION 157: Preferred Site - SN4045SL, Land south of Hackford Road	12, 165, 1036, 1803	Support	Summary of comments in support of SN4045SL: This site would only work with limited numbers to limit overlooking of neighbouring properties and access issues; The site is suitable, available and achievable and [the developer] is willing to work with the Council to develop an appropriate policy; Development of this site would support the village and provide employment for local builders; Affordable housing is needed within the village for younger residents; This site is the least disruptive to the village - access would not put pressure on the surrounding lanes or High Street and close proximity to a bus stop; and Developer should provide traffic calming measures and drainage enhancements.	The Council acknowledges these comments submitted in support of SN4045SL, including the suggestions for off-site infrastructure works associated with the development. The site is currently proposed for up to 12 dwellings which is considered appropriate for the site in terms of impact on neighbouring properties as well as highway safety. Detailed design matters would be agreed at the planning application stage but would include an assessment of the impact of the site layout and design on existing properties adjacent to the site.	532	No action required.
QUESTION 158: Should any shortlisted / rejected sites be allocated?	210, 772, 1331, 2080, 2237	Comment	Comments relating to SN4064: Most favourable site as would consolidate footprint of the village rather than extending it further; could provide access to additional land at the core of village enabling further consolidation;	The Council acknowledges the support that has been expressed for this site, in particular those comments relating to the form and character of the village, but remains concerned about the loss of employment land in this central location without the submission of appropriate supporting evidence to demonstrate the site is not viable for rural employment.	567	No action required.

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			not visible from the roadside therefore would not alter the form and character of the village; would not result in loss of countryside; new residents would be at heart of the village allowing better integration; easy access into the site and not directly onto a busy main road; nurseries are no longer viable therefore no loss of employment; LLFA - green rating; no major ecological constraints identified from desktop study; surveys and enhancement measures required in accordance with policy; no priority habitats identified; green habitat for GCNs; and site in SSSI IRZ but residential development does not trigger consultation with Natural England.	In addition, during the technical consultation NCC Highways Officers expressed concerns about visibility when accessing The Street from the site and no evidence has been submitted to demonstrate that a suitable visibility splay could be achieved. The Council therefore remains of the opinion that whilst this site may present an alternative option for development it is not the Council's preferred site for allocation.		
QUESTION 158: Should any shortlisted / rejected sites be allocated?	1729	Comment	Comments relating to SN0249SL: Please note that in addition to the TPO trees on site adjacent to the workhouse/ St George the Diocese has confirmed that	The Council is aware of the unmarked pauper's graves on part of this site. The Council understands that the burial ground is likely to cover part of this site but the precise location of the burial ground is unknown. The site assessment	565	Update the site assessment form to reflect the additional information obtained relating to the

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			150 bodies remain buried on the site. Land not suitable for building on.	form should be updated to reflect this information.		presence of the burial ground on this site.
QUESTION 158: Should any shortlisted / rejected sites be allocated?	496	Support	Comments in support of SN0232REV: Existing development along this road; part of Wicklewood village already - no issue with linking properties up; and any heritage sites would be revealed and addressed.	The Council notes the comments in support of this site but remains of the opinion that this site is not suitable for allocation due to the issues previously identified in the site assessment form.	543	No action required
QUESTION 158: Should any shortlisted / rejected sites be allocated?	499, 1195, 1799	Mixed	Representation relating to rejected site SN2179: SUPPORT - large parcel of land and building could be located away from the stream's edge close to the garage; existing properties on the west side of High Street; highways assessment is incorrect - visibility is good in both directions; possible to provide a footpath across whole (or part) of the site frontage; substantially less than 50% of the site lies within a flood zone and due to the topography this could be mitigated - at least part of the site could be developed; additional evidence is being sought to substantiate the position regarding this site. OBJECTIONS - unsuitable location for development; a large area of the site is prone to flooding; loss of views across the open fields as well as impact on wildlife; site access is unsuitable; concerns about speeding vehicles.	The Council acknowledges the comments received relating to the rejection of this site, noting the differing opinions about the suitability of this site for development. Additional information/evidence has not been submitted in support of this site at the time of preparing this response. The Council maintains its position and considers this site to be unreasonable for allocation based on the conclusions set out in the site assessment.	542	No action required

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QUESTION 158: Should any shortlisted / rejected sites be allocated?	166	Object	Comment in support of existing proposed allocations: Preferred allocation site SN4045SL is suitable, achievable and available and do not consider that any alternative sites should be selected for allocation.	These comments are noted.	541	No action required
QUESTION 158: Should any shortlisted / rejected sites be allocated?	498, 729, 1375	Mixed	Comments submitted in support of SN0535: Infill development on this site would be preferable to large development on the edge of the village; development in this location would be achievable - access solutions could be achievable; inevitable that development will occur in this location; dispute the reason for rejecting this site [access constraints] - Access Feasibility Appraisal submitted in support of the site; existing access is sufficiently wide enough to accommodate two vehicles and a footway and is wider than Wicklewood High Street without reducing the curtilage of the adjacent properties; access to the site would be framed by dwellings but this is not uncommon; volume of traffic accessing this site would be low; the site provides an opportunity to	The comments in support of this site are recognised by the Council. As set out in the site assessment the key reason for the rejection of this site was highway safety concerns. SN0535 was subject to technical consultation with NCC Highways Officers prior to the Regulation 18 consultation and highways comments reflect the concerns raised during this process. The Council accepts the submission of the supporting evidence submitted by the agents/owner for the site and this should be reviewed by NCC Highways Officers. Notwithstanding a possible technical solution to the access concerns previously identified, consideration would also need to be given to the impact an access between two existing properties would have on the amenities of these residents. The Council also maintains concerns about the opportunity to create a continuous footway between the site and Wicklewood Primary School as set out in the site assessment form. The promoter of the site suggests a low density scheme with significant landscaping to reflect the characteristics of the existing development adjacent to	540	Discussion with NCC Highways as technical consultees regarding the supporting evidence submitted in respect of the access arrangements for this site, including the suggested visibility splays.

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			diversify housing provision in Wicklewood - the site is offered for low density development (circa. 12-15 dwellings reflecting infill characteristics of the site and to allow for the inclusion of a significant buffer) offering landscape, amenity and biodiversity gain opportunities and maintaining a form of development consistent with existing development; site could include affordable homes and/or opportunities for self-build in addition to the baseline number of 12-15 dwellings; development of SN0535 would enable development on underutilised land within the existing settlement whilst preserving the form of the settlement; site is free of constraints and is promoted by the owner; and site offers an opportunity to meet the objectives of the Plan in terms of diversity of housing (particularly self-build).	the site however it is also noted that the suggestion for affordable housing and self-build plots on this site would be in addition to the baseline figure of the 12-15 dwellings suggested therefore resulting in a greater number of dwellings on the site, and a higher density of development than the representation suggests. In any case, development on this site would be required to accord with current policy, including the provision of affordable housing which would be required as part of any scheme exceeding 12 units. As promoted SN0535 exceeds the typical size threshold being sought through the VCHAP and the Council is of the opinion that allocation of the full site would not be appropriate. In addition, development of the site at the density suggested in the respondent's representation would fail to make effective use of land, as required by the NPPF. The Council therefore continues to maintain concerns about the allocation of this site.		
QUESTION 158: Should any shortlisted / rejected sites be allocated?	14, 852, 951, 1050	Mixed	General (non- site specific) representations submitted in respect of Question 158: Estate development in the village will alter its character - prefer to see smaller infill frontage developments; Agree that the rejected sites should not be considered for allocation;	The Council acknowledges these comments which do not relate to specific sites within Wicklewood but provide a commentary on the overall strategy for the housing allocations in the village. These comments are noted but have been addressed in responses to the site specific issues raised and are not repeated here.	539	No action required

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			Additional housing can not be built along these roads.			
QUESTION 159: Should any shortlisted sites be rejected?	15, 500, 739, 775, 853, 950, 1051, 1329, 1330, 1512	Mixed	Summary of comments submitted to Question 159 not specifically relating to the shortlisted site SN4064: Site to the south of the school is too large; no shop in the village would result in increased traffic to other village and towns; start of urban sprawl by establishing development on the south side; dangerous locations on a bend with restricted visibility; limits the opportunities to expand the school in the future; infill development would integrate better in the village; no evidence to support the scale of/ demand for development proposed beyond current permissions and windfall development; no proposals for starter homes or older people's housing; flood problems will get worse; significant traffic problems already; and SN4064 should be a preferred site.	Whilst the Council notes the contents of these representations it also considers that these issues do not specifically relate to Question 159. Rather these comments are concerned with the principle of development in Wicklewood as well as the allocation of the preferred sites. These matters have been responded to in detail in response to Questions 155 - 157 therefore the Council does not consider it necessary to repeat the same information again here.	575	No action required.

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QUESTION 159: Should any shortlisted sites be rejected?	487	Object	Objections to the shortlisting of SN4064: The Nurseries forms part of a large open area which has previously been referred to as a particular feature of the village; development in this location would be detrimental to the form, character and rural setting of the village; development here would be backland development and poorly relate to the existing pattern of development in the village; and would set a precedent for development of the remaining large open area of land which would double the size of the village.	The Council is aware that the shortlisting of SN4064 has resulted in both comments in support and of objection of this site. The shortlisted site is a brownfield site and this has been taken into consideration appropriately in the site assessment form. Consequently the Council does not consider that the redevelopment of this site would have an adverse impact on the existing form and character of the village and the Council has noted some support locally for the redevelopment of this site. However, at this time the Council does not consider it appropriate to reconsider the site as a preferred allocation site for the reasons set out in response to the other relevant questions.	573	No action required

Winfarthing and Shelfanger

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QUESTION 160: Settlement Limit	329, 1489	Mixed	Comments relating to the SL: Access to the shortlisted [SL] site would be dangerous; development in this location would increase surface water run-off and limit natural absorption areas; this area of the village has seriously flooded - twice in the last 5 years; existing unresolved surface water flood issues arising from the housing development to the west of the B1077; no school or pub; landowner supports shortlisting of the site and submits additional information in support of the site; further investigation and advise would be sought if the site were to be taken forward for development, particularly in relation to highways safety and utilities capacity; an appraisal of the heritage context of the site would be undertaken to inform site design; additional hedgerow planting would be undertaken to compensate for the loss of the frontage hedgerow - loss of the existing hedgerow should be balanced against the opportunity to provide a	The Council shortlisted one site as a possible extension to the existing settlement limits however a number of possible constraints/ issues were identified and the Council considers that these issues still remain. Although SN0399BSL was shortlisted as a possible site for inclusion in the settlement limit on balance the Council considers that it is not appropriate to extend the settlement limit to include this site.	578	SN0399BSL should be removed from the list of shortlisted sites.

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			development site within the settlement limits; and consider the site to be suitable for 6-8 dwellings to maximise the potential of the land whilst respecting the local character.			
QUESTION 161: Preferred Site - SN4050, Land to the west of Hall Road, Winfarthing	1164	Object	Objection to SN4050: 30mph speed limit will need to be extended; site is subject to flooding due to the water not having anywhere to run too; area to the south is un-croppable due to being wet; depending on a design could be an eyesore when entering the village; roadside hedgerow likely to be removed; and development could not have anything but a harmful impact on the local landscape and townscape.	The Council recognises the concerns that have been raised about the allocation of this site. As noted in another response to this question clarification is to be sought from NCC Highways about the possible extension of the existing speed limit along the site frontage. Comments relating to the site drainage are noted. Concerns about surface water flooding have not been raised in the technical consultation and it is noted that a riparian watercourse runs parallel to the south of the site which could account for the poor drainage noted within this area of the site. Development of this site could offer an opportunity to improve the current situation but would in any case be restricted to the eastern area of the site thereby avoiding the areas noted as being within a surface water flowpath. It is acknowledged that development would result in removal of at least some of the roadside hedgerow but overall it is considered that with good design this site could have a positive impact on the local townscape. The ecologist has noted that the hedgerow is heavily managed and as such it may be assumed that it is of limited ecological value.	582	No action required.

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QUESTION 161: Preferred Site - SN4050, Land to the west of Hall Road, Winfarthing	1083, 1283	Mixed	Comments in support of SN4050: Support but consideration needs to be given to the speed limit in this area - to encourage more villagers to walk to the school and the village hall the 30mph speed restriction should be moved from Chapel Close to the corner beyond the village hall; increase in houses in the village will require the provision of related amenities (e.g., playgrounds) to reduce travel by car; assume the existing footpath from Chapel Close to the village hall would be upgraded as part of this allocation; this plot would fit in well with the existing houses, has good road frontage and access via footpath to the village amenities; and with careful consideration the hedgerow could remain.	The Council notes the comments in support of this site, as well as the additional comments that have been made about the existing speed restrictions along Hall Road and the potential opportunity to upgrade the existing footpath to the village hall. These matters should be clarified with NCC Highways to ensure that if appropriate they are included within site specific allocation policy text.	581	Discuss with NCC Highways whether an extension to the TRO is necessary as part of the site specific text for this site, as well as an upgrade to the pedestrian footpath to the village hall.
QUESTION 161: Preferred Site - SN4050, Land to the west of Hall Road, Winfarthing	2239	Comment	Summary of technical ecological comments: Green rating - no major ecological constraints identified; surveys and enhancements in accordance with policy requirements; agricultural field bounded by heavily managed hedge; no other priority zones identified on site;	These comments are noted and any planning application for development on this site would be required to accord with current planning policy and legislation. Site surveys should inform the site design, as well as appropriate mitigation measures.	580	No action required.

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			amber zone for GCNs; and site is SSSI IRZ but residential development does not trigger consultation with NE.			
QUESTION 161: Preferred Site - SN4050, Land to the west of Hall Road, Winfarthing	1992, 2123, 2124	Comment	Technical comments relating to surface water: LLFA - green rating; site is adjacent to the Waveney, Lower Yare and Lothingland IDD; a riparian watercourse is located to the south of the proposed site; and If surface water discharges within the watershed catchment of the Board's IDD, this should be facilitated in line with the Non-statutory technical standards for SuDS.	These comments are noted. It will be for the developer of the site to ensure an appropriate drainage strategy is prepared for the site, as well as liaison with the relevant third parties.	579	No action required.
QUESTION 162: Preferred Site - SN4055, Land off The Street, Winfarthing	1143, 1166	Object	Objections to SN4055: SN4055 is home to various wildlife - development in this location would have an impact on their wellbeing; footpath is used by walkers; traffic speeds tend to exceed the 30mph speed limit; development of the site would result in traffic pulling into the road and impacting on the safety of school children; adverse impact on landscape and townscape;	These concerns are recognised however the Council remains of the opinion that this site is suitable for allocation, albeit with a review of the potential boundaries/ site layout to address the technical comments of the LLFA. The Council considers that this would also address the landscape and townscape concerns that have been expressed. No significant concerns were raised during the technical consultation relating to either the site ecology or highway safety. Appropriate off-site highway works have been identified and should be included in the site specific policy text.	596	Include identified off-site highway works within the site specific policy text.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			visual impact on entering the village will depend on good design; site subject to surface water run off from land to the west; and proposed development is too large for an edge of village.			
QUESTION 162: Preferred Site - SN4055, Land off The Street, Winfarthing	1082	Comment	Comments relating to SN4055: Support but consideration needs to be given to encourage fewer car journeys and travel for families - need to incorporate playgrounds etc into the village; and additional road safety signage is necessary close to the school and the location of these new houses.	The Council recognises the support for this site, as well as the additional comments that have been submitted. A key objective of the VCHAP is to improve the sustainability of smaller villages however it is also recognised that there is an inevitable tension with the need to travel to make use of services and facilities outside the immediate area. In accordance with current requirements new development is required to make either on-site or off-site contributions towards local infrastructure (for example, public open space including children's play areas) to ensure adequate facilities are available locally. This could result in the provision of new facilities or the enhancement of existing facilities if appropriate.	593	No action required.
QUESTION 162: Preferred Site - SN4055, Land off The Street, Winfarthing	1993, 2114, 2173	Comment	Comments received relating to surface water management: We live directly opposite the site and have had significant flooding twice in the last 5 years; further hard standing for 25x dwellings would exacerbate the flooding issues; and	The Council recognises the technical comments and residents' concerns that have been raised in response to this proposed site allocation. Following the Regulation 18 consultation comments, further detailed discussions took place with the Lead Local Flood Authority who have confirmed the extent of the flood risk in proximity to this site, as well as	587	Review the preferred allocation and consider whether an alternative site area would provide an improved development option. Consideration to be given to site specific policy text to reflect

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			surface water from further up in Winfarthing adds to the drainage problem as the system becomes overwhelmed. TECHNICAL REPRESENTATIONS: Site is adjacent to the Waveney, Lower Yare and Lothingland IDD; if surface water discharges within the watershed catchment of the Board's IDD this should be facilitated in line with the Non-statutory technical standards for SuDS; LLFA rating - green but also note that the on-site flood risk contributes to a major flow path adjacent to the site; flow lines indicate this flood water flows northeast off the site, contributing to a flowpath east of the site - this must be considered in the site assessment; and a large area of the site is unaffected by the flood risk and has the potential to be developed.	the on-site flood risk closest to the existing residential properties to the north. However, it is recognised that this site is of substantial size and with an appropriate layout it was concluded that there could be an opportunity to develop this site. A suitable drainage strategy would need to ensure drainage of the site away from the at-risk areas and access to the site would also need to be outside of the identified area of flood risk. An alternative option may therefore be a linear pattern of development extending further to the south, avoiding the areas of flood risk but continuing the existing pattern of development in the village. The LLFA have also noted that infiltration levels may be poor therefore it will be for the developer of the site to demonstrate that a suitable drainage strategy can be achieved on the site. In accordance with policy and legislation, new development must not add to existing surface water flooding and through good design development of the site may offer an opportunity to improve the situation of those residents opposite the site who are noted as having experienced flooding in recent years.		the comments of the LLFA, with particular reference to the access arrangements for the site. If the site layout is amended this site should be included within the technical re-consultation for NCC Highways.
QUESTION 162: Preferred Site - SN4055, Land off The Street, Winfarthing	2061, 2241	Comment	Technical comments relating to ecological and heritage matters for SN4050: Green rating following desktop search; surveys and enhancements in accordance with policy required;	The comments of these technical consultees are noted and a Heritage Impact Assessment should be prepared in accordance with the advice from Historic England to determine the suitability of this site allocation, as well as identify any mitigation measures/	586	HIA to be prepared to inform the allocation of the site, including any mitigation measures.

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			agricultural field bounded to the north by a priority habitat hedgerow - no other priority habitats identified; amber/ green zone for GCNs; site within SSSI IRZ but residential development does not trigger development with Natural England; no designated heritage assets on the site the Winfarthing Conservation Area and Grade II LB lie circa 50 m north of the site; development of this site has the potential to impact on the significance of these heritage assets therefore a heritage impact assessment of the site should be undertaken.	enhancements/ policy wording as appropriate.		
QUESTION 162: Preferred Site - SN4055, Land off The Street, Winfarthing	378	Comment	Comments incorrectly submitted against SN4055.	The Council notes that these comments have been incorrectly submitted in response to Question 162. These comments have also been submitted in response to Question 160 and responded to accordingly in that response.	585	No action required.
QUESTION 163: Should any shortlisted / rejected sites be allocated?	2102, 2242	Comment	Technical consultation responses to SN0399BSL: LLFA rating - green; SN0399BSL is in close proximity to a large number of internal flood events associated with Rectory Road - this must be considered in the site assessment; the on-site flood risk contributes to a	A number of issues have been identified on this site during the Regulation 18 and site selection process. As a result, the Council considers that the cumulative impact of these is such that the site is not suitable for development and the settlement limit should not be amended to include this site.	612	This site should be removed from the list of shortlisted sites.

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			major flow path off-site - flow lines indicate this flood water flows south off of the site, contributing to a flow path south of the site; a large area of the site is unaffected by flood risk and has the potential to be developed; NCC Ecology rating - amber; priority habitat onsite or proximity to SSSI (recreational impact concerns) and or buffer required; hedges are priority habitat so any losses (which would appear to be substantial from the description) would need to be minimised (by design) and compensated for if the site is allocated; amber zone for GCNs; and within SSSI IRZ but residential development doesn't trigger consultation with Natural England (unless 50 units or more).			
QUESTION 163: Should any shortlisted / rejected sites be allocated?	492	Comment	Comments in support of SN2049SL: Additional information submitted to support the site, development would be compatible with the existing development at Holly Farm and not have a detrimental impact on the local landscape; highways information also submitted from planning application 2006/1903 showing	The Council has reviewed the site assessment for this site following the submission of the additional highways information and has noted an omission relating to the recording of a surface water flowpath that runs across the site. This identified area incorporates 3.33%AEP - 0.1%AEP flood events. These areas were shown on the Regulation 18 maps but this information should also be included on the site	602	The site assessment form should be updated to include details of the identified surface water flooding on the site.

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			the visibility splay previously approved for access to the approved scheme.	assessment forms. The assessment should be updated accordingly. The Council recognises that development occurred on the adjacent site in 2006 however flood mapping has been updated this time and the areas at risk identified. Whilst technical drainage solutions may be possible the Lead Local Flood Authority have advised during technical consultations that the avoidance of development in surface water flowpaths would always be the preferred solution. The Council welcomes the submission of additional supporting information however it is noted that the highways drawings were prepared in support of a 2006 planning application and the technical requirements may have evolved since this time. If this site were to be reconsidered as a possible allocation site this would need to be assessed by NCC Highways however the Council remains of the opinion that there are other more appropriate sites for sites for allocation within Winfarthing.		
QUESTION 163: Should any shortlisted / rejected sites be allocated?	1174	Support	Comments in support of SN0556: The site has not flooded in the 40+ years that we have farmed it; entrance to the site can be achieved from neighbouring field; entrance to 50mph speed limit on B1077 achievable with visibility;	The Council has considered these comments in support of SN0556 but maintains its opinion that this site is not a suitable option for allocation. The promoter of the site has submitted an illustrative sketch plan indicating access to the site via the adjacent field to the west of the site thereby avoiding the loss of the frontage hedgerow which is noted as a particular feature of the	600	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			no hedgerows require removal therefore no landscape/ townscape impact; access to existing footpaths at Chapel Close and south west corner; field levels between 1.25m and 2 metres above the road level; and phased development could allow for building by local builders.	street scene and also addressing concerns about accessing the site from Chapel Close to the north. NCC Highways has not assessed this proposal however the Council considers that this solution would be unsatisfactory both in terms of landscape impact and the potential impacts on the amenities of both current and future occupiers of the intervening properties. Whilst the comments relating to the lack of flood events on this parcel of land are noted the technical response of the LLFA noted a clear concern about the flood risk on this site. Furthermore, access to the site would need to avoid the areas identified as being at risk which the proposed access solution fails to do. The site is therefore not considered to be suitable for allocation.		
QUESTION 163: Should any shortlisted / rejected sites be allocated?	1085	Support	Comments relating to preferred allocations SN4050 and SN4055: The sites in Winfarthing are suitable if developed well and with consideration for speed limits, footpaths and children's facilities - without these they will put more pressure on a stretched village and increase driving.	The Council notes these comments in support of the preferred allocation sites and notes the concerns about additional pressures on the existing facilities.	599	No action required.
QUESTION 164: Should any shortlisted sites be rejected?	1560	Comment	Comments relating to SN0399BSL: Public footpath to the south of the site adjoining a drainage ditch outside ownership; The site is elevated from the highway and vision splays would be difficult to achieve	The Council notes these concerns that have been raised. In view of the issues raised through the Regulation 18 consultation the Council has reconsidered this site and no longer believes it to be suitable for shortlisting as an extension to the settlement limits.	614	The site should be removed from the list of shortlisted sites.

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			without the removal of the hedge within the total width of the site and the bank; and 30mph speed restriction but in reality vehicles are often travelling at about 45-50mph at this point as the road runs down to the village centre.			
QUESTION 164: Should any shortlisted sites be rejected?	1084	Support	Comments submitted in response to Question 164: Both of these sites are suitable but consideration for amenities, speed limits and proper paths need to be factored in.	The Council notes these comments and believes that they relate to the preferred sites SN4050 and SN4055.	613	No action required.

Woodton and Bedingham

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 166: Preferred Site - SN0262, Land north of Church Road, Woodton	243, 304, 1399	Mixed	Comments submitted in relation to SN0262: Development boundary does not extend to this area; Highway concerns linked to HGV vehicle movements on the B1527; SN0262 is the second preferred choice of Woodton PC; landowners continue to support the allocation of the site and a linear form of development to reflect character and support SN0268SL also being allocated; and landowners express confidence in the availability of infrastructure to the site and have confirmation from AW that there is sufficient foul sewage capacity.	The Council acknowledges the submissions made both in support of this site as well as the concerns that have been raised. If allocated a new site would be drawn around the allocation and would likely be extended to include the existing development to the west of the site as well as SN0268SL if this preferred site was also allocated. This would result in a new settlement limit in Woodton. Technical consultation with NCC Highways did not raise concerns about vehicular traffic along the B1527 - following junction upgrades to the B1527/B1332 development along this road was considered to be the preferable option in terms of highways. The continued support of the landowner to the allocation of the site is welcomed, as are the indications of support for a design that reflects the existing character of the area, however the Council will need to ensure that the allocations deliver the best options in Woodton.	678	No action required.
QUESTION 166: Preferred Site - SN0262, Land north of Church Road, Woodton	1994, 2062, 2073, 2243	Comment	Technical consultee comments submitted for SN0262: Outside the IDD boundary - if surface water discharges within the watershed catchment of the Board's IDD, discharge should be facilitated in line with the Non-statutory technical standards for (SuDS); LLFA - green rating;	The comments of the technical consultees are noted in relation to this site. A Heritage Impact Assessment should be undertaken to determine the impact of development on the significance of the heritage assets identified in the response from Historic England. The Council is reassured that no significant drainage or ecological	677	Undertake a Heritage Impact Assessment to understand the impact of development on the significance of the identified heritage assets, as well as any mitigation measures that may be required if development is

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			no major ecological constraints identified from desk-top search - surveys, and biodiversity enhancement in accordance with policy required; part of agricultural field bounded by hedges (priority habitat); amber habitat zone for great crested newts (pond onsite) and in strategic GI corridor; grade II listed Rectory lies to the east of the site and the grade II listed Manor Farmhouse lies to the north of the site; and a heritage impact assessment is required to assess the impact of the proposed development on the listed buildings and determine if allocation of this site is appropriate, and if it is what mitigation may be required.	constraints have been identified on this site.		considered acceptable on the site.
QUESTION 167: Preferred Site - SN0268SL, Land north of Church Road, Woodton	244, 305, 1401	Mixed	Comment received relating to SN0268SL: Highways concerns - similar to those raised in response to Question 166; Woodton PC do not support this site due to its distance from the village; the landowners can confirm that the site can be supported and agree that any development is likely to be linear in form to reflect local character and appearance and the site could be developed alongside/combined with SN0262; and	These comments are noted and a detailed response to the highways matters raised has been set out in response to the same comments submitted in respect of Question 166. Similarly, the ongoing commitment and support of the landowner to the allocation of this site is recognise however the Council will need to ensure that the final allocation delivers the best option in Woodton.	680	No action required.

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			the landowners are confident that the necessary infrastructure/service is available and have confirmation from Anglian Water that there is sufficient foul sewage capacity to accommodate flows from the site (and other sites in the village).			
QUESTION 167: Preferred Site - SN0268SL, Land north of Church Road, Woodton	1995, 2074, 2245	Comment	Technical consultee comments in respect of SN0268SL: Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment and minor development - no further comments; LLFA - green rating; no major ecological constraints identified from desk-top search - surveys, and biodiversity enhancement in accordance with policy required; Part of agricultural field bounded to south by a hedge - (priority habitat) - losses should be avoided - minimised, and as a last resort, compensated; and amber habitat zone for great crested newts and in strategic GI corridor.	The Council welcomes these technical comments and confirmation that no significant constraints have been identified on this site. It is anticipated that appropriate mitigation measures could address the ecological matters identified.	679	No action required.
Preferred Site - (Northern End of) SN0278, Land south of Church Road, Woodton	306, 1751	Support	Comments in support of SN0278: Woodton PC supports this site as a preferred site - suitable access off Church Road, close proximity to the primary school and links in well with the village centre;	The Council welcomes the comments in support of the allocation of preferred site SN0278 and notes the additional matters raised in these representations. The Council remains of the opinion that the site remains a suitable option for allocation within the VCHAP. It is recognised that promoter of the site	682	Reassess the site to consider the best options for Woodton - whether a single, larger development on SN0278 or a smaller scale development on the same site with

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			Woodton PC have expressed concerns about the current capacity of the primary school and suggest expansion of the primary school would be required to accommodate this growth; support of the landowner for development of this site - both for 25 dwellings (phase 1 to the north of the site) and as a larger area for 50 dwellings (phase 1 & 2 across the whole site) [indicative schemes submitted for both options]; promoted benefits for the development of the site include pedestrian linkages to the primary school (phase 1), pedestrian linkages to the centre of the village, community open space and amenity areas, dog walking areas, improvements to the primary school and opportunity for an onsite retail outlet (phases 1 & 2); vehicular access via Church Road with a possible revision of the speed limit to 30mph; and support of Saffron Homes for the delivery of the site; no anticipated infrastructure constraints on the site - AW have confirmed capacity [report submitted].	supports increased numbers and phased development of the wider site area however this alternative proposal will need to formally assessed following the agreed site assessment criteria and as such it is not appropriate to offer further comment on this proposal in response to Question 168. The Council notes that the promoter's representation makes reference to a number of public benefits that would be associated with the delivery of the site. Whilst the provision of pedestrian linkages would improve existing connectivity to the school it should be established whether this can be achieved either without utilising third party land or . Little detail has been provided at this time about the evidence and support for the other benefits offered in the representation. For example, community open space would require the support of the parish council if they would be expected to adopt these areas (as set out in current Council policy), it is unclear what the improvements to the school may be and it is has not been demonstrated that an additional shop within the village is either required or viable. Comments of the Parish Council relating to the existing capacity of the primary school are noted however detailed discussions with NCC Education have not suggested a capacity issue at this school and it is the Council's understanding that		added development opportunities on the opposite side of Church Road.

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				the numbers of children arising from local development could be accommodated within this school without further expansion.		
Preferred Site - (Northern End of) SN0278, Land south of Church Road, Woodton	1996, 2075, 2246	Comment	Technical comments submitted in respect of SN0278: Outside the IDD boundary but within the Waveney, Lower Yare and Lothingland IDB watershed catchment; major development - if surface water discharges within the watershed catchment of the Board's IDD this should be facilitated in line with the Non-statutory technical standards for SuDS; LLFA - green rating; no major ecological constraints identified from desk-top search - surveys, and biodiversity enhancement in accordance with policy required; and part of agricultural field bounded to east by a hedge (between site and recreation ground) (priority habitat); amber habitat zone for great crested newts (pond onsite) and in strategic GI corridor.	The Council welcomes the comments of the technical consultees and notes that so significant issues have been identified in the northern section of this site. The site promoter should note that it will for the developer of the site to ensure that an appropriate drainage strategy is prepared for the site and that this includes liaison with the correct third parties. The Council notes that these comments relate to development of the northern section of this site only (as per the Regulation 18 consultation details) however subsequent representations made by the promoter of the site indicate other areas within the site could also be considered for development. Should the Council reassess the site and conclude an alternative area is more appropriate for allocation it will be necessary to ensure that the relevant consultees are afforded an opportunity to review and/or update their comments. However, based on the comments received to date the Council does not anticipate any substantial constraints being identified within the wider site area.	681	If the area within the site proposed for allocation is amended following this consultation and following a review of the representations received, the Council should ensure that the relevant technical consultees are made aware of this alteration in the proposed allocation and provided with an opportunity to update their comments accordingly.

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QUESTION 169: Should any rejected sites be allocated?	307, 1801	Comment	Comments on rejected sites in Woodton: Woodton PC agree with the rejection of the six sites submitted for access and flooding reasons; With reference to SN1009 the highways and landscaping assessments are questionable as much of the undergrowth on the site is poor quality and unmanaged - albeit with some valuable trees and hedges mixed in; the site owner proposes undertaking management works to the vegetation; and we will notify you by the end of October 2021 of the outcome of these works so that the site can be reassessed.	The comments of the Parish Council are noted in response to Question 169. Support for site SN1009SL has been expressed in response to this question with the site promoter suggesting that existing vegetation along the site frontage could be removed to address both the landscaping and highway safety concerns raised during the site assessment process. The Council does not consider that this would be an appropriate course of action as the existing vegetation forms part of the rural approach into the settlement and is therefore an important characteristic of the streetscene. The respondent notes themselves the presence of some valuable trees and hedgerows within this vegetation. Furthermore, the Council continues to retain concerns about achieving safe access into this site and the significant works that would be required to address the technical comments received from NCC Highways. These comments also highlight concerns about visibility at the Hempnall Road/ B1332 junction as well as the lack of pedestrian connectivity to the primary school. It is noted that additional information was to be forthcoming in October 2021 from the promoter of the site however at the time of preparing this response in December 2021 no further information has been received. However, notwithstanding this, the Council remains of the opinion that this site is not suitable for development and should not be included as an extension	643	No action required.

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				to the existing settlement limit in the VCHAP.		

Wreningham, Ashwellthorpe and Fundenhall

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QUESTION 170: Settlement Limit	1159	Object	I think the historic ribbon development an unfortunate inheritance. A village designed from scratch would not be this way. We should move to a more clustered development with maximum use of open spaces.	The aim of the Plan is to allocate a series of smaller sites, typically within the range of 12 to 50 homes, across the 48 rural Village Clusters in South Norfolk, to accommodate at least 1,200 new homes in total. It reflects the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages.	570	No action or change required.
QUESTION 170: Settlement Limit	898, 980, 984, 1142, 1175, 1178, 1276, 1649	Mixed	Summary of Objections include: Overdevelopment of village; current Settlement Limit in Wreningham is still appropriate and should not be altered, Wreningham has already provided its fair share of development to meet housing targets, lack of existing infrastructure and limited facilities; school and GP are already full, highway safety and network concerns; Wymondham and Hethel road are unsuitable for development as too narrow, no footpaths and flooding issues,	The scale of development proposed in is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development. Allocating the sites within the Plan area ensures that enough land is available in appropriate locations to meet the growth targets in accordance with the requirements of the GNLP. With regards to any highway concerns, the NCC Highway Authority have been consulted and have provided their comments on the preferred and shortlisted sites and where appropriate provided mitigation methods. It is acknowledged that very few of the village clusters include a GP surgery, and are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity	559	No action or change is required,

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				issue at the school for local children. With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority who have advised where necessary appropriate mitigation measures. Details of drainage would be dealt with at the planning application stage.		
QUESTION 170: Settlement Limit	677	Object	Concern raised with regards to existing flooding issues and sewage capacity and how further development will cause further issues.	Issues of surface water flood risk have been considered in the site assessment for all sites, in conjunction with the relevant technical consultees, and where relevant migration measures have been provided. The Lead Local Flood Authority (LLFA) have raised significant concerns with preferred site SN2183 and as such the Council will seek to review the inclusion of the site based upon the identified flood risk.	550	No further action or change required,
QUESTION 171: Preferred Site - SN0017SL - Land to the west of New Road, Ashwellthorpe & SN0242 - Land to the west of New Road, Ashwellthorpe	1176	Object	The proposed site is not suitable for building houses on due to the ongoing flooding in the village, and all reports say more wet weather and heavy downpours should be expected as the new weather patteRn. The site does not have good access the small single track road giving access is not able to take that much heavy traffic .	With regards to the flooding concerns, discussions have taken place with the Lead Local Flood Authority who have advised that with appropriate mitigation measures in place development of this site would be achievable. NCC Highway Authority have provided comments on the site in terms of access and wider transport network. They have advised that visibility left from New Road to Wymondham Road is limited and have requested that prior to	574	Access visibility requirements to be confirmed prior to allocation.

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				allocation satisfactory visibility is confirmed.		
QUESTION 171: Preferred Site - SN0017SL - Land to the west of New Road, Ashwellthorpe & SN0242 - Land to the west of New Road, Ashwellthorpe	2003	Comment	Inaccuracy in the definition of this site within the 'Village Clusters' section of the 'Introduction and Background'. Here, the Settlement Limit Extension sites are defined as being "for sites smaller than 12 dwellings". On examination it is found that the following 'SL' site is not for fewer than 12 dwellings: SN0017SL Land to the west of New Road, Ashwellthorpe & SN0242 – Land to the west of New Road, Ashwellthorpe for an allocation of 12 dwellings.	SN0017SL considered in isolation would have been a Settlement Limit extension, and potentially still could be if there are reasons why the larger site (combined sites SN0017SL and SN0242) shouldn't progress. However, the Regulation 18 text is very clear that the site is being considered in combination with SN0242 as an allocation on a 0.89ha site.	566	No action or change required.
QUESTION 171: Preferred Site - SN0017SL - Land to the west of New Road, Ashwellthorpe & SN0242 - Land to the west of New Road, Ashwellthorpe	1997, 2072	Comment	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. The site is located within Source Protection Zone 3. The on-site flood risk contributes to a major flow path adjacent to the site. Flow lines indicate flood water flows north away from the site.	The comments made in relation to water management are noted and the requirement for geotechnical investigation. Site is affected by a Source Protection Zone 3 and developers will need to liaise with the Environment Agency to ensure that development / drainage does not adversely affect the water quality; however Zone 3 is the lowest risk	562	No action or change required.

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QUESTION 171: Preferred Site - SN0017SL - Land to the west of New Road, Ashwellthorpe & SN0242 - Land to the west of New Road, Ashwellthorpe	2167	Comment	NCC Highway comments: Visibility left from New Road to Wymondham Road is limited. It should be confirmed prior to allocation that this can be satisfactorily resolved.	The Council note the required to determine visibility can be achieved prior to allocation.	538	Access visibility requirements to be confirmed prior to allocation.
QUESTION 171: Preferred Site - SN0017SL - Land to the west of New Road, Ashwellthorpe & SN0242 - Land to the west of New Road, Ashwellthorpe	2247	Comment	NCC Ecologist comments: Green no major ecological constraints identified from desk-top search. Two agricultural fields part bounded/divided by hedges - (priority habitat) - losses should be avoided - minimised, and as a last resort, compensated. No other priority habitats identified onsite see MAGIC). Site in amber habitat zone for great crested newts. Site in SSSI IRZ, but residential development doesn't trigger consultation with Natural England (unless development 100 unites plus)	The Council acknowledge the comments made by the NCC ecologist. It is noted that consideration should be given to delivering Biodiversity Net Gain.	537	Consider the need to reflect the protection of hedgerows in any Policy for the site.
QUESTION 172: Preferred Site - SN2183 - Land south of Wymondham Road, Wreningham	1433	Support	We make the following comments in support of the site's allocation: Scheme would include range of dwelling sizes/types including affordable housing, vehicular and pedestrian access, open space and wetland area - will alleviate the surface water issues in the village. Would also present opportunity to increase biodiversity. Houses would be in keeping with	The Council acknowledge the support for the site and the information related to flood and highway concerns.	584	Liaise with the NCC highway Authority nd the LLFA in light of the updated information.

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			properties on opposite side of Wymondham Road. Vehicular access would be provided directly off Wymondham Road. Good visibility would be available from proposed access in both directions. Proposed development would benefit from good access to local services. The land is currently available for development and there are not considered to be any utilities infrastructure constraints.			
QUESTION 172: Preferred Site - SN2183 - Land south of Wymondham Road, Wreningham	450, 451, 584, 758, 804, 922, 983, 985, 1144, 1163, 1185, 1189, 1249, 1280, 1325, 1376, 1616, 1650, 1720, 1779	Object	Summary of Objections: Highway safety concerns: road infrastructure is not suitable for any more additional traffic, Many of driveways on Wymondham Road have poor visibility for access, no pavements. Development will significantly increases the risk of flooding in the village; sewage and surface flood School is full, no village amenities Site has same issues as those in village rejected; why not use brownfield sites Out of character and scale for a village of this size; Wreningham is a linear village with two small cul-de sacs of four houses. The designated housing number has been exceeded.	NCC Highways officers have provided technical advice relating to both site access and the impact of the proposed development on the wider highway network. In this instance, Highways have raised significant concerns with the proposed access via Wymondham Road which they consider to be of a limited width and without footway. It is not clear that acceptable visibility splays can be provided at the site access. In addition, the Lead Local Flood Authority) have also raised their concerns with the site; there is an on-site flood risk which is a major flow path which affects the eastern side of the site, extending west across the site as events increase. This includes the access to the site which appears to be heavily affected by the on-site flood risk. As a result the Council will need to review the inclusion of the site based upon the highway and flood risk concerns.	576	Highways and LLFA objection - review inclusion of site as Preferred.

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			Ecological impacts	Wrenningham has a basic range of basic services, including a primary school, village hall, recreation ground, public house and a bus service during peak hours, linking surrounding villages and larger centres. The Council acknowledges that there are some inherent tensions linked to the relative accessibility of a range of higher order services and goods in several locations compared to other. However, the Plan aims to reflect the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages selection of employment opportunities etc. It is acknowledged that very few of the village clusters include a GP surgery, and are reliant on nearby larger settlements for these. The County Council has confirmed that, taking into account falling rolls and the number of out of catchment pupils, there is not a capacity issue at the school for local children. The Council is also engaging with a number of service providers as part of the production of the plan, this includes Norfolk County Council in its roles as Education and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.		

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				With regards to the use of Brownfield land, the GNLP priorities the allocation of Brownfield sites in Norwich and other larger settlements; however, the housing requirements of the GNLP cannot be met without the use of Greenfield land. The alternative locations suggested are not considered suitable for various reasons, including: not being promoted for development, remote from services etc. The scale of development proposed in is within the objectives of the VCHAP and is considered to be reasonable for supporting the existing facilities and services within the development; 25 dwellings per hectare is not considered inappropriate in a rural context. The overall requirement for additional housing is considered in the GNLP, which is currently at Public Examination; the VCHAP needs to reflect the requirements of that Plan. Comments on the environmental impact have also been noted, however all development will be required to consider biodiversity net-gain on site and where appropriate developers will be required to undertake ecological surveys to establish the presence of protected species on a site. Development proposals for the site would then be required to include the appropriate mitigation measures identified in these surveys.		
QUESTION 172: Preferred Site -	2063	Comment	This site lies just to the north of the grade II* Poplars and grade II listed associated	Heritage assets were considered as part of the assessment of sites; however a	563	Complete an HIA to inform the allocation of

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SN2183 - Land south of Wymondham Road, Wreningham			barn. Therefore, any development of this site that the potential to impact upon the significance of these heritage assets through development within the setting of the assets. We have particular concerns about this site, leading us to question the very principle of development on the site. The extent of the historic settlement is clearly defined, and there are views of the roof of the Poplars across the field in question. Development would impact the setting of these assets.	Heritage Impact Assessment (HIA) of the site will undertaken. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.		the site including any mitigation, enhancement and policy wording.
QUESTION 172: Preferred Site - SN2183 - Land south of Wymondham Road, Wreningham	2168	Comment	NCC Highway comments: The highway access to the site would be via Wymondham Road which is of a limited width and without footway, it does not appear feasible to improve the road to a standard that would be appropriate to support development of the site. It is not clear that acceptable visibility splays can be provided at the site access. It is also considered that the Wymondham Road junction with Ashwellthorpe Road and Mill Lane is not of a suitable standard to support development traffic. Visibility is constrained from Wymondham Road to the right and there are no facilities for a safe pedestrian route across the junction to the school. It is likely that the Highway Authority would object to an application at this location and as such would request it is not allocated. In summary – if site remains in the Local Plan at the pre-submission (reg 19) stage this would result in the County Council as	The comments relating to highway concerns are noted and the inclusion of this site within the VCHAP will need to be reassessed, otherwise the Highway Authority will raise a Soundness Objection.	547	Review the inclusion of the site based upon the highway concerns,

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			Highway Authority raising a Soundness Objection			
QUESTION 172: Preferred Site - SN2183 - Land south of Wymondham Road, Wreningham	1998, 2143	Comment	Water management comments: Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. If surface water discharges within the watershed catchment of the Board's IDD, this discharge should be facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS). Infiltration potential is dependent on a complete geotechnical investigation, including BRE365 Soakaway Testing. Where possible, surface water infiltration should be utilised. The on-site flood risk is a major flow path in the 3.33%, 1.0% and 0.1% AEP events. It forms off-site in and affects the eastern side of the site, extending west across the site as events increase. Flow lines indicate this flood water flows southeast off of the site. Access to the site appears to be heavily affected by the on-site flood risk. A small area of the site is unaffected by flood risk (west and southwest).	The comments relating to the flood risk of this site are noted and the inclusion of this site within the VCHAP will need to be reassessed.	546	Review the inclusion of the site based upon the identified flood risk; site access appears to be heavily affected, only small area to the west and southwest is unaffected.
QUESTION 172: Preferred Site - SN2183 - Land south of Wymondham Road, Wreningham	2249	Comment	Green no major ecological constraints identified from desk-top search. Surveys, and biodiversity enhancement in accordance with policy required. Rough grassland part bounded by hedge - (priority habitat) - losses should be avoided - minimised, and as a last resort, compensated. No other priority habitats identified onsite see MAGIC). Site in amber	The Council acknowledge the comments made by the NCC ecologist; ecology reports required at planning application stage and consideration should be given to delivering Biodiversity Net Gain	545	No action or change required.

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			habitat zone for great crested newts and strategic GI corridor. Site in SSSI IRZ, but residential development doesn't trigger consultation with Natural England.			
QUESTION 173: Should any rejected sites be allocated?	1171	Object	The planning process seems arbitrary without consistent or coherent reasoning	Comments noted.	583	No action or change required.
QUESTION 173: Should any rejected sites be allocated?	1193	Comment	Recommended that the Council look at the site that was Spratts coaches in the centre of Wreningham. However, reiterate than any development should be of a similar density to existing housing, be contingent on improvement to the fabric of the school and road improvement at the Hethel/Church road junction noted elsewhere.	The Council acknowledges the comments made, however with regards to the previous Spratts Coaches site, this site was not promoted to the Council for review and therefore is not a consideration at this stage of the Plan.	549	No action or change required.
QUESTION 173: Should any rejected sites be allocated?	1191	Support	Support for a single dwelling development in the rejected site in Toprow. and support for limited density housing along Hethel Road and Wymondham Road.	With regards to the development of the aforementioned rejected sites, the Council is still of the opinion that these sites are not suitability for development. Amongst other constraints, these sites are considered to be distant from any Settlement Limit and is very remote from services.	548	No action or change.