



SOUTH NORFOLK VILLAGE CLUSTERS HOUSING ALLOCATIONS DOCUMENT

STATEMENT OF CONSULTATION

PART 3 – REG. 19 PUBLICATION

December 2023

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1. Introduction

- 1.1 This report details the publication and consultation that South Norfolk Council undertook on its proposed Village Clusters Housing Allocations Plan (VCHAP), in compliance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 Principally, it provides details of the number of representations made and a summary of the main issues raised within those representations, as required by Regulation 22(c) of the aforementioned legislation. The report also provides a brief response by South Norfolk Council to each of the main issues raised.
- 1.3 The report forms Part 3 of South Norfolk Council's Statement of Consultation, where Part 1 deals with the preliminary consultations undertaken when proposed allocations in the South Norfolk Village Clusters were being dealt with as part of the Greater Norwich Local Plan, and Part 2 deals with the subsequent consultations under Regulation 18, once this work had been transferred to South Norfolk Council.

2. Publication of the Village Clusters Housing Allocations Plan (Reg. 19)

Legislative requirements

2.1 Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 states:

'Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must—

- (a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and
- (b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).'

2.2 Regulation 35, as referred to in the excerpt above, makes specifications on the availability of documents for the purposes of this legislation, stating that a document is taken to be 'made available' by a local planning authority when it is:

- (a) made available for inspection, at their principal office and at such other places within their area as the local planning authority consider appropriate, during normal office hours, and
- (b) published on the local planning authority's website.

2.3 Regulation 20 allows any person to make representations on the local plan document referred to in Regulation 19 and specifies that any such representations must be received by the local planning authority by the end date specified in the statement of representations procedure.

2.4 The information below details how these legislative requirements have been met in the production of the South Norfolk Village Clusters Housing Allocations Plan.

Timetable for publication

2.5 The proposed Village Clusters Housing Allocations Plan was originally published between 9.00am on 23 January and 5.00pm on 6 March 2023.

2.6 Two days into the consultation period, it was discovered that two site assessments had not been published on the consultation website, and so the decision was taken to extend the representation period by two days. This fact was communicated to all who had received the original notification.

- 2.7 This constitutes a period of 6 weeks and two days, and thus complies with Regulation 17 where it states that the period for making representations must not be less than 6 weeks from the day on which the statement of representations procedure is published.

Consultees

- 2.8 Each of the specific and general consultation bodies that were consulted on the Regulation 18 draft of the VCHAP document were directly notified of the publication of the proposed submission documents and invited to submit representations.
- 2.9 A list of the specific consultation bodies consulted (including the 'Relevant Authorities') can be found in Appendix 1. These bodies were notified by email/letter, a copy of which can be found in Appendix 2.
- 2.10 In addition, all of the individuals and organisations registered on the Council's Local Plan consultation database (Opus Consult) were notified of the publication period, by email or letter.
- 2.11 This database comprises specific and general consultation bodies, interested individuals, organisations and businesses that have previously registered an interest in the development of the Greater Norwich Local Plan, the VCHAP, or both documents.
- 2.12 It also includes those individuals or organisations that have previously promoted sites for consideration, whether through the GNLP originally, or through South Norfolk Council during the development of the VCHAP.

Availability of documents and representation procedure

- 2.13 The consultation took the form of an online document to which consultees were directed via a URL, provided in their notification email/letter or via on the many forms of wider publicity (see below) concerning the publication of the VCHAP.
- 2.14 The online document was essentially the proposed submission version of the VCHAP, with consultation points alongside each paragraph (meaning that respondents could submit representations on any aspect of the plan).
- 2.15 The online and hard copy representation form asked respondents to state whether or not the Plan is legal and/or procedurally compliant and whether it meets the tests of soundness set out in the National Planning Policy Framework. It was made clear in the statement of representations procedure and in the representation form guidance note that any representations which do not address these questions may not be able to be considered during the independent examination of the plan. The statement of representations procedure, the representation form, and the representation form guidance notes feature as appendices 3, 4 and 5, respectively.

2.16 As well as being available online, the proposed VCHAP and other supporting documents (including representation forms, guidance notes and the statement of representations procedure) were made available at the following locations:

- South Norfolk Council offices – Thorpe Lodge, 1 Yarmouth Rd, Norwich
- The Octagon (South Norfolk Council) – Mere Street, Diss, Norfolk
- Libraries in South Norfolk
- Millennium Library - The Forum, Norwich

2.17 Alongside the proposed submission document, the Council made available a range of supporting documentation, both online and in hard copy at the locations specified above. These documents comprised:

- Statement of representations procedure
- Representation form
- Representation form guidance note
- Frequently asked questions
- Policy maps
- Review of carried forward allocations
- Duty to Co-operate statement
- Equality impact assessment
- Habitats Regulations assessment
- Health impact assessment
- Heritage impact assessments
- Landscape and visual assessments
- Site assessments
- Sustainability appraisal
- Viability appraisal
- Water cycle study
- Statement of consultation
- Strategic flood risk assessment

2.18 In common with the earlier Regulation 18 consultation, a virtual exhibition room was also established, using the same URL as for the previous exhibition (<https://vchap.exhibition.app>).

2.19 The exhibition link was included in notification letters/emails and in wider publicity undertaken by the Council to advertise the publication stage (see below).

2.20 The exhibition room included contextual and background information regarding the development of the proposed submission VCHAP document, including an outline of how the Council had arrived at the proposals within the proposed submission document, and links to the various supporting documentation and the proposed submission document itself.

- 2.21 The virtual exhibition was seen as providing a consistent approach to broadening digital engagement in the development of the VCHAP. During the publication period, the site attracted 2,626 users, with the majority (25%) of those belonging in the 45-54 age group. Those in the 55-64 and 65+ age categories each averaged between 16-19% of users, and those in the 25-34 and 35-44 age categories each averaged between 14-15% of users.

Additional publicity

- 2.22 In addition to the initiatives discussed above, further work was undertaken by the Council to publicise the Regulation 19 publication period and bring it to the attention of those with an interest in the matters addressed by the VCHAP.
- 2.23 Similar to the event undertaken at the start of the previous Regulation 18 consultation stage, the Council held a briefing event for South Norfolk's parish and town councils.
- 2.24 This briefing event was held in the Council Chamber at the Council's offices (then, Thorpe Lodge, 1 Yarmouth Rd, Norwich) on 26th January 2023, and it was simultaneously broadcast virtually, via Zoom, to attendees who weren't able to attend in person. 23 parish/town councillors registered to attend in person, and a number of others attended the briefing virtually.
- 2.25 The event provided an opportunity for Council officers to explain the background to the Regulation 19 publication stage and how the proposed submission VCHAP had developed since the previous Regulation 18 consultation. It also allowed parish and town council representatives to put questions to officers regarding the proposed Plan.
- 2.26 Other publicity included a public notice that was sent to libraries, GP surgeries and parish and town councils in the district, with a request for the notice to be placed on notice boards in these respective locations.
- 2.27 In addition, a press release was written and distributed to local media at the start of the consultation period. This press release was run in the Eastern Daily Press on 18th January 2023.
- 2.28 South Norfolk Council also produced several social media posts on Facebook and Twitter, throughout the publication period, alerting people to the document and inviting representations.

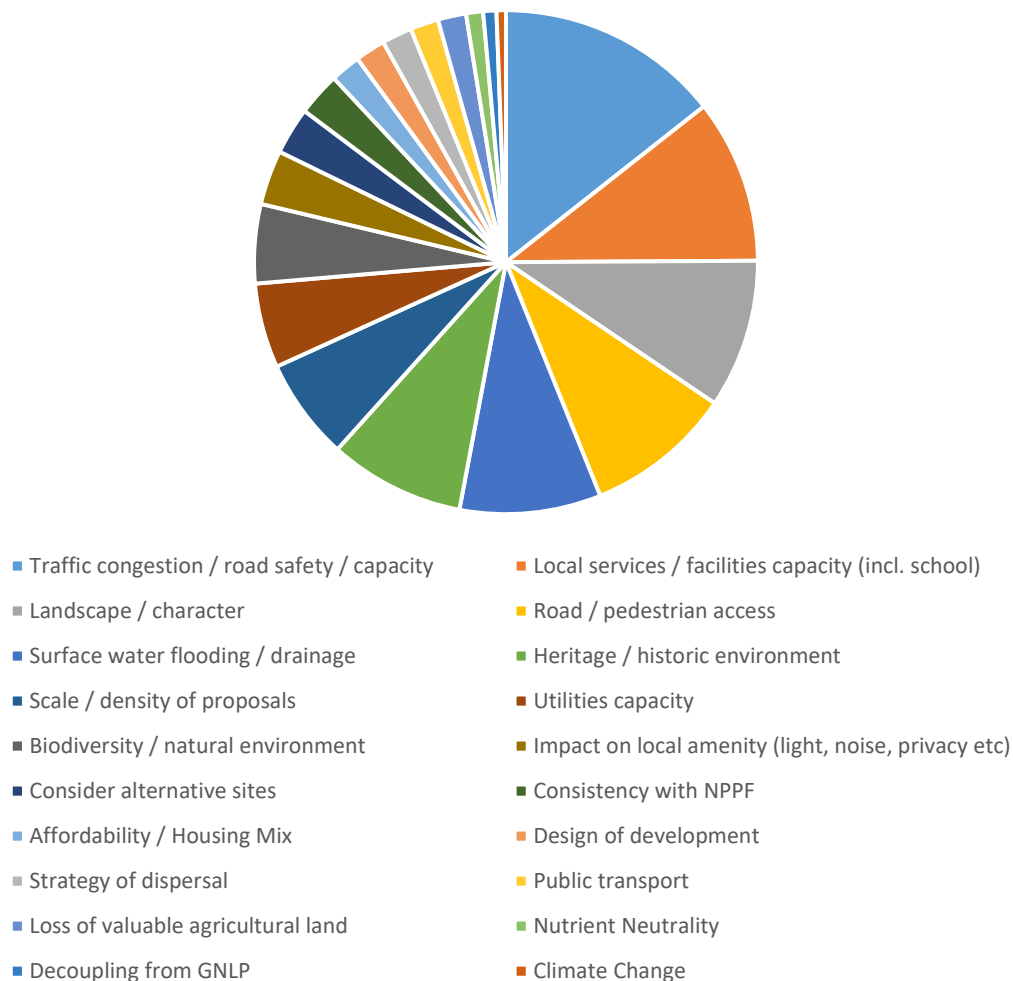
Submitted representations

- 2.29 In total, **983 representations** were submitted in relation to the proposed submission VCHAP document.
- 2.30 These were submitted by 399 respondents.
- 2.31 A summary of the main issues raised within these representations can be found in the next section.
- 2.32 A small number of the representations received were considered to be 'not duly made'. That is to say they did not include a response to either the matter of legal compliance, duty to co-operate or legal soundness (as set out in paragraph 2.15 of this document).
- 2.33 Where possible the Council sought to notify the authors of these representations that their responses were considered to be 'not duly made'. Many respondents chose to update their responses within the consultation timeframe as a direct consequence of this correspondence and these submissions were then accepted as duly made responses.
- 2.34 The Council has undertaken to review the outstanding 'not duly made' representations and summarise the key issues raised in these responses where they have not already been addressed in the main representations received and responded to. These will be reported to the Inspector(s) as part of the Examination in due course.

3. Summary of main issues raised in representations

- 3.1 A range of issues were raised within the Regulation 19 representations. Many of these issues replicate those identified within responses at the Regulation 18 consultation stage.
- 3.2 A summary of the issues raised and South Norfolk Council's responses to those issues (for each of the Cluster Areas where representations were made, as well as for other sections of the document, such as the Introduction, and that relating to the monitoring framework) can be found in Appendix 6.
- 3.3 In a similar fashion to Part 2 of the Statement of Consultation, a categorisation of the main issues raised in the Regulation 19 representations has been undertaken. Again, this has identified a number of key themes which emerge from the responses across all sections of the VCHAP document. The chart below illustrates these key themes (many of which are similar in nature and frequency to those identified following the Regulation 18 consultation) and shows which of these featured most often within the representations submitted.

Main Issues Raised in VCHAP Reg 19 Responses



- 3.4 The table on the following page provides a South Norfolk Council response to each of these identified themes, explaining in general terms how they have been considered in the development of the proposed submission VCHAP document.
- 3.5 The consideration of these issues, as well as those identified during the earlier, Regulation 18 consultation, has enabled South Norfolk Council to develop the Village Clusters Housing Allocations Plan in a manner which best addresses the specific growth needs of the Village Cluster areas across the district.

Table highlighting main issues raised during Reg. 19 Publication stage and South Norfolk Council's response

Issue Raised	South Norfolk Council 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 and following the Regulation 19 consultation. 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. Meetings were also held to discuss specific issues that arose relating to comments raised during the Regulation 19 consultation. All sites that were submitted for consideration as part of the Regulation 19 consultation were subject to the same process as those submitted at previous stages. 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 are reflected in the site-specific planning policy text. 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.

Issue Raised	South Norfolk Council Response
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 and following the Regulation 19 consultation 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. The Education Authority has also confirmed a trend for falling birth rates in the county which is also reducing pressure on new school places throughout the county. 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 and could be at risk of viability issues. The ICS has expressed some concerns about the level of growth proposed in the District. However, the Council recognises this to be 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 locally. The Council has sought engagement with the ICS throughout the process and has highlighted locations in which growth is planned; these discussions have taken place to help inform resource planning for the ICS, including (but not limited to) facilities within existing GP practices and healthcare practitioners operating within the community. 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. Generally, utilities providers such as Anglian Water have stated that there is capacity for the level of development being proposed in the VCHAP. In the few areas where concerns over capacity have been raised, these concerns have not been at a level where the amount of development being allocated has needed to be significantly reduced or even removed, and mitigation measures have been identified. Where relevant, these have been included within the policies in the VCHAP.

Issue Raised	South Norfolk Council Response
Impacts on the landscape and the form and character of the settlement	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 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 were specifically considered by the Council's respective Design, Landscape and Arboricultural 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 were included within the site-specific policy allocation text as appropriate. The site assessments 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 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 however sought to minimise these effects, avoid harmful impacts and wherever possible enhance the existing situation.

Issue Raised	South Norfolk Council Response
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. 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) was the opportunities available to create safe vehicular and pedestrian access both into and from the sites. This continued following the Regulation 19 consultation where specific issues were raised by the HA. VC ROC2 was removed from the VCHAP due to a safe vehicular access not being achievable. 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	South Norfolk Council Response
Surface water flooding and site drainage	Concerns were raised in response to the Regulation-19 consultation about the impact that new development will have on drainage and flooding in South Norfolk. 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. In some instances site boundaries have been drawn to specifically exclude areas noted as potentially being at risk from surface water flooding. Specific issues that were raised during the Regulation 19 consultation were also discussed with technical consultees. All of these processes have resulted in mitigation measures being identified for some sites and as appropriate which have been 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	South Norfolk Council 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 a 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, specifically 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 and those carried over into the Regulation 19 consultation. 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 were subsequently completed and used to inform the site-specific policy allocation text as appropriate. Further comments were received from HE during the Regulation 19 consultation. These comments were discussed further during an in-person meeting with Historic England which also included joint site visits to a number of sites. These comments have been actioned alongside further discussions with our Senior Heritage and Design Officer. VC TAS1 has been reduced by 5 dwellings due to these actions.

Issue Raised	South Norfolk Council Response
The scale and density of growth / specific proposals	A number of representations were concerned with 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-19 consultation stage. 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 starting point for site density, although where it is considered appropriate the density of a site has been adjusted to reflect its context within the final site-specific policy allocation text. As set out in the Reg-19 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 clearly sets 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. Some sites have however been subject to a review of housing numbers following third party comments and observations and further consideration of the site itself. For example, VC TAS1 has been reduced by 5 dwellings to consider its impacts on the historic environment. Smaller sites (fewer than 12 dwellings) have also come forward following updates to some of the existing Local Plan Settlement Limits. Detailed proposals for development on these sites will 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.

Issue Raised	South Norfolk Council Response
The capacity of local utilities infrastructure (incl. sewerage, water supply, broadband)	Concerns were raised regarding the capacity of local utilities infrastructure to be able to accommodate new development. The majority of concerns related to wastewater and sewerage. However other concerns were also raised. 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 highlights any particular areas of concern that may exist in the wastewater network. The Council has also liaised with Anglian Water to discuss network capacity and infrastructure issues. Any sites that require specific mitigation have had this mitigation included within the site specific policies. Specific concerns raised by local residents during the Regulation 19 consultation have also been proactively raised by the Council with Anglian Water and actioned where appropriate. 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.
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 site assessments where relevant. All requirements have been reflected, as appropriate, in the site-specific policy background and allocation text. Both Norfolk Wildlife Trust and Natural England are consultees in the Development Plan process and were contacted during the preparation of the site assessments. They were also contacted during both the Regulation 18 and 19 consultations. In addition, the VCHAP is supported by a Habitats Regulation Assessment in accordance with the Habitats Regulations (2017) to assess the potential effects of the plan on designated habitats.

Issue Raised	South Norfolk Council Response
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 relevant development management policies at the time, including the impact of development on the amenities of existing residents. It should be noted that following the Regulation 18 consultation the decision was taken to not include general Development Management policies within the VCHAP as these policies are included elsewhere within the planning policy framework. Where particular issues have been identified through the site assessment process or in response to the consultation process, (such as changes in levels, orientation of properties and/or a predominance of single-story dwellings adjoining a site), these have been addressed in the site-specific policies where appropriate.
Need for consideration of alternative sites	Representations were submitted by both members of the public and landowners stating that the Council should reconsider other sites that were submitted for the VCHAP and that these should be allocated within the Plan. The Council conducted a robust site assessment process which all sites submitted for consideration were subject to. Any sites that were determined to have detrimental impacts that could not be mitigated were deemed to not be acceptable for development. The remaining sites were determined to be either 'Preferred Sites' or 'Reasonable Alternatives' and were given appropriate consideration based on their own merits. The Council has been in regular contact with technical consultees to establish if there were any further considerations for these sites. A number of sites were resubmitted or were subject to additional supporting evidence in response to the Regulation-19 publication period. This information has been considered by both the Council and the relevant technical consultees where appropriate. The Council states that the sites being proposed for allocation are considered to be the most appropriate for inclusion based on this process.

Issue Raised	South Norfolk Council Response
Need for consistency with the National Planning Policy Framework (NPPF)	The VCHAP has been prepared in accordance with the requirements set out in the National Planning Policy Framework and is considered by the Council to meet these requirements. For example, Section 5 of the NPPF outlines the Local Planning Authorities requirements for delivering new homes, such as providing a number of smaller sites (Paragraph 69) and maintaining the supply and delivery of homes (paragraphs 74 – 77). These requirements support to principle of the VCHAP. Specifically, paragraph 79 of the NPPF states that ‘housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.’. This underpins the VCHAP and the plan has been prepared regarding the need to support the social sustainability in rural areas whilst acknowledging the larger and more dispersed rural geography of South Norfolk, as set out in the Greater Norwich Local Plan. The VCHAP forms one element of the larger Development Plan for Greater Norwich alongside the GNLP. The largest amount of growth is focussed within or adjacent to the urban fringe, the Main Towns and most accessible villages. Therefore, when considered comprehensively the emerging Development Plan has a very strong emphasis on placing growth in the most accessible locations in accordance with the NPPF.

Issue Raised	South Norfolk Council Response
The affordability / mix of housing	The representations received in relation to this topic were split between respondents seeking increased numbers of affordable housing, fewer affordable housing units or alternative housing mixes on sites. However, it should be noted that following the Regulation 18 consultation the decision was taken to remove general Development Management policies from within the VCHAP. A specific policy relating to affordable housing/ mix of housing will be set out in the GNLP and it was determined that this did not need to be repeated within the VCHAP. 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 latest evidence. 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.
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, has included design requirements in the site-specific policy allocation text for certain sites. The design requirements set out in these policies have been informed by the assessments and 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 any adopted Neighbourhood Plans, and will be subject to full assessment against these at the planning application stage. It should be noted that following the Regulation 18 consultation the decision was taken to not include general Development Management policies within the VCHAP. These policies are set out elsewhere in the planning policy framework and it was determined that they did not need to be repeated within the VCHAP.

Issue Raised	South Norfolk Council Response
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. The GNLP is currently consulting on its Main Modifications and is therefore at an advanced stage of preparation. No significant modifications have been proposed that affect the strategy of the VCHAP. 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.
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 was also 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. As a rural District it is also acknowledged that residents have a higher level of car ownership.

Issue Raised	South Norfolk Council Response
Loss of valuable agricultural land	As part of the site assessment process the Council 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 also 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 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.
Nutrient Neutrality	The Council acknowledges the concerns raised relating to the introduction of Nutrient Neutrality requirements in certain areas of South Norfolk. The Council also acknowledges that these issues relate to both the impact on new development on the natural environment as well as the impact of Nutrient Neutrality on the delivery of new housing. The Council is working with neighbouring authorities and relevant partners to establish a mitigations strategy to respond to the need to consider Nutrient Neutrality. This includes the consideration and preparation of the Norfolk Environmental Credits Joint Venture. However, the VCHAP is a long-term planning document that sets out the Councils plan for housing delivery in the Village Clusters up to 2038 as the Council is required to prepare even with Nutrient Neutrality in place. Nutrient Neutrality is not considered a material issue that could undermine the principle of development and therefore the Council is still required to produce a development plan for the area to meet the housing needs identified for South Norfolk. While Nutrient Neutrality may have an impact on the delivery of new housing in the short term whilst the mitigation strategy is being developed, it is considered that once this is in place this impact will be negated.

Issue Raised	South Norfolk Council Response
The 'de-coupling' of the South Norfolk Village Clusters from the GNLP	The principle of the VCHAP was established through the preparation of the Greater Norwich Local Plan. The GNLP states that the VCHAP has been prepared due to the nature of South Norfolk as much larger and with a much more rural nature than the other areas within the GNLP area. Therefore, the VCHAP will allow this to be recognised and provide a strategy of development that is appropriate for this area, whilst also being incorporated as part of the overall strategy for the Greater Norwich area. At the time of writing, the GNLP is currently conducting its Main Modifications consultation and is therefore at a late stage in its preparation. While the VCHAP is not at this stage yet, the general principle for the VCHAP and its preparation are still included within the GNLP and have not changed since the beginning of the preparation of the VCHAP.
Impact of housing development on climate change	The Council takes its role within the climate change agenda seriously. 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. It should be noted that following the Regulation 18 consultation the decision was taken to not include general Development Management policies within the VCHAP. These policies are set out elsewhere in the planning policy framework and it was determined that they did not need to be repeated within the VCHAP. The VCHAP is part of a 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 and lengthier journeys to schools, recreational opportunities etc.

Appendix 1: 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 2: Email/letter notification to specific and general consultation bodies

<Recipient Address>

Place Shaping Manager - Planning
South Norfolk and Broadland Councils
Thorpe Lodge
1 Yarmouth Road
Norwich
NR7 0DU

Please ask for: **Paul Harris**
Direct Line: 01603 430444

Email: paul.harris@southnorfolkandbroadland.gov.uk

Dear Sir / Madam,

South Norfolk Village Clusters Housing Allocations Plan- Regulation 19 Publication

The South Norfolk Village Clusters Housing Allocations Plan (VCHAP) will be published **between 9am on Monday 23 January and 5pm on Monday 6 March 2023**, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Representations are invited on the legal compliance and soundness of the Plan. Any representations submitted must be received by South Norfolk Council within this timeframe.

The purpose of the VCHAP is to deliver growth that will support the vitality of the rural communities of South Norfolk. The proposed plan allocates housing sites in the South Norfolk village cluster settlements, in order to meet the minimum requirements set out in the Greater Norwich Local Plan (GNLP). It also defines the Settlement Limits for the village cluster settlements. A list of the village cluster settlements can be viewed at www.southnorfolkandbroadland.gov.uk/vchap.

During the publication period, the proposed Village Clusters Housing Allocations Plan will be available to view at the following locations:

- Online at - www.southnorfolkandbroadland.gov.uk/vchap
- **South Norfolk Council offices** - Thorpe Lodge, 1 Yarmouth Rd, Norwich, NR7 0DU (open Mon-Fri: 8.30am-5pm)
- **The Octagon** - Mere Street, Diss, Norfolk, IP22 4AH (open Mon-Fri: 9am-5pm)
- **Libraries in South Norfolk** - visit the Norfolk County Council website for details of your local branch (www.norfolk.gov.uk/libraries-local-history-and-archives)
- **Millennium Library** - The Forum, Millennium Plain, Norwich NR2 1AW (open Mon-Fri: 10am-7pm; Sat: 9am-7pm; Sun: 10.30am-4.30pm)

Supporting documents are also available to view online at the above locations. Further information and background material will also be available through a 'virtual exhibition'

which can be accessed during the publication period at: <https://vchap.exhibition.app>.

Anyone wishing to submit a formal representation on the content of the plan may do so, **in writing, and before 5.00pm on 6th March 2023**. These can be submitted online, via the website listed above or using one of our hard copy representation forms which are available at the locations listed above. This will help ensure that submitted representations are in the prescribed format and can be taken into account in the examination of the plan. Completed hard copy forms should be posted to the South Norfolk Council office address listed above.

For further information and enquiries, please contact the Council's Place Shaping Team on (01508) 533805 or at localplan.snc@southnorfolkandbroadland.gov.uk.

Yours faithfully

A handwritten signature in black ink, consisting of a stylized 'P' followed by a series of vertical and diagonal strokes.

Paul Harris

Place Shaping Manager - Planning
South Norfolk and Broadland Councils

Appendix 3: Statement of Representations Procedure

South Norfolk Village Clusters Housing Allocations Plan

(Regulation 19 Pre-submission Draft)

Statement of Representations Procedure

Subject Matter and Area Covered

The Village Clusters Housing Allocations Plan (VCHAP) has been produced by South Norfolk Council. Its purpose is to deliver growth that will support the vitality of the rural communities of South Norfolk. The proposed VCHAP allocates housing sites in the South Norfolk village cluster settlements, in order to meet the minimum requirements set out in the Greater Norwich Local Plan (GNLP).

The Plan also defines the Settlement Limits for the village cluster settlements. These limits mark the extent of the existing built-up area of villages. The Settlement Limits have been updated to reflect recent developments or permission for development that have been granted. In addition, in certain instances the VCHAP proposes changes to the Settlement Limits to provide further opportunities for smaller developments in addition to the proposed development allocations.

The Plan covers each of the Village Cluster parishes in South Norfolk, excluding the parts of those parishes falling within the Broads Authority Executive Area.

Village Cluster parishes are all parishes within the district, except for:

Chedgrave; Colney; Costessey; Cringleford; Diss; Easton; Framingham Earl; Framingham Pigot; Hethersett; Hingham; Loddon; Long Stratton; Poringland; Redenhall w. Harleston; Trowse w Newton; and Wymondham.

The document also excludes housing sites in: parts of Roydon and Heywood that relate to the settlement of Diss; parts of Tharston & Hapton that relate to the settlement of Long Stratton; and parts of Caistor St Edmund & Bixley and Stoke Holy Cross that relate to the settlement of Poringland/Framingham Earl.

This is the 'Regulation 19 Pre-submission Draft' of the Plan – the document that South Norfolk Council intends to submit to the Planning Inspectorate, for examination.

Publication Period

The Village Clusters Housing Allocations Plan will be published between **9.00am on Monday 23 January and 5.00pm on Monday 6 March 2023**. Representations are invited on the legal compliance and soundness of the Plan. Any representations submitted must be received by South Norfolk Council within this timeframe.

How to view the documents

During the publication period, the proposed Village Clusters Housing Allocations Plan will be available to view at the following locations:

- Online at - www.southnorfolkandbroadland.gov.uk/vchap
- **South Norfolk Council offices** – Thorpe Lodge, 1 Yarmouth Rd, Norwich, NR7 0DU (open Mon-Fri: 8.30am-5pm)
- **The Octagon** – Mere Street, Diss, Norfolk, IP22 4AH (open Mon-Fri: 9am-5pm)
- **Libraries in South Norfolk** – visit the Norfolk County Council website for details of your local branch (www.norfolk.gov.uk/libraries-local-history-and-archives)
- **Millennium Library** - The Forum, Millennium Plain, Norwich NR2 1AW (open Mon-Fri: 10am-7pm; Sat: 9am-7pm; Sun: 10.30am-4.30pm)

Supporting documents are also available to view online at the above locations. Further information and background material will also be available through a ‘virtual exhibition’ which can be accessed during the publication period at: <https://vchap.exhibition.app>.

Making Representations

Anyone wishing to submit a formal representation on the content of the Plan may do so, **in writing, and before 5.00pm on 6th March 2023**. Late representations cannot be accepted.

Representations can be submitted online, via www.southnorfolkandbroadland.gov.uk/vchap or using one of our hard copy representation forms which are available at the locations listed above. This will help ensure that submitted representations are in the prescribed format and can be taken into account in the examination of the plan. Completed hard copy forms should be posted to the South Norfolk Council office address listed above.

The Council would strongly advise anyone wanting to make representations to read the Representation Guidance Note, available at the locations specified above, before completing and submitting their representation.

The Council recommends that representations are made online, through the online consultation portal which is available via the web address above.

Representations must relate to the whether or not the Plan is legally and/or procedural compliant and whether it meets the tests of soundness set out in the National Planning Policy Framework. This is explained further in the Representation Form Guidance Note. Representations that have not been made in accordance with the Representation Form Guidance Note may not be able to be considered during the future independent examination of the VCHAP.

All appropriately made representations received will be submitted to the Secretary of State, together with a summary of the main issues raised during the representations period and considered as part of a public Examination by an independent Planning Inspector.

Requests to be notified

The Representation Form (online and hard copy) allows you to request to be notified of any of the following:

That the Village Clusters Housing Allocations Plan has been submitted for independent examination;

That the recommendations of the person appointed to carry out the independent examination of the Village Clusters Housing Allocations Plan have been published;

That the Village Clusters Housing Allocations Plan has been adopted.

For further information, please contact South Norfolk Council's Place Shaping Team on (01508) 533805 or at localplan.snc@southnorfolkandbroadland.gov.uk.

Appendix 4: Representation Form

South Norfolk Village Clusters Housing Allocations Plan

(Regulation 19 Pre-submission Draft)

Publication Stage Representation Form

This form enables you to submit a representation(s) regarding the proposed Village Clusters Housing Allocations Plan. The Council is encouraging respondents to view the Plan and submit representations online, at southnorfolkandbroadland.oc2.uk. However, this Representation Form is available to complete electronically or in hard copy, for those that wish to respond in this way.

Before completing this form, please ensure you have read South Norfolk Council's Representation Form Guidance Note, available alongside this Representation Form.

Please ensure you return your completed Representation Form to South Norfolk Council by 5.00pm on Monday 6th March 2023.

Completed forms should be posted to:

Place Shaping Team, South Norfolk Council, Thorpe Lodge, 1 Yarmouth Rd,
Norwich, NR7 0DU

Email: localplan.snc@southnorfolkandbroadland.gov.uk

Please refer to the Council's Privacy Statement at www.southnorfolkandbroadland.gov.uk/vchap before completing this form.

This form has two parts:

- Part A –** Personal Details: this only needs to be completed once.
- Part B –** Your Representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A – Personal Details

1. Respondent Details

(N.B. If an agent is appointed, please complete only the Title, Name and Organisation [if applicable] fields, below, but complete the full contact details of the agent in section 2)

Title / Name:	
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

2. Agent Details (if applicable)

Title / Name:	
Job Title:	
Organisation / Company:	
Address:	
Postcode:	
Tel No:	
E-mail:	

Part B – Your Representation(s)

(Please use a separate sheet for each representation)

3. To which part of the document does your representation relate?

Paragraph No.		Policy No.		Policies Map	

4. Do you consider the proposed Village Clusters Housing Allocations Plan is:

- i. **Legally compliant**
- ii. **Sound**
- iii. **Complies with duty to co-operate**

(Please tick as appropriate)

YES	NO

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

(Continue on a separate sheet if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Please note: in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No , I do not wish to participate in hearing session(s)	
Yes , I wish to participate in hearing session(s)	

Please note: while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Appendix 5: Representation Form Guidance Notes

South Norfolk Village Clusters Housing Allocations Plan

(Regulation 19 Pre-submission Draft)

Representation Form Guidance Note

January 2023

South Norfolk Council has published its proposed Village Clusters Housing Allocations Plan, in accordance with Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations 2012. The document is now subject to a period whereby anyone may make a formal representation relating to its 'soundness' and/or its legal and procedural compliance. This period commences at **9.00am on Monday 23 January** and finishes at **5.00pm on Monday 6 March 2023**.

All representations must be received in writing or electronically by this deadline. Only representations received within the consultation period have a statutory right to be considered by the Inspector during the subsequent examination of the Local Plan.

The Village Clusters Housing Allocations Plan, all supporting documents, and further information can be found at www.southnorfolkandbroadland.gov.uk/vchap.

This guidance note is intended to assist you in completing the representation form. Please read the note thoroughly before completing the form.

Data Protection & Privacy

Please view the Council's [Privacy Statement](#) before submitting a representation, for details of how the Council will process, use and share the information you provide, for the purposes of developing the Village Clusters Housing Allocations Plan.

Any representation(s) made will subsequently be copied to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector). Representation details will also be made available online via South Norfolk Council's website, as set out in the Privacy Statement. Personal contact details for members of the public (other than names) will be redacted, as described within the Statement.

To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the Plan. Therefore, any representations submitted will be treated as public and South Norfolk Council will not be able to accept anonymous representations.

The Planning Inspectorate has also published a [Privacy Statement](#) on how they manage personal information.

1. Introduction

- 1.1 The South Norfolk Village Cluster Housing Allocations Plan has been published by South Norfolk Council, as the local planning authority (LPA), in order for representations to be made on it before it is submitted for examination by a Planning Inspector. The Planning and Compulsory Purchase Act 2004, as amended, [PCPA] states that the purpose of the examination is to consider whether the plan complies with the relevant legal requirements, including the duty to co-operate, and is sound. The Inspector will consider all representations on the plan that are made within the period set by South Norfolk Council.
- 1.2 To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. South Norfolk Council will therefore ensure that the names of those making representations can be made available (including publication on the Council's website) and taken into account by the Inspector.

2. Legal Compliance and Duty to Co-operate

- 2.1 You should consider the following before making a representation on legal compliance:
 - The Village Cluster Housing Allocation Plan has been included in the South Norfolk current Local Development Scheme [LDS]. The LDS is effectively a programme of work prepared by the LPA, setting out the plans it proposes to produce and the key stages that should be followed. South Norfolk Council's LDS is available on the Council's website: www.southnorfolkandbroadland.gov.uk/future-development and available at its main offices. You may wish to consider whether you think the plan has been produced in accordance with the Council's LDS.
 - The process of community involvement for Village Cluster Housing Allocation Plan should be in general accordance with the LPA's Statement of Community Involvement [SCI]. The SCI sets out the LPA's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications. South Norfolk Council's SCI can be found here: www.southnorfolkandbroadland.gov.uk/future-development. You may wish to consider whether you think the plan has been produced in accordance with the Council's SCI.
 - South Norfolk Council is required to provide a Sustainability Appraisal [SA] report when it publishes a plan such as the Village Cluster Housing Allocations Plan. This should identify the process by which SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. SA is a tool for assessing the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The SA prepared by South Norfolk Council to

accompany the Village Cluster Housing Allocations Plan has been published as part of supporting document alongside the Consultation.

- The Village Cluster Housing Allocations Plan should also comply with all other relevant requirements of the PCPA and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended [the Regulations].

2.2 You should consider the following before making a representation on compliance with the duty to co-operate:

- Section 33A of the PCPA requires South Norfolk Council to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. South Norfolk Council is expected to provide evidence of how it have complied with the duty. Non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector cannot recommend adoption of the plan.

3. Soundness

3.1 The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). Plans are sound if they are:

- **Positively prepared** – providing a strategy which, as a minimum seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** - deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

3.2 If you think the content of the Village Cluster Housing Allocation Plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy?
- Is the issue with which you are concerned already covered by another policy in this plan?
- If the policy is not covered elsewhere, in what way is the plan unsound without the policy?

- If the plan is unsound without the policy, what should the policy say?

4. General advice

- 4.1 If you wish to make a representation seeking a modification to a plan or part of a plan you should set out clearly in what way you consider the plan or part of the plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria highlighted above. Your representation should be supported by evidence wherever possible. It will be helpful if you also say precisely how you think the plan should be modified.
- 4.2 You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the plan has been submitted for examination may only be made if invited by the Inspector, based on the matters and issues he or she identifies.
- 4.3 Where groups or individuals share a common view on the plan, it would be very helpful if they would make a single representation which represents that view, rather a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.
- 4.4 Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.

Appendix 6: Summary of representations and South Norfolk Council responses

Introduction

The following tables set out a summary of representations and issues raised during the Regulation 19 publication period relating to the proposed Village Clusters Housing Allocations Plan (VHCAP), which took place between January and March 2023. The tables also include responses by South Norfolk Council to the issues raised.

Each table, below, relates to a different Village Cluster chapter of the VCHAP and there are also tables relating to the Introduction, the Objectives, and the Monitoring Framework chapters of the Plan. Representation summaries are set out within each table by the specific paragraph or policy that they relate to within that chapter.

Please use 'Bookmarks' to navigate between different sections.

Introduction & Background

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
A. Introduction and Background, A.1.	2322	Object	Challenge the decoupling of the VCHAP from the rest of the GNLP as being unsound. The GNLP Regulation 19 consultation commenced before the VCHAP Regulation 18 consultation despite the Local Development Scheme stating that the VCHAP would be consulted on in February/March 2021 yet took place later in year. Local Plans can contain different documents, but to be sound the GNLP and VCHAP should follow the same or very similar timetable, otherwise it is impossible to judge whether the two (or more) documents are based on proportionate evidence. The outcome of the GNLP's Examination on challenges around issues related to the VCHAP is currently unknown and therefore its soundness can be questioned. Challenges to the GNLP included questioning the housing numbers, which includes the 1,228 in the draft VCHAP, within a total delivery target of 49,492 by 2038. Additional housing will be provided by windfall development which will be in excess to that accounted for in the 49,492 figure, as only 1,296 windfall dwellings have been included despite forecasting that 4,450 windfalls during the plan period. Sites already allocated by the current Local Plan should be delivered before there is any consideration of additional new sites, including all of those within the VCHAP. Any newly allocated sites will be in less sustainable locations and therefore make it more difficult to adhere to Climate Change targets. The VCHAP disperses housing growth in largely less-sustainable car-dependent locations, with few employment opportunities. The development of greenfield sites, often on Best and Most Versatile (BMV) agricultural land, should be avoided. The two plans should run to the same timetable to make them sound. The inclusion of unnecessary housing numbers within the VCHAP in unsustainable locations makes the VCHAP unsound.	To address these issues and to make the two plans sound they should run to the same timetable. As outlined the inclusion of unnecessary housing numbers within the VCHAP in unsustainable locations also makes the VCHAP unsound and therefore it should not be adopted.	The Council does not consider the issues raised to relate to the soundness of the Plan. The principle of the VCHAP was established through the preparation of the Greater Norwich Local Plan. Paragraphs 30 and 31 of the GNLP state that the VCHAP has been prepared due to the nature of South Norfolk being much larger and having a much more rural nature than the other areas within the GNLP area. Therefore, the VCHAP will allow this to be recognised and provide a strategy of development that is appropriate for this area, whilst also being incorporated as part of the overall strategy for the Greater Norwich area. The hearing sessions for the GNLP have now been completed, including those relating to housing numbers. In a letter from the Inspectors dated 9th August it is stated that the next steps will be the preparation of the final version of the GNLP including the modifications. This will then need to be consulted on. No additional hearings are anticipated. The GNLP is therefore at an advanced stage of preparation. Any changes that could result through the final stages of the plan preparation will be considered as the VCHAP continues through its own preparation including the eventual examination. Therefore the different timescales for both plans is not considered to be an issue that relates the soundness of the plan. Paragraph 79 of the NPPF states that 'housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.'. This underpins the VCHAP as stated in paragraph A.6. The plan has been prepared regarding this element of the NPPF to support the social sustainability in rural areas whilst acknowledging the larger and more dispersed rural geography of South Norfolk, as set out in the Greater Norwich Local Plan. The Council is aware of the tensions than can exist when seeking sustainable allocation sites within a predominantly rural area.	1440	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
					Section 11 of the NPPF sets out the Local Authorities requirements for making the effective use of land, including making as much use as possible of brownfield land (paragraph 119). However, it also states that Local Authorities must meet their objectively assessed needs. The use of brownfield land has been given weight through the site assessment process, however it is not possible for the Council to meet these needs exclusively through the use of brownfield land, therefore development on greenfield land is required. The site assessments have included consideration of the Agricultural Land Classification and the Council have have sought to avoid higher grade land where possible.		

A. Introduction and Background, A.1.	3063	Object	Although welcome the progression of the VCHAP, it is felt this should be considered at the same time as the rest of the GNLP. It remains difficult to comprehend that two interrelated documents are being considered on separate timetables. Especially as the VCHAP must deliver a minimum of 1,200 dwellings to support the GNLP meeting its need of over 49,000 dwellings over the plan period. These representations conclude that the VCHAP will unlikely deliver the 1,200 dwellings required, and in turn will significantly undermine the GNLP that is already being drastically constrained by the Nutrient Neutrality issue.	No changes submitted.	The Council does not consider the issues raised to relate to the soundness of the Plan. The principle of the VCHAP was established through the preparation of the Greater Norwich Local Plan. Paragraphs 30 and 31 of the GNLP state that the VCHAP has been prepared due to the nature of South Norfolk being much larger and having a much more rural nature than the other areas within the GNLP area. Therefore, the VCHAP will allow this to be recognised and provide a strategy of development that is appropriate for this area, whilst also being incorporated as part of the overall strategy for the Greater Norwich area. The hearing sessions for the GNLP have now been completed, including those relating to housing numbers. In a letter from the Inspectors dated 9th August it is stated that the next steps will be the preparation of the final version of the GNLP including the modifications. This will then need to be consulted on. No additional hearings are anticipated. The GNLP is therefore at an advanced stage of preparation. Any changes that could result through the final stages of the plan preparation will be considered as the VCHAP continues through its own preparation including the eventual examination. Therefore the different timescales for both plans is not considered to be an issue that relates the soundness of the plan. Paragraph 79 of the NPPF states that ‘housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.’. This underpins the VCHAP as stated in paragraph A.6. The plan has been prepared regarding this element of the NPPF to support the social sustainability in rural areas whilst acknowledging the larger and more dispersed rural geography of South Norfolk, as set out in the Greater Norwich Local Plan. The Council is aware of the tensions than can exist when seeking sustainable allocation sites within a predominantly rural area. Section 11 of the NPPF sets out the Local Authorities requirements for making the effective use of land, including making as much use as possible of brownfield land (paragraph 119). However, it also states that Local Authorities must meet their objectively	1439	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
					assessed needs. The use of brownfield land has been given weight through the site assessment process, however it is not possible for the Council to meet these needs exclusively through the use of brownfield land, therefore development on greenfield land is required. The site assessments have included consideration of the Agricultural Land Classification and the Council have sought to avoid higher grade land where possible.		
A. Introduction and Background, A.1.	2282, 3027	Support	Support for the VCHAP and efforts towards rural housing provision.	No changes identified.	The Council welcomes the support for the plan and will endeavour to meet the objectives of the VCHAP.	1404	None required.
A. Introduction and Background, A.1.	2802	Support	Bunwell site SN2126 would have been a good opportunity to extend the settlement limit. Other than three developed sites, no 'provision' whatsoever appears to have been made to the village limits.	Allow potential for further development in Bunwell by extending the settlement limits.	Queries concerning site SN2126 have been discussed in response 1359 to paragraph 9.3 and it is not considered necessary to repeat them here. Throughout the VCHAP process the Council has rigorously assessed the sites put forward to us by landowners and identified suitable allocation and settlement limit extension sites for inclusion in the VCHAP. The Council does not consider the issues raised in this representation to relate to the soundness of the plan.	1403	None required.
A. Introduction and Background, A.1.	2575	Object	Bawburgh already suffers from flooding, lack of sewage capacity, traffic and the school is oversubscribed.	Reduce scale of allocation to five houses.	The Council considers that the issues raised have already been adequately addressed by response 1133 to Policy VC BAW1 and it is not considered necessary to repeat them here. The Council does not consider the issues raised in this representation to relate to the soundness of the plan.	1388	None required.
A. Introduction and Background, A.3.	2803	Object	Currently have two 2015 Site Specific Allocations in Bunwell with eleven 4/5 bedroom detached houses and only four 3 bedroom detached houses. Due to the high value of these properties, they are being purchased by retired couples and Work From Home professionals with no demands being placed upon developers for more competitively priced 2/3 bedroom houses. If NPPF targets are to be achieved, local planners must demand this of developers, in addition to Affordable Housing. Also allow increased numbers of windfall housing numbers where needed. Not convinced the required range of housing required in Bunwell will be met. To date dwellings have been built to maximise developer profit opportunities rather than satisfy the specific needs of the village.	It should be stated that the range of housing must meet the requirements of the village and local authority planners.	The Council does not consider the issues raised to relate to the soundness of the Plan. The VCHAP, alongside the Greater Norwich Local Plan, will replace the Joint Core Strategy and Site Allocation and Policies Documents in the existing Development Plan. Development Management Policies will remain in place, including Policy DM3.1 which requires new development to contribute to a range of regulations. As identified in the latest housing evidence, affordable housing will be required in accordance with emerging Policy 5 of the GNLP. This will remain a requirement for housing developments within South Norfolk once the VCHAP is adopted and it is not considered to be necessary to repeat this policy criterion within the VCHAP.	1463	No action required.

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National Policy, A.4.	3052	Object	Opposed to the whole concept of village clusters because it nullifies the point of settlement hierarchy, which means to concentrate development in locations where it is 'sustainable' i.e. where there are alternatives to the private car for most necessary trips. Clustering villages together where you can't actually get between parts of the same cluster without a car does not improve the sustainability of those places in any way. The car dependence of new development makes the plan inconsistent with paragraphs 152 and 154 of the NPPF. Plans should support transition to a low carbon future and new development should be planned to reduce emissions. This is inconsistent with sporadic development in villages that do not have facilities such as shops, surgeries, schools and other basic conveniences accessible by means of low-carbon transport. The car dependent form of development will increase emissions.	Evidence is needed to show how emissions will be reduced. Good low carbon public transport services should be provided between villages which have been formed as 'clusters' and share facilities such as shops, surgeries, schools and other basic conveniences.	The Council considers the strategy for the distribution of growth in the VCHAP to be sound. Please see the Councils response to Representation 3051 for a full response to the issues related to emissions and sustainability. Paragraph 79 of the NPPF states that 'housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.'. This underpins the VCHAP as stated in paragraph A.6 of the plan. The plan has been prepared having regard to this element of the NPPF in order to support the social sustainability in rural areas whilst acknowledging the larger and more dispersed rural geography of South Norfolk, as set out in the Greater Norwich Local Plan. The tension between supporting growth and avoiding stagnation in existing rural areas and the constraints of planning for growth in a rural district is a challenge that is recognised by the Council. The identification of village clusters by the VCHAP was established through the preparation of the GNLP including through public consultation. The Village Clusters were based on primary schools catchments and safe routes to school in order to help promote healthy lifestyles and reduce additional car journeys. This approach was used to establish the Village Clusters across the Greater Norwich area after it was agreed as the preferred approach. Any change from this approach would mean the VCHAP is not consistent with the approach taken in the GNLP and the overall growth strategy for the Greater Norwich area. The VHCAP forms just one element of the larger Development Plan for Greater Norwich alongside the GNLP. The largest amount of growth is focussed within or adjacent to the urban fringe, the Main Towns and most accessible villages. Therefore, when considered comprehensively the emerging Development Plan has a very strong emphasis on placing growth in the most accessible and sustainable locations.	1419	No action required.

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National Policy, A.5.	2804	Object	SNC must ensure the right number and mix of dwellings in addition to the Cluster Sites around primary schools. With electric vehicles coming on stream more and more, car pollution will be of reducing concern. Primary schools and their locations should not be to the exclusion of more windfall sites outside of these locations and settlement limits, where they are seen of benefit to the village. We appreciate that Affordable Housing is not included in the cap but the 3/5 windfall allocations are insufficient to offer the required choice in the buyer market and to inject the necessary village vitality.	The number of windfall dwellings for Bunwell (5), excluding Affordable Housing and some self build, is inadequate for the projected period. It should be specifically stated that some flexibility of Windfall Housing numbers will be considered where seen by the local parish council and local authority to be justified and required.	The Council does not consider the issues raised to relate to the soundness of the Plan. The VCHAP, alongside the Greater Norwich Local Plan, will replace the Joint Core Strategy and Site Allocation and Policies Documents in the existing Development Plan. The Development Management Policies will remain in place. Policy DM 3.1 requires that proposals should contribute to a range of dwelling types to meet requirements identified through the current housing needs assessment. This will still be required for housing developments within South Norfolk once the VCHAP is adopted and it is not considered to be necessary to repeat this within the VCHAP. The GNLP seeks to establish parameters for windfall development within the wider area, including in the SNVCHAP boundaries. Policy 7.5 of the GNP has been reviewed as of the examination and at the time of preparing this response (September 2023) is expected to form part of the modifications consultation. Further relaxation of the policies guiding development beyond the Settlement Boundaries risks allowing the development of isolated dwellings or groups of dwellings in unsustainable areas that would be entirely reliant on private transport to access services. This is contradictory to paragraph 80 of the NPPF.	1464	No action required.
National Policy, A.5.	2850	Object	Policy 79 (previously 55) is to restrictive not enabling communities to build 3 bedroom houses that can meet the characteristics of the rural community and offer outstanding architecture that's achievable and affordable. Planning within the community adjacent to other property should not be restricted as considered 'isolated'.	Remove Policy 79 which SNDC continually use to restrict planning/windfall sits from coming forward.	South Norfolk's adopted local plan policies ensure a consistent approach across planning decisions in the district. Review of South Norfolk's development management policies is beyond the scope of and not considered a matter of soundness for the Village Cluster Housing Allocation Plan.	1458	None required.

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National Policy, A.5.	2491	Object	The allocation of 35 units at Bawburgh (BAW1) is not sustainable. The school is over-subscribed. The local doctors surgery, the Humbleyard Practice in Hethersett, is over-subscribed by 5,000 people. Bawburgh is not part of a cluster of nearby villages. The allocation is unsound and fails para 79 of the NPPF.	Reduce scale of the allocation with a lower density and providing bungalows.	The Council considers that the issues raised have already been adequately addressed by response 1133 to Policy VC BAW1 and it is not considered necessary to repeat them here. As a general note, the Council have proactively engaged with infrastructure providers, including the Integrated Care Service and Education Authority, to both better understand local infrastructure pressures and enable them to inform their resource and growth strategies. Reference is made Bawburgh not forming part of a larger cluster. A number of villages do not naturally cluster with others and this is not considered to be a soundness issue. The Council does not consider the issues raised in this representation to relate to the soundness of the plan.	1390	None required.
National Policy, A.6.	2852	Object	Conservation areas and village facilities weren't identified on the maps accompanying the Regulation 19 publication of the VCHAP.	Maps and plans need to be clear and precise with conservation areas and facilities correctly identified.	Accompanying the Regulation 19 publication of the VCHAP was an interactive map which included layers to identify conservation areas and the schools within each cluster. The Tacolneston cluster includes a number of facilities and it is disingenuous to suggest that the main facilities are within or adjacent to the Conservation Area. The Council does not consider the issues raised to relate to the soundness of the plan.	1405	None required.
National Policy, A.7.	2805	Support	The Plan only makes allowance for 3–5 windfall dwellings during the Plan period up until 2038 excluding Affordable and some self-build. Consider this insufficient for balanced expansion. Bunwell, as an example, has a serious lack of new 2/3 bedroom houses under market builds which is adversely affecting the primary school intake to the point where a nursery class has now been created. To address the housing needs balance, allocated sites must have a significant number of 2/3 bedroom commercial build houses plus onsite Affordable Housing. Offsite Affordable Housing is an option but it must be in the village concerned.	No changes submitted.	The Council does not consider the issues raised to relate to the soundness of the Plan. The GNLP seeks to establish parameters for windfall development within the wider area, including in the SNVCHAP boundaries. Policy 7.5 of the GNP has been reviewed as of the examination and at the time of preparing this response (September 2023) is expected to form part of the modifications consultation.	1465	No action required.
National Policy, A.7.	2492	Object	The proposed allocation BAW1 is 1.4ha therefore contrary to Paragraph 69 of the NPPF.	Reduce size and density of the site.	The Council considers that this issue of site size has been adequately addressed by response 1133 to Policy VC BAW1 and it is not considered necessary to repeat this again in this response. The Council does not consider the issues raised in this representation to relate to the soundness of the plan.	1391	None required.

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The Greater Norwich Local Plan (GNLP), A.8.	2323	Object	Challenge the decoupling of the VCHAP from the rest of the GNLP as being unsound. The GNLP Regulation 19 consultation commenced before the VCHAP Regulation 18 consultation despite the Local Development Scheme stating that the VCHAP would be consulted on in February/March 2021. Local Plans can contain different documents, but to be sound the GNLP and VCHAP should follow the same or very similar timetable, otherwise it is impossible to judge whether the two (or more) documents are based on proportionate evidence. The outcome of the GNLP's Examination on challenges around issues related to the VCHAP is currently unknown and therefore its soundness can be questioned. Challenges to the GNLP included questioning the housing numbers, which includes the 1,228 in the draft VCHAP. Additional housing will be provided by windfall development which will be in excess to that accounted for in the total for Greater Norwich, as only 1,296 windfall dwellings have been included despite forecasting that 4,450 windfalls during the plan period. Sites already allocated by the current Local Plan should be delivered before there is any consideration of additional new sites, including all of those within the VCHAP. Any newly allocated sites will be in less sustainable locations and therefore make it more difficult to adhere to Climate Change targets. The VCHAP disperses housing growth in largely less-sustainable car-dependent locations, with few employment opportunities. The development of greenfield sites, often on Best and Most Versatile (BMV) agricultural land, should be avoided. The two plans should run to the same timetable to make them sound. The inclusion of unnecessary housing numbers within the VCHAP in unsustainable locations makes the VCHAP unsound.	To address these issues and to make the two plans sound they should run to the same timetable. As outlined the inclusion of unnecessary housing numbers within the SNVCHAP in unsustainable locations also makes the SNVCHAP unsound and should therefore not be adopted.	The Council has responded to this same representation in full in its response to paragraph A.1.	1441	No action required.

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The Greater Norwich Local Plan (GNLP), A.9.	2806	Support	There is deep concern that sensible windfall housing development in Village Clusters and Non Village Clusters will be constrained to the point where villages may not be allowed to expand as they might wish and need. This could have the detrimental effect of removing beneficial housing opportunities for young families, retirees, local first time buyers and small builders with the consequences of collapsing local infrastructure and local business services. For some villages the suggested figures of 3 – 5 windfall dwellings over the Plan period simply isn't enough. If the right mix is not achieved the primary schools will suffer.	No changes submitted.	The Council does not consider the issues raised to relate to the soundness of the Plan. The GNLP seeks to establish parameters for windfall development within the wider area, including in the SNVCHAP boundaries. Policy 7.5 of the GNP has been reviewed as of the examination and at the time of preparing this response (September 2023) is expected to form part of the modifications consultation. More generally, the Council requires development sites to deliver schemes that provide a mix of of housing to reflect the housing requirements identified in the most up to date evidence base. Overall both the dispersed growth strategy of the VCHAP and the proposed windfall policy are intended to enable growth at a sustainable level across the District to support existing services and facilities.	1466	No action required.
The Greater Norwich Local Plan (GNLP), A.10.	2853	Object	Government guidance states that 'allocation and outline permission should not be relied upon unless there is clear evidence that these sites will be delivered'. I don't consider a response from the landowner is clear evidence enough to include undelivered sites/allocations from 2015 within the calculations, therefore I consider the figures potentially unsound.	Clear legally binding evidence obtained to enable the correct housing units to be submitted.	The Council does not consider the issues raised to relate to the soundness of the Plan. The Council prepared a review of the allocations to be carried forward to support the VCHAP which outlines the reasons why each site was carried forward, and why 2 sites were not carried forward. The Council looked at various factors to determine the deliverability of the sites, including whether the site has been subject to a planning application or pre-application discussions, whether work has commenced, promotion by the landowner and if any constraints have been identified that would prevent the site from coming forward. Many of the sites being carried forward were done so because work had begun on the sites or they had been subject to planning permission, as well as there being recent contact with landowners. For those that did not yet have planning permission, contact with the landowners has reinforced the availability of these sites. Therefore, in these cases the Council was satisfied that the sites are still deliverable.	1424	No action required.

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The Greater Norwich Local Plan (GNLP), A.10.	3215	Object	Nutrient Neutrality will result in both delays and overall viability challenges as the mitigation strategy remains uncertain, leading to delays in development as it is uncertain whether the sites can accommodate burden. Test of viability cannot take place until a solution is resolved. The Plan proposes a development of 1,200 new dwellings in the period ending March 2038 most of which will arise from sites identified for the first time in the Plan and are currently undevelopable as a result of Nutrient Neutrality. South Norfolk Council can offer no positive certainty as to when a solution will come forward and at what cost. Dwelling completions arising from the Plan were initially forecast to take place in 2024/25, this forecast has been revised resulting in a 4 year delay. Development was originally projected to be completed over a period of 14 years has now been revised to 10 years resulting in an unjustified 40% annual average increase in completions. South Norfolk Council consider it will be 6+ years from now before completions under this Plan are delivered. Conclude the Plan is unsound and unviable as the cost of Nutrient Neutrality mitigation has not been demonstrated. Paragraph A.10 sets out the requirement to deliver at least 1,200 homes through the VCHAP. Consider such a delivery is unsound.	No changes submitted.	The Council does not consider the issues raised to relate to the soundness of the Plan. The VCHAP is a long-term development plan document that identifies allocated sites for growth in South Norfolk up to 2038. Nutrient Neutrality may have an impact on the timing of development depending on the delivery of a mitigation strategy but is not considered to undermine the principle of development. South Norfolk Council is required to prepare an up-to-date development plan that sets out the development of its area under Part 2 of the Planning and Compulsory Purchase Act 2004 as amended and the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended. Nutrient Neutrality, as set out above, is not considered to be a valid reason for not producing an up-to-date plan. The overall growth identified for the South Norfolk Village Clusters as identified in Policy 1 of the Greater Norwich Local Plan is 2,592 (part of a total of 4,220 new dwellings in the entirety of the Village Clusters including Broadland). 1,392 of these dwellings in South Norfolk are already contained within existing commitments. The 1,200 new dwellings identified in the VCHAP make up the remainder of the growth identified for the South Norfolk Village Clusters. As noted above it is accepted the Nutrient Neutrality may have an impact on the timing of delivery of these new allocations. However, combined with the already committed development, the Council is satisfied that the strategy presented in the VCHAP will meet the demand for new housing.	1423	No action required.

The Greater Norwich Local Plan (GNLP), A.10.	3214	Object	New allocations for South Norfolk Village Clusters are not within the Greater Norwich Local Plan. The GNLP Sustainability Appraisal states that smaller alternative sites for South Norfolk were not assessed as this would be part of the VCHAP, showing that the need for 1,200 new dwellings in the South Norfolk area was devised in advance of assessing the sustainability for the area to deliver this. The VCHAP is therefore inconsistent with paragraph 35 of the NPPF. Therefore the allocations should be considered alongside the allocation sites in the Main Towns and Key Service Centres. Also, it is premature to progress the VCHAP while the GNLP is still under examination and not yet adopted. The site assessments for the VCHAP did not have regard for alternative sites in the Key Service Centres and Main Towns. Support enhancing and maintaining vitality of rural areas but must be balanced with other sustainability objectives, such as sustainable travel methods. The Settlement Hierarchy shows that there are increased opportunities for growth in the upper tiers due to access to services and employment. Therefore the VCHAP is inconsistent with paragraph 104 of the NPPF which states that transport issues should be considered early in plan preparation and paragraph 105 which states that plans should promote sustainable travel methods. There is currently no scheme in place to provide mitigation for Nutrient Neutrality. The price of credits has not been established and therefore their impact cannot be determined. As such there is not certainty that these sites can be delivered within the Plan period.	A review of settlement limits within all settlements within South Norfolk by way of a focused review of the Site Specific Allocations and Policies Document and Area Actions Plans should be undertaken.	The Council considers the strategy for the distribution of growth in the VCHAP to be sound. The principle of the VCHAP was established through the preparation of the Greater Norwich Local Plan. The preparation of the GNLP established the objectively assessed needs for the Greater Norwich area as well as the settlement hierarchy and growth strategy related to this. Whilst around 74% of the growth will take place in the Strategic Growth area, growth was also allocated to the Village Clusters in Broadland and South Norfolk to respond to the NPPF requirements, namely allocating a reasonable portion of growth to small and medium sized allocations to support the rural economy. Paragraphs 30 and 31 of the GNLP state that the VCHAP has been prepared due to South Norfolk being much larger and having a much more rural nature than the other areas within the GNLP area. The VCHAP allows this to be recognised and provides a strategy for development that is appropriate for this area, whilst also forming part of the overall strategy for the Greater Norwich area. The Council therefore considers that the Plan is in conformity with the NPPF. The VCHAP forms just one element of the larger Development Plan for Greater Norwich alongside the GNLP. The largest amount of growth is focussed within or adjacent to the urban fringe, the Main Towns and most accessible villages. Therefore, when considered comprehensively the emerging Development Plan has a very strong emphasis on placing growth in the most accessible and sustainable locations. Paragraph 79 of the NPPF states that ‘housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.’. This underpins the VCHAP as stated in paragraph A.6. The plan has been prepared regarding this element of the NPPF to support the social sustainability in rural areas whilst acknowledging the larger and more dispersed rural geography of South Norfolk, as set out in the Greater Norwich Local Plan. Section 7 of the Sustainability Appraisal Report which supports the VCHAP states that	1422	No action required.

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					it is the decision of the Council to determine the most appropriate strategy for distributing growth in South Norfolk. This includes considering the balance between social sustainability in supporting accessible services and facilities in rural areas with the importance of transport and climate change objectives. Production of the plan has been an iterative process which involving significant adjustments and refinements to the point where the preferred option now performs broadly similarly to the alternative ('accessibility' option) in many of the sustainability objectives. Some differences between the options remain, however the Council considers an appropriate has been reached. It was therefore concluded that the preferred option should be taken forward. It should be acknowledged that site-specific criteria are set out to maximise the positive aspects of the allocated sites and reduce the negative where possible. The VCHAP is a long-term development plan document that identifies allocated sites for growth in South Norfolk up to 2038. Nutrient Neutrality may have an impact on the timing of development depending on the delivery of a mitigation strategy but is not considered to undermine the principle of development as it is considered to be a short-term constraint to the delivery of development.		

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Village Clusters, A.13. There are 48 Village	3142	Support	NCC Education comments in response to A.13: - Norfolk is currently seeing a decline in its birth rate which is impacting the entry year into school and subsequent years, this will continue to take effect over the next 2-3 years and it is anticipated the higher numbers transitioning through Primary are moving to the latter part of their schooling which will ensure capacity is available in schools as time moves on; - Some schools continue to act as an overflow to some strategic areas where there are plans to develop a school site, which will release this pressure in the future; - The impact of movement between counties is often of net effect, often a similar level of children move in and out of the county which does not put any significant pressure on surrounding schools; and - We continue to work with our admission colleagues to ensure pupils have the appropriate places and will get a place of their choice.	No changes proposed	The Council welcomes the comments of Norfolk County Council, submitted in its role as education provider, during the publication period for the Regulation-19 VCHAP. These comments reflect the discussions that have taken place between the authorities during the preparation of both the GNLP and the VCHAP. The Council received a significant number of representations from residents in response to the VCHAP raising concerns about the capacity of local primary schools within the cluster/ settlement - where appropriate specific queries were raised directly with NCC. The comments of NCC are consistent with the advice received by the Council in response to these queries. The Council is reassured that a combination of a declining birth rate, the effect of parental choice on school preferences and the development of new school sites in strategic locations will ensure that appropriate school admissions can be achieved across the village clusters and re-iteration of this is welcomed.	1450	No action required
Village Clusters, A.13. There are 48 Village	2857	Object	I object to the process followed when carrying out site assessments (desk top only). The Character Appraisal of Tacolneston, is internationally misleading/contrived with the aim to relocate Tacolneston away from the village school, Pub and Social club within the village/conservation area adjacent to heritage assets. Promoting sites 1200m away causes people to drive to services, parking is limited causing highway safety implications, vibration and pollution. (SNDC have no air quality assessments/data available) The school is full and further building expansion would cause harm to the setting.	Obtain robust evidence on whether sites allocated in 2015 still not developed should be counted. Follow due process and re assess using 'on sites' visits aperiitif. Consider potential school places to meet housing needs only without pressure on school expansion needs.	As detailed in the site assessment for VC TAC1, a site visit constituted a key element in the suitability appraisal. The Council received a significant number of representations from residents in response to the VCHAP raising concerns about the capacity of local primary schools within the cluster/settlement - where appropriate specific queries were raised directly with NCC in its role as Education provider. The Council is reassured that a combination of a declining birth rate, the effect of parental choice on school preferences and the development of new school sites in strategic locations will ensure that appropriate school admissions can be achieved across the village clusters and re-iteration of this is welcomed. The Councils consider that all other matters raised have been addressed in response to representations on paragraphs 37.7 to 37.13 and the VC TAC1 policy itself, and it is not considered necessary to repeat them here. The Council does not consider the issues raised in this representation to relate to the soundness of the plan.	1407	None required.

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Village Clusters, A.13. There are 48 Village	2493	Object	Bawburgh school is over-subscribed.	Reduce the size and density of the allocation.	The Council considers that the issues raised have already been adequately addressed by response 1133 to Policy VC BAW1 and it is not considered necessary to repeat them here. The Council does not consider the issues raised in this representation to relate to the soundness of the plan.	1392	None required.
Village Clusters, A.14. The sites within the	2807	Support	Understand the windfall allowance overall is 800 dwellings with a 'maximum' of 3/5 dwellings per village. This excludes affordable housing and some self-builds. We question however the 3/5 'maximum' hard and fast figures and consider individual village allowances should allow some flexibility and discretion where an increase is fully justified, even if outside settlement limits.	No changes submitted.	The Council does not consider the issues raised to relate to the soundness of a Plan. The GNLP seeks to establish parameters for windfall development within the wider area, including in the SNVCHAP boundaries. Policy 7.5 of the GNP has been reviewed as of the examination and at the time of preparing this response (September 2023) is expected to form part of the modifications consultation.	1467	No action required.

Village Clusters, A.14. The sites within the	3145	Object	Comments of Historic England submitted in response to A.14: We note that the smaller sites have not been included as allocations but instead the settlement limit has been extended to include that land. However, there are some extensions which would have an impact on the historic environment and yet, in the absence of a site-specific policy, we are concerned about how the recommendations of the HIAs and any necessary mitigation/enhancement will be secured through an appropriate policy framework. The NPPF (para 16d) makes it clear that Plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react development proposals. Further advice on the content of policies is given in the PPG at Paragraph: 002 Reference ID: 61-002-20190315 Revision date: 15 03 2019. It states that, 'Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development'.	No change proposed in writing in response to the Regulation-19 Plan.	The Council has continued to proactively engage with Historic England following the close of the Regulation-19 publication period, including via site visits and an in-person meeting. As part of these discussions this matter was explored further between both parties. The Council reaffirmed its position that extensions to the existing settlement limits (SL) are not site allocations but instead offer an opportunity for windfall development sites to be considered via the standard Development Management route. In order to identify potential SL alterations the Council undertook a consideration of those sites that were submitted to the VCHAP for assessment but fell below the threshold set for minimum site size/ numbers of dwellings. These sites have therefore been subject to the same HELAA and technical site assessment process as proposed allocation sites but as they are not proposed for allocation they have not been included in the evidence base to the same degree, and they are not subject to site specific allocation policies. Rather, should development on these sites be proposed in the future the detailed assessment of these sites would be undertaken at the planning application stage. However, at the Regulation-18 stage of the VCHAP process, Historic England requested that a number of smaller sites being considered for possible inclusion within the settlement limits (either as Preferred or Reasonable Alternative options) should be subject to Heritage Impact Assessments (HIAs). The Council undertook this exercise whilst preparing HIAs for the proposed allocation sites and these have been published alongside the VCHAP in the wider evidence base. Whilst the Council recognises the concerns of Historic England with regard to recognition of the findings of these HIAs the Council does not consider it to be either appropriate / necessary to produce specific policies for these sites for the reasons set out above. The Council has set out within each cluster chapter a paragraph that specifically relates to the Settlement Limit for each settlement. This includes reference to any amendments proposed to the SL via the VCHAP. Although the Council does not consider the concerns raised by Historic England to relate to the soundness of the Plan, should the Inspector consider it to be an appropriate modification the Council would consider it acceptable to modify this text to include reference to any HIA prepared to support the inclusion of a site within the settlement limit. For clarification purposes the Council has only	1438	Whilst the Council does not consider the concerns raised by Historic England to relate to the soundness of the Plan, should the Inspector consider it to be an appropriate modification the Council would consider it acceptable to modify this text to include reference to any HIA prepared to support the inclusion of a site within the settlement limit. For clarification purposes the Council has only undertaken HIAs for those SL sites considered to have a potential impact on identified heritage assets and updated text would be required for the following: Brooke, Seething, Tivetshall St Margaret and Wortwell.

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					undertaken HIAs for those SL sites considered to have a potential impact on identified heritage assets and updated text would be required for the following: Brooke, Seething, Tivetshall St Margaret and Wortwell.		
Village Clusters, A.14. The sites within the	2810	Object	Bawburgh suffers from a lack of sewage capacity, flooding, traffic and few services.	Reduce scale of allocation and provide upgrades to the sewage works and village services.	The Council considers that the issues raised have already been adequately addressed by response 1133 to Policy VC BAW1 and it is not considered necessary to repeat them here. The Council does not consider the issues raised in this representation to relate to the soundness of the plan.	1389	None required.
Village Clusters, A.15. The threshold of 12	2808, 2858	Support	Summary of representations received in response to A.15.: - Support for use of settlement limit extensions for erection of self-build dwellings. - Sites with multiple self-build units should be phased to avoid disruption. - Lack of available information on self-build policy.	No changes identified.	The Council welcomes the support for the approach to settlement limit extensions. These sites are always of an area suitable for fewer than 12 dwellings, with most realistically allowing for a smaller number of dwellings, thereby reducing the construction impact of these sites on existing residents. Whilst the Council recognises the concerns raised about impacts during this period, this is considered to be a short-term matter only and one that should not prevent the development of these sites. The Council maintains a self-build register for South Norfolk in line with the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016). Joining the register will indicate demand for self-build and custom house building in future periods ending on 30 October each year. The number joining will affect our duties in respect of future three year periods. For more information see: https://www.southnorfolkandbroadland.gov.uk/self-build-register/south-norfolk-custom-self-build-register	1406	None required.

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The Regulation 19 Publication of the South Norfolk Village Clusters Housing Allocation, A.17.	2324	Object	Challenge the decoupling of the VCHAP from the rest of the GNLP as being unsound. The GNLP Regulation 19 consultation commenced before the VCHAP Regulation 18 consultation despite the Local Development Scheme stating that the VCHAP would be consulted on in February/March 2021. Local Plans can contain different documents, but to be sound the GNLP and VCHAP should follow the same or very similar timetable, otherwise it is impossible to judge whether the two (or more) documents are based on proportionate evidence. The outcome of the GNLP's Examination on challenges around issues related to the VCHAP is currently unknown and therefore its soundness can be questioned. Challenges to the GNLP included questioning the housing numbers, which includes the 1,228 in the draft VCHAP. Additional housing will be provided by windfall development which will be in excess to that accounted for in the total for Greater Norwich as only 1,296 windfall dwellings have been included despite forecasting that 4,450 windfalls during the plan period. Sites already allocated by the current Local Plan should be delivered before there is any consideration of additional new sites, including all of those within the VCHAP. Any newly allocated sites will be in less sustainable locations and therefore make it more difficult to adhere to Climate Change targets. The VCHAP disperses housing growth in largely less-sustainable car-dependent locations, with few employment opportunities. The development of greenfield sites, often on Best and Most Versatile (BMV) agricultural land, should be avoided. The two plans should run to the same timetable to make them sound. The inclusion of unnecessary housing numbers within the VCHAP in unsustainable locations makes the VCHAP unsound.	To address these issues and to make the two plans sound they should run to the same timetable. As outlined the inclusion of unnecessary housing numbers within the VCHAP in unsustainable locations also makes the VCHAP unsound. Therefore the VCHAP should not be adopted.	The Council has responded to this same representation in full in response to comments submitted to A.2.	1442	No action required.

The Regulation 19 Publication of the South Norfolk Village Clusters Housing Allocation, A.17.	2884	Object	Agree with the CPRE's challenge to the soundness of the VCHAP because it has been decoupled from the Greater Norwich Local Plan, which has had a different consultation timetable, rendering both "unsound". Furthermore, the challenges to the GNLP included questions relating to overall numbers of houses provided by the plan, which, if found to be unsound, would impact the number of houses allocated by the VCHAP. This is particularly true of greenfield sites, and both the sites within the village are greenfield, with the land south of Mill Road (SN0305) in particular being classified as grade 3/4 agricultural. The parish council's planning committee agreed with both these assessments, and refer to these in the parish council's responses to the VCHAP consultation. If SNC had sufficient sites elsewhere in the district and these village clusters were therefore surplus to requirements, the plan was unsound as it did not fulfil the stated objective of "meeting housing needs".	The timetable of consultations should be regularised.	The Council does not consider the issues raised to relate to the soundness of the Plan. The principle of the VCHAP was established through the preparation of the Greater Norwich Local Plan. Paragraphs 30 and 31 of the GNLP state that the VCHAP has been prepared due to South Norfolk being much larger and rural in nature than the other areas within the GNLP area. Paragraph A.10 of the VCHAP and Policy 1 of the GNLP both state that the 1,200 homes to be allocated by the VCHAP is a minimum requirement. Section 5 of the NPPF outlines the Local Planning Authorities requirements for delivering new homes, such as providing a number of smaller sites (Paragraph 69), maintaining the supply and delivery of homes (paragraphs 74 – 77) and to enhance or maintain the vitality of rural communities (paragraph 79). The VCHAP will therefore form part of the overall Development Strategy for the Greater Norwich area with a specific focus on the elements of the NPPF outlined above. The housing allocated in this Plan is not surplus to requirements and will contribute to the overall strategy for the Greater Norwich area to meet the requirements set out in the NPPF. The numbers of homes allocated in the VCHAP have been accounted for in the overall housing numbers identified within the VCHAP. The hearing sessions for the GNLP have now been completed. In a letter from the Inspectors dated 9th August it is stated that the next steps will be the preparation of the final version of the GNLP including the modifications. This will then need to be consulted on. No additional hearings are anticipated and the GNLP is therefore at an advanced stage of preparation. Any changes that could result to the GNLP through the final stages of the plan preparation will be considered by the VCHAP continues through its own preparation including the eventual examination. The different timescales for the GNLP and VCHAP not considered to be an issue that relates the soundness of the plan. Section 11 of the NPPF sets out the Local Authorities requirements for making the effective use of land, including making as much use as possible of brownfield land (paragraph 119). However, it also states that Local Authorities must meet their objectively assessed needs. The use of brownfield land has been given weight through the site assessment process, however it is not possible for the Council to meet these needs	1437	No action required.

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					exclusively through the use of brownfield land, therefore development on greenfield land is required. This is not exclusive to the Kirby Cane and Ellingham cluster.		
The Regulation 19 Publication of the South Norfolk Village Clusters Housing Allocation, A.17.	2822	Support	Having read the Plan in full, it is considered the document is sound, justified and fully compliant	No changes identified.	The Council welcomes the support for the plan.	1408	None required.
The Regulation 19 Publication of the South Norfolk Village Clusters Housing Allocation, A.19.	3149	Object	The Plan states that maps showing site boundaries are included alongside the policies. However, this is not the case. They are not included in the PDF version of the plan but on separate individual settlement policy maps. It would be helpful if site maps were included in the Plan itself next to the policy.	Include maps in the Plan itself next to the policies	The Council welcomes these comments and will review the best format for presenting the Plan.	1446	The Council will review the best format for presenting the Plan.
The Plan Objectives, A.24.	3070	Support	The County Council supports the sustainable objectives set in the Plan in respect of: • Objective 1 - Meeting housing needs; • Objective 2 - Protecting village communities and supporting rural services and facilities; and • Objective 3 - protecting the character of villages and their setting.	No changes proposed	The Council welcomes the support of Norfolk County Council for the objectives of the VCHAP. The Council notes that this response includes further detailed site specific matters and these have been responded to in full at the appropriate sections of the document.	1506	No action required

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The Plan Objectives, A.24.	2811	Support	We are concerned that without the necessary attention, action and ongoing vigilance to the points stated in other representations and those stated by South Norfolk Council, we simply shall not realise the required and desired Cluster Village and Non Cluster Village housing in support of our communities and schools. Regarding SNVC Objective 2, equally important is the urgent need to address the current significant infrastructure failings which can only get worse if not addressed e.g. the Bunwell mains sewage system. So far the huge development of Wymondham has seen no improvements in vital infrastructure.	No changes submitted.	The Council does not consider the issues raised to relate to the soundness of the Plan. Please see the Council's response to representations 2803 - 2807 for full responses to the issues raised. The site-specific policies for the allocations have been prepared in consultation with various stakeholders, such as Norfolk County Council and Anglian Water. Where there has been an identified need for infrastructure improvements or provision, such as footways, highways improvements and potential needs for water capacity enhancements, these have been included as requirements in the policies. These consultees were also invited to provide further comment in response to the publication of the Reg-19 plan. As part of the Council's response to the Reg-19 representations, the Council is reviewing and actioning these comments as appropriate. It should also be noted that the VCHAP forms just one part of the Development Plan for the Greater Norwich Area. The Greater Norwich Local Plan includes policies for the delivery of strategic infrastructure to support the overall growth for the area, including that being allocated within the VCHAP. As set out in paragraph A.2 of the VCHAP, it was determined that the inclusion of Core Policies within the VCHAP would be a duplication of the policies set out both nationally and in the Greater Norwich Local Plan and on this basis they were omitted from the Reg-19 plan. The Council therefore considers that appropriate infrastructure needed to support growth as allocated in the VCHAP will be delivered sustainably and in an appropriate manner.	1468	No action required.
The Assessment of Sites, A.27.	2494	Object	The Council has failed to consider appropriate site densities. VC BAW1 proposed 25 dwellings on 1.4Ha but should reflect the density of the development opposite, namely 9 dwellings per hectare (under permission 2018/1550).	No changes proposed.	When considering the form and scale of development on proposed allocation sites, the Council adopted 25 dwellings per hectare as a starting point. However, as appropriate this was then adjusted in order to better reflect the local context. As required by the NPPF, the Council must have due regard to making efficient use of land (paragraph 124).	1393	None required.

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The Assessment of Sites, A.28.	3138	Support	Comments submitted by NCC Ecology in response to A.28: - Where sites are within the vicinity of CWS and increased recreational pressure may be seen; Norfolk County Council may look to seek Planning Obligations and/ or use of Community Infrastructure Levy (CIL) funds in order to mitigate against these pressures, including any soft landscaping design/ species selection to reflect the composition of the CWS. Where adjacent to a CWS, a suitable buffer should be incorporated within the design; and - Where proposals about a Roadside Nature Reserve (RNR), careful consideration would need to be given to the location of site access points and the application must demonstrate that the RNRs will not be adversely impacted by the proposal. If the site is adjacent to an existing or candidate RNR, opportunities to enhance the RNR should be incorporated into the scheme design or contributions discussed by means of Planning Obligations/ CIL.	No changes proposed	The Council has sought engagement with both Norfolk County Council's Ecology Team and Norfolk Wildlife Trust during the Regulation-18 and Regulation-19 consultations. The production of the VCHAP has also been supported by the production of a Habitats Regulation Assessment (HRA), the purpose of which is to build upon the evidence produced for the GNLPS and identify sites within the village clusters that are part of the National Site Network. This evidence, alongside the Council's own assessments, has informed the ecological considerations of the VCHAP, including (but not limited to) the site selection process. There are no sites preferred for allocation within the VCHAP which abut either County Wildlife Sites or Roadside Nature Reserves however should an area of land be designated as such subsequently this would be assessed appropriately at the planning application stage. With regards to the wider impacts on County Wildlife Sites, the Council has adopted the 'Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy' (GIRAMS). This is a Norfolk-wide strategy that seeks to both divert and deflect residents from visiting Habitats Sites as well as provide strategic mitigation for any residual impacts arising from new development. All new development is required to pay this tariff which has been calculated on a per- dwelling basis that has been calculated by dividing the total cost of the 'RAMS' package by the number of dwellings still to be delivered up to 2038. The Council welcomes these comments but does not consider that they raise matters of soundness relating to the VCHAP.	1451	No action required

Evidence Base, A.31.	3106	Object	Summary of representation received in response to A.31: - Generally, SCC supports the draft Village Clusters Local Plan. However, we consider there are some matters that require further evidence for the Plan to be considered sound; - Suffolk County Council (SCC) makes comments regarding cross boundary issues which may result from the chosen distribution of the Village Clusters Local Plan; particularly around the market towns close to the boundary. These towns will serve communities on both sides of the border, such as Bungay, Beccles and Diss; - The responsibility for providing school places in Norfolk is Norfolk County Council. However, there is movement of school pupils across boundaries (in both directions) due to parental choice. There are a number of proposed allocations, particularly in communities along the Norfolk/Suffolk border in the vicinity of Bungay, Beccles and Worlingham, where this is most likely to occur; - SCC's previous response stated that the Village Clusters Local Plan should ensure there is sufficient education capacity in Norfolk schools to accommodate all growth proposed within the draft Plan. However, the current submission documents provide no evidence that this is the case and without this evidence SCC considers the Plan has not been positively prepared; - SCC request that appropriate evidence is provided to demonstrate that pupils arising from the proposed growth can be accommodated at Norfolk schools; and - The Waveney, Suffolk Coastal and emerging Babergh and Mid Suffolk Joint Local Plan have been prepared with the support of the Suffolk Transport Model. The model shows that the areas of Suffolk that may be affected by the allocations in the Village Clusters Local Plan (mainly towns in the former Waveney area along the Norfolk/Suffolk border) are not on especially constrained parts of the Suffolk highway network; - It is not expected, given the small size of the sites, that the proposed allocations would have significant impact on the Suffolk highway network. However, in our previous response, dated 2nd August 2021, SCC stated that a high-level assessment of the impact caused by the Village Clusters Local Plan should be undertaken; and - Following recent conversations with Norfolk	Summary of changes proposed in response to A.31: - SCC would be happy to engage further on both matters raised	The Council welcomes the response from Suffolk County Council (SCC) and notes the general support for the VCHAP by SCC, as well as the issues raised relating to the potential impact of development on both the highway network and education facilities. The Council considers that the Plan has been positively prepared, is justified and therefore the matters raised do not relate to the soundness of the Plan. The Council has engaged with Suffolk County Council during the production of the VCHAP and as required by the NPPF, and will continue to liaise with the authority to produce a joint Statement of Common Ground. Education As noted elsewhere the Council has engaged with Norfolk County Council Education Services throughout the production of the Plan to understand the impact the proposed dispersed growth may have on existing education facilities within the Plan area. These discussions concluded that the scale of growth proposed could be incorporated into the existing school network and that a number of factors are anticipated to reduce pressures in some key locations in the near future - these include declining birth rates and the provision of new schools in some growth locations. In addition, and as noted in the response of SCC, there is movement across the authority boundaries in both directions due to parental choice and as such it is not considered that the small scale growth proposed in the VCHAP will disproportionately impact upon school places in Suffolk. Transport With regards to transport matters SCC had previously requested at Regulation-18 that a "high level assessment of the impact caused by the Village Clusters Local Plan should be undertaken". Subsequently the Council discussed the matter with Norfolk County Council who advised that "The county council has worked as highway authority in partnership to develop the Greater Norwich Local Plan. As The GNLP sets the spatial distribution that the Village cluster document follows there are no in principle issues raised by the scale of growth. The growth proposed is dispersed and relatively modest it will not give rise to significant strategic impacts that require strategic assessment or transport infrastructure. The	1507	Preparation of a Statement of Common Ground with Suffolk County Council

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			County Council, we are not anticipating any significant impacts on traffic in Suffolk as a result of the proposed allocations. Though, we would still welcome discussions regarding the creation and enhancement of sustainable, walking and cycling, transport links between Norfolk villages close to the border and key destinations in Suffolk.		main highway issues will be those associated the impacts of individual sites giving rise to local improvements." Suffolk County Council confirmed in their email response of January 2022 that this was acceptable and that there were no further concerns regarding this matter. Both of the above matters will be discussed with Suffolk County Council during the production of the Statement of Common Ground prepared between the two authorities.		
Evidence Base, A.31.	3155	Support	We advocate the preparation of a topic paper in which you can catalogue the evidence you have gathered and to show how that has translated into the policy choices you have made.	No changes proposed in response to A.31.	The Council is currently considering preparation of a Topic Paper on key issues. The balance of considerations that has been made relating to the selection of each site is set out in the supporting text for the policies, and makes reference to the relevant areas of the evidence base where appropriate.	1456	Preparation of a Topic Paper on key issues (if considered appropriate)
Evidence Base, A.31.	3151, 3153	Support	Historic England welcomes the preparation of Heritage Impact Assessments and Landscape Visual Appraisals to inform the site selection process and site allocation policies.	No changes identified.	The Council welcomes the support for the production of HIAs and LVAs and welcomes the continual and ongoing engagement with Historic England throughout the production of the plan. The Council notes that a number of site-specific comments have been submitted by HE in response to the Reg-19 plan and its evidence base and has responded to the on a site-by-site basis as appropriate.	1414	None required.

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Sustainability Appraisal, A.32.	3199	Object	Representations submitted in response to A.32: - We are concerned at the over-reliance of GIS distance-based analysis for the Sustainability Appraisal (paras 5.3.7 – 5.3.10). The report itself comments of the limitations of this and states that it is not technically appraisal. And little or no potential to reach conclusions on significant effects. The report uses the example of biodiversity features. The same issue applies for heritage assets. We do however welcome the preparation of Heritage Impact Assessments (noted at para 5.3.18).The analysis at section 9.8 seems to pick up on the findings of the HIAs and also the inclusion of many of those recommendations in the supporting text or policies of the Plan which is welcomed.	No changes proposed	The Council welcomes the comments of Historic England in response to the publication of the Regulation-19 version of the VCHAP but does not consider that they relate to the soundness of the Plan. The Sustainability Appraisal (SA) forms one part of the evidence base that has supported the assessment and the selection of sites and should be considered alongside other documents, for example the Heritage Impact Assessments. The purpose of the SA is to appraise the Plan as well as its Reasonable Alternatives, both in terms of the spatial strategy and specific sites. It is for the Council to determine, with reference to the findings of the SA, the weight to be given to the issues that it raises. The document clearly recognises the inherent limitations of the GIS analysis (para 5.3.9) and to address this limitation the Council has undertaken detailed Heritage Impact Assessments to fully assess the potential impact of proposed allocations on heritage assets. The Council is therefore satisfied that the impact on heritage assets has been appropriately considered throughout the production of the Plan.	1508	Comments relating to notation to be forwarded to AECOM for future iterations of the Sustainability Appraisal.
Sustainability Appraisal, A.32.	3043	Object	No mention of houses being built with installation of low carbon technology or increased use of low embodied carbon materials in construction. Tables 3.1 and Section 6.9 of the Sustainability Appraisal state that houses should 'Support timely delivery of an appropriate mix of housing types and tenures to ensure supply of high-quality housing across the village clusters which meets the needs of South Norfolk residents and diversify the housing market to help maintain delivery.'	Mention should be made that houses will strive to attain zero carbon and use low embodied carbon materials in construction.	The Council does not consider the issues raised to relate to the soundness of the Plan. The VCHAP will form one part of the Development Plan for the Greater Norwich Area. The Greater Norwich Local Plan includes policies on how new housing should be developed to respond to climate change, including improving water and energy efficiency. Paragraph A.2 of the VCHAP states that it was determined that the inclusion of Core Policies would be a duplication of the policies set out nationally and in the Greater Norwich Local Plan and were not taken forward.	1421	No action required.

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Sustainability Appraisal, A.32.	3051	Object	The car dependence of new development makes the plan inconsistent with paragraphs 152 and 154 of the NPPF. Plans should support transition to a low carbon future and new development should be planned to reduce emissions. This is inconsistent with sporadic development in villages that do not have facilities such as shops, surgeries, schools and other basic conveniences accessible by means of low-carbon transport. The car dependent form of development will increase emissions.	Evidence is needed to show how emissions will be reduced. Good low carbon public transport services should be provided between villages which have been formed as 'clusters' and share facilities such as shops, surgeries, schools and other basic conveniences. Evidence that houses will be built with installation of low carbon technology and increased use of low embodied carbon materials in construction.	The Council considers the strategy for the distribution of growth in the VCHAP to be sound. Section 7 of the Sustainability Appraisal Report which supports the VCHAP states that the most appropriate strategy for distributing growth in South Norfolk involves considering the balance between social sustainability in supporting accessible services and facilities in rural areas with the importance of transport and climate change objectives. However, it should be noted that the intention of the VCHAP as set out in the Greater Norwich Local Plan is to promote social sustainability, reflecting the larger and more dispersed rural geography of South Norfolk. To find an appropriate balance the Plan has been prepared through an iterative process which has involved significant adjustments and refinements to the point where the preferred option performs broadly similarly to the alternative ('accessibility' option) in many sustainability objectives, whilst there are still some differences. It was therefore concluded that the preferred option should be taken forward. It should be acknowledged that site-specific criteria are set out to maximise the positive aspects of the allocated sites and reduce the negative where possible. It should be noted that the VCHAP forms one small element of the larger Development Plan for Greater Norwich. The largest amount of growth is focussed within or adjacent to the urban fringe, the Main Towns and most accessible villages. Therefore, when considered comprehensively the emerging Development Plan has a very strong emphasis on placing growth in the most accessible locations.	1418	No action required.

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Sustainability Appraisal, A.32.	2495	Object	The sustainability assessment does not look at school, employment or health capacities in the villages.	No changes proposed.	The sustainability appraisal has been undertaken in accordance with the procedures set out by the 'Environmental Assessment of plans and programmes regulations 2004', with a view in informing both the consultation stages and the plan preparation. Table 3.1 of the SA clearly sets out the scope of that document. Capacity levels of services and facilities fluctuate and therefore the SA could only provide a snapshot assessment of this issue. However, the Council has engaged proactively with consultees (e.g. the Education Authority and Integrated Care Service) to both better understand current capacity levels and inform them of proposed growth locations so that they may plan their resources accordingly.	1394	None required.
Habitats Regulation Assessment, A.33.	3139	Support	Comments submitted in response to A.33: - It is noted that water impacts were identified for a number of hydrologically connected Habitats sites and that policy wording in respect of nutrient neutrality issues at the Broads SAC and Broadlands Ramsar site has not yet been agreed and incorporated in the GNLP; and - The report therefore concludes that it is not currently possible to rule out adverse impacts on the integrity of the Broads SAC and Broadland Ramsar site due to nutrient enrichment impacts without this policy in place, but that once the GNLP policy has been updated to address this issue, the VCHAP HRA will be updated to reflect this.	No changes proposed in response to A.33	The above representation was submitted by the Ecological Team at Norfolk County Council as part of their wider response to the publication of the Regulation-19 VCHAP. The Council can confirm that the Habitats Regulation Assessment will be updated in accordance with the conclusions reached as part of the GNLP Examination.	1455	Update to the HRA to reflect the conclusions reached during the GNLP Examination, prior to the submission of the HRA as part of the VCHAP evidence base.

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Heritage Impact Assessments, A.34.	3144, 3146, 3147	Object	Representations received in response to A.34: - There are a few allocations where we [Historic England] recommend the preparation on an HIA now prior to EiP (e.g. VC BRO1 West, VC WOR1). The policy wording should then be amended accordingly. In the absence of an HIA we consider these sites are not sufficiently justified; - Some settlement limit extensions also require HIAs; - Some recommendations in HIAs have not been incorporated into the policy - details of these are provided as Appendix A; - Whilst we welcome the inclusion of a criterion for archaeology, in our view some assessment is needed to inform any planning application (rather than waiting until after permission is granted but before development). This is consistent with the policy set out in para 194 of the NPPF. We therefore advise that the archaeology criterion should be amended; and - We have raised a number of quite site-specific issues in relation to the Bressingham, Little Melton, Rockland St Mary and Tasburgh sites. See the attached table for further details of our concerns.	Changes proposed are set out in response to individual site allocations throughout the VCHAP.	The Council has proactively engaged with Historic England throughout the production of the VCHAP, including around the production of Heritage Impact Assessments as part of the evidence base. This has continued with site visits and an in-person meeting since the close of the Regulation-19 publication period where the matters raised at Regulation-19 were discussed in further detail. Where specific comments have been raised against individual sites (as set out in Appendix A of Historic England's representation) the Council has provided a full response against these sites. For clarification purposes, the Council can confirm that additional HIAs will be completed in response to the identification of additional sites requiring this evidence and justification. The one exception to this position is the suggested HIA for site SN0588SL at Seething as this site has already been constructed and its inclusion within the VCHAP as a settlement limit extension is simply intended to regularise this boundary. With regards to the archaeological criterion this has also been the subject of further discussion with Historic England. As a consequence HE have advised in writing (by email dated 5th July 2023) that the following alternative policy wording would be considered acceptable "Planning applications should be supported by a desk based archaeological assessment and, where necessary, the results of a field evaluation as advised by the LPAs archaeological advisors". The Council has welcomed the discussions held regarding this matter however it remains of the opinion that repetition of the developer requirements set out in paragraph 194 of the NPPF is unnecessary. However as indicated against the relevant sites, should the Inspector be minded to modify the Plan to reflect the suggested wording of Historic England, the Council would not object to this proposed wording.	1454	The Council has addressed site specific matters as appropriate against the relevant sites in the remainder of the VCHAP. The general comments raised here are not considered to be issues that relate to the soundness of the Plan however, should the Inspector be minded to accept Historic England's suggested wording regarding the archaeological criterion on identified sites ("Planning applications should be supported by a desk based archaeological assessment and, where necessary, the results of a field evaluation as advised by the LPAs archaeological advisors") the Council would not object. The Council will also seek to undertake (with the exception of SN0588SL) the additional Heritage Impact Assessments required by Historic England in their comments.
Heritage Impact Assessments, A.34.	2310, 3152	Support	Support for the Council's production of Heritage Impact Assessments to inform the site selection process and site allocation policies. Request to protect heritage assets lacking statutory protection.	No changes identified.	The Council welcomes the support for the production of the HIAs which have been produced following discussion with Historic England. Local heritage assets are considered at the application stage as part of the Council's effort to preserve and enhance their significance. The Council also supports the production of Neighbourhood Plans in the district, which can designate and add weight to these local heritage assets.	1415	None required.

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Landscape and Visual Appraisals, A.35.	3137, 3154	Support	Support for the preparation of the Landscape Visual Appraisals to inform the site allocation policies.	No changes identified.	The Council welcomes the support for the production of the Landscape Visual Appraisals which have been produced in order to identify key landscape features for the Council's preferred allocation sites and inform site-specific policy mitigation measures where appropriate.	1416	None required.
Strategic Flood Risk Assessment, A.36.	3254	Support	Consider that the Plan is Sound, but consider that ongoing engagement is needed to refine the SFRA and lead to the production of a Statement of Common Ground with the Council prior to Submission/Examination. Further comments may arise through more detailed review of the SFRA. A number of specific comments are made on the SFRA regarding: River Waveney Modelling; the Flood Zone 3b used; the layering on the interactive GeoPDFs; and the modelling used at Gillingham and Brockdish.	No changes proposed	The Council welcomes the comments of the Environment Agency and notes the continued commitment to the production of a Statement of Common Ground between the two parties in due course. The Council is continuing to liaise with both the Environment Agency and the Lead Local Flood Authority to address comments relating specifically to the SFRA and the modelling within this document but does not consider it to be a soundness matter for the Plan.	1510	Continued engagement with the Environment Agency to prepare a Statement of Common Ground
Strategic Flood Risk Assessment, A.36.	3135	Object	Representation submitted in response to A.36: - We note that the South Norfolk Village Clusters - Level 2 Strategic Flood Risk Assessment has been referenced within the Regulation 19 Pre-submission Draft; and - Comments have recently been provided as part of a technical consultation directly from the allocated consultancy working on behalf of the local planning authority. LLFA Consultation Response Letter FW2022_1170 (Dated: 16 January 2023) highlights a number of concerns with the strategic assessment.	Changes proposed in response to A.36: - The local planning authority should consider and work to address the concerns raised in LLFA Consultation Response Letter FW2022_1170 (Dated: 16 January 2023).	The Council welcomes the comments of the LLFA and notes that these relate specifically to the Strategic Flood Risk Assessment (SFRA) that is being prepared to support the selection of sites, as well as informing site specific mitigation measures. The Council (and its technical consultants who have been preparing the SFRA) have engaged extensively with both the Environment Agency and the Lead Local Flood Authority and this proactive engagement continues to address the matters raised by the LLFA in their response.	1509	Continued engagement with the Environment Agency and the Lead Local Flood Authority.

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Water Cycle Study, A.37.	3252, 3255	Support	Representations received in response to A.37: Anglian Water - Anglian Water is generally supportive of the VCHAP to guide small-scale development in rural settlements within the district. Although we have raised a number of proposed modifications to the policies in the VCHAP, these are considered to help provide clarity and consistency and ensure the Plan is effective as it proceeds to submission for examination; and - We would emphasise that a consistent policy approach to surface water management on all development sites is important to reduce the risk of run-off and minimising the risk of surface water intrusion into our foul drainage network. Environment Agency - High level comments which we would potentially wish to engage on in more detail and see clarified or addressed ahead of the Council's submission for Examination. These comments are unlikely to be a complete version of our comments and we may need to pick up on additional sections, particularly with reference to the Evidence Base WCS, during further engagement; and - We have engaged with the Council's Planning Policy Team, and an initial acknowledgment that a future Statement of Common Ground may be sought between parties to address additional comments was noted and agreed as a sensible way forward.	Summary of changes proposed in response to A.37: - As the Plan intends to bring forward relatively small sites across rural communities in South Norfolk, [Anglian Water] do not perceive a policy requirement for phasing delivery or headroom/capacity at our WRCs to be necessary. However, we actively endorse early engagement with us so we can assess the connection requirements of each development and its impact and implement any mitigation necessary.	The Council welcomes the comments from these consultees. The suggested changes proposed by Anglian Water have been noted and responded to within the individual chapters alongside the relevant allocation sites. Having reviewed these comments the Council does not consider that any of the proposed modifications relate to the soundness of the Plan. Following receipt of the Regulation-19 representation from the Environment Agency the Council has sought further comments from the EA under the Duty to Cooperate but at the time of preparing this response (18th August 2023) there had been no further response from the Environment Agency.	1453	The Council will continue to seek engagement with both Anglian Water and the Environment Agency whilst preparing Statements of Common Ground with each party.

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Viability Appraisal, A.38.	3253	Object	Nutrient Neutrality will result in both delays and overall viability challenges as the mitigation strategy remains uncertain, leading to delays in development as it is uncertain whether the sites can accommodate burden. Test of viability cannot take place until a solution is resolved. The Plan proposes a development of 1,200 new dwellings in the period ending March 2038 most of which will arise from sites identified for the first time in the Plan and are currently undevelopable as a result of Nutrient Neutrality. South Norfolk Council can offer no positive certainty as to when a solution will come forward and at what cost. Dwelling completions arising from the Plan were initially forecast to take place in 2024/25, this forecast has been revised resulting in a 4 year delay. Development was originally projected to be completed over a period of 14 years has now been revised to 10 years resulting in an unjustified 40% annual average increase in completions. South Norfolk Council consider it will be 6+ years from now before completions under this Plan are delivered. Conclude the Plan is unsound and unviable as the cost of Nutrient Neutrality mitigation has not been demonstrated. Paragraph A.38 sets out the Viability Appraisal, my representation considers the Viability Appraisal is inadequate and fails to justify the plans viability which in turn concludes the Plan is unsound.	No changes submitted.	The Council does not consider the issues raised to relate to the soundness of the Plan. Please see the Council response to Representation 3215 for a complete response on the issues relating to Nutrient Neutrality and delivery timescales. The Viability Appraisal which supports the VCHAP took into consideration additional costs that could result from future compliance with Nutrient Neutrality. This was completed through consideration of the 'surplus' achieved by development rather than applying a specific amount. It was concluded that there were sufficient capacity to accommodate Nutrient Neutrality. The conclusions do acknowledge the increases in Core Build Costs which could affect the amount of 'surplus' that is achieved. However, the conclusions continue to state that these challenges will also affect the rest of the country due to the economic environment currently being experienced. Also, it should be noted that the accepted developers profit was tested at the mid to higher points of the accepted range (15-20%). Therefore, this is not considered a valid reason to discount the general conclusions of the appraisal.	1425	No action required.

The Plan Objectives

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SNVC Objective 1 - Meet housing needs	3220	Object	Objection relating to the exclusion of site SNO552 from the South Norfolk Village Clusters Housing Allocations Plan. The emerging VCHAP fails to meet the tests of soundness as outlined in paragraph 35 of the National Planning Policy Framework as it is not positively prepared, justified, effective or otherwise consistent with the NPPF. As the Council is aware the company is proposing to deliver a new publicly accessible Country Park on land they own at Barford. As explained previously this will be enabled by a modest proportionate amount of private and affordable housing within the village of Barford. As evidenced in the previous submissions to the VCHAP and GNLP, this 29 ha County Park is required to address existing acknowledged deficiencies. Failure to allocate this proposal to offset the impact of future planned VCHAP housing growth cannot be the most effective strategy. Failure to deliver this also fails to comply with current and emerging national policy contained in paragraphs 84, 92, 98, 123 and 130 of the National Planning Policy Framework. The current VCHAP strategy that seeks to deliver no strategic public open spaces to offset the impact of 1,200 new homes means it is not positively prepared or effective. Site SNO552 has not been properly assessed when compared against other sites and therefore its exclusion is not justified. Contend that site SNO552 with the Country Park would have a greater landscape impact than emerging allocated site VCHAD1 at Haddiscoe. Furthermore, it also cannot be the case that the site has the potential for a greater ecological and landscape impact than that of emerging site VCGEL at Geldeston that is located some 450m from a RAMSAR site. It also cannot be the case that site SNO552 has inferior vehicular access arrangements to emerging allocated sites VCW001 at Woodton, VCBAP1 at Brooke, VCHEM1 at Hempnall and VCBAP1 at Bergh Apton contained in the VCHAP. In comparison with other sites in the VCHAP SN0552 has not been correctly assessed and as a result the emerging allocations do not meet the tests of soundness.	No changes submitted.	The Council considers that the VCHAP does meet the requirements of paragraph 35 of the NPPF in being positively prepared, justified, effective and consistent with the NPPF. The principle of the VCHAP is set out in paragraphs 30 and 31 of the Greater Norwich Local Plan to provide a strategy for housing deliver in the area that is appropriate for the larger and more rural nature of the district compared to other areas within the Greater Norwich area. The VCHAP forms one element of the larger Development Plan for Greater Norwich alongside the GNLP and will contribute to the overall strategy for the Greater Norwich area. Specifically, the VCHAP will provide housing to support the sustainability of rural areas as required by paragraph 79 of the NPPF. The Greater Norwich Local Plan includes policies of the delivery of strategic infrastructure and open space to support the overall growth for the area, including that being allocated within the VCHAP. Paragraph A.2 of the VCHAP states that it was determined that the inclusion of Core Policies would be a duplication of the policies set out nationally and in the Greater Norwich Local Plan and were not taken forward. The Council therefore considers that appropriate infrastructure needed to support growth as allocated in the VCHAP will be delivered sustainably and in an appropriate manner. The Council considers the site assessment process to be sound. All sites were considered on their own merits and the conclusions reached were independent of the other sites being considered. Comments from technical consultees were requested which have been included within the assessment conclusions. The site assessment for SN0552 concluded that the site would have a significant impact on the landscape and townscape. It was also concluded that the site was inappropriate for allocation within the VCHAP due to the significant size of the site and the VCHAP allocating sites ranging between 12 and 50 dwellings. A number of variations of the site at a smaller scale were also considered and one of these was considered appropriate for development (VC BAR1) as it would help enhance the local townscape. SN0552REVC was also considered to be a reasonable alternative site as it better reflected the	1469	No action required.

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					objectives of the VCHAP. The other variations of the site were considered to have constraints and/or impacts that meant they were not considered to be suitable sites either for allocation or reasonable alternative sites.		
SNVC Objective 1 - Meet housing needs	2941	Object	Site assessment of SN0016 and variations fails to include site history 2021/1044 and 2021/1045 granted during this process.	Tacolneston Sites GNLPSL0016/GNLPSL0016Rev/GNLPSL0016RevB should be allocated for one self build' through an settlement extension.	The Council has robustly assessed this site in various forms, as demonstrated in the site assessment forms, as well as the planning history of the site. The Council remains of the opinion that this site is not suitable for inclusion within the Settlement Limit for the reasons set out in the conclusion of the site assessment form, as repeated here: "The site is an UNREASONABLE site for both allocation and extension to the settlement limit. The fundamental issues remain as highlighted in the previous Regulation 18 Site Assessment SN0016REV, the most recently refused planning application for one dwelling (October 2020) and the dismissed Appeal (May 2017). The reduced site area does not change the previous conclusion. Development would have an unacceptable impact on the setting and significance of the Listed Buildings and Conservation Area. The traditional verdant setting of the group of dwellings at number 116 and 122 Norwich Road will not be preserved and development of this site would erode the character of the conservation area. Concerns have also been maintained about the provision of a suitable vehicular access into the site and the provision of acceptable visibility splays." This representation does not alter the position of the Council and the Council does not consider the omission of this site from the Settlement Limit to be a soundness matter.	1457	None required.

SNVC Objective 1 - Meet housing needs	2600	Object	Challenge the decoupling of the VCHAP from the rest of the GNLP as being unsound. The GNLP Regulation 19 commenced before the VCHAP Regulation 18 despite the Local Development Scheme stating that the VCHAP would be consulted on in February/March 2021. To be sound the GNLP and VCHAP should follow the same or very similar timetable, otherwise it is impossible to judge whether the two (or more) documents are based on proportionate evidence. The VCHAP Reg 19 makes the difference in timelines even more pronounced. The outcome of the GNLP's Examination on issues around the VCHAP is currently unknown and therefore its soundness can be questioned. Challenges to the GNLP included questioning the housing numbers, which includes the 1,228 in the draft VCHAP. Additional housing will be provided by windfall development which will be in excess to the total for Greater Norwich as only 1,296 windfall dwellings have been included despite forecasting that 4,450 windfalls during the plan period. Sites already allocated by the current Local Plan should be delivered before there is any consideration of additional new sites, including all of those within the VCHAP. Any newly allocated sites will be in less sustainable locations and therefore make it more difficult to adhere to Climate Change targets. The VCHAP disperses housing growth in largely less-sustainable car-dependent locations, with few employment opportunities. The development of greenfield sites, often on Best and Most Versatile (BMV) agricultural land, should be avoided. The inclusion of unnecessary housing numbers within the VCHAP in unsustainable locations makes the VCHAP unsound. No need for allocations as part of VCHAP or anywhere in South Norfolk. Hempnall Parish Council policy states that the current recent development at Willow Drive together with infill (windfall) developments and the hoped for provision of social housing on VC HEM1 will increase the number of houses in the village by around 10% which is considered manageable and will enable successful assimilation into the community without threatening the character. Do welcome that none of the other sites have progressed and re-state strong opposition to the inclusion of any further sites other than VC HEM1.	Given that the housing numbers proposed for inclusion in the GNLP could be found to be unsound and unnecessarily large this reinforces the view that there is no need for additional sites to be allocated for housing in the village as part of the South Norfolk Village Clusters Plan and indeed there is no need for any allocations to be made anywhere in South Norfolk via the VCHAP.	The Council does not consider the issues raised to relate to the soundness of the Plan. The Council does not consider the issues raised to relate to the soundness of the Plan. The principle of the VCHAP was established through the preparation of the Greater Norwich Local Plan. Paragraphs 30 and 31 of the GNLP state that the VCHAP has been prepared due to the nature of South Norfolk being much larger and having a much more rural nature than the other areas within the GNLP area. Therefore, the VCHAP will allow this to be recognised and provide a strategy of development that is appropriate for this area, whilst also being incorporated as part of the overall strategy for the Greater Norwich area. The hearing sessions for the GNLP have now been completed, including those relating to housing numbers. In a letter from the Inspectors dated 9th August it is stated that the next steps will be the preparation of the final version of the GNLP including the modifications. This will then need to be consulted on. No additional hearings are anticipated. The GNLP is therefore at an advanced stage of preparation. Any changes that could result through the final stages of the plan preparation will be considered as the VCHAP continues through its own preparation including the eventual examination. Therefore the different timescales for both plans is not considered to be an issue that relates the soundness of the plan. Paragraph 79 of the NPPF states that 'housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.'. This underpins the VCHAP as stated in paragraph A.6. The plan has been prepared regarding this element of the NPPF to support the social sustainability in rural areas whilst acknowledging the larger and more dispersed rural geography of South Norfolk, as set out in the Greater Norwich Local Plan. The Council is aware of the tensions than can exist when seeking sustainable allocation sites within a predominantly rural area. Section 11 of the NPPF sets out the Local Authorities requirements for making the effective use of land, including making as	1436	No action required.

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					much use as possible of brownfield land (paragraph 119). However, it also states that Local Authorities must meet their objectively assessed needs. The use of brownfield land has been given weight through the site assessment process, however it is not possible for the Council to meet these needs exclusively through the use of brownfield land, therefore development on greenfield land is required. The site assessments have included consideration of the Agricultural Land Classification and the Council have have sought to avoid higher grade land where possible. Section 11 of the NPPF sets out the Local Authorities requirements for making the effective use of land, including making as much use as possible of brownfield land (paragraph 119). However, it also states that Local Authorities must meet their objectively assessed needs. The sustainability of each site that has been allocated within the VCHAP was considered at the site assessment stage. Sites that were considered to not contribute to the social sustainability of the local area and those which resulted in detrimental effects to environmental sustainability were not taken forward. Site specific criteria have also been included where appropriate to ensure that sites positively contribute to the local area. The use of brownfield land has been given weight through the site assessment process, however it is not possible for the Council to meet these needs exclusively through the use of brownfield land, therefore development on greenfield land is required. The Council welcomes the comments on the strategy for Hempnall.		

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SNVC Objective 1 - Meet housing needs	2873	Object	Site SN0475REVA or SN0475REVB should be an allocated site in the Plan. Any adverse impacts would be outweighed by the social and economic benefits of the provision of an affordable housing-led scheme in Colton.	Site SN0475REVA or SN0475REVB should be an allocated site (affordable housing-led scheme) in the Plan.	While recognizing the benefits of an affordable housing-led scheme, multiple and significant constraints to development remain on these sites. As outlined in the site assessments, both SN0475REVA and SN0475REVB relate poorly to existing services including the cluster primary school, and would have a poor relationship with the existing form and character of the settlement. Significant access and highway network constraints have also been identified and are considered to be further barriers to the development of these sites. The Council remains of the opinion that these sites are not suitable for allocation and that the issues raised in these representations do not relate to the soundness of the plan.	1409	None required.
SNVC Objective 1 - Meet housing needs	2609	Object	It is not a viable site for such great density of dwellings. The terrain is undulating and uneven, resulting in some properties being overlooked. Concerns about surface water flooding and the requirement for a sewage pumping station.	Reduce scale of allocation VC THU2 to 5 dwellings.	The Council considers that the issues raised have already been adequately addressed by response 1134 to Policy VC THU2 and it is not considered necessary to repeat them here. The Council does not consider the issues raised in this representation to relate to the soundness of the plan.	1398	None required.
SNVC Objective 1 - Meet housing needs	2658	Object	Scale of VC WIC1 is disproportionate to the size and location of Wicklewood, considering housing needs for the immediate area are being provided already by large developments in nearby Wymondham.	Reduce scale of allocation.	The Council considers that the issues raised have already been adequately addressed by response 1042 to VC WIC1 and it is not considered necessary to repeat them here. The Council does not consider the issues raised in this representation to relate to the soundness of the plan. The Council assumes that reference to developments in Wymondham relate to the planned growth set out in Policy 10 of the Joint Core Strategy (to 2026), and would advise that the VCHAP plans for housing growth to 2038 in line with the requirements of the GNLP.	1395	None required.

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SNVC Objective 2 - Protect village communities and support rural services and facilities	3040	Object	This part includes vague ambitions to improve infrastructure, but nowhere is it mentioned how to achieve this in a sustainable fashion.	Evidence is needed to show how good low carbon public transport services will be provided between villages which have been formed as 'clusters' and share facilities such as shops, surgeries, schools and other basic conveniences.	The Council does not consider the issues raised to relate to the soundness of the Plan. The site-specific policies for the allocations have been prepared in consultation with various stakeholders, such as Norfolk County Council Highways Authority and Anglian Water. Where there has been an identified need for infrastructure improvements or provision, such as footways, highways improvements and potential needs for water capacity enhancements, these have been included as requirements in the policies. As a general starting point, the Council has sought to allocate sites that either benefit from reasonable connectivity to existing services and facilities (including pedestrian access), or where achievable and proportionate require the provisional upgrade of these linkages as part of site-specific policies. As part of the assessment process the Council sought local information about the availability of services and facilities within settlements and across clusters. This information was a consideration in the assessment of the accessibility and sustainability of sites. The Council recognises however that a tension exists when planning for growth across a dispersed rural area. It should also be noted that the VCHAP will form one part of the Development Plan for the Greater Norwich Area. The Greater Norwich Local Plan includes policies of the delivery of strategic infrastructure to support the overall growth for the area, including that being allocated within the VCHAP. Paragraph A.2 of the VCHAP states that it was determined that the inclusion of Core Policies would be a duplication of the policies set out nationally and in the Greater Norwich Local Plan and were not taken forward. The Council therefore considers that appropriate infrastructure needed to support growth as allocated in the VCHAP will be delivered sustainably and in an appropriate manner.	1420	No action required.

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SNVC Objective 2 - Protect village communities and support rural services and facilities	3104	Support	Doubtless more groups of housing are needed in our area. Please take into consideration the need for the following to be in place prior to introducing a population: green space, various facilities and adequate drainage.	No changes identified.	The Council welcomes the support for the plan. At each stage of the plan-making process we have sought to engage and gain input from a number of statutory consultees, including the local health board, Anglian Water, the Environment Agency and the Lead Local Flood Authority and these discussions have helped to inform both the site selection process and site-specific requirements. Provision of green space and affordable housing will be required through an S106 agreement for all allocations in the plan and will be in accordance with existing and/or emerging policy requirements as appropriate (e.g. the Open Space SPD and Policy 5 of the GNLP regarding affordable housing). Through the VCHAP the Council is seeking to increase housing options in the most sustainable locations within a rural context. Inevitably this leads to a tension relating to the availability of a comprehensive suite of services and facilities across these villages, and the Council recognises this as an inherent tension when planning growth across a rural area.	1412	None required.
SNVC Objective 2 - Protect village communities and support rural services and facilities	2608	Object	Thurlton's traffic issues will be worsened by the allocation of VC THU2.	Reduce the scale of the allocation.	The Council considers that the issues raised have already been adequately addressed by response 1134 to Policy VC THU2 and it is not considered necessary to repeat them here. The Council does not consider the issues raised in this representation to relate to the soundness of the plan.	1397	None required.
SNVC Objective 2 - Protect village communities and support rural services and facilities	2659	Object	Wicklewood's traffic issues would worsen with the proposed allocation, with sharp bends and heavy loads already an issue.	Reduce scale of allocation.	The Council considers that the issues raised have already been adequately addressed within the site-specific responses to allocations in the Wicklewood chapter and it is not considered necessary to repeat them here. The Council does not consider the issues raised in this representation to relate to the soundness of the plan.	1396	None required.
SNVC Objective 3 - Protect the character of villages and their settings	3150	Support	We welcome the reference to the historic environment and landscapes in Objective 3.	No changes identified.	The Council welcomes the support for the aims of Objective 3 and welcomes the continual and ongoing engagement with Historic England throughout the production of the plan.	1413	None required.
SNVC Objective 3 - Protect the character of villages and their settings	2660	Object	The 30 dwellings proposed by VC WIC1 will not enhance the character of Wicklewood and exceed the present proportion of homes along Hackford Road in both numbers and in density.	A smaller scale development would be more appropriate in a less prominent position in the landscape.	The Council considers that the issues raised have already been adequately addressed by response 1134 to Policy VC WIC1 and it is not considered necessary to repeat them here. The Council does not consider the issues raised in this representation to relate to the soundness of the plan.	1400	None required.

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SNVC Objective 3 - Protect the character of villages and their settings	2610	Object	The proposal is an over development of the site with an inappropriate density. Thurlton's traditional rural features should be preserved.	Reduce the number and density of the dwellings in the plan.	The Council considers that the issues raised have already been adequately addressed by response 1134 to Policy VC THU2 and it is not considered necessary to repeat them here. The Council does not consider the issues raised in this representation to relate to the soundness of the plan.	1399	None required.

2. Alington, Yelverton and Bergh Apton

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Alington and Yelverton, 2.2	2795	Object	1. School - increased traffic around school. It is already chaotic at pick-up times by parents jamming the narrow roads. 2. Normal traffic through the village is already heavy at times and is appalling if A146 is closed due to an accident. 3, The roads in Alington and Yelverton are TOTALLY UNSUITABLE for the extra traffic which will be generated by the proposed 25 more dwellings. 4. 25 more dwellings will generate upwards of 30+ more vehicles. 5. There is a proposal to alter the roadways in the villages to alleviate the extra traffic. I totally object to this. With modern cars increasing in width every year our rural roads are becoming even more inadequate. I do not want see any more large scale housing developments in either of our twin villages of Alington and Yelverton. Ribbon development, where appropriate, is a much better option.	I do not want see any more large scale housing developments in either of our twin villages of Alington and Yelverton.	Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including those in Alington. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds, either in terms of in access to/from the village or the suitability of Church Meadow/Church Road. As noted in other responses, the primary school currently has a number of out of catchment pupils which increases the volume of car traffic at drop off/pick up times. This is expected to change over time with improved provision in Poringland/Framingham Earl and more local pupils generated by new development.	1091	No action required.
Alington and Yelverton, 2.2	2467	Object	FORM & CHARACTER It would be inappropriate to develop beyond the "nucleated" settlement as every village is based on ribbon development and new development should follow this pattern. HIGHWAYS SAFETY The Church Meadow Site is beyond two former nucleated development sites and only accessible by a single access point. The existing houses are commonly populated by young families and children can often be found playing in the street outside their houses; additional development would increase traffic and thereby generate road safety issues.	Remove ALP1 from the VCHAP.	FORM & CHARACTER It is not entirely clear what the assertion that "every village is based on ribbon development" is based on; however, form and character was a key consideration in the assessment of sites, and this site is considered to be a well contained within the landscape and well related to the form of the village. HIGHWAYS SAFETY The number of dwellings from the combination of existing houses on Church Meadow/St Marys Close/Priory Close and the proposed allocation, is below Norfolk County Council's maximum for a single point of access.	1090	No action required.
Alington and Yelverton, 2.3	2607	Object	I do not understand this observation. Good areas of tree planting on Church Road? Hedges? Most of the properties are open plan in the front. Highways have prevented planting owing to claiming highway rights. or when they have been requested removal see Framingham Earl Road now being destroyed by people using front lawns to pass each other. Totally wrong submission	Factual updates required.	There are a number of treed areas along Church Road, including the approach to the village from the south, the churchyard and at Alberta Piece; in between these there are many houses with trees and hedging to the front.	1089	No action required.

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Alpington and Yelverton, 2.4	2895	Object	The B1332 does not lie 'immediately to the west of the parish'. It is 2 kilometres from the boundary, and two-and-a- half kilometres from the centre of the village along largely single track roads with no footpaths until Poringland. There are no 'good links' to services in Poringland, and no bus service on those routes. The bus route through the village goes to Norwich. The 'nucleated' estate development is not 'nucleated' in the landscape sense, which implies gathering round a centre. The estates do not interconnect, and do not provide any centre to the village.	Inaccuracies should be corrected and where good links are referred to, it should be made clear that these are principally by car.	The B1332 is approximately 450m west of the parish boundary and 1.5km from the main part of the village. Whilst the roads connecting Alpington/Yelverton to the B1332 are rural in nature, this is characteristic of the wider area, and the B1332 itself provides a good quality links to Norwich and Bungay. Whilst the village has no one central feature (such as a village green), it is described as 'nucleated' on the basis that a small group of roads make up the main area of the settlement and include the key services and facilities (village hall, pub, school, church), rather than being a more dispersed or linear settlement.	1087	No action required.
Alpington and Yelverton, 2.4	2292, 2412, 2416, 2468, 2475, 2587	Object	Inadequate highways - specifically the width and alignment of roads into the village (connecting to the A146 and Poringland) and the lack of footways in many parts of the village. Most journeys to work, secondary school and healthcare facilities will require a car.	No further development in Alpington, or reduced numbers and improved roads.	Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including those in Alpington. NCC has raised no objection to the allocation or the settlement limit at the Regulation 19 stage on highways grounds, either in terms of in access to/from or within the village.	1086	No action required.
Bergh Apton, 2.5	2789	Object	The roads are referred to as rural. They are one car width with no footpaths.	Further development should not be permitted	Comment noted.	1092	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Services and Community Facilities, 2.6	2290, 2394, 2413, 2417, 2469, 2778	Object	SCHOOL CAPACITY The School is currently at capacity and has no ability to expand. OTHER SERVICES & FACILITIES The users of Yelverton football club are from outside of the village. No bus services to the nearest GP, shop etc. in Poringland. Pre-school is currently struggling. No safe walking route to the Post Office.	Remove VC ALP1 and/or reduce the numbers across the cluster.	SCHOOL CAPACITY In terms of the capacity at the local primary school, Norfolk County Council Education Services team has reiterated their advice that there has been a decline in birth rates which is impacting on primary school entry rates, and it is anticipated that this will take effect within the next 2-3 years. Children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the schools and, as noted in some representations, Alington attracts a number of pupils from out of catchment. NCC is actively looking to improve provision in Poringland/Framingham Earl. As such, increased pupil numbers locally will support the ongoing future of rural schools. OTHER SERVICES & FACILITIES The VCHAP acknowledges that car use will continue to be necessary in the rural area, and will be the first choice for many journeys. However, the modest levels of growth proposed through the plan seek to balance the impacts of car use with support for local services and facilities, whilst providing for choice and diversity in the housing market and affordable units for local people.	1085	No action required.

Alpington and Yelverton, 2.7	2281, 2372, 2431, 2432, 2476, 2603	Object	HIGHWAYS Inadequate highways - specifically the width and alignment of roads into the village (connecting to the A146 and Poringland) and the impact on Church Road. SERVICES & FACILITIES Overall lack of facilities (no shop within the village), lack of capacity at the primary school and of healthcare facilities in Poringland. Public Transport is infrequent. Lack of capacity in utilities. PRINCIPLE VCHAP is leading to overdevelopment of villages.	Do not change the Settlement Limit to accommodate additional development, at least not without significant improvement to highways/infrastructure.	HIGHWAYS Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. NCC has raised no objection to the Alpington Settlement Limit at the Regulation 19 stage on highways grounds, either in terms of in access to/from the village, of the suitability of Church Road. SERVICES & FACILITIES In terms of the capacity at the primary school, Norfolk County Council Education Services team has reiterated their advice that there has been a decline in birth rates which is impacting on primary school entry rates, and it is anticipated that this will take effect within the next 2-3 years. Children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the schools and, as noted in some representations, Alpington attracts a number of pupils from the Poringland area and NCC is actively looking to improve provision in Poringland/Framingham Earl. As such, increased pupil numbers locally will support the ongoing future of rural schools throughout the village cluster area. Public transport directly through the village is limited, with 3-4 services a day in each direction on the Loddon/Norwich route; however a number of other services run throughout the day on the Lowestoft/Beccles/Norwich route along the main A146 (stopping within the cluster at Hellington Corner and Yelverton), which is a short drive from the site. There are no improvements planned to broadband through Better Broadband for Norfolk, however this does not mean that improvements will not be made through commercial provision. In addition, the main utilities have been consulted and have raised no objection to the principle of the VCHAP or the specific allocations and settlement limits. PRINCIPLE The aim of the Village Clusters is to deliver smaller-scale development in more rural locations. The scale of sites allocated is a balance between the the land promoted and the acceptability of those sites when tested through the Site Assessment, Sustainability Appraisal and consultation processes, and	1084	No action required.

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					they are considered proportionate to the rural location. The issue of the appropriateness of the overall target of 1,200 home being dealt with through the Examination of the GNLP.		
Alpington and Yelverton, 2.7	2896	Support	The inclusion of the land on Nichols Road is in keeping with the dispersed nature of the historic village settlement rather than the concentrated post-war development to the north-west of the crossroads. It will maintain an organic expansion of the village along the 'spines' of the village - Church Road/Nichols Road and Bergh Apton Road/Wheel Road, and is close to village amenities.	No change required.	Support noted.	1083	No action required.

Alpington and Yelverton, 2.7	2393, 2407, 2414, 2418, 2428, 2470, 2779, 2790, 2854	Object	CORRECTION The Settlement Limit Extension is described as 'west' of Nichols Road, when it should be 'east' PRINCIPLE The proposed extension is to the south of a small group of affordable dwellings which were allowed as a local needs affordable housing exceptions site, which South Norfolk Council said would not be extended further and was rejected in the last plan. This could set a precedence for further extensions to the Settlement Limit. HIGHWAYS This is a quiet, but narrow road with no footways. AGRICULTURAL LAND CLASSIFICATION The land is classified as Grade 2, best and most versatile agricultural land and should not be developed.	Do not extend the Settlement Limit to the east of Nichols Road.	CORRECTION Agreed, the extension is east of Nichols Road, not west. PRINCIPLE The housing immediately to the north was originally permitted in 2009 as a local needs affordable housing exceptions scheme. The site was subsequently included within the Settlement Limit as part of a Main Modification (MM52) by the Inspector examining the 2015 Local Plan, however the Inspector did not include the land immediately to the south as it did not "logically form an infill plot within the settlement". Although not an infill, development on the site would be seen in the context of the completed affordable units to the north and the existing school and dwellings on the west of Nichols Road, all of which are within the Settlement Limit. The site does not extend either east or south beyond the plots of the existing dwellings, and therefore would not set a precedent for further extensions into the open countryside in this location. It is not clear at what meeting Yelverton Parish Council considers South Norfolk Council stated that no further development would take place in this location, particularly as 2005 predates the planning application for the affordable units by 4 years; in any event, officers and members of the Council would not be able to give an assurance that a site would 'never' be considered for future development, particularly as this is a relatively unconstrained site (i.e. agricultural land, with road frontage and no environmental/heritage designations), adjoining the existing Settlement Limit, with residential development to both the north and west. The documents appended by Yelverton Parish Council represent their objections to the last Local Plan, not an agreement with South Norfolk Council. HIGHWAYS Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Whilst there is no policy for the Settlement Limit Extension, the Site Assessment form notes that NCC Highways and the Council's Senior Heritage and Design Officer would wish to see frontage development onto Nichols Road, with an extension of the	1082	Promote a factual correction to paragraph 2.7 to state that the Settlement Limit Extension is east of Nichols Road.

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					footpath provided as part of the adjoining affordable units. AGRICULTURAL LAND CLASSIFICATION It is acknowledged that the site is Grade 2 agricultural land, however the scale of the proposed extension would not compromise the ability to keep the remainder of the field in agricultural use.		
VC ALP1, 2.9	2429, 2434, 2477, 2604, 2780, 2898	Object	The assessment of sites is flawed. Access to VC ALP1 is via a older estate road which is not suitable. The site is green field and should not be developed.	VC ALP1 should be removed from the Plan.	Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds in terms of the suitability of Church Meadow/Church Road. Whilst the site is greenfield, the VCHAP forms part of the allocations across the wider GNLP, which aims to utilise brownfield sites, particularly those within Norwich; however, it is not possible to meet the GNLP requirements solely on brownfield sites. The main access to the site from Church Meadow is suitable for a road with footways, which gives pedestrian access within 800m of the main facilities in the village (school, village hall/recreation ground, pub and football club). The links to the footpaths to the north give an alternative route/recreational opportunity.	1071	No action required.
VC ALP1, 2.10	2415, 2430, 2435, 2471, 2606, 2781	Object	Inadequate highways - specifically the width and alignment of roads into and through the village (including those connecting to the A146 and Poringland), with the lack of passing places and footway provision, making the walking environment dangerous. This is exacerbated by the lack of streetlighting and the 30mph speed limit being too high. Data indicates approximately 29,000 movements in and out of the village on a monthly basis. The policy proposals will not encourage sustainable transport options.	Impact on local roads mean that the VC ALP1 should not be developed.	Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds in terms of access to/from the village or the road network in the immediate vicinity. In terms of the policy criteria, these are designed to encourage walking to local facilities, including the village hall and bus stops.	1068	No action required.

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VC ALP1, 2.11	2880	Object	We chose to live in Alington because we wanted to live in a rural village and enjoy the benefits of the countryside and its views. If the SN 0400/VC ALP1 site is built upon, it will probably completely ruin our view of the field and trees on the Western side edge of Church Meadow and may have a detrimental effect on the value of our property.	Abandon the plan and intention to build upon this piece of green field land.	Any application will be tested against relevant national and local policies relating to residential amenity. However the specific issues raised in terms of views of the open field and tress on the western boundary, as well as the impact on property value are not in themselves planning considerations. Any impact on views would be considered as part of a landscape and visual appraisal (if one was considered necessary), and generally views from private properties do not carry significant weight in that process.	1067	No action required.
VC ALP1, 2.11	2422	Object	Any future development should be for bungalows only. Not a majority of houses and a handful of bungalows but all bungalows. Much is made of larger houses being underoccupied. This is likely driven by the lack of bungalows being built and nowhere suitable to move to and stay local if that is the preference.	The plan should stipulate that bungalows will be required to be built to reduce the impact of building on this green field.	The mix of housing on the site will be informed by the Greater Norwich Local Housing Needs Assessment, or successor evidence document(s), at the time of any application. In terms of reducing impact, any application will tested against relevant national and local planning policy on residential amenity.	1065	No action required.
VC ALP1, 2.11	2472, 2782	Object	Access to the site through the existing Church Meadow development is constrained/unsuitable.	Remove VC ALP1.	Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds in terms of the suitability of Church Meadow.	1064	No action required.

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VC ALP1, 2.11	2420	Object	The site assessment form contains omissions and potential errors. 1. Accessibility - no mention of lack of footpaths to bus stop on X2 route or Aldis farm shop. 2. Distances to Village Hall (250m) and Yelverton Football Club pavilion (550m) incorrect. YFC pavilion is closer to site than the Village Hall. 3. No mention that St Mary's Church is Grade 1 listed and flagged as red in GIS analysis- why wasn't this covered in the Heritage Impact Assessment? These inaccuracies lead to a lack of confidence in the site assessment process.	The facts need to be updated and the assessment reviewed.	In terms of the specific points: 1. The site assessment notes that there are footpaths to those services/facilities 'within the village' (school, villages hall, football club, local bus services), however the other facilities noted are within the distances set out in the Site Assessment process, but are likely to require people to use a car. 2. The distances are measured using walking routes, rather than 'as the crow flies', therefore the distance to the football club assumes people will have to walk along Church Meadow and back along the access track to the club. It may be that a shorter route can be established via Alington FP2/Yelverton FP4. 3. The 'red' score in Sustainability Appraisal GIS analysis is based on the physical 'as the crow flies' distance to the Grade I Listed church; however, the comments of the Council's Senior Heritage and Design Officer (as part of the Site Assessment), and the response of Historic England at the Regulation 18 and 19 stages, note that the existing intervening development on Church Meadow means that the impact on the church of developing on VC ALP1 would be minimal.	1062	No action required.
VC ALP1, 2.13	2764	Object	Bergh Apton is not a rural services village, does not have a shop within easy walking distance of the majority of the village, and has already had 27 new properties built since the last development plan. Any children would have to be transported to Alington school as there are no adequate pathways or cycle ways. Given the planned development in Alington, the village school could well have insufficient space. The narrow road access has no speed limit and is inadequate for possibly 50 new car movements. The Highways officer has visited the village and said that there are no grounds to provide a limit.	Fewer (if any) dwelling on VC BAP1	The representation relates primarily VC BAP1. Whilst it is acknowledged that the site is more remote from services and facilities than others in the VCHAP, the site currently has a scrapyard use and an extant industrial use, which Norfolk County Council Highways has acknowledged generates/could generate a level commercial traffic which can be offset against the future residential use. In term the speed limit, the County Council may wish to review the situation as part of the submission of a planning application for the site, but has not indicated that this needs to be a requirement of the policy. As noted in the responses to representation on Policy VC ALP1, capacity at the school is not considered to be a restriction.	1056	No action required.

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VC ALP1, 2.13	2392, 2423, 2433	Object	Representations objecting to allocation VC ALP1 covering the following: HIGHWAYS Inadequate highways - specifically the width and alignment of roads into the village (connecting to the A146 and Poringland) SERVICES & FACILITIES Will increase pressure on local services. ALLOCATION NUMBERS What does approximately mean and how can numbers above 25 dwellings be prevented?	The remove VC ALP1, or reduce the number of dwellings the site is allocated for.	HIGHWAYS Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds. SERVICES & FACILITIES In terms of the capacity at the local primary school, Norfolk County Council Education Services team has reiterated its advice that there has been a decline in birth rates which is impacting on primary school entry rates, and it is anticipated that this will take effect within the next 2-3 years. Children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the schools and, as noted in some representations; Alington attracts a number of pupils from the Poringland area and NCC is actively looking to improve provision in Poringland/Framingham Earl. ALLOCATION NUMBERS The site is 1.87ha in extent, the allocation for 'approximately' 25 dwellings reflects the need to address the criteria within VC ALP1, which means that a lower than average density is likely to be achieved. The 2014 planning application for the site was for fewer than 25 dwellings. However, the suitability of a modest increase in numbers will be tested through the planning application process, which will take into account the full suite of Development Plan policies (as well as national policies/requirements), including those related to highways, amenity, biodiversity, flood risk and landscaping.	1055	No action required.
VC BAP1, 2.16	2791	Object	The access to Bergh Apton from Norwich is the A146 into Mill Road. There is no footpath on the entire length of Mill Road which is single carriage way in places. Cars are constantly speeding although half of the road is 30mph. The junction of Mill Road to the A 146 is a blind junction and there are repeated accidents from those trying to turn right. To the proposed development site the roads are single carriage. 25 new houses will mean at least 50 more cars as public transport is not available The roads and services are just not suitable	Refuse the site unless the junction of Mill Road and the A146 is improved.	Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds in terms of access to/from the village	1081	No action required.

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Policy VC ALP1: West of Church Meadow	3207	Support	The Landowner/Developer (Otley Properties) SUPPORTS the proposed allocation of land they have an interest in at Alington (ALP 1). The Landowner/Developer confirms that the land is available for and suitable for development and are committed to bringing the site forward for residential development as soon as possible. A Site Promoter Confirmation of Availability, Deliverability and Viability is appended to this submission.	None required.	Support welcomed. The Council notes the contents of the promoter engagement form and welcomes the commitment to deliver the Policy aspirations of VC ALP1.	1054	None required.
Policy VC ALP1: West of Church Meadow	3156	Support	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.	None required.	The Council agrees with the Historic England conclusion.	1053	None required.

Policy VC ALP1: West of Church Meadow	2280, 2289, 2305, 2306, 2369, 2373, 2383, 2421, 2427, 2474, 2612, 2689, 2719, 2783, 2794	Object	Representations objecting to allocation VC ALP1 covered the following HIGHWAYS Inadequate highways - specifically the width and alignment of roads into the village (connecting to the A146 and Poringland), concerns about the suitability of Church Meadow (particularly safety concerns, existing parked cars, noise/pollution) and the ability to improve Church Road (safety, need to use private garden land). SERVICES & FACILITIES Overall lack of facilities (no shop within the village), lack of capacity at the primary school and of healthcare facilities in Poringland. Public Transport is infrequent. WILDLIFE & BIODIVERSITY Site is greenfield, and brownfield sites should be prioritised. Loss of habitat for a variety of species. Agricultural land should not be taken out of production. FLOOD RISK/DRAINAGE Field regularly floods. PUBLIC RIGHT OF WAY There is a public right of way across the field that has not been taken into account. RESIDENTIAL AMENITY Would damage the outlook from/privacy of existing homes. Impact of building works and necessary transport works on local residents. PRINCIPLE Site is outside the current Development Boundary. It has not been possible to evenly distribute the development across the 48 village clusters, therefore the target of 1,200 homes should be reviewed. There has also been a change in Government Policy on the need to deliver housing requirements. FORM & CHARACTER Estate development would not be characteristic of the village/the rural area.	To either reduce the number of dwellings on the allocation, or to remove the allocation completely, particularly as there is another allocation in the Cluster. Upgrades needed to infrastructure in the village, including improved footways and more school capacity. Review the 1,200 home target for the South Norfolk Village Clusters.	HIGHWAYS Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds, either in terms of in access to/from the village, of the suitability of Church Meadow/Church Road and the ability to delivery any necessary improvements within existing highway land). SERVICES & FACILITIES In terms of the capacity at the local primary school, Norfolk County Council Education Services team has reiterated their advice that there has been a decline in birth rates which is impacting on primary school entry rates, and it is anticipated that this will take effect within the next 2-3 years. Children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the schools and, as noted in some representations; Alington attracts a number of pupils from the Poringland area and NCC is actively looking to improve provision in Poringland/Framingham Earl. As such, increased pupil numbers locally will support the ongoing future of rural schools throughout the village cluster area. Public transport directly through the village is limited, with 3-4 services a day in each direction on the Loddon/Norwich route; however a number of other services run on the Beccles/Norwich route along the main A146 (stopping within the cluster at Hellington Corner and Yelverton), which is a short drive from the site. WILDLIFE & BIODIVERSITY The VCHAP forms part of the allocations across the wider GNLP, which aims to utilise brownfield sites, particularly those within Norwich; however it is not possible to meet the GNLP requirements solely on brownfield sites, and the VCHAP also aims to offer choice across the housing market in terms of the size and location of developments. Whilst the site is greenfield, there is no evidence to suggest that development will impact on any protected species or habitat. Protection of the Veteran Tree and mature hedges is required by Policy VC ALP1. The site is not currently in agricultural use.	1030	No changes required.

					FLOOD RISK/DRAINAGE Assessment of Flood Risk has been a key part of the site assessment process, including engagement with the LLFA and the Environment Agency. The site has been specifically considered in more detail in the SFRA supporting the VCHAP, leading to a specific requirement for a site-specific SFRA to accompany any future planning application. Anglian Water has also been consulted on capacity within the area. PUBLIC RIGHT OF WAY A previous attempt was made to establish a PRoW across the site, this was considered by the Planning Inspectorate at an Inquiry in 2016 (Ref: FSP/X2600/7/112), where the Inspector concluded that the Order should not be confirmed as there was insufficient evidence. RESIDENTIAL AMENITY The amenity of neighbouring residents is a key consideration at the Planning Application stage and is covered by other policies of the Development Plan. There is no reason to anticipate that the impacts of construction would be exceptional for this site. PRINCIPLE The current Development Boundary was established for the 2015 Local Plan, it is part of the remit of the VCHAP is to review that Boundary and promote suitable sites for allocation. The aim of the Village Clusters is to deliver smaller-scale development in more rural locations. The scale of sites allocated is a balance between the land promoted and the acceptability of those sites when tested through the Site Assessment, Sustainability Appraisal and consultation processes. It should be noted that the 50 dwellings for this cluster are made up of two smaller sites (both 'up to 25 dwellings') in separate villages; therefore this is considered to be consistent with the overall approach. The issue of the appropriateness of the 1,200 home target is being dealt with through the Examination of the GNLP. Currently changes to Government Policy are not adopted, and in any event the Council considers this site an acceptable option for meeting the housing needs identified as part of the GNLP requirements. FORM & CHARACTER This part of Alington is not linear in		

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					character. The site is to the rear of an established small estate made up of Church Meadow, Priory Close and St Mary's Close, and the locality is characterised by similar small-scale development in depth at Gilbert Close, Cherrywood and Fortune Green.		
Policy VC BAP1: Former Concrete Batching Plant, south of Church Road	2328	Support	FW Properties consider VC BAP1 to be a suitable and deliverable location for new homes within the village. The regeneration of this brownfield site as a residential development would provide social and environmental benefits to the local community. The site is immediately available and FW Properties consider the development of 25 new homes to be viable and deliverable. The site is not subject to any delivery constraints which would prevent its development for housing and we believe that the site specific requirements attached to this draft allocation can all be fulfilled. Therefore, VC BAP1 should be taken forward for allocation.	No change required.	Support welcomed. The Council notes the contents of the promoter engagement form and welcomes the commitment to deliver the Policy aspirations of VC BAP1.	1080	No action required.
Policy VC BAP1: Former Concrete Batching Plant, south of Church Road	3157	Support	We welcome the addition of the policy criterion in relation to listed buildings.	No change required.	Supported welcomed.	1079	No action required.

Policy VC BAP1: Former Concrete Batching Plant, south of Church Road	2374, 2406, 2424, 2478, 2605, 2730, 2814, 2815, 2840, 2845, 2918, 2980, 3045, 3053, 3066, 3101, 3117	Object	Representations objecting to allocation VC BAP1 covering the following: HIGHWAYS Will lead to a significant increase in traffic over the existing commercial use. The main village currently is currently subject to the national speed limit. Poor access from Church Road onto The Street. Too far from services facilities, therefore not encouraging walking and cycling. SERVICES & FACILITIES Lack of services in the village (e.g. no shop), lack of capacity at the primary school and of healthcare facilities in Poringland/Loddon. Public Transport is very limited. FORM & CHARACTER Too many dwellings proposed, a lower density with open space/community orchard etc. would be preferable. Not in keeping with the linear form of the village. Estate-scale development would be out of keeping. PRINCIPLE The whole principle of VCHAP is a flawed one. Bergh Apton was classified as an Other Village in the Joint Core Strategy and has already had up to 27 dwellings under that plan. However as a brownfield site it should have preference over greenfield options. RESIDENTIAL AMENITY Needs a buffer to the dwellings to the east. OTHER Increase in light pollution. Impact on wildlife.	Either remove VC BAP1 or significantly reduce the numbers significantly to 10-12 dwellings. Specific requirements suggested include introduction of a 30mph speed limit through the main part of the village. Connection to mains sewage required.	HIGHWAYS Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds. Whilst it is acknowledged that the site is more remote from services and facilities than others in the VCHAP, the site currently has a scrapyard use and an extant industrial use, which Norfolk County Council Highways has acknowledged generates/could generate a level commercial traffic which can be offset against the future residential use. Specifically in term the speed limit, the County Council may wish to review the situation as part of the submission of a planning application for the site, but has not indicated that this needs to be a requirement of the policy. SERVICES & FACILITIES In terms of the capacity at the local primary school, Norfolk County Council Education Services team has reiterated their advice that there has been a decline in birth rates which is impacting on primary school entry rates, and it is anticipated that this will take effect within the next 2-3 years. Children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the schools and, as noted in some representations; Alington attracts a number of pupils from the Poringland area and NCC is actively looking to improve provision in Poringland/Framingham Earl. As such, increased pupil numbers locally will support the ongoing future of rural schools throughout the village cluster area. It is acknowledged that the parish has limited services, however the Post Office, farm shop and frequent bus service between Norwich and Beccles/Lowestoft are all located adjacent to/on the A146 at Hellington Corner, which would be likely to require car journeys from any part of the main village around Cooke's Road, The Street and Church Road. FORM & CHARACTER The density of the scheme strikes a balance between the size of the site, the highways impact and the level of development needed	1076	No action required.

					to make redevelopment viable. Bergh Apton is characterised by smaller clusters of development, separated by open areas. Whilst this would be larger than the existing clusters, it would fall into that general pattern. NCC has indicated that a less formal highways arrangement would be more appropriate, focussing on non-adopted shared access and frontage development. The Council's Senior Heritage and Design Officer raised no concerns as part of the Site Assessment process. There is also the potential to reduce the impact through improved landscaping to replace/enhance the existing non-native planting. PRINCIPLE The Principle of the Village Clusters is currently being tested through the Examination of the GNLP, and the VCHAP is consistent with the submitted Plan. Bergh Apton is classified as a 'Service Village' in the JCS (not 'Other Village' as some representations have indicated), suitable for an allocation of 10-20 dwellings plus infill development. The JCS was adopted 9 years ago and runs to 2026 and the circa 27 dwellings completed in the past 8 years is consistent with this definition. The GNLP will replace the JCS and moves the housing requirement on for a further 12 years (to 2038). RESIDENTIAL AMENITY The amenity of neighbouring residents is a key consideration at the Planning Application stage and is covered by other policies of the Development Plan. Policy VC BAP1 already includes "protection and retention of the established trees on the eastern boundary". OTHER New developments do not generally contain street lighting, and there is no reason to assume that new dwellings would be any more light polluting than existing developments in the village. The majority of the site is currently intensively used as a brownfield site and the existing planting in a non-native mix; consequently the landscaping/planting proposed through the policy has the potential to enhance biodiversity (in line with national proposals for Biodiversity Net Gain).		

3. Aslacton, Great Moulton and Tibenham

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Aslacton & Great Moulton, 3.7	3092	Object	Please see supporting Statement (PDF) appended to this submission for reasoning as to why the Reg. 19 consultation draft is potentially unsound with the omission of my clients' site as an allocation and/or inclusion within the settlement boundary of Great Moulton & Aslacton (see Part B in particular). Part A of the statement (PDF) is intended to affirm the suitability, availability and achievability of my client's site as an allocation and/or inclusion within the settlement boundary (to facilitate windfall development) within the context of the emerging VCHAP. It is also requested that the information provided in this section informed the assessment of sites undertaken by the Council as part of their next review of the Hosing and Economic Land Availability Assessment (HELAA) that will in itself inform any future reviews of the VCHAP once adopted.	Allocate my client's site reference SN2118 for residential development (possibly self-build) and/or include my client's site within any amended settlement boundary drawn for Great Moulton & Aslacton as part of the emerging VCHAP process (for 'windfall' development and possibly self build).	The Council's assessment of the site concluded that it could be a reasonable alternative, but was potentially limited by surface water flood risk. This was identified as affecting approximately 42% of the site, with a surface water flow path adjacent to the site. The Strategic Flood Risk Assessment notes that, in relation to surface water flooding, "there is a significant increase in the extent of flooding on site between the 1% and 0.1% AEP surface water events, indicating the site is very sensitive to the effects of climate change." The site promoter has indicated that this issue could potentially be addressed, however the Council does not consider that the plan is unsound without this site.	1106	No action required.
Aslacton & Great Moulton, 3.7	2483	Object	The settlement boundary for Aslacton as shown in 3.7(2) is not sound. Before the Coopers Close development the property and grounds known as Boundary Villa were isolated and there was the Scrapyard between it and any other properties. Now with Coopers Close infilling where the scrapyard was there is an uninterrupted line of buildings up to the Church Road Muir Lane crossroads. In addition with the proposed development on the North side of Church Road being put forward this will create a settlement boundary on the North side extending to the crossroads above. This is illogical.	The settlement boundary on the South side of Church Road should be extended to the crossroads and therefore include the property and grounds of Boundary Villa. I believe this was just an oversight which needs correcting.	This Settlement Limits extension has not been promoted at previous stages and has therefore not been assessed by the Council. The Council understands the logic of and extension, as described, but does not consider this an issue which affects the soundness of the plan.	1105	The Council does not consider the omission of the proposed Settlement Limit extension affects the soundness of the Plan; however, should the Inspector be minded to make a change, an extension as described in the representation could be acceptable.

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VC ASL1, 3.9	2718	Object	The site assessment for ASL1 was completed in September 2018 and therefore does not include a full assessment of the new development at Coopers Close (where we live) which is directly opposite this proposed site.	As a minimum the site must be fully reassessed on a number of fronts as outlined in sections A.26 – A.28 of this document (the South Norfolk Village Clusters Housing Allocations Plan – Reg. 19 Pre-submission draft). A new LVA (Landscape Visual Appraisal) should be completed as per section A.35. Very careful attention must be paid to how the proposed site will deliver on ecological concerns given that it is a greenfield site	The former Coopers Scrapyard (now Coopers Place) was allocated in the 2015 Local Plan and has had planning permission for a number of years; as such the principle of residential development on this site and the approximate quantum of development was known at the time of the original site assessment. The site was revisited by planning officers immediately prior to the completion of the Regulation 19 VCAHP and the site assessment reviewed with an updated conclusion in April 2022. In terms of the LVA, this is principally concerned with views from the public realm and the impact on nearby properties is a key consideration at the Planning Application stage and is covered by other policies of the Development Plan. Similarly, the ecological impacts of developing the site are covered by other national and local planning policies which will be taken into account at the time of a planning application. Biodiversity net gain is likely to be a national requirement prior to the adoption of the VCHAP. In terms of impact of Coopers Place on VC ASL1, new residential development is likely to have a lesser impact than the previously extant scrapyard use of the site.	1102	No action required.
VC ASL1, 3.10	2722	Object	The current landscaping proposals do not meet SNVC Objective 3 which aims to “protect the character of villages and their settings”. Further landscaping measures will be needed to mitigate the effect of loss of open views for our house and for other dwellings and road users on Church Road. Section A.24 of the SNVCHAP Reg. 19 demands that “appropriate landscaping measures are delivered as part of new development”. Furthermore, there is an important question as to who will maintain the village green to avoid an eyesore for village residents. Will this fall to the Parish Council?	Developer should be required to ensure there are tree clusters or hedgerow planting along the north side of the proposed village green in order to screen new dwellings from Church Road. This would go towards mitigating the impact of the development on the currently wide and far reaching open views across the Tas Valley from Church Road and towards enhancing the natural landscape. Developer must be required to set out clear and binding plans for the maintenance of any village green and provision made for some recourse in the event that this maintenance doesn't happen.	As acknowledged in the Landscape and Visual Appraisal, VC ASL1 will impact on long distance/open views, particularly from the south-east corner approaching the village. The density of the housing and the open green area to the front (south) of the site are designed to maintain the character of the edge of village location. However the immediate site is the corner of an agricultural field, which is flat with no features other than the hedge line along the western boundary, which is to be retained. The inclusion of the village green was originally prompted by the responses of the site promoter and the Parish Council chairman at the Regulation 18 stage. The new open space (and car parking) would be offered to the Parish Council for adoption in the first instance; however alternatives, such as a management company, would also be possible.	1101	No action required.

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VC ASL1, 3.13	2723	Object	Site is too big based on NPPF guidelines quoted in section A.7 of SNVCHAP Reg. 19: “Paragraph 69 of the NPPF notes the importance of small and medium sized sites up to 1 hectare in size, in contributing to meeting housing needs.” Even taking off 0.4 hectares for a village green of 1 acre (per the Preliminary Plan drawing DR-A-1000) this leaves a site of 1.9 hectares. The number of dwellings should also be reduced to reflect the 14 dwellings at Coopers Close (permission reference 2020/0493), and the granted permission (reference 2020/0751) for 9 dwellings at Orchard Farm, Great Moulton.	Size of site and number of dwellings should be reassessed and reduced, or the village green should be made significantly larger, or a large area of natural habitat / nature reserve should be created.	Whilst the VCHAP is making a contribution to the sites of less than 1 hectare, this does not require all of the sites in the plan to be of this scale. Overall the VCHAP seeks to allocate a range of small and medium sized sites, to offer choice and diversity in the housing market. In terms of the two applications referred to: (1) Coopers Close was the allocation in the previous (2015) Local Plan, for the period to 2026, the GNLP and VCHAP now roll the housing requirement forward to 2038 necessitating new allocations; and (2) Orchard Farm is a windfall redevelopment of a disused meat processing factory, both the 2014 Joint Core Strategy and emerging GNLP anticipate that, over and above allocations, there will continue to be a level of windfall development on sites such as this.	1100	No action required.
Policy VC ASL1 – Land off Church Road	2820	Support	Silverley Properties supports the allocation of this site. The site is available now and would provide a medium sized development that could be built out relatively quickly and early on in the Plan period.	None.	The Council notes the work already undertaken by Silverley Properties in terms of progressing this site, including early public/parish council engagement and further investigation of the issues arising. In addition, the Council notes the work related to highways, utilities, landscape and heritage, to demonstrate that the site can be delivered, taking into account the constraints noted in the site assessment and the VC ASL1 policy criteria.	1099	No action required.
Policy VC ASL1 – Land off Church Road	3110	Object	The centre of Aslacton contains just 61 houses with 15 more in the process of build and 33 being planned as part of the VCHAP. It is stated by South Norfolk Council that the effects of multiple developments should be considered as a whole and therefore the village centre is in the process of a 78% increase. To do so without increasing the road capacity in the direction of Long Stratton and Norwich renders the proposed development unsound.	Muir Lane should be widened to its junction with Aslacton Road in order that the traffic restrictions which are currently experienced are removed. To ensure a safe pedestrian and cyclist route northwards from the proposed development, a footpath and a 40 mph speed limit should be introduced. This would also provide a more safe pedestrian access to and between recognised footpaths and in order that pedestrians and cyclists are provided with a safe route.	The suggested improvements are some considerable distance from VC ASL1. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds.	1098	No action required.

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Policy VC ASL1 – Land off Church Road	3227	Support	There has been recent experience through the Greater Norwich Local Plan (GNLP) examination where the Inspector has questioned the need for a policy requirement that requires wastewater infrastructure capacity confirmation prior to development taking place. Investment at our WRCs is linked to development coming forward with planning permission, so anything with a pre-commencement condition to evidence capacity of the receiving WRC could be problematic, particularly given the small-scale developments in the VCHAP. We suggest that appropriate policy wording is used to encourage developers to contact Anglian Water – similar to that in the GNLP submission version Policy 2 Sustainable Communities.	Modify policy text to read: Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network.	The Council notes Anglian Water's comments. Whilst this is not considered a soundness issue, the Council would not object to a modification which brings the wording into line with the emerging GNLP.	1097	The Council does not consider that a modification to the site-specific policy is necessary to make the Plan sound; however, if the Inspector is minded to modify the policy to address the comments raised, the Council suggests the following wording: "Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network".
Policy VC ASL1 – Land off Church Road	3158	Support	Whilst there are no designated heritage assets within the site boundary, there is the 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.	No change required.	Comments noted.	1096	No action required.

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Policy VC ASL1 – Land off Church Road	3136	Object	The plan is not sound in respect of location VC ASL1, Church Road, Aslacton because: i) It does not have any support from within the village. ii) The services available in the village are not sufficient for a 33 house development. In particular, insufficient capacity in the foul drainage network; difficulty in securing adequate electricity supply; the ability to implement SuDS in the prevailing	The site does not have any support within the village and that the services in the area are not sufficient for a 33 house development. To make the Plan sound, the site should be removed from the Plan.	LOCAL SUPPORT The Council acknowledges that the Parish Council has held meetings to discuss VC ASL1, variously attended by the site promoter, SNC members and SNC officers. The SCI states that the Council will meaningfully involve communities, however public support for the site is not a prerequisite for development and the proposals for this site have been adapted to reflect the Parish Council response at the Regulation 18 stage. The site has attracted only limited objection at the Regulation 19 stage, and those issues raised have been given full consideration. FOUL DRAINAGE The Council forwarded previous correspondence on Foul Drainage to Anglian Water, who noted that problems have largely been caused by infiltration of surface water into the foul water system. This issue has been partially addressed, but work is ongoing with landowners and the LLFA to deliver further improvements. Work was also due to be undertaken in October 2022 to upgrade pumping stations at Aslacton and Wacton, to help increase flows. Neither Anglian Water nor the Environment Agency have raised concerns at the Regulation 19 stage. ELECTRICITY SUPPLY The utility companies have been consulted throughout the preparation of the VCHAP and have raised no objection to VC ALP1. SUDS SUDS remains the primary option for surface water drainage, and any applicant would need to demonstrate that this has been fully investigated before 'conventional' options are considered; however, this does not mean that the site cannot deliver an appropriate drainage solution.	1095	No action required.

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Policy VC ASL1 – Land off Church Road	2846	Object	DRAINAGE The drainage is inadequate for the existing properties, excluding the 15 already in progress as raw sewage spews into the river. HIGHWAYS There are also issues with the volume of traffic on very small poorly maintained roads and although the highways have not objected to this I sincerely hope that should there be a fatality on these roads that whoever signs off on this has done their research properly and if not should be challenged legally should this come to pass. ELECTRICITY Also we have recently been made aware of huge challenges with the electricity to the proposed new development.	10 to 15 year pause to allow the village to absorb the development that's in progress to be concluded.	DRAINAGE Both Anglian Water and the Environment Agency have been consulted on the Regulation 19 document and have raised no concerns with the principle of development on this site. Solutions to the foul drainage of the site will be investigated at the Planning Application stage. HIGHWAYS Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds. ELECTRICITY The utility companies have need engaged throughout preparation of the VCHAP and have raised no objection to the allocation at the Regulation 19 stage.	1094	No action required.
Policy VC ASL1 – Land off Church Road	2466, 3141	Object	Concerns over the location of the entry road for new estate being in close proximity to the accesses to existing dwellings on Church Lane. Currently the proposal contradicts the 10m rule that is applied to dropped curb access and T Junctions as started on Norwich County Council's website.	The plan needs to be reviewed so that the access road does not cause a hazard to existing dwellings to access their driveways safely.	VC ASL1 has an approx. 150m frontage to Church Road and the location of the access point has not been established; to date, any drawings provided by the site promoter are indicative only. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds	1093	No action required.
Policy VC GRE1 – North of High Green, west of Heather Way	3159	Support	Whilst there are no designated heritage assets within the site boundary, there are two grade II listed buildings on High Green to the south of the site. Any development of the site has the potential to impact on the significance of these designated heritage assets. The site lies to the north of site VC GRE2 which has the benefit of planning consent for residential development. Assuming this permission is implemented, this site would form a logical extension. We welcome the second bullet point to minimise the visual impact and integrate the site into the landscape.	No change required.	Comments noted. Carried forward site VC GRE2 immediately to the south of VC GRE1 has been partially completed, and benefits from a recently approved consent to increase the number of dwellings, therefore it is realistic to assume that this development will be completed in due course.	1103	No action required.

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Policy VC GRE2: Land north of High Green opposite White House Bungalow	3160	Object	Whilst there are no designated heritage assets within the site boundary, there are two grade II listed buildings on High Green to the south of the site. Any development of the site has the potential to impact on the significance of these designated heritage assets. We note that this site has the benefit of planning permission. However, it is helpful that there are still policy criteria in this policy for any new planning permission. It would be helpful to add a heritage criterion to read, 'Development that preserves and enhances the significance of nearby listed buildings on High Green (including any contribution made to that significance by setting).'	Add new criterion to read: 'Development that preserves and enhances the significance of nearby listed buildings on High Green (including any contribution made to that significance by setting).'	Comments noted. Carried forward site VC GRE2 has been partially completed and benefits from a recently approved consent to increase the number of dwellings, therefore it is realistic to assume that this development will be completed in due course.	1104	The Council considers Policy VC GRE2 to be sound; however, should the Inspector be minded to modify the policy in response to Historic England's comments the Council suggests the criterion proposed by Historic England be added.

4. Barford, Marlingford, Colton and Wrampingham

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Barford, 4.9	2643	Object	FW Properties have submitted the attached Site Assessment for Land off Chapel Street as we believe the VCHAP proposals for the village are unsound without the inclusion of this land. Not only have the Parish Council expressed delivery concerns to the draft VC BAR1 but also there have been comparatively few homes built in the village during the last 20 years. If the land off Chapel Street and VC BAR1 are both developed for housing there would be an uplift of 35 new homes (excluding the 10 houses removed from the current local plan) which can be accommodated within Barford.	The plan should include this land off Chapel Street for the development of 25 new homes and a new village hall together with a new playing field on the adjacent land to the North.	The Council notes the site submission and the inclusion of a site assessment, in the format used by the Council, plus supporting documents. The Council also notes the benefits being proposed as part of this site, in terms of a replacement for the aging village hall and provision of off-carriageway parking for the nearby primary school. As highlighted by the respondent, the 2015 Local Plan allocation for Barford has not been delivered and is not being carried forward in the VCHAP, and the level of windfall development was been relatively modest. As such, a level of allocation up to 45 dwellings, noting the additional benefits being provided, could be acceptable. Overall the site assessment appears accurate, although there are areas where the Council would highlight specific issues and may score the site differently. For example, the Landscape RAG score and the commentary on existing policies need to reflect the fact that the site is within a River Valley Landscape. More significantly, the site assessment has not been through the technical consultation with key stakeholders (such as NCC Highways, the LLFA, the Environment Agency, Historic England etc.) and the site has not been covered by the key evidence base documents (SA, HRA, SFRA and WCS). As such, there may be concerns with the site which have yet to be identified. The concerns raised regarding the deliverability of VC BAR1 have been addressed in the responses to that policy.	1127	The Council does not consider the plan is unsound without the the inclusion of this site. However, if the Inspector considers that there is a need for an additional site/sites to ensure the soundness, this proposal is considered to have potential as an allocation, subject to further assessment and consultation.
Colton, 4.12	2875	Object	Site SN0475REVA or SN0475REVB should be an allocated site in the Plan. The suitability assessment paints an unnecessarily pessimistic picture regarding the sustainability credentials of the site. Any adverse impacts would be outweighed by the social and economic benefits of the provision of an affordable housing-led scheme in Colton/village cluster (including much-needed accommodation for staff at the nearby Barnham Broom Golf & Country Club, N&N NHS Trust and UEA) and provision of public open space in Colton. The Plan is therefore unsound, in that it is inconsistent with national policy (NPPF paragraphs 78-79).	Site SN0475REVA or SN0475REVB should be an allocated site (affordable housing led scheme) in the Plan.	The Council maintains that the site assessments for SN0475REVA and REVB remain robust. Both national and local planning policies make provision for affordable housing-led exceptions sites outside Settlement Limits; as such, if a need can be demonstrated, these proposals could be pursued via the Development Management process. The respondent refers to affordable housing provision to support the Norfolk and Norwich University Hospital and the University of East Anglia; however, there are several housing developments in the Major Growth Locations at Cringleford, Costessey/Easton, Hethersett	1120	No action required.

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					and Wymondham (as well as within Norwich City itself) which include substantial elements of affordable housing which is either within walking and cycling distance of, or on a high quality public transport route to, these institutions.		
VC BAR1, 4.13	2544	Object	The site VCBAR1 is not available for development. Three businesses currently operate out of the garage including a car maintenance and repair shop, a used car seller, and a business in the offices upstairs. Historically, there has long been a business of this type here. Loss of this local employment goes against the delivery of sustainable development. There is no overriding economic, environmental or community benefit from redevelopment or change to another use which outweighs the benefit of the current lawful use continuing. The businesses are well-supported by the residents of Barford and Wramplingham. See uploaded documents.	None specified.	The Council acknowledges that VC BAR1 will result in the loss of employment land; however, Policy DM 2.2 of the 2015 Local Plan allows for this where "there would be an overriding economic, environmental or community benefit from redevelopment or change to another use which outweighs the benefit of the current lawful use continuing". In this instance the proposal has benefits in terms of the removal of a prominent commercial use in close proximity to designated and non-designated heritage assets, with consequent benefits to the townscape/landscape. The site will also deliver part of the identified housing requirement for the Greater Norwich area, as opposed to being more speculative, windfall redevelopment of employment land. This housing would include a proportion of affordable dwellings. Furthermore, two other employment sites are located in close proximity on the B1108; the 9-unit Barford Industrial Estate and Barford Van Hire. In terms of the availability of the site, the representative of the site owner has been contacted again following the Parish Council's submission and it has been confirmed that the site will be available for development within the first five years of the plan.	1111	No action required.
VC BAR1, 4.14	2545	Object	LANDSCAPE The proposed development of 20 houses in this location will have a significant impact on the distinctive landscape characteristics of the area. The change is not just to the greenfield site affected but to the landscape and visual amenity of the whole village. There is no suggestion in the proposal that there has been any attempt to consider or design a high quality landscape design. CONTAMINATION The proposal is also contrary to health and safety policy (Garage site) and should be assessed in advance of progressing with the proposal. See uploaded document.	None specified.	LANDSCAPE Approximately 50% of the site is already developed with existing industrial/commercial buildings, which already include a two story element (plus an existing two story house) and a use (car sales), which by its nature relies on making the site visually prominent. The Council considers that the site is well contained within the landscape, with existing trees/hedging to both the Back Lane and B1108 Watton Road frontages, which Policy VC BAR1 requires the 'retention, protection and enhancement of'. The Policy also requires assessment of the central tree line (which separates the greenfield and brownfield elements), and to incorporate these trees within a scheme layout as far as possible. As such, whilst the site is on the	1112	No action required.

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					periphery of the River Valley landscape, which surrounds Barford, it is not considered that development is unacceptable (see the LVA for details). It is not clear why, at this stage, the Parish Council has assumed the development will include three story development. CONTAMINATION Policy VC BAR1 requires the relevant contamination surveys to be undertaken, and the outputs from these will be a consideration in the determination of any planning application. It is not unusual for former commercial and industrial sites to be reused for residential dwellings.		
VC BAR1, 4.15	2539	Object	HIGHWAYS Whilst i can support the landscape improvement value to Barford of removing the garage site, the change of use to housing is compromised by the access next to the B1108 junction which is now unsuitable for residential use given the volume of traffic. EMPLOYMENT LAND The development also removes premises for two active businesses and employment, without allocation of an alternative in the village. ALTERNATIVE SITE The development ignores the significant amenity space, improved access for Back Lane and landscaping available from other proposed sites. 20 houses will be on a busy B road with poor access and limited amenity space.	Sites should be allocated where they provide green amenity space for the benefit of the development and the wider village. Access improvements must be taken advantage of where offered for wider benefit alongside landscape features to protect historic and natural features. The Barford allocated site only offers landscape improvement based on an opinion after commercial premises have been taken away and not replaced. Wider landscaping and highways improvement around Back Lane would make the whole plan work better in isolation and for the wider community. My proposal would be to leave the businesses in place and allocate the vacant land to the north and south of Back Lane. Back lane's access onto the B1108 can then be moved north to a safe vision splay helping the development and through traffic. Landscaping and access to amenity land for the development and wider community will benefit all. Ideas of what can be achieved are attached with the exact layout to be agreed.	HIGHWAYS Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds. EMPLOYMENT LAND The Council acknowledges that VC BAR1 will result in the loss of employment land; however, Policy DM 2.2 of the 2015 Local Plan allows for this where "there would be an overriding economic, environmental or community benefit from redevelopment or change to another use which outweighs the benefit of the current lawful use continuing" In this instance the proposal has benefits in terms of the removal of a prominent commercial use in close proximity to designated and non-designated heritage assets, with consequent benefits to the townscape/landscape. The site will also deliver part of the identified housing requirement for the Greater Norwich area, as opposed to being more speculative, windfall redevelopment of employment land. This housing would include a proportion of affordable dwellings. Furthermore, two other employment sites are located in close proximity on the B1108; the 9-unit Barford Industrial Estate and Barford Van Hire. The alternatives promoted by the respondent (SN0552REVC and REVD) lie to the west of VC BAR1, and it is not clear how these proposal	1114	No action required.

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					could provide safe pedestrian and cycle links to the facilities in the village, including the primary school, without utilising the preferred site. Whilst the respondent has suggested a larger site to the west could deliver significant amenity land, it is not clear what the rationale is for putting this forward in this location, and how this would be delivered and maintained. The site assessment also notes the respondents alternative sites are located opposite the listed Sayers Farm, with implications for its current rural setting, and have the potential to create a visual intrusion which makes the settlement of Barford more prominent in the landscape.		
VC BAR1, 4.15	2546	Object	Location of access: The single access point to Cock Street is too close to the B1108 and is likely to endanger highway safety. We propose it should have a red rating. The likely increase in traffic (more than 80 vehicle movements per day) is likely to cause significant queuing and disruption at an already hazardous junction between Cock Street and the B1108. Highway safety will also be compromised by the provision of a footway (of no recreational value) through the site connecting Cock Street to Back Lane (unsuitable for pedestrian use) to the west. See uploaded document.	None specified, assume removal of VC BAR1.	Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds. It should be noted that VC BAR1 has a proposed 50m frontage to Cock Street, as it incorporates the dwellings north of the garage. NCC Highways had initially requested a frontage footway along the B1108, to connect to Back Lane, however this would compromise the retention of the landscaping, therefore it is proposed that a link be put through the site instead.	1113	No action required.
VC BAR1, 4.16	2547	Object	Re heritage, development of the site will adversely impact on the setting of Sayers Farm (Grade 2 listed) which, due to the bend in the road, will directly face the site. Also, the compression of 20 homes into this small site will not enhance the setting of the Cock Inn, nor the ancient centre of the village which is adjacent to the site. The hedgerows are unlikely to screen the site significantly due to the height of modern housing. The lack of consistency with national policy means the proposal fails the test of soundness. See uploaded document.	None specified, but assumed removal of VC BAR1	A Heritage Impact Assessment was undertaken for VC BAR1 which has influenced in the policy criteria. The Council's Senior Heritage and Design Officer is satisfied that the separation created by the B1108 to the designated/non-designated heritage assets and the retention of the frontage hedge and the open fields to the west, would sufficiently mitigate any impacts. Similarly, whilst Historic England have suggested a small amendment to the policy, there is no fundamental objection to the allocation. It is also noted that development of this site will remove the existing industrial/commercial buildings, which already include a two story element, and a use (car sales), which by its nature relies on making the site visually prominent. In relation to density, it is the older cottage-style and terraced properties in the immediate vicinity which exhibit the highest	1115	No action required.

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					density, with more modern bungalow development being present immediately opposite the site and the Cock Inn.		
VC BAR1, 4.17	2548	Object	Any sewerage capacity assessment, has not taken into account the full recorded history of repeated sewerage capacity incidents in the village. Barford has been subjected to much sewage release into resident's gardens, and on occasion into houses because the sewage system is unable to cope with the combination of effluent and rainfall. Adding additional houses to the system will continue to put further load on it. Barford and Wramplingham are already susceptible to property flooding, which we consider is exacerbated by run off from housing developments that feed into the Tiffey and adjoining rivers. See uploaded document.	None specified, but assume removal of VC BAR1.	The site has been subject to assessment as part of the Strategic Flood Risk Assessment, which looks at all forms of risk, including surface water. The VCHAP SFRA sits under the wider work undertaken for the GNLP, which takes into account the cumulative effects of development in the river catchments. Similarly the issue of foul drainage has been assessed through the Water Cycle Study and specifically raised with Anglian Water who have stated "we have a scheme with contractors to resolve flooding on Park Avenue to address river inundation of the network ... apart from river inundation, there are no other key priorities here" and "sewers running at depths of less than 1.5m that traverse gardens with mature trees, can result in localised blockages with root ingress – these are issues that can be picked up by the flow monitors or by residents reporting issues directly to us." (AW email of 14/12/22).	1117	No action required.
VC BAR1, 4.18	2549	Object	Discussions have been ongoing for decades, and the problem continues to worsen. Therefore, we do not agree with additional housing to be considered until this issue has been solved. The "3 recorded instances" is INCORRECT. There have been many more. We understand that Anglia Water have put the village of Barford on a list of "Villages of Concern". Recent "remedial actions" by Anglia Water have yet to be tested for their efficacy. See uploaded document.	None specified, but assume removal of VC BAR1	See response to para 4.17.	1118	No action required.
VC BAR1, 4.19	2550	Object	The village has grown but the limited services have declined or not kept pace: a small village school (often over-subscribed), a 1960-s built small village hall, and an hourly bus service to Norwich and one weekly service to Wymondham. No village shop for the 4-village cluster. VCBAR1 will not contribute to a sustainable village. Indeed, it will have the opposite effect. 24 houses have been built during the recent past which have not benefited the residents other than to permit a few landowners to benefit from the "windfall" associated with building on green field sites. See uploaded document.	None specified, but assume removal of VC BAR1.	Barford remains a better served village than many in the Village Clusters. The village has a regular bus to Norwich, which runs via the hospital, with some services also stopping at the bus interchange at Cringleford for connecting routes. Busses also run in the opposite direction, to Watton (via Hingham), which has a range of shops and services, including a weekly market. Under the JCS Barford was considered suitable for an allocation of 10-20 dwellings, plus windfall development, for the period up to 2026 (JCS, para 6.61). Whilst a site for 10 dwellings was allocated, this has not come forward due to highways safety concerns, and is not being carried forward in the VCHAP. The level of windfall development represents fewer than 2 dwellings per year (note the Parish Council's total includes both holiday	1119	No action required.

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					units and some double counting). The VCAHP now moves the housing requirement forward to 2038. The Parish Council suggests no benefit to the local community from this housing; however the majority of these permissions (post 1 May 2014) will deliver CIL, with a proportion specifically for the parish, and these sites provide a range on new homes for local and new residents. Using Norfolk County Council's current Planning Obligations Standards (Feb 2022) a development of this scale will generate fewer than one pupil per primary school year and the County Council has confirmed through the Regulation 19 process that they do not consider primary school capacity to be a constraint. With declining birth rates, increased pupil numbers locally will support the ongoing future of rural schools.		
Policy VC BAR1 – Land at Cock Street and Watton Road	3161	Object	Whilst there are no designated heritage assets within the site boundary, the grade II listed Sayers Farmhouse lies to the south west of the site. There are glimpsed views farmhouse from the site. Any development of the site has the potential to impact on the significance of this listed building. We welcome the completion of an HIA to consider the impact of development on this asset and the non-designated Cock Inn. We welcome the reference to Sayers Farm in bullet point 4 and the reference to heritage assets in bullet point 5. We recommend that Sayers Farmhouse should also be referenced in bullet point 5 in relation to layout and design. The bullet point would read: ‘...given to the setting of Sayers Farmhouse and The Cock Inn.’	Amend bullet point 5 to read: ‘...given to the setting of Sayers Farmhouse and The Cock Inn.’	Comments noted. The Council does not consider that this issue affects the soundness of the Plan, as the impact on Sayers Farm and its setting is adequately covered by Policy VC BAR1, as well as other national and local planning policy.	1110	The Council considers Policy VC BAR1 to be sound. However, should the Inspector be minded to modify the policy in response to the comments of Historic England, the Council suggests using the wording supplied.
Policy VC BAR1 – Land at Cock Street and Watton Road	3143	Support	Cllr Margaret Dewsbury (Hingham) has indicated that if the development is agreed there would be a need for a reduced speed limit and a pedestrian crossing of some sort.	None suggested.	The County Council has not suggested that this should be a formal requirement for this allocation, although may wish raise this issue as part of the determination of any future planning application.	1109	No action required.
Policy VC BAR1 – Land at Cock Street and Watton Road	2551	Object	HIGHWAYS Proposed single access point to Cock St is so close to B1108 that likely to endanger highway safety. No reason for pedestrian footway to connect Cock St with Back Lane, which is a narrow rural road. Link would not provide additional access to local footpath network. Back Lane unsuitable for	None specified.	HIGHWAYS Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the	1108	No action required.

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			significant pedestrian use. HERITAGE, TOWNSCAPE & LANDSCAPE Concern over likely damage to heritage assets. Wish to see a severe limit on height of any houses to prevent housing from dominating beautiful and ancient centre of village. Density of proposed housing considerably greater than at present. This development will badly damage amenity of Barford, particularly on entering from west. CONTAMINATION Any contamination survey should be undertaken before any permissions are granted. DRAINAGE & FLOOD RISK No consideration given to flood risk associated with run off. Assessment must apply to additional run off into village and valley where flooding of dwellings more likely. Impact on sewage release into gardens and homes must be considered.		allocation at the Regulation 19 stage on highways grounds. As a highway, Back Lane is available for use by cyclists and providing a link through VC BAR1 would avoid the need to use the B1108. HERITAGE, TOWNSCAPE & LANDSCAPE A Heritage Impact Assessment was undertaken for VC BAR1 which has influenced in the policy criteria. The Council's Senior Heritage and Design Officer is satisfied that the separation created by the B1108 to the designated/non-designated heritage assets and the retention of the frontage hedge and the open fields to the west, would sufficiently mitigate any impacts. Similarly, whilst Historic England have suggested a small amendment to the policy, there is no fundamental objection to the allocation. It is also noted that development of this site will remove the existing industrial/commercial buildings, which already include a two story element, and a use (car sales), which by its nature relies on making the site visually prominent. CONTAMINATION Policy VC BAR1 requires the relevant contamination surveys to be undertaken, and the outputs from these will be a consideration in the determination of any planning application. DRAINAGE & FLOOD RISK The site has been subject to assessment as part of the Strategic Flood Risk Assessment, which clearly looks at all forms of risk, including surface water. Similarly the issue of foul drainage has been raised with Anglian Water who have stated "we have a scheme with contractors to resolve flooding on Park Avenue to address river inundation of the network ... apart from river inundation, there are no other key priorities here" and "sewers running at depths of less than 1.5m that traverse gardens with mature trees, can result in localised blockages with root ingress – these are issues that can be picked up by the flow monitors or by residents reporting issues directly to us." (email of 14/12/22). Policy VC BAR1 also requires a site-specific Flood Risk Assessment to accompany/inform any future planning application.		

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Policy VC BAR1 – Land at Cock Street and Watton Road	2540	Object	EMPLOYMENT LAND Whilst I can understand the landscape improvement value to Barford of removing the commercial site, the change of use to housing removes premises for two businesses and employment, without an alternative site allocated in the village. HIGHWAYS The site is also compromised by the access next to the B1108 junction which is now unsuitable for residential use given the volume of traffic. ALTERNATIVE SITES The development ignores the significant amenity space, improved access for Back Lane and landscaping available from other proposed sites. 20 houses will be on a busy B road with poor access and limited amenity space.	The plan should take into account wider benefits to housing development such as provision of green space and improved access where available. These should be considered alongside environmental benefits and and benefits to the wider community. This allocation simply fits 20 houses onto a commercial site, it offers no benefits beyond the housing itself. Landscape improvements are there but limited given the size of the plot and the need for housing, amenity provision and environmental benefit are negligible. I would propose that the commercial site is retained for employment allowing the vacant land south and north of a remodeled Back Lane to provide the housing and green space. This would deliver significantly enhanced amenity land and a safer, improved access for Back Lane onto the B1108 for use by the development and other traffic. The plan must take account of the amenity and environmental benefits available on other available sites.	EMPLOYMENT LAND The Council acknowledges that VC BAR1 will result in the loss of employment land; however, Policy DM 2.2 of the 2015 Local Plan allows for this where "there would be an overriding economic, environmental or community benefit from redevelopment or change to another use which outweighs the benefit of the current lawful use continuing" In this instance the proposal has benefits in terms of the removal of a prominent commercial use in close proximity to designated and non-designated heritage assets, with consequent benefits to the townscape/landscape. The site will also deliver part of the identified housing requirement for the Greater Norwich area, as opposed to being more speculative, windfall redevelopment of employment land. This housing would include a proportion of affordable dwellings. Furthermore, two other employment sites are located in close proximity on the B1108; the 9-unit Barford Industrial Estate and Barford Van Hire. HIGHWAYS Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds. ALTERNATIVE SITE The alternatives promoted by the respondent (SN0552REVC and REVD) lie to the west of VC BAR1, and it is not clear how these proposals could provide safe pedestrian and cycle links to the facilities in the village, including the primary school, without utilising the preferred site. Whilst the respondents refer to improving the existing Back Lane junction, this would itself be accessed from the same 'busy B road' as Cock Street, which is used to access VC BAR1. The respondent has suggested a larger site to the west could deliver significant amenity land but it is not clear what the rationale is for putting this forward in this location, nor how it would be delivered and maintained.	1107	No action required.

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					The site assessment also notes the respondents alternative sites (SN0552REVC and REVD) are located opposite the listed Sayers Farm, with implications for its current rural setting, and have the potential to create "visual intrusion which would make the settlement of Barford more prominent, as opposed to presently being visually well contained".		

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

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC BB1 – Corner of Norwich Road and Bell Road	3228	Support	As raised in paragraph 3.4 above (rep for VC ASL1), Anglian Water suggests that due to the relatively small-scale nature of the sites, that the policy requirement regarding the capacity of the WRC is unnecessary. The draft DWMP has identified growth for the WRC catchment area to 2050 and has not included any medium or long-term strategies over this period. The policy requirement should be amended to reflect capacity within the network.	Modify policy text to read: Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network.	The Council notes Anglian Water's comments. Whilst this is not considered a soundness issue, the Council would not object to a modification in line with Anglian Water's suggestion.	1124	The Council does not consider that a modification to the site-specific policy is necessary to make the Plan sound; however, if the Inspector is minded to modify the policy to address the comments raised, the Council suggests the following wording: "Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network".
Policy VC BB1 – Corner of Norwich Road and Bell Road	2404, 2458, 2459, 2460, 2906	Object	SCHEME DETAIL Difficult to comment without seeing the details of the scheme. OPEN SPACE General support for an open area adjacent to the shop/junction and would like to see this extended to the area in front of the pub. HIGHWAYS Concern about the volume of extra traffic. Need more detail on how the realignment of the crossroads will create a safe environment. SERVICES & FACILITIES Concern about the capacity of the school and foul drainage in the village. CHARACTER Open spaces contribute to the overall character of the settlement. Density of development is too high for the local context.	Reduce the number of dwellings on VC BB1 or move the allocation to a site on the edge of the village.	SCHEME DETAIL A number of the responses are seeking a level of detail that will only be available at the planning application stage. Although information has previously been provided by the site promoter, this was only indicative. OPEN SPACE The Council would wish the open space created by the realigned Bell Road maximise the opportunity to create a focal point in the centre of the village, as well as retaining established vegetation as far as possible. The detail will be influenced by both highways design and the layout of the adjoining development, as well as any opportunity to retain existing vegetation. HIGHWAYS Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds. SERVICES & FACILITIES NCC Children's Services has confirmed through the Regulation 19 process that they do not consider primary school capacity to be a constraint. With declining birth rates, increased pupil numbers locally will support the ongoing future of rural schools. Similarly, whilst Anglian Water has suggested an amendment to the wording of VC BB1, there is no objection on foul water network capacity grounds.	1121	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
					CHARACTER The site assessment for VC BB1 acknowledges that there will be an impact in terms of filling an existing gap within the village. This is balanced against the central location of the site, within easy walking distance of the local services/facilities, the opportunity to realign the junction and the potential to create a focal area outside the shop and pub. In terms of density, the character of the surrounding development is very mixed, in terms of plot size, dwelling size and the whether buildings sit close to the road frontage, or further back within their plots. It will be for any future planning application to respond to this context.		

6. Bawburgh

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Form and character, 6.1	2295, 2326, 2334, 2364, 2490, 2496, 2502, 2559, 2707, 2708	Object	PRINCIPLE Bawburgh is not part of a 'Cluster'. Why are these houses not located in a larger settlement. The site is bigger than 1.0ha, therefore does not meet the NPPF small/medium sized sits requirement. CHARACTER Development is out of scale with the village. New houses unlikely to be in keeping. Proximity to the Conservation Area. HIGHWAYS Traffic flows already too heavy through the village. Poor access to the sites. Lack of alternatives to the car, therefore not supporting walking, cycling and public transport. SERVICES & FACILITIES Lack of local services. School is already full. LANDSCAPE & BIODIVERSITY Loss of views over towards the Norwich Southern Bypass/Yare Valley. Close to an SSSI. FLOOD RISK & DRAINAGE Road floods on a regular basis. Foul water systems unable to cope with existing development.	Remove VC BAW1 or a reduction the the number of houses/density proposed.	The majority of the above points are addressed in the response to Policy VC BAW1. PRINCIPLE The GNLP has a strategy for development across the three districts. The Village Clusters are receiving a proportionately smaller level of development than higher tiers in the Settlement Hierarchy (in relation to existing population); however, as set out in the supporting information for the GNLP, moderate levels of development in the Village Clusters is designed to support diversity and delivery in the housing market, as well as maintain the vitality of smaller settlements. LANDSCAPE & BIODIVERSITY Whilst the site is within an SSSI Impact Risk Zone (IRZ), these are used to identify the locations where development could potentially effect the specific sensitivities of an SSSI. However, this does not preclude new development.	1213	See Action related to Policy VC BAW1.
Form and character, 6.1	2349	Object	Lack of suitable infrastructure for 35 new homes. Danger of more fatalities as traffic increases through the rat run. Borders up to conservation area.	Remove VC BAW1.	See response to para 6.3 and Policy VC BAW1.	1202	No action required.
Form and character, 6.2	2350	Object	Lack of suitable infrastructure for 35 new homes. Danger of more fatalities as traffic increases through the rat run. Borders up to conservation area.	Remove VC BAW1.	See response to Para 6.3 and Policy VC BAW1.	1203	No action required.

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Services and Community Facilities, 6.3	2370, 2497, 2579, 2657, 2681, 2699, 2724, 2743, 2768	Object	BUS SERVICE There is no daily service in the village, just a weekly bus to Wymondham. SERVICES & FACILITIES Limited to a primary school, village hall (with recreation ground) and pub. Primary school is currently oversubscribed. Lack of capacity in NHS services. HIGHWAYS Poor pedestrian access to/from and within the village.	Better provision of facilities e.g. regular bus services. Remove VC BAW1.	It is acknowledged that the regular bus service to the village is only weekly. However, other services, such as Transport Plus and Wymondham Flexi-Bus, are available on other days. The remaining issues are covered in the response to VC BAW1.	1215	Whilst the Council does not consider it an issue of soundness, a minor modification to the supporting text, to accurately reflect the transport provision is recommended. See also Action related to Policy VC BAW1.
Services and Community Facilities, 6.3	2339, 2351	Object	Lack of suitable infrastructure for 35 new homes. Danger of more fatalities as traffic increases through the rat run. Borders up to conservation area.	Remove VC BAW1.	The main issues in relation to this representation are dealt with under the response to Policy VC BAW1. Other specific points are: PUBLIC ENGAGEMENT The proposal is not a planning application and has not been dealt with as such. RECENT DEVELOPMENT The two previous developments west of Stocks Hill have taken place over the past 6-7 years. The VCHAP is now planning for the housing requirement to 2038. These developments have been for lower density single story properties, which many respondents have suggested should be replicated on VC BAW1. The development north of the village hall has been identified as contributing positively to the Conservation Area in the 2017 Character Appraisal.	1204	No action required.
Settlement Limit, 6.4	2340, 2352	Object	Lack of suitable infrastructure for 35 new homes Danger of more fatalities as traffic increases through the rat run. Borders up to conservation area.	Remove VC BAW1.	See response to para 6.3 and Policy VC BAW1.	1205	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC BAW1, 6.5	2362, 2498, 2709	Object	PRINCIPLE Site is larger than the 1.0ha for small and medium sized sites in the NPPF. CHARACTER & LANDSCAPE The character of the village has already been harmed by the extensive development which has occurred in the vicinity, including large-scale housing (Hetherset, Easton, Costessey, Bowthorpe), the Longwater Retail Park and Employment Area and the Costessey Park and Ride, all of which has contributed to rat-running through the village. Proposed densities are too high. Will impact on the openness of the Norwich Southern Bypass Landscape Protection Zone. HIGHWAYS Access point on the brow of a hill is dangerous. No footways out of the village to the Watton Road or Bowthorpe.	Remove VC BAW1 or decrease the density.	These issues are dealt with under the response to Policy VC BAW1.	1216	See Action related to VC BAW1 re density of development.
VC BAW1, 6.5	2341, 2353	Object	Lack of suitable infrastructure for 35 new homes. Danger of more fatalities as traffic increases through the rat run. Borders up to conservation area.	Remove VC BAW1.	See response to para 6.3 and Policy VC BAW1.	1201	No action required.
VC BAW1, 6.6	2371, 2499, 2771	Object	LANDSCAPE & CHARACTER Site is within the Norwich Southern Bypass Landscape Protection Zone (NSBLZ) and will not be screened to the same extent as the developments north and south of the village hall (west of Stocks Hill). The density of development will also be out of keeping with the area/village. May need to be restricted to bungalows. Site is not in keeping with the Conservation Area Appraisal.	Changes to the density of VC BAW1 and requirement for substantial landscaping.	These issues are largely dealt with under the Response to VC BAW1. Whilst the site is in close proximity to the Conservation Area, the gap between the houses immediately to the north and south on Stocks Hill is not noted as being of particular significance. It is also noted that modern development can make a positive contribution to the area, as evidenced by the development at The Warren, west of Stocks Hill Policy VC BAW1 includes criteria requiring both a landscape appraisal to inform development of the site and a design that makes a positive contribution to the Conservation Area.	1217	See Action under Policy VC BAW1 regarding density.
VC BAW1, 6.6	2342, 2354	Object	Lack of suitable infrastructure for 35 new homes. Danger of more fatalities as traffic increases through the rat run. Borders up to conservation area.	Remove VC BAW1.	See responses to para 6.3 and Policy VC BAW1.	1206	No action required.

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VC BAW1, 6.7	2744, 2772	Object	LANDSCAPE Existing vegetation will not screen the new housing sufficiently. The gap gives the village a rural character and a sense of separation from Norwich. CHARACTER Adjacent to the Conservation Area and potential impact of additional traffic on the Listed Building in the village.	Smaller, bungalow development.	These issues are largely covered in the responses to VC BAW1 and paragraph 6.6. In addition: LANDSCAPE Whilst development of the site will close a gap within the built form of the village, it will not materially close the gap between Bawburgh and Norwich and the the main rural approaches along Stocks Hill, New Road and Harts Lane will not be affected. CHARACTER Neither the Council's Senior Heritage and Design Officer, nor Historic England have raised concerns regarding the volume of traffic impacting on the Conservation Area and/or Listed Buildings. Many Listed Buildings in urban areas will be affected by significantly greater volumes of traffic than this location.	1227	See Action related to VC BAW1 concerning the density of development.
VC BAW1, 6.7	2343, 2355	Object	Lack of suitable infrastructure for 35 new homes. Danger of more fatalities as traffic increases through the rat run. Borders up to conservation area.	Remove VC BAW1.	See responses to para 6.3 and Policy VC BAW1.	1207	No action required.
VC BAW1, 6.8	2580, 2700, 2711, 2745, 2773	Object	HIGHWAYS Despite traffic calming, there is still a problem with speeding vehicles. Pedestrians will have to cross the road to access the Village Hall and there is no continuous footway to the pub. Parking for the village hall spills onto Stocks Hill at times. Construction traffic would need to use rural roads to reach the village. Access point to the site could be dangerous. New residents will require car access to facilities outside of the village.	Remove VC BAW1 or reduce it in size. Crossing point on Stocks Hill. Better pedestrian access in the village.	HIGHWAYS The majority of these issues are covered in the response to VC BAW1. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds, either in terms of in access to/from the village, the speed/volume of traffic through the village, or the suitability of. another access off Stocks Hill. In addition, construction traffic is likely to be similar to that required for the recent development west of Stocks Hill, or for any other building projects in the village, and is therefore not considered exceptional.	1228	No Action required.

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VC BAW1, 6.8	2344, 2356	Object	Lack of suitable infrastructure for 35 new homes. Danger of more fatalities as traffic increases through the rat run. Borders up to conservation area.	Remove VC BAW1.	See responses to para 6.3 and Policy VC BAW1.	1208	No action required.
VC BAW1, 6.9	2581, 2712, 2774	Object	SURFACE WATER Increased hard standing could worsen off-site flooding issues. FOUL DRAINAGE Requires regular maintenance by Anglian Water.	Remove VC BAW1, or reduce it in scale.	These issues are covered in the response to VC BAW1. The relevant agencies have been involved in the perpetration of the VCHAP (including the Environment Agency, Anglian Water and the Lead Local Flood Authority), and the VCHAP is supported by a Strategic Flood Risk Assessment. The relevant agencies have not objected to the allocation of this site.	1229	No Action required.
VC BAW1, 6.9	2345, 2357	Object	Lack of suitable infrastructure for 35 new homes. Danger of more fatalities as traffic increases through the rat run. Borders up to conservation area.	Remove VC BAW1.	See responses to para 6.3 and Policy VC BAW1.	1209	No action required.
VC BAW1, 6.10	2746	Object	Phasing would lengthen disruption to nearby residents and villagers, with long term building noise and added traffic. Disruption to sewers serving nearby housing.	Reduce the scale of development.	The criterion in VC BAW1 refers to phasing in relation to other developments which also discharge to Whitlingham Water Recycling Centre, rather than phasing of the units within the site itself. However Anglian Water has indicated that this may not be necessary.	1231	No Action required.
VC BAW1, 6.10	2715	Object	There are already problems with the sewers and water supply in Bawburgh and Anglian Water has to attend issues with blockages and burst pipes each year. With all the development taking place within the catchment of the Whitlingham Water Recycling Centre (WWRC) concerns need to be raised regarding the ability of the WWRC to process the increased volumes of sewerage especially as the numbers of discharges of sewerage into the sea and waterways is already a national concern.	Remove VC BAW1.	This issue is already addressed in the Responses to VC BAW1 and paragraph 6.9.	1230	No Action required.
VC BAW1, 6.10	2346, 2358	Object	Lack of suitable infrastructure for 35 new homes. Danger of more fatalities as traffic increases through the rat run. Borders up to conservation area.	Remove VC BAW1.	See responses to para 6.3 and Policy VC BAW1.	1210	No action required.

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VC BAW1, 6.11	2321, 2500, 2582, 2721, 2747, 2775	Object	LANDSCAPE & CHARACTER Will obscure views of the Yare Valley. Will impact on the historic character of the village. Proposed density is too high. HIGHWAYS Roads already too busy/dangerous. Parking issues related to the village hall. New residents will be reliant on private cars for the majority of journeys. PRINCIPLE Bawburgh has had two recent developments and does not require more. Will impact on existing house values. Site is bigger than 1.0ha, so is not compliant with the NPPF. Will lead to a 25% increase in the population of the village. Bawburgh is not clustered with other settlements. FLOODRISK Further hardstanding will increase flood risk issues.	Remove VC BAW1, or significantly reduce the scale of the allocation.	The majority of these issues are covered in the Response to VC BAW1. In addition, the suggestion that the development will increase the population by 25% would suggest an average household size of almost 4.3 people per dwelling, which is approximately double the actual average household size for South Norfolk. As such, the development would lead to a population increase in the region of 12-15%, more in line with the overall increases proposed through the GNLP for the Village Clusters of 9%.	1232	See Action related to VC BAW1 concerning the density of development.
VC BAW1, 6.11	2347, 2359	Object	Lack of suitable infrastructure for 35 new homes. Danger of more fatalities as traffic increases through the rat run. Borders up to conservation area.	Remove VC BAW1.	See responses to para 6.3 and Policy VC BAW1.	1211	No action required.
Policy VC BAW1: Land east of Stocks Hill	3248	Support	Anglian Water agrees with the approach taken regarding the site allocation policies for Wicklewood where matters regarding cumulative/in-combination effects with the development identified in the GNLP may require the phasing of development beyond the early years of the plan, are addressed in the supporting text and therefore a policy requirement is not considered necessary. We suggest that the same approach is taken with other VCHAP allocations within WRC catchments that have in-combination effects with the GNLP developments, including sites within the catchment of Whitlingham WRC:	The small-scale nature of these allocations is unlikely to require phasing in respect of Whitlingham WRC and therefore the policy requirement can be removed.	The Council notes Anglian Water's comments.	1200	The Council does not consider the inclusion of the requirement to engage with Anglian Water is a soundness issue. However, should the Inspector consider a modification is necessary, the Council would not object to the removal of this bullet point.

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Policy VC BAW1: Land east of Stocks Hill	3162	Object	Whilst there are no designated heritage assets within this site, the site lies immediately to the south of the boundary of the Bawburgh Conservation Area. Any development of this site therefore has the potential to affect the Conservation area and its setting including views into and out of the Conservation area. We welcome the preparation of an HIA for the site. The HIA makes several recommendations. These have been included in bullet point 2 and 4 which is welcomed. Bullet point 3 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. However, this is different to the recommendation in the HIA which states that 'Require investigation on the proposed site prior to development commencing to identify and further historic activity'. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 3 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	Amend criterion 3 to read... 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	The Council welcomes the support for bullet points 2 and 4 of Policy VC BAW1. In terms of archaeology, the Council considers that bullet point 3 is sound. Policy VC BAW1 highlights the need for archaeology to be considered; however, the Council's experience is that the need for field evaluation prior an application being determined is rare and can be required under NPPF paragraph 194 if necessary.	1199	The Council does not consider this to be a soundness issue as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.

Policy VC BAW1: Land east of Stocks Hill	2313, 2348, 2360, 2363, 2365, 2367, 2368, 2481, 2486, 2487, 2501, 2508, 2510, 2514, 2515, 2522, 2524, 2532, 2533, 2535, 2543, 2562, 2563, 2564, 2576, 2642, 2677, 2694, 2731, 2741, 2742, 2748, 2763, 2765, 2769, 2788, 2816, 2837, 2856, 2883, 2892, 2911, 2912, 2915, 2917, 2937, 2942, 2943, 2945, 2998, 3024, 3056, 3069, 3093, 3094, 3095, 3096, 3098, 3103, 3105, 3107, 3112, 3115, 3116, 3118, 3119, 3120, 3121, 3122, 3123, 3124, 3125, 3126, 3127, 3128, 3129, 3131, 3132, 3133, 3208	Object	The main issues raised in respect of VC BAW1 relate to: PRINCIPLE Bawburgh is not clustered with any other villages, therefore does not fit with the plan. Site is bigger than 1ha and therefore does not meet the requirement for small sites. Bawburgh is classified as an 'Other Village' in the 2014 Joint Core Strategy, and therefore not suitable for a development of this scale. Conflict with the principles of the GNLP and the NPPF in terms of supporting local services and sustainable access. No need for additional housing in the Norwich area. PUBLICITY & DEMOCRACY Site was not publicised in the same way as a planning application. Large volume of objections to the site and no opportunity to comment effectively. PRECEDENT If this site is developed it will open up the wider field for development HIGHWAYS & TRANSPORT Village is already a 'rat run' for traffic accessing the A47 and the B1108. Problems with speeding traffic despite recent traffic calming. Access to the site is on the brow of a hill, opposite the village hall (with attendant parking problems) and two recent housing developments. Lack of services in the village will mean that a high proportion of traffic will be cars. Lack of public transport and poor facilities for walking and cycling will lead to increased car traffic and consequent emissions. CHARACTER & HERITAGE The village is very rural in character, and the introduction of street lighting, footways etc. would erode this. Differing views on recent developments, some consider them not in keeping with the local character, whilst other consider the development should replicate the bungalows/low density of recent development. Development proposal is too dense and is of a scale not previously seen in the village. Impact on the Conservation Area. Potential damage to the Ancient Monument bridge in the centre of the village. LANDSCAPE & WILDLIFE Will spoil the view over the Yare Valley to the Norwich Southern Bypass. Open space/view is part of the character of the village. Will impact on the flora and fauna of the site.	Remove VC BAW1 or a smaller number of dwellings with increased green space. Plan should potentially specify a lower density and bungalow development. A number of local improvements suggested, particularly related to: increasing the capacity of the school; increased green space; and to highways (e.g. traffic calming, improved footways/cycleways, especially to the Watton Road). The VCHAP should also include more detail on landscaping schemes, drainage proposals etc.	PRINCIPLE The Village Clusters are based on Primary School catchments, in the case of Bawburgh the catchment does not extend to adjoining parishes, therefore the parish is treated individually. This applies to a number of Clusters. Whilst the NPPF seeks a proportion of development on smaller allocations of sites up to 1.0ha, which the VCHAP is helping to achieve, the final choice of sites needs to balance a number of factors (including available land, site constraints, density of development, local services etc.); a number of the VCHAP sites are consequently larger than 1.0ha. It should be noted that the NPPF requirement covers both urban and rural areas, and within urban areas a 1.0ha could easily accommodate 50+ dwellings. In this context, 35 dwellings still represents a smaller site which will aid quick delivery. Bawburgh was classified as an Other Village in the JCS; however, it should be noted that JCS Policy 16 also made provision for those Other Villages closer to Norwich (such as Bawburgh) to accommodate more development than those in more rural locations. In any event, the Village Clusters approach promoted by the GNLP will supersede the Other Village classification. Overall the GNLP continues to propose only modest growth in the Village Clusters, with proportionately less development in relation to the existing population than any other level of the settlement hierarchy. The Council acknowledges that whilst there may be conflict with specific paragraphs of the NPPF when taken individually, the Village Clusters and the sites in the VCHAP are part of a balanced portfolio of development options across the Greater Norwich area which together are considered consistent with the NPPF; the overall approach is being tested through the GNLP Examination. In terms of the need for housing, this is also established through the GNLP and is being tested through its Examination. PUBLICITY & DEMOCRACY The site was publicised through the VCHAP Regulation 19 process in accordance with the relevant Regulations and the Council's SCI. The site was also publicised and consulted on as a Preferred Option for 35 dwellings at the Regulation 18 stage in Summer 2021.	1133	The Council does not consider the proposed density of development on allocation VC BAW1 to be a soundness issue. However, should the Inspector consider a modification is necessary to address local concerns about density, and give greater scope in terms of design options for the site, the allocation could be expanded to the east, whilst retaining the number of dwellings at 'approximately 35'.

			GYPSY & TRAVELLER SITE Is there any link between the proposals for the housing site and the Gypsy and Traveller site being considered through the GNLP? SERVICES & FACILITIES Services are limited and gradually declining Primary school over-subscribed. Differing views on the village hall with some suggesting it is small/under-used and others that it has many users and consequently not enough parking. Lack of footbaths and street lighting. Other larger villages with better services should be the location for development (e.g. Brooke). Nearby NHS services already overstretched. FLOOD RISK & DRAINAGE Foul drainage is currently inadequate and could be overloaded. Flood risk issues in the centre of the village, which may be exacerbated by the development of this site and increased run off up hill from existing houses. Site not covered by the SFRA. RESIDENTIAL AMENITY Impact on the residential amenity of adjoining properties. Impact of further building works, following issues related to the completion of two nearby sites. BROWNFIELD SITES Development would be better located on brownfield sites in the urban areas. AFFORDABLE HOUSING Recent developments have only delivered limited affordable units, 10% of this site would be 3 dwellings. OTHER Field is currently used for dog walking, so that amenity would be lost. Currently poor internet speeds. Could lead to complaints about noise etc. from the village hall. Would like a public meeting to hear why this development is appropriate.		Whilst the site has received a larger number of responses than any other during the Regulation 19, public support for the site is not a prerequisite for development. As noted in the summary of changes to the plan, many of the objectors indicated that a smaller number of dwellings could be acceptable; however, such proposals would still raise many of the same issues as a larger scheme, either proportionately (traffic volumes, school places, impact on the foul drainage system etc.) or in more absolute terms (limiting views towards the Norwich Southern Bypass, closing a gap on the approach to the Conservation Area). There is also no consensus view on a number of issues, with varying views on the appropriateness of bungalows; larger properties vs affordable development; the desirability of footways and street lighting; or how well used the existing village hall is, and therefore how much of an issue the related traffic/parking/disturbance is. PRECEDENT The scope of the VCHAP is to look for smaller sites, up to circa 50 dwellings, across a range of Village Clusters. There is no reason to suggest that a development of approximately 35 dwellings would lead to any additional housing in the future; Policy VC BAW1 seeks and layout and landscaping that minimises the impact from the A47 Norwich Southern Bypass, which could limit future development. Decisions on further development would be for future Local Plan processes to determine. HIGHWAYS Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds, either in terms of in access to/from the village, the speed/volume of traffic through the village, or the suitability of another access off Stocks Hill. The site offers the ability to walk to both the village hall and primary school. Various demand-based transport options are available in Bawburgh, including Transport Plus and Wymondham Flexi-bus. The Council acknowledges that village cluster sites are likely to be more reliant on car transport than those in more urban locations;	

					however, the proximity to Norwich, the A47, and to a wider range of facilities in nearby settlements, makes those journeys shorter than in many other villages. The Council also notes the Government's targets for moving new vehicle sales away from combustion engine options over the next decade. CHARACTER & HERITAGE Whilst many respondents have indicated that a lack of street lighting and footways make walking around the village less safe, others have objected to their potential introduction impacting on the rural character of the village. Currently highways have not suggested any off-site footway improvements are necessary and street lighting is no longer routinely included within new developments. In terms of the appearance, Policy VC BAW1 requires design and materials that make a positive contribution to the Conservation Area, which is immediately north of the site. Whilst the Conservation Area Character Appraisal has a short paragraph on Stocks Hill, the gap that this site occupies is not noted as being of particular significance and Policy VC BAW1 requires the retention of vegetation on the approach to the Conservation Area. The 2015 Local Plan allocation, developed as The Warren, is noted as making a positive contribution to the Conservation Area. As such, there is no inherent reason why new development should not fulfil the objectives of national and local policies relating to Conservation Areas, which would apply to any future planning application for the site. In terms of the overall scale of development, 35 dwellings is not out of keeping with the cluster of houses immediately to the south, which contains 25 dwellings, or to the east of the primary school on Hockering Lane, which contains 40 dwellings. The allocation is made at a higher density, to balance the need to make effective use of land, whilst also responding to the rural location. With regard to the impact on the Ancient Monument bridge, no concerns have been raised either by Historic England or NCC as highway authority. LANDSCAPE & WILDLIFE The site currently affords some views over the Yare Valley towards the Norwich Southern Bypass and, less significantly, new development would be seen in glimpsed views from the bypass towards the village,		

					and potentially from the wider river valley, although the latter would be seen in the context of the existing development in the village. The LVA which supports the VCHAP notes that the views across the field are limited. The impact is most likely to be noticeable to those using the footway on Stocks Hill. The LVA also notes the potential need to landscape the eastern boundary of the site. The site falls within the Norwich Southern Bypass Landscape Protection Zone (NSBLPZ); the NSBLPZ is there to prevent development from detrimentally impacting on the landscape setting of Norwich, and the bypass corridor from becoming the developed edge of the city. The NSBLPZ does not have a distinct landscape character of its own, and through the 2015 Local Plan several allocations were made within the zone which balanced the need to protect the setting of the city with locating development on suitable and sustainable sites in close proximity to Norwich. Policy VC BAW1 requires any future planning application to be accompanied by a landscape appraisal which informs the design, layout and landscaping of the site. In terms of wildlife, the site has no designations or records of protected species. The site is currently a small part of a wider agricultural field, the remainder of which is expected to remain in its current use. Policy VC BAW1 requires the protection and retention of hedges and trees on the field margins and any future planning application is likely to be subject to the national requirements on biodiversity net gain, due to be implemented by the end of 2023. GYPSY & TRAVELLER SITE. The Gypsy and Traveller site at Hockering Lane, which was included in the GNLP focussed consultation that ran concurrently with the VCHAP Regulation 19, is in the same landownership and part of the same wider agricultural field, but is otherwise unrelated to VC BAW1. VC BAW1 (then SN4053) was a preferred site in the Regulation 18 version of the VCHAP in summer 2021, prior to the Gypsy and Traveller site being proposed or assessed during 2022. Neither site is dependent on the other being allocated or delivered.		

					SERVICES & FACILITIES In terms of the capacity at the primary school, Norfolk County Council Education Services team has reiterated their advice that there has been a decline in birth rates which is impacting on primary school entry rates, and it is anticipated that this will take effect within the next 2-3 years. Children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the schools and, as noted in some representations, Bawburgh attracts a number of out of catchment pupils. NCC is looking to increase provision in nearby areas, including as part of the major growth at Easton and Hethersett. As such, increased pupil numbers locally will support the ongoing future of rural schools throughout the village cluster area. In terms of NHS provision, this is recognised as a regional and national issue, which will not be aided by failing to provide adequate housing. Representatives of the NHS Integrated Care System (ICS) have been engaged with both the Greater Norwich Local Plan and the VCHAP in order to inform their ongoing healthcare strategies and future investment. In terms of other locations, the VCHAP has balanced the available sites, the assessment of site suitability and the availability of local services and facilities, and has allocated larger sites, up to 50 dwellings, accordingly (including VC BRO1 at Brooke). FLOODRISK & DRAINAGE The Water Cycle Study and consultation with Anglian Water has not identified any foul water issues, other than the for the wider catchment of Whittingham WRC, and Anglian Water has made a direct response to allocation VC BAW1. In terms of flood risk, all preferred and shortlisted sites at the Regulation 18 stage were screened as part of the Stage 2 SFRA (76 sites in total), with specific assessments produced for those sites considered to require one; VC BAW1 was not one of those sites. Similarly, whilst the LLFA notes a significant flow path near to the site, the site itself was not considered to be a concern.		

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
					RESIDENTIAL AMENITY Policy VC BAW1 requires the retention of boundary vegetation on both residential boundaries of the site. Amenity is also covered by other policies of the Development Plan, which would apply to any future planning application. There are no exceptional circumstances to assume this site will cause any more disturbance during the construction phase than any other similarly sized greenfield development. BROWNFIELD SITES The VCHAP forms part of the overall strategy for development across the Greater Norwich area, which aims to focus as much development on suitably located brownfield sites as possible; however it is not possible to deliver the required level of housing solely on brownfield sites. AFFORDABLE HOUSING The level of affordable housing being sought will be consistent with Local Plan requirements at the time of any planning application; currently this is assumed to be 33% of the site, in accordance with emerging GNLP policy. OTHER Whilst the field may be used for informal dog walking, there are no formal Public Rights of Way. The development is on the opposite side of Stocks Hill to the Village Hall and there is no reason to suggest that these properties will be any more liable to disturbance than those recent developments immediately to the north and south of the Hall. Residents were able to comment on the site during the Regulation 18 and Regulation 19 stages of the plan, including being able to contact officers direct to answer any specific questions. The next opportunity will be through the Examination in Public.		

7. Bressingham

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC BRE1, 7.4	2904	Object	Reference to local services presumably includes the village primary school. The school is full, there is no land to extend it, children of families moving to the proposed development may not be accommodated.	The plan should refer to the school as a local service and make the point that it is full and has no land on which to expand.	To support the selection of sites for the VCHAP the Council has engaged with Norfolk County Council in its role as education provider. NCC Education Services have reiterated their earlier advice that throughout Norfolk there has been a decline in birth rates which is impacting on the entry years and subsequent years in schools; it is anticipated that this will take effect within the next 2-3 years as higher numbers of pupils transition through the primary schools. Increased pupil numbers locally will support the ongoing future of rural schools throughout the village cluster area. Furthermore, as previously noted throughout the VCHAP, children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the school.	1428	No action required.
VC BRE1, 7.7	2903	Object	- Localised widening is not sufficient to address the narrowness of School Road; - A car park on the opposite side of the road does not solve the road congestion; - Current congestion will be made worse by this development; and - A car park on the opposite side of the road raises safety issues for school children.	The full length of School Road would have to be widened, to cope with the new development, addition of a footpath. The parking problem facing the school cannot be resolved in this proposal.	The Council has engaged extensively with the Highways Authority throughout the production of the VCHAP and has had a number of detailed site specific discussions, including relating to VC BRE1. The Highways Authority has identified the extent of the off-site highway works considered to be necessary to support the allocation of VC BRE1 for the number of dwellings proposed in this location and these have been reflected in the site specific policy requirements. The Highways Authority did not raise an objection to this allocation in response to the Regulation-19 publication of the Plan. The Council has included within the policy a requirement for the site developer to explore the delivery of a school car park within the site. This is intended to address local concerns about congestion arising at school drop-off and pick-up times. Alternative options were considered for the delivery of a school car park on the same side of the road as the primary school however these were not considered to be realistic / feasible solutions. The Council does not consider that either of the matters raised in this representation relate to the soundness of the Plan.	1427	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC BRE1, 7.8	2800	Object	The site as is being rough grassland and scrubland absorbs heavy rainfall, surface water from 40 dwellings their driveways, the service road and run off from sewerage treatment plants can only increase the rate it leaves the site giving a certain flood risk to school road.	Given the increased risk of heavy rainfall and storm surge School road drainage will have to be radically improved to cope with this.	To support the allocation of sites in the VCHAP the Council has liaised with technical consultees and consultants and has prepared a significant evidence base, including an updated Level 1 Strategic Flood Risk Assessment (building upon the evidence prepared for the GNLP) as well as Level 2 Strategic Flood Risk Assessments (SFRA) where appropriate. These assessments include consideration of surface water and fluvial flooding, as well as modelling for climate change allowance. Where appropriate the results from these assessments have informed site selection as well as specific policy requirements. Following a technical screening exercise it was not considered necessary to undertake a Level 2 SFRA for VC BRE1. Technical consultations have included detailed discussions with the Lead Local Flood Authority (LLFA). These identified the presence of a significant surface water flowpath that originates on the opposite side of School Road and continues along the length of School Road. It does not impact on this site. However, discussions with the LLFA concluded that the nearby Regulation-18 shortlisted site (SN4037) and the Regulation-19 preferred site (VC BRE1) should not be delivered in combination to avoid impacting on the existing flowpath. For this reason the VCHAP only includes site VC BRE1. Furthermore, current requirements set out that surface water runoff rates post development must not exceed the greenfield runoff rates therefore the new development will not increase the surface water run off rate from this site. In some instances it is possible that drainage strategies installed on new sites can improve the existing situation although precise details of the drainage scheme would be determined at the detailed planning application stage. The Council has considered the appropriate evidence and advice and does not consider that this is a matter of soundness.	1426	No action required.
VC BRE1, 7.9	2905	Object	There is reference in 7.9 to provision of "overflow" car parking for the school within the proposed development. The problem cannot be mitigated in the plan.	The location of the proposed development is opposite the village primary school. There is no nearby school parking currently, other than for staff, parents and visitors park on School Road itself. School Road is not sufficiently wide to allow two way passing of vehicles and road side parking. Provision of parking for the school within the proposed development is not appropriate and creates safety risks, since it is on the opposite side of the road to the school.	The Council has	1387	XX

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC BRE1: Land east of School Road	3258	Support	We welcome the policy wording for hedgerows/trees in Policy VC ROC. We recommend that similar policy wording is applied to the policies listed below to ensure this approach is applied consistently across the Local Plan. Where removal of a tree or any part of a hedgerow is unavoidable, we recommend that policy wording includes reference to mitigation measures, reflecting the updated biodiversity duty required in the 2021 Environment Act to have regard to the enhancement of biodiversity. VC BB1, VC BRE1, VC HAL2, VC SWA2, VC NEE1, VC WOR2, VC NEW2, VC SPO3, VC TAS1, VC BUR1, VC WIN1.	No changes proposed to the Plan	The Council has recognised in the supporting text for VC BRE1 that existing vegetation along the site frontage will need to be removed to facilitate development of the site. The Council has also clearly identified the boundaries which will need to be protected and enhanced (for both biodiversity and amenity reasons). The Council does not consider it to be either appropriate or necessary to repeat requirements set out in existing policy and/ or legislation and for this reason the Council does not consider a modification to VC BRE1 be required, nor does it consider this to be a matter of soundness for the Plan.	1386	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC BRE1: Land east of School Road	3163	Object	Summary of Historic England's representations in response to VC BRE1: - The site lies adjacent to Grade II listed Pine Tree Cottage and has the potential to impact on the setting of this LB; - We welcome the recommendation of the HIA to provide an area of open space to preserve views of the building and create a degree of separation but have some concerns as to whether an area of open space to protect the setting of the listed building is compatible with the land also being used as a car park; - Consideration should be given to locating the car park in another area of the site, or even off-site; - If you are going to pursue the car park option on-site, we suggest the addition of wording to criterion 2 to read, "Consideration should be given to the design of the car park to ensure that the grade II listed Pine Tree Cottage including its setting is conserved and enhanced"; - Criterion 1 of the policy suggests that there should be frontage development and yet the HIA was specific about the need to set development back from the frontage. We suggest you review the wording of criterion 1 accordingly; and - Bullet point 4 states that the HER should be consulted to determine the need for any archaeological surveys prior to development - this should be amended.	Summary of changes proposed to VC BRE1: - Criterion 1 to be amended to reflect requirement of the HIA to avoid frontage development; - Criterion 2 to be amended to read: "Consideration should be given to the design of the car park to ensure that the grade II listed Pine Tree Cottage including its setting is conserved and enhanced"; and - Criterion 4 to be amended to read: "Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate".	The Council has continued to engage with Historic England following the close of the Regulation-19 publication period. Having reviewed both the published Heritage Impact Assessment (HIA) and the Regulation-19 site specific policy wording for VC BRE1 the Council considers that the proposed wording is appropriate with regards to all of the issues raised in the HE response. With regards to the suggested school car park, whilst the Council has recognised the concerns raised locally about car parking provision associated with the school, it has not determined that this must be delivered as part of the VC BRE1 allocation, where this should be located within the site or the form this could take. Rather, the policy recognises the limited options to improve the current situation and the positive role that the delivery of this site could play in addressing this matter. Both the policy and the supporting text clearly recognise that a demonstrable need for such provision needs to be established and that the site layout and design must protect and enhance the setting of Pine Tree Cottage. The Council does not consider it necessary to repeat criterion 5 with specific reference to a potential car park on-site. The Council is also of the opinion that frontage development alongside an area of open space and appropriate landscaping in the south-west corner of the site will protect the setting of the listed building as far as possible. The Council must consider a number of competing factors when allocating sites and drafting policies. Within these are highways requirements which, with specific regards to VC BRE1, included a requirement for frontage development to improve highway safety and reinforce the current speed limit along this section of School Road. The Council considers that the policy successfully addresses this concern whilst also protecting the setting of the listed building. Finally, the Council does not consider a modification to the policy criterion regarding archaeology to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to the wording of criterion 4 to be amended to reflect the wording proposed by Historic England.	1385	The Council does not consider the comments raised to be matters of soundness for the reasons set out in the Council's response to these matters however, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC BRE1: Land east of School Road	3057	Object	Although the site appears relatively constraint free, with access to a small number of services accessible locally, there appears to be insufficient capacity at the local primary school. The inability to serve the proposed new population will inevitably put pressure on the local highways network and surrounding villages, increasing congestion through a more significant reliance on private vehicle use.	Not specified.	The respondents indicate the the current Pupil Admission Number (PAN) for Bressingham Primary is approximately 17 pupils, although the published Pupil Admission Limit on NCC's website is 22. Under the current NCC Planning Obligations Standards, a site of 40 dwellings would generate approx. 11 pupils across all school years (i.e. less than 2 pupils per school year out of the approx. 17 capacity); these Standards are currently being reviewed. NCC Children's Services notes generally falling pupil numbers and the fact that parental choice means that NCC does not foresee any problems with the village cluster allocations. Previous discussions on the school indicated that the majority of new pupils (up to 80%) were coming from Diss and Roydon, which have capacity within their own recently expanded primary schools. Therefore, having more catchment pupils could actually reduce overall traffic generation. The claims of increased 'congestion' are unsubstantiated and there is no objection to the Reg, 19 document from NCC Highways.	1242	No Action required.

Policy VC BRE1: Land east of School Road	2309, 2680, 2812, 2887	Object	The main issues raised relate to: HIGHWAYS Road is already too busy and cannot cope with the additional traffic. Busy junction with the A1066 to the south which needs reduced speed limit. DRAINAGE & FLOOD RISK Site has a 4m drop north to south and currently absorbs rainwater runoff. CHARACTER Would double the number of homes in this part of the Village. Site offers views across the Waveney Valley BIODIVERSITY Site is a wildlife haven. CONSULTATION These proposals need the agreement of key agencies, including the school, NCC Highways, Norfolk Wildlife Trust and Anglian Water. NEIGHBOUR AMENITY Impact on privacy and security.	Reduce the scale of the proposals. Implement road widening and parking on the same side of the road as the school. Improve the highway drainage on School Road.	HIGHWAYS Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds, either in terms of the immediate highway network, of the connections to the wider network. DRAINAGE & FLOOD RISK The site was screened as part of the Stage 2 Strategic Flood Risk Assessment and it was determined that a detailed assessment was not needed at this stage. Any planning application will need to satisfactorily demonstrate adequate drainage and flood risk measures. CHARACTER The site needs to be seen in the context of Bressingham as a whole. There are two main pockets of development, of which this is one. The impact on townscape and landscape has been considered as part of the site assessment process and an LVA produced which did not identify any significant issues, beyond the retention of trees. BIODIVERSITY The site is not designated and could revert to agricultural use without requiring permission. CONSULTATION Bressingham School was not consulted directly; however, Norfolk County Council Education Service has reiterated its advice that throughout Norfolk there has been a decline in birth rates which is impacting on the entry years and subsequent years in schools. Children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the school.? Consequently, increased pupil numbers locally will offset any overall decline and will support the ongoing future of rural schools throughout the village cluster area. All of the other agencies listed have been engaged in the process of preparing the VCHAP and were consulted on the Regulation 19 document; they have not raised any objection to the allocation of the site.	1233	No Action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
					NEIGHBOUR AMENITY Policy VC BRE1 requires the protection of existing hedgerows, in order to maintain residential amenity. Amenity is also a key consideration in other Development Plan policies which would be applicable at the time of any application.		

8. Brooke, Kirstead and Howe

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Brooke, 8.1	2316, 2557	Object	Existing development along the B1332 Norwich Road is primarily linear in nature and allocation VC BRO1 would change the character of the area. Development should also be a of a range of types and sizes to help diversify the population. No development should extend beyond the existing properties.	Development should be frontage only. Identification of a range if property sizes to encourage diversification of the village population.	For a distance of approx. 250m from the village hall northwards the housing is single depth frontage development. However further south, with Edward Seago Place and development backing immediately onto Windemere Close, there is a precedent for development in depth (particularly on the west side of the B1332). A range of types and sizes of housing, including affordable units, is more likely to be achieved with small estate-scale development, rather than a continuation of the existing frontage units. Developers will also be expected to provide a mix of house types (as well as the requisite levels of affordable housing as set out in the Greater Norwich Local Plan) to reflect the most up-to-date evidence available at the time of submitting a scheme for the site. Furthermore, as noted elsewhere in the VCHAP, the continued linear extension of settlements does not always provide for the most effective use of land or enhance the overall cohesion of settlements.	1462	No action required.
Brooke, 8.2	2682	Object	The high density planned housing is out of character with rest of the village. The local school is full and has no possibility to expand. The designated G.P. surgeries are not coping with the current local population. Local national health dentists are unable to accommodate new patients. The proposed development will cause the loss of yet more valuable agricultural land. More traffic to add to the significant speeding/pollution problems which already exist on this very busy road through the village. More residents using cars to commute to work and for food shopping.	Reduce significantly the number of planned units	The issues of impact on character, school capacity, healthcare provision, greenfield development, and highways/traffic, are covered in full in the Council's response to Policy VC BRO1 itself and the Council does not consider them to be matters of soundness for the plan. In addition, both parts of the allocation are classified as Grade 3 Agricultural Land, i.e. not the best and most versatile, and there is no indication that the development of these parcels would compromise the continued use of the remaining areas for agriculture outside of the allocated sites. In brief, the Council has engaged with technical consultees such as the Education Authority in order to understand local constraints on existing services and inform them of the planned growth areas to enable them to focus their resources accordingly.	1476	No Action required.
Brooke, 8.2	2317	Object	Brooke Industrial Park development is irrelevant in the context of the village cluster housing plan, it is light industrial and storage and does not offer a precedent for additional housing development in Brooke village. Although it offers an employment opportunity, housing is not dependent on the success of the business park.	A clear separation of light industrial development and housing development needs to be made clearer. The inclusion of Brooke business park is a distraction from the main point of the LVHCP.	The reference to the Business Park is part of a description of the parish as a whole, and therefore accurate. This is particularly relevant as it provides employment opportunities within a relatively short distance of VC BRO1.	1475	No Action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Services and Community Facilities, 8.5	2786	Object	There is insufficient provision or access to services in many of the settlements within the “village clusters”, in particular from many of the preferred sites for new housing. The decision to allocate additional new housing beyond what is already allocated within the JCS is largely based on the existence of a primary school with available places or potential for expansion, for some clusters this is not the case with schools at or near capacity. This does not amount to the provision of ‘good access to services and facilities’ this level of new housing should not be permitted within the GNLP.	This village does not have the infrastructure and facilities to cope. Truly affordable housing should be concentrated in urban areas. Development should utilise brownfield sites first, not greenfield with the further loss of agricultural land required for food production.	The GNLP and VCHAP will supersede the JCS and the existing 2015 allocations document, and as such the housing requirements are moved on from the JCS end date of 2026 to 2038. The principle of Village Clusters based on Primary School catchments has been set within the GNLP, which is at an advanced stage of production. The Council has sought engagement with Norfolk County Council in its role as education provider throughout the preparation of the VCHAP. The Council has also considered the availability and accessibility of a wider range of services and facilities as set out in the agreed site assessment criteria. Overall Broke is considered as a settlement with a reasonable range of services and facilities, capable of supporting the level of growth proposed in the VCHAP. The issues of infrastructure capacity and brownfield development are covered in the Council's Response to Policy VC BRO1.	1487	No Action required.
Services and Community Facilities, 8.5	2554	Object	The properties proposed are at the far end of the village from existing village amenities. There will inevitably be a an increase in car journeys to use those amenities. It is wishful thinking to assume the potential residents of this site will be employed at the local business park and even if they are, there is no footpath between the 2 locations so there would be an inevitable increase in car journeys	Don't build the proposed houses.	The site assessment supporting this allocation considered the walking distance to local services and facilities. 800m is considered a standard 10 minute walk; the primary school, village hall/playing field, pub, garage/shop and bus stops are all within 800m, with a wider range of facilities within a 15-20 minute walk. Policy VC BRO1 states that footways will be required to connect with existing provision, providing a continuous link with the local facilities. Whilst the Business Park is not expected to employ the majority of residents from the new development, it does offer a range of opportunities, as do other businesses and services in the village, such as the care home, vets, pubs and shops. There is a footway from the village to the Business Park, although this does involve crossing the B1332 at one point. The Council does not consider these comments to relate to the soundness of the plan.	1486	No Action required.

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Services and Community Facilities, 8.5	2318	Object	The employment opportunities at the business park will not provide adequate employment for an additional 120 people at the average ratio of people per household in Norfolk. It is likely that public transport will need to be improved to serve development in the preferred area, and that considerable traffic management will be needed by Highways to manage additional private car journeys. Cycle paths will need to be included to maintain sustainable transport options north to Norwich and south to Beccles and Bungay,	Removal of mention of employment opportunities in this paragraph.	Whilst the site may generate circa 120 residents, only a proportion of these would be of working age, with others being retired or in full time education. It is not suggested that the Business Park would employ a substantial element of future residents, but it does provide employment opportunities within a relatively short distance, as do other facilities in the village, such as the care home, vets, pubs, school, shops etc. There is no evidence to substantiate that the type of housing, including affordable units, would not be relevant to some employees of local business and services. The B1332 is already on a bus route between Bungay and Norwich, with hourly services to the city (via Poringland) throughout the day. The Council does not consider that these matters relate to the soundness of the plan.	1477	No Action required.
Settlement Limit, 8.6	3164	Object	Although this is not an allocated site in the Local Plan, the settlement limit is being amended to incorporate this land. The land lies within the Brooke Conservation Area and just to the south of The Warren (grade II listed). Any development of the land has the potential to impact on the significance of these designated heritage assets. There does not appear to be an HIA for this site. We recommend the preparation of an HIA for this site ahead of the EIP. Have some reservations about the approach to the extension of settlement limits. Unclear how site-specific policy requirements can be secured in the absence of a site-specific policy.	Prepare an HIA for Settlement Limit extension.	Further to the receipt of the these Reg-19 comments from Historic England, the Council will undertake a Heritage Impact Assessment to support the inclusion of this site within the settlement limit. It should be noted that any applications within the Settlement Limit including the extension will be subject to a planning application and any issues relating to heritage will need to be addressed as part of this application.	1512	The Council will prepare a HIA for the Settlement Limit extension in Brooke.

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Settlement Limit, 8.6	3202	Object	Comments in support of shortlisted site SN2119: Drawings show suitable footway can be accommodated with two width options and no need for third party land. Conservation Area does extend over some of proposed footway but as there is no Conservation Area Appraisal it is difficult to objectively assess impact and would require qualified consultant. Drawings show visibility splays can be achieved. Would encourage reconsideration of all evidence provided. Condition for access from Astley Cooper Place is not reasonable option due to gardens on existing properties and amenity issues. The scheme has been designed to avoid any areas of flood risk, and any application would be accompanied by a suitable drainage strategy. Unclear why townscape score is 'amber' as no concerns raised. Site is outside Conservation Area and layout can be agreed at application stage. Frontage development will not be within Conservation Area. Masterplan shows that existing vegetation can be preserved with dwellings outside root protection areas. Land sold to adjacent historic building to provide additional buffer to mitigate impact on setting. Conservation Area largely concerns historic core and with no Appraisal no way to assess impact. Proximity however does not preclude development suitability as previous applications have been approved. Nutrient Neutrality has not been referred to and it would be prudent to exercise caution on housing delivery related to this by allocating additional sites. Site is outside Nutrient Neutrality and therefore deliverable in short/medium term. Lack of evidence on Nutrient Neutrality represents a failure to comply with Section 33A of the PCPA. Cannot dispute that the Council has worked collaboratively with other authorities thus far. However, the site is not positively prepared as site represents an 'aspirational but deliverable' option as detailed above. Plan is not justified as it has not appropriately consideration reasonable alternatives or based on proportionate evidence as technical drawings are not considered. Plan is not effective as it has not considered Nutrient Neutrality which covers a large proportion of the allocated sites. Rejection of site contradicts NPPF paragraphs 111 and 190.	We would encourage the Authority to reconsider their assessment of SN2119, which has been attached to this letter, and to review their conclusion that the site is 'unreasonable'.	The Council considers the VCHAP and the preferred site allocation for Brooke to be sound. The site assessment referenced above was conducted in a consistent manner with the other site assessments undertaken as part of the VCHAP. The site assessments were completed in conjunction with technical consultees such as Norfolk County Council, the NHS and Anglian Water who provided advice on requirements for sites to make them suitable for development, and the site selection process has been informed by a detailed evidence base. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this site. Those discussions have led to the conclusions that were included within the site assessments and informed the conclusions on the sites. In particular, ongoing concerns continue to be raised about the possibility of creating appropriate pedestrian linkages without the loss of significant landscaping on third-party land. Furthermore, this loss of vegetation along High Green would negatively impact on the character of the area and the entrance to Brooke from the west. The Council remains of the opinion that SN2119 is not suitable for allocation in the VCHAP. The VCHAP is a long-term development plan document that identifies allocated sites for growth in South Norfolk up to 2038. Nutrient Neutrality may have an impact on the timing of development depending on the delivery of a mitigation strategy but is not considered to undermine the principle of development.	1503	No action required.

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Settlement Limit, 8.6	2319, 2555	Object	The site is outside the current Development Limit for Brooke and the introduction of estate scale development is out of keeping with the location.	Clarify that the site is outside the current Development Limit and that linear development would be more in keeping in this location.	The purpose of the VCHAP is to review the Development Boundaries/Settlement Limits and propose new allocations and changes to those boundaries to accommodate the growth required under the GNLP. This allows for the managed release of land in a sustainable way. The issue of small estate-scale development being out of character is covered in the Council's Response to paragraph 8.1 on Form and Character.	1488	No Action required.
VC BRO1, 8.7	2315, 2785	Object	The site is not well located for local services and facilities, being 500m from the centre of the village, along the B1332. There is no requirement for footway links.	Remove the sentence which suggests the site is well located for local services/facilities in the village.	The site assessment supporting this allocation considered the walking distance to local services and facilities. 800m is considered a standard 10 minute walk; the primary school, village hall/playing field, pub, garage/shop and bus stops are all within 800m, with a wider range of facilities within a 15-20 minute walk. Policy VC BRO1 states that footways will be required to connect with existing provision, providing a continuous link with the local facilities.	1461	No action required.
VC BRO1, 8.9	2669, 2787	Object	The extensive proposed development on both sides of the road is out of character with the rest of the village, going far deeper into open farmland than neighbouring ribbon development. Its scale will place too large a burden on local infrastructure. The site East of Norwich Road, however well screened by landscaping, will encroach too much on the historic conservation area and spoil the extensive landscape views which have survived since local artist John Crome painted here. Any building should continue the existing parallel linear small-scale development rather than cramming the site with dwellings.	The proposed development, particularly to the East of Norwich Road, is as described too deep and if permitted should be a ribbon development in line with the neighbouring houses. This would make it more sympathetic with the character of the village and prevent it encroaching on the conservation area or its curtilage. Therefore the development should either be stopped or its depth reduced significantly (such as by up to 30% on the West side and 50% on the East side of Norwich Road). Additionally, if the development goes ahead, in whatever form, trees and other landscaping, in character with the surrounding fields and woodland, need visually to completely screen the development from the conservation area. Development should utilise brownfield sites first not greenfield with the further loss of agricultural land required for food production.	The Council does not consider the issues raised to relate to the soundness of the plan. The site is larger than several others proposed in VCHAP because Brooke has a wider range of services and facilities, including regular bus service access to higher order facilities in Poringland and Norwich. The site also needs to deliver a highways solution on the B1332, the expectation being that this will be a roundabout, which would be an exceptional cost that most other allocations are not required to deliver. Reducing the number of dwellings is unlikely to reduce the extent to which the site extends north, as frontage development would be in keeping with the form/character of the area. In any event, on the west side of the B1332 further extension north is well contained by the grounds of Brooke Lodge. On the east side of the B1332 the northern extent is marked by a field boundary, where Policy VC BRO1 requires landscaping to successfully contain and integrate the development with the surrounding countryside. The allocation has been subject to the Heritage Impact Assessment. The outcome of this assessment determined that this allocation would have no negative impacts on the heritage assets located in the nearby area.	1496	No action required.

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VC BRO1, 8.10	2401, 2784	Object	The B1332 has a large amount of lorries plus private cars using it who all speed through the village. Adding more housing plus cars and delivery vans (i.e. Amazon etc) will only increase the amount of traffic the village has to contend with. Vehicles also start speeding up as they come from the south once past the community centre. There should also be provisions for a cycle lane. There will be negative impacts with extra traffic noise and pollution, and commuters who suffer from using the B1332 already as this can hardly cope with traffic flows now.	Limit the amount of housing and provide better ways of calming the large amount of traffic using the road using cameras and state how it will provide safe passage for cyclists and pedestrians. Any building should continue the existing parallel linear small-scale development rather than cramming the site with dwellings.	The Council does not consider the issues raised to relate to the soundness of the plan. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on several sites, including VC BRO1. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage in terms of increased traffic volumes and consider the allocation to be sound with the requirements included in the policy.	1495	No action required.
VC BRO1, 8.10	2314	Support	Support the calming of traffic speeds through the village, although noise from a new roundabout may be excessive due to slowing down and acceleration of vehicles at the site. There also appears to be no allocation in the plans for siting of a roundabout, which would impinge on the development area, the existing layby and the curtilage of Brooke Lodge, and also interrupting an existing field drain that crosses the road at the northern boundary. Additionally, electricity pylons would need to be moved to accommodate a roundabout.	No changes submitted.	The Council does not consider the issues raised to relate to the soundness of the plan. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on several sites, including VC BRO1. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage in terms of increased traffic volumes. The roundabout is an expectation of the policy, details of which would be established at the time of a planning application.	1494	No action required.
VC BRO1, 8.11	2552	Object	There is insufficient space for a footpath on the western side of the road, between the end of the current path outside 45 Norwich Rd, and the new development. The road would have to be narrowed to provide a wider footpath.	The land proposed is far from village amenities and with inevitably result in more car journeys being made along Norwich Rd, creating further air pollution.	The Council does not consider the issues raised to relate to the soundness of the plan. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on several sites, including VC BRO1. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage in terms of increased traffic volumes. Details of the crossing and other footpaths would be established at the time of a planning application.	1493	No action required.

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VC BRO1, 8.12	2553	Object	The site has no connection to mains sewerage. The adjoining 5 properties require a pumping station to pump waste to the mains. Where is the waste from 50 properties going to go. The site is already prone to flooding and the construction of a large number of houses on this site, with destruction of existing ditches, will create significant flooding risks for neighbouring properties.	Do not build houses on the site.	The Council does not consider the issues raised to relate to the soundness of the Plan. Anglian Water and Norfolk County Council as the Local Lead Flood Authority have been engaged throughout the preparation of the VCHAP. This has involved discussions and requests for comments on the allocated sites. Neither Anglian Water or Norfolk County Council in their role as the Lead Local Flood Authority have raised objections to this site in relation to flooding and sewerage. Tthe VCHAP has been subject to a Strategic Flood Risk Assessment (SFRA) which has identified the need for a site-specific FRA and strategy for the site (in Policy VC BRO1), which would be consulted on as part of the planning application process.	1492	No action required.

VC BRO1, 8.13	2400, 2558	Object	This report lacks the definitive clarification of the proposed 50 dwellings. The infrastructure of Brooke and Poringland is not big enough to support the extra people that more dwellings will bring. Doctors, chemists, dentists are all overwhelmed a fact borne out during the recent pandemic. The local school is not big enough to accommodate the extra pupils this development will bring. In addition the proposal would further exacerbate the congestion on the B1332 with the addition of the proposed roundabout. Pollution and flooding risks are also greater the more Green sites are built on.	Reduce the amount of housing or not build them at all. Detailed summary of each house type to ensure compliance with local planning regulations and to insure in-keeping with the aesthetics of the proposed site and local area. The proposed development should take extra care to cater for the first time buyer in addition to large family homes as successful built under the 2015 application.	The Council does not consider the issues raised to relate to the soundness of the plan. Any planning application that is submitted for this allocation will be subject to any other relevant policies in the Development Plan and will be required to meet the requirements of these, such as the provision of affordable housing. This information will need to be provided at the time of a planning application. The percentage of affordable units is set through GNLP policy, based on the most up to date evidence at the time of any planning application (currently it is anticipated as being 33%). In terms of NHS provision, this is recognised as a regional and national issue, which will not be aided by failing to provide adequate housing. Representatives of the NHS Integrated Care System (ICS) have been engaged with both the Greater Norwich Local Plan and the VCHAP in order to inform their ongoing healthcare strategies and future investment. In terms of capacity at the local primary school, NCC Education Services team has reiterated their advice that there has been a decline in birth rates which is impacting on primary school entry rates, which is anticipated will take effect within the next 2-3 years. Children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the schools; Brooke attracts a number of pupils from the Poringland area and NCC is actively looking to improve provision in Poringland/Framingham Earl. As such, increased pupil numbers locally will support the ongoing future of rural schools throughout the village cluster area. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on several sites, including VC BRO1. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage in terms of increased traffic volumes. The roundabout is an expectation of the policy, and any alternative would need to be agreed with NCC as an appropriate solution. Details of the crossing would be established at the time of a planning application. Environmental performance is determined by strategic policy in the GNLP and through other regimes, such as Building Regulations, and there is no specific reason why this	1491	No action required.

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					allocation should be subject to different requirements. The VCHAP has been subject to a Strategic Flood Risk Assessment (SFRA) which has identified the need for a site-specific FRA and strategy for the site (in Policy VC BRO1), which would be consulted on as part of the planning application process.		
Policy VC BRO1: East and West of the B1332, Norwich Road	3165	Object	Although no designated heritage assets on site, the site lies to the south east of the grade II listed Brooke Lodge, dating from 1835 and to the north of the Brooke Conservation Area. Any development of the site has the potential to impact on the significance of these designated heritage assets. Welcome the preparation of an HIA. However, it only covers the eastern portion of the site and does not consider the land to the west of the road, which is likely to have a greater impact on the setting of Brooke Lodge. We recommend that the HIA is updated to reflect this. The recommendations from the revised HIA should be used to inform the policy wording. The extensive landscaping between the proposed site and the listed Lodge would limit the impact of development on the historic environment. Bullet point 9 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application.	Update the HIA to include the land to the west of the road. Amend criterion 9 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	The Council agrees that the HIA for Policy VC BRO1 should be extended to cover the western side of the road. In terms of archaeology, the Council considers that bullet point 9 is sound. Policy VC BRO1 highlights the need for archaeology to be considered; however, the Council's experience is that the need for field evaluation prior an application being determined is rare and can be required under NPPF paragraph 194 if necessary.	1489	The Council will update the HIA for Policy VC BRO1 to cover the western side of the road. The Council does not believe a modification to the policy to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.
Policy VC BRO1: East and West of the B1332, Norwich Road	2329	Support	FW Properties consider VC BRO1 to be a suitable and deliverable location for new homes within the village. Development in this location, which is close to an established community, would represent sustainable development as defined within the National Planning Policy Framework. The site is immediately available and its development for 50 homes is considered to be viable and deliverable. The site is not subject to any constraints which would prevent its development for housing and the site specific requirements attached to this draft allocation can all be fulfilled. As a result, VC BRO1 should be taken forward for allocation.	No change.	Support for the allocation and confirmation that the site promoter believes it can be delivered in a timely manner, taking into account the requirements of Policy VC BRO1, is welcomed.	1460	No action required.

Policy VC BRO1: East and West of the B1332, Norwich Road	2320, 2556, 2561, 2641, 2706	Object	Representations objecting to the allocation of VC BRO1 covering the following. ECOLOGY/BIODIVERSITY - loss of habitat and impact on protected species. ENVIRONMENTAL PERFORMANCE - need for development to be carbon neutral, energy self-sufficient and water efficient. FLOOD RISK - underlying conditions of the site potentially puts existing properties on the B1132 at increased risk of flooding. SCALE & FROM - why is the site bigger than most others in the VCHAP? Extends the settlement towards Poringland, risking urban sprawl. HIGHWAYS - will add to the volume of traffic, roundabout needs to be a firm requirement and need to establish the nature of the 'crossing point'. SERVICES & FACILITIES - impact on local services and facilities, including schools and healthcare. AFFORDABLE HOUSING - set out the percentage. GREENFIELD - Village Clusters approach is flawed and there should be a focus on Brownfield sites and development closer to Norwich.	Various suggesting covering, not allocating the site or allocating at a reduced scale, establish more firmly the highways requirements, any housing being energy neutral, flood risk assessment to be undertaken.	ECOLOGY/BIODIVERSITY - the site is predominantly farmed agricultural land, with some potential habitat on the margins. Natural England, Norfolk Wildlife Trust and the Council's Ecologist have not raised any concerns at this stage. Appropriate surveys will need to be undertaken as part of the planning application process, and from November 2023 sites of this scale are due to demonstrate Biodiversity Net Gain under national requirements (and also GNLP policy). ENVIRONMENTAL PERFORMANCE - this is determined by strategic policy in the GNLP and through other regimes, such as Building Regulations, and there is no specific reason why this allocation should be subject to different requirements. FLOOD RISK - the VCHAP has been subject to a Strategic Flood Risk Assessment (SFRA) which has identified the need for a site-specific FRA and strategy for the site (in Policy VC BRO1), which would be consulted on as part of the planning application process. SCALE & FORM - The site is larger than several others proposed in VCHAP because Brooke has a wider range of services and facilities, including regular bus service access to higher order facilities in Poringland and Norwich. The site also needs to deliver a highways solution on the B1332, the expectation being that this will be a roundabout, which would be an exceptional cost that most other allocations are not required to deliver. Reducing the number of dwellings is unlikely to reduce the extent to which the site extends north, as frontage development would be in keeping with the form/character of the area. In any event, on the west side of the B1332 further extension north is well contained by the grounds of Brooke Lodge. On the east side of the B1332 the northern extent is marked by a field boundary, where Policy VC BRO1 requires landscaping to successfully contain and integrate the development with the surrounding countryside. HIGHWAYS - Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on several sites, including VC BRO1. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage in terms of increased traffic volumes. The roundabout is an expectation of the policy, and any alternative would need to be agreed with NCC as an appropriate solution.	1459	No Action required.

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					Details of the crossing would be established at the time of a planning application. SERVICES & FACILITIES - In terms of capacity at the local primary school, NCC Education Services team has reiterated their advice that there has been a decline in birth rates which is impacting on primary school entry rates, which is anticipated will take effect within the next 2-3 years. Children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the schools; Brooke attracts a number of pupils from the Poringland area and NCC is actively looking to improve provision in Poringland/Framingham Earl. As such, increased pupil numbers locally will support the ongoing future of rural schools throughout the village cluster area. In terms of NHS provision, this is recognised as a regional and national issue, which will not be aided by failing to provide adequate housing. Representatives of the NHS Integrated Care System (ICS) have been engaged with both the Greater Norwich Local Plan and the VCHAP in order to inform their ongoing healthcare strategies and future investment. AFFORDABLE HOUSING - the percentage of affordable units is set through GNLP policy, based on the most up to date evidence at the time of any planning application (currently it is anticipated as being 33%). GREENFIELD - The concept of Village Clusters has been tested through the Examination of the GNLP. The VCHAP forms part of the overall strategy for development across the Greater Norwich area, which aims to focus as much development on suitably located brownfield sites as possible; however, it is not possible to deliver the required level of housing solely on brownfield sites.		

8. Brooke, Kirstead and Howe

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Brooke, 8.1	2316, 2557	Object	Existing development along the B1332 Norwich Road is primarily linear in nature and allocation VC BRO1 would change the character of the area. Development should also be a of a range of types and sizes to help diversify the population. No development should extend beyond the existing properties.	Development should be frontage only. Identification of a range if property sizes to encourage diversification of the village population.	For a distance of approx. 250m from the village hall northwards the housing is single depth frontage development. However further south, with Edward Seago Place and development backing immediately onto Windemere Close, there is a precedent for development in depth (particularly on the west side of the B1332). A range of types and sizes of housing, including affordable units, is more likely to be achieved with small estate-scale development, rather than a continuation of the existing frontage units. Developers will also be expected to provide a mix of house types (as well as the requisite levels of affordable housing as set out in the Greater Norwich Local Plan) to reflect the most up-to-date evidence available at the time of submitting a scheme for the site. Furthermore, as noted elsewhere in the VCHAP, the continued linear extension of settlements does not always provide for the most effective use of land or enhance the overall cohesion of settlements.	1462	No action required.
Brooke, 8.2	2682	Object	The high density planned housing is out of character with rest of the village. The local school is full and has no possibility to expand. The designated G.P. surgeries are not coping with the current local population. Local national health dentists are unable to accommodate new patients. The proposed development will cause the loss of yet more valuable agricultural land. More traffic to add to the significant speeding/pollution problems which already exist on this very busy road through the village. More residents using cars to commute to work and for food shopping.	Reduce significantly the number of planned units	The issues of impact on character, school capacity, healthcare provision, greenfield development, and highways/traffic, are covered in full in the Council's response to Policy VC BRO1 itself and the Council does not consider them to be matters of soundness for the plan. In addition, both parts of the allocation are classified as Grade 3 Agricultural Land, i.e. not the best and most versatile, and there is no indication that the development of these parcels would compromise the continued use of the remaining areas for agriculture outside of the allocated sites. In brief, the Council has engaged with technical consultees such as the Education Authority in order to understand local constraints on existing services and inform them of the planned growth areas to enable them to focus their resources accordingly.	1476	No Action required.
Brooke, 8.2	2317	Object	Brooke Industrial Park development is irrelevant in the context of the village cluster housing plan, it is light industrial and storage and does not offer a precedent for additional housing development in Brooke village. Although it offers an employment opportunity, housing is not dependent on the success of the business park.	A clear separation of light industrial development and housing development needs to be made clearer. The inclusion of Brooke business park is a distraction from the main point of the LVHCP.	The reference to the Business Park is part of a description of the parish as a whole, and therefore accurate. This is particularly relevant as it provides employment opportunities within a relatively short distance of VC BRO1.	1475	No Action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Services and Community Facilities, 8.5	2786	Object	There is insufficient provision or access to services in many of the settlements within the “village clusters”, in particular from many of the preferred sites for new housing. The decision to allocate additional new housing beyond what is already allocated within the JCS is largely based on the existence of a primary school with available places or potential for expansion, for some clusters this is not the case with schools at or near capacity. This does not amount to the provision of ‘good access to services and facilities’ this level of new housing should not be permitted within the GNLP.	This village does not have the infrastructure and facilities to cope. Truly affordable housing should be concentrated in urban areas. Development should utilise brownfield sites first, not greenfield with the further loss of agricultural land required for food production.	The GNLP and VCHAP will supersede the JCS and the existing 2015 allocations document, and as such the housing requirements are moved on from the JCS end date of 2026 to 2038. The principle of Village Clusters based on Primary School catchments has been set within the GNLP, which is at an advanced stage of production. The Council has sought engagement with Norfolk County Council in its role as education provider throughout the preparation of the VCHAP. The Council has also considered the availability and accessibility of a wider range of services and facilities as set out in the agreed site assessment criteria. Overall Brome is considered as a settlement with a reasonable range of services and facilities, capable of supporting the level of growth proposed in the VCHAP. The issues of infrastructure capacity and brownfield development are covered in the Council's Response to Policy VC BRO1.	1487	No Action required.
Services and Community Facilities, 8.5	2554	Object	The properties proposed are at the far end of the village from existing village amenities. There will inevitably be a an increase in car journeys to use those amenities. It is wishful thinking to assume the potential residents of this site will be employed at the local business park and even if they are, there is no footpath between the 2 locations so there would be an inevitable increase in car journeys	Don't build the proposed houses.	The site assessment supporting this allocation considered the walking distance to local services and facilities. 800m is considered a standard 10 minute walk; the primary school, village hall/playing field, pub, garage/shop and bus stops are all within 800m, with a wider range of facilities within a 15-20 minute walk. Policy VC BRO1 states that footways will be required to connect with existing provision, providing a continuous link with the local facilities. Whilst the Business Park is not expected to employ the majority of residents from the new development, it does offer a range of opportunities, as do other businesses and services in the village, such as the care home, vets, pubs and shops. There is a footway from the village to the Business Park, although this does involve crossing the B1332 at one point. The Council does not consider these comments to relate to the soundness of the plan.	1486	No Action required.

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Services and Community Facilities, 8.5	2318	Object	The employment opportunities at the business park will not provide adequate employment for an additional 120 people at the average ratio of people per household in Norfolk. It is likely that public transport will need to be improved to serve development in the preferred area, and that considerable traffic management will be needed by Highways to manage additional private car journeys. Cycle paths will need to be included to maintain sustainable transport options north to Norwich and south to Beccles and Bungay,	Removal of mention of employment opportunities in this paragraph.	Whilst the site may generate circa 120 residents, only a proportion of these would be of working age, with others being retired or in full time education. It is not suggested that the Business Park would employ a substantial element of future residents, but it does provide employment opportunities within a relatively short distance, as do other facilities in the village, such as the care home, vets, pubs, school, shops etc. There is no evidence to substantiate that the type of housing, including affordable units, would not be relevant to some employees of local business and services. The B1332 is already on a bus route between Bungay and Norwich, with hourly services to the city (via Poringland) throughout the day. The Council does not consider that these matters relate to the soundness of the plan.	1477	No Action required.
Settlement Limit, 8.6	3164	Object	Although this is not an allocated site in the Local Plan, the settlement limit is being amended to incorporate this land. The land lies within the Brooke Conservation Area and just to the south of The Warren (grade II listed). Any development of the land has the potential to impact on the significance of these designated heritage assets. There does not appear to be an HIA for this site. We recommend the preparation of an HIA for this site ahead of the EIP. Have some reservations about the approach to the extension of settlement limits. Unclear how site-specific policy requirements can be secured in the absence of a site-specific policy.	Prepare an HIA for Settlement Limit extension.	Further to the receipt of the these Reg-19 comments from Historic England, the Council will undertake a Heritage Impact Assessment to support the inclusion of this site within the settlement limit. It should be noted that any applications within the Settlement Limit including the extension will be subject to a planning application and any issues relating to heritage will need to be addressed as part of this application.	1512	The Council will prepare a HIA for the Settlement Limit extension in Brooke.

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Settlement Limit, 8.6	3202	Object	Comments in support of shortlisted site SN2119: Drawings show suitable footway can be accommodated with two width options and no need for third party land. Conservation Area does extend over some of proposed footway but as there is no Conservation Area Appraisal it is difficult to objectively assess impact and would require qualified consultant. Drawings show visibility splays can be achieved. Would encourage reconsideration of all evidence provided. Condition for access from Astley Cooper Place is not reasonable option due to gardens on existing properties and amenity issues. The scheme has been designed to avoid any areas of flood risk, and any application would be accompanied by a suitable drainage strategy. Unclear why townscape score is 'amber' as no concerns raised. Site is outside Conservation Area and layout can be agreed at application stage. Frontage development will not be within Conservation Area. Masterplan shows that existing vegetation can be preserved with dwellings outside root protection areas. Land sold to adjacent historic building to provide additional buffer to mitigate impact on setting. Conservation Area largely concerns historic core and with no Appraisal no way to assess impact. Proximity however does not preclude development suitability as previous applications have been approved. Nutrient Neutrality has not been referred to and it would be prudent to exercise caution on housing delivery related to this by allocating additional sites. Site is outside Nutrient Neutrality and therefore deliverable in short/medium term. Lack of evidence on Nutrient Neutrality represents a failure to comply with Section 33A of the PCPA. Cannot dispute that the Council has worked collaboratively with other authorities thus far. However, the site is not positively prepared as site represents an 'aspirational but deliverable' option as detailed above. Plan is not justified as it has not appropriately consideration reasonable alternatives or based on proportionate evidence as technical drawings are not considered. Plan is not effective as it has not considered Nutrient Neutrality which covers a large proportion of the allocated sites. Rejection of site contradicts NPPF paragraphs 111 and 190.	We would encourage the Authority to reconsider their assessment of SN2119, which has been attached to this letter, and to review their conclusion that the site is 'unreasonable'.	The Council considers the VCHAP and the preferred site allocation for Brooke to be sound. The site assessment referenced above was conducted in a consistent manner with the other site assessments undertaken as part of the VCHAP. The site assessments were completed in conjunction with technical consultees such as Norfolk County Council, the NHS and Anglian Water who provided advice on requirements for sites to make them suitable for development, and the site selection process has been informed by a detailed evidence base. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this site. Those discussions have led to the conclusions that were included within the site assessments and informed the conclusions on the sites. In particular, ongoing concerns continue to be raised about the possibility of creating appropriate pedestrian linkages without the loss of significant landscaping on third-party land. Furthermore, this loss of vegetation along High Green would negatively impact on the character of the area and the entrance to Brooke from the west. The Council remains of the opinion that SN2119 is not suitable for allocation in the VCHAP. The VCHAP is a long-term development plan document that identifies allocated sites for growth in South Norfolk up to 2038. Nutrient Neutrality may have an impact on the timing of development depending on the delivery of a mitigation strategy but is not considered to undermine the principle of development.	1503	No action required.

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Settlement Limit, 8.6	2319, 2555	Object	The site is outside the current Development Limit for Brooke and the introduction of estate scale development is out of keeping with the location.	Clarify that the site is outside the current Development Limit and that linear development would be more in keeping in this location.	The purpose of the VCHAP is to review the Development Boundaries/Settlement Limits and propose new allocations and changes to those boundaries to accommodate the growth required under the GNLP. This allows for the managed release of land in a sustainable way. The issue of small estate-scale development being out of character is covered in the Council's Response to paragraph 8.1 on Form and Character.	1488	No Action required.
VC BRO1, 8.7	2315, 2785	Object	The site is not well located for local services and facilities, being 500m from the centre of the village, along the B1332. There is no requirement for footway links.	Remove the sentence which suggests the site is well located for local services/facilities in the village.	The site assessment supporting this allocation considered the walking distance to local services and facilities. 800m is considered a standard 10 minute walk; the primary school, village hall/playing field, pub, garage/shop and bus stops are all within 800m, with a wider range of facilities within a 15-20 minute walk. Policy VC BRO1 states that footways will be required to connect with existing provision, providing a continuous link with the local facilities.	1461	No action required.
VC BRO1, 8.9	2669, 2787	Object	The extensive proposed development on both sides of the road is out of character with the rest of the village, going far deeper into open farmland than neighbouring ribbon development. Its scale will place too large a burden on local infrastructure. The site East of Norwich Road, however well screened by landscaping, will encroach too much on the historic conservation area and spoil the extensive landscape views which have survived since local artist John Crome painted here. Any building should continue the existing parallel linear small-scale development rather than cramming the site with dwellings.	The proposed development, particularly to the East of Norwich Road, is as described too deep and if permitted should be a ribbon development in line with the neighbouring houses. This would make it more sympathetic with the character of the village and prevent it encroaching on the conservation area or its curtilage. Therefore the development should either be stopped or its depth reduced significantly (such as by up to 30% on the West side and 50% on the East side of Norwich Road). Additionally, if the development goes ahead, in whatever form, trees and other landscaping, in character with the surrounding fields and woodland, need visually to completely screen the development from the conservation area. Development should utilise brownfield sites first not greenfield with the further loss of agricultural land required for food production.	The Council does not consider the issues raised to relate to the soundness of the plan. The site is larger than several others proposed in VCHAP because Brooke has a wider range of services and facilities, including regular bus service access to higher order facilities in Poringland and Norwich. The site also needs to deliver a highways solution on the B1332, the expectation being that this will be a roundabout, which would be an exceptional cost that most other allocations are not required to deliver. Reducing the number of dwellings is unlikely to reduce the extent to which the site extends north, as frontage development would be in keeping with the form/character of the area. In any event, on the west side of the B1332 further extension north is well contained by the grounds of Brooke Lodge. On the east side of the B1332 the northern extent is marked by a field boundary, where Policy VC BRO1 requires landscaping to successfully contain and integrate the development with the surrounding countryside. The allocation has been subject to the Heritage Impact Assessment. The outcome of this assessment determined that this allocation would have no negative impacts on the heritage assets located in the nearby area.	1496	No action required.

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VC BRO1, 8.10	2401, 2784	Object	The B1332 has a large amount of lorries plus private cars using it who all speed through the village. Adding more housing plus cars and delivery vans (i.e. Amazon etc) will only increase the amount of traffic the village has to contend with. Vehicles also start speeding up as they come from the south once past the community centre. There should also be provisions for a cycle lane. There will be negative impacts with extra traffic noise and pollution, and commuters who suffer from using the B1332 already as this can hardly cope with traffic flows now.	Limit the amount of housing and provide better ways of calming the large amount of traffic using the road using cameras and state how it will provide safe passage for cyclists and pedestrians. Any building should continue the existing parallel linear small-scale development rather than cramming the site with dwellings.	The Council does not consider the issues raised to relate to the soundness of the plan. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on several sites, including VC BRO1. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage in terms of increased traffic volumes and consider the allocation to be sound with the requirements included in the policy.	1495	No action required.
VC BRO1, 8.10	2314	Support	Support the calming of traffic speeds through the village, although noise from a new roundabout may be excessive due to slowing down and acceleration of vehicles at the site. There also appears to be no allocation in the plans for siting of a roundabout, which would impinge on the development area, the existing layby and the curtilage of Brooke Lodge, and also interrupting an existing field drain that crosses the road at the northern boundary. Additionally, electricity pylons would need to be moved to accommodate a roundabout.	No changes submitted.	The Council does not consider the issues raised to relate to the soundness of the plan. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on several sites, including VC BRO1. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage in terms of increased traffic volumes. The roundabout is an expectation of the policy, details of which would be established at the time of a planning application.	1494	No action required.
VC BRO1, 8.11	2552	Object	There is insufficient space for a footpath on the western side of the road, between the end of the current path outside 45 Norwich Rd, and the new development. The road would have to be narrowed to provide a wider footpath.	The land proposed is far from village amenities and with inevitably result in more car journeys being made along Norwich Rd, creating further air pollution.	The Council does not consider the issues raised to relate to the soundness of the plan. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on several sites, including VC BRO1. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage in terms of increased traffic volumes. Details of the crossing and other footpaths would be established at the time of a planning application.	1493	No action required.

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VC BRO1, 8.12	2553	Object	The site has no connection to mains sewerage. The adjoining 5 properties require a pumping station to pump waste to the mains. Where is the waste from 50 properties going to go. The site is already prone to flooding and the construction of a large number of houses on this site, with destruction of existing ditches, will create significant flooding risks for neighbouring properties.	Do not build houses on the site.	The Council does not consider the issues raised to relate to the soundness of the Plan. Anglian Water and Norfolk County Council as the Local Lead Flood Authority have been engaged throughout the preparation of the VCHAP. This has involved discussions and requests for comments on the allocated sites. Neither Anglian Water or Norfolk County Council in their role as the Lead Local Flood Authority have raised objections to this site in relation to flooding and sewerage. Tthe VCHAP has been subject to a Strategic Flood Risk Assessment (SFRA) which has identified the need for a site-specific FRA and strategy for the site (in Policy VC BRO1), which would be consulted on as part of the planning application process.	1492	No action required.

VC BRO1, 8.13	2400, 2558	Object	This report lacks the definitive clarification of the proposed 50 dwellings. The infrastructure of Brooke and Poringland is not big enough to support the extra people that more dwellings will bring. Doctors, chemists, dentists are all overwhelmed a fact borne out during the recent pandemic. The local school is not big enough to accommodate the extra pupils this development will bring. In addition the proposal would further exacerbate the congestion on the B1332 with the addition of the proposed roundabout. Pollution and flooding risks are also greater the more Green sites are built on.	Reduce the amount of housing or not build them at all. Detailed summary of each house type to ensure compliance with local planning regulations and to insure in-keeping with the aesthetics of the proposed site and local area. The proposed development should take extra care to cater for the first time buyer in addition to large family homes as successful built under the 2015 application.	The Council does not consider the issues raised to relate to the soundness of the plan. Any planning application that is submitted for this allocation will be subject to any other relevant policies in the Development Plan and will be required to meet the requirements of these, such as the provision of affordable housing. This information will need to be provided at the time of a planning application. The percentage of affordable units is set through GNLP policy, based on the most up to date evidence at the time of any planning application (currently it is anticipated as being 33%). In terms of NHS provision, this is recognised as a regional and national issue, which will not be aided by failing to provide adequate housing. Representatives of the NHS Integrated Care System (ICS) have been engaged with both the Greater Norwich Local Plan and the VCHAP in order to inform their ongoing healthcare strategies and future investment. In terms of capacity at the local primary school, NCC Education Services team has reiterated their advice that there has been a decline in birth rates which is impacting on primary school entry rates, which is anticipated will take effect within the next 2-3 years. Children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the schools; Brooke attracts a number of pupils from the Poringland area and NCC is actively looking to improve provision in Poringland/Framingham Earl. As such, increased pupil numbers locally will support the ongoing future of rural schools throughout the village cluster area. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on several sites, including VC BRO1. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage in terms of increased traffic volumes. The roundabout is an expectation of the policy, and any alternative would need to be agreed with NCC as an appropriate solution. Details of the crossing would be established at the time of a planning application. Environmental performance is determined by strategic policy in the GNLP and through other regimes, such as Building Regulations, and there is no specific reason why this	1491	No action required.

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					allocation should be subject to different requirements. The VCHAP has been subject to a Strategic Flood Risk Assessment (SFRA) which has identified the need for a site-specific FRA and strategy for the site (in Policy VC BRO1), which would be consulted on as part of the planning application process.		
Policy VC BRO1: East and West of the B1332, Norwich Road	3165	Object	Although no designated heritage assets on site, the site lies to the south east of the grade II listed Brooke Lodge, dating from 1835 and to the north of the Brooke Conservation Area. Any development of the site has the potential to impact on the significance of these designated heritage assets. Welcome the preparation of an HIA. However, it only covers the eastern portion of the site and does not consider the land to the west of the road, which is likely to have a greater impact on the setting of Brooke Lodge. We recommend that the HIA is updated to reflect this. The recommendations from the revised HIA should be used to inform the policy wording. The extensive landscaping between the proposed site and the listed Lodge would limit the impact of development on the historic environment. Bullet point 9 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application.	Update the HIA to include the land to the west of the road. Amend criterion 9 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	The Council agrees that the HIA for Policy VC BRO1 should be extended to cover the western side of the road. In terms of archaeology, the Council considers that bullet point 9 is sound. Policy VC BRO1 highlights the need for archaeology to be considered; however, the Council's experience is that the need for field evaluation prior an application being determined is rare and can be required under NPPF paragraph 194 if necessary.	1489	The Council will update the HIA for Policy VC BRO1 to cover the western side of the road. The Council does not believe a modification to the policy to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.
Policy VC BRO1: East and West of the B1332, Norwich Road	2329	Support	FW Properties consider VC BRO1 to be a suitable and deliverable location for new homes within the village. Development in this location, which is close to an established community, would represent sustainable development as defined within the National Planning Policy Framework. The site is immediately available and its development for 50 homes is considered to be viable and deliverable. The site is not subject to any constraints which would prevent its development for housing and the site specific requirements attached to this draft allocation can all be fulfilled. As a result, VC BRO1 should be taken forward for allocation.	No change.	Support for the allocation and confirmation that the site promoter believes it can be delivered in a timely manner, taking into account the requirements of Policy VC BRO1, is welcomed.	1460	No action required.

Policy VC BRO1: East and West of the B1332, Norwich Road	2320, 2556, 2561, 2641, 2706	Object	Representations objecting to the allocation of VC BRO1 covering the following. ECOLOGY/BIODIVERSITY - loss of habitat and impact on protected species. ENVIRONMENTAL PERFORMANCE - need for development to be carbon neutral, energy self-sufficient and water efficient. FLOOD RISK - underlying conditions of the site potentially puts existing properties on the B1132 at increased risk of flooding. SCALE & FROM - why is the site bigger than most others in the VCHAP? Extends the settlement towards Poringland, risking urban sprawl. HIGHWAYS - will add to the volume of traffic, roundabout needs to be a firm requirement and need to establish the nature of the 'crossing point'. SERVICES & FACILITIES - impact on local services and facilities, including schools and healthcare. AFFORDABLE HOUSING - set out the percentage. GREENFIELD - Village Clusters approach is flawed and there should be a focus on Brownfield sites and development closer to Norwich.	Various suggesting covering, not allocating the site or allocating at a reduced scale, establish more firmly the highways requirements, any housing being energy neutral, flood risk assessment to be undertaken.	ECOLOGY/BIODIVERSITY - the site is predominantly farmed agricultural land, with some potential habitat on the margins. Natural England, Norfolk Wildlife Trust and the Council's Ecologist have not raised any concerns at this stage. Appropriate surveys will need to be undertaken as part of the planning application process, and from November 2023 sites of this scale are due to demonstrate Biodiversity Net Gain under national requirements (and also GNLP policy). ENVIRONMENTAL PERFORMANCE - this is determined by strategic policy in the GNLP and through other regimes, such as Building Regulations, and there is no specific reason why this allocation should be subject to different requirements. FLOOD RISK - the VCHAP has been subject to a Strategic Flood Risk Assessment (SFRA) which has identified the need for a site-specific FRA and strategy for the site (in Policy VC BRO1), which would be consulted on as part of the planning application process. SCALE & FORM - The site is larger than several others proposed in VCHAP because Brooke has a wider range of services and facilities, including regular bus service access to higher order facilities in Poringland and Norwich. The site also needs to deliver a highways solution on the B1332, the expectation being that this will be a roundabout, which would be an exceptional cost that most other allocations are not required to deliver. Reducing the number of dwellings is unlikely to reduce the extent to which the site extends north, as frontage development would be in keeping with the form/character of the area. In any event, on the west side of the B1332 further extension north is well contained by the grounds of Brooke Lodge. On the east side of the B1332 the northern extent is marked by a field boundary, where Policy VC BRO1 requires landscaping to successfully contain and integrate the development with the surrounding countryside. HIGHWAYS - Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on several sites, including VC BRO1. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage in terms of increased traffic volumes. The roundabout is an expectation of the policy, and any alternative would need to be agreed with NCC as an appropriate solution.	1459	No Action required.

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					Details of the crossing would be established at the time of a planning application. SERVICES & FACILITIES - In terms of capacity at the local primary school, NCC Education Services team has reiterated their advice that there has been a decline in birth rates which is impacting on primary school entry rates, which is anticipated will take effect within the next 2-3 years. Children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the schools; Brooke attracts a number of pupils from the Poringland area and NCC is actively looking to improve provision in Poringland/Framingham Earl. As such, increased pupil numbers locally will support the ongoing future of rural schools throughout the village cluster area. In terms of NHS provision, this is recognised as a regional and national issue, which will not be aided by failing to provide adequate housing. Representatives of the NHS Integrated Care System (ICS) have been engaged with both the Greater Norwich Local Plan and the VCHAP in order to inform their ongoing healthcare strategies and future investment. AFFORDABLE HOUSING - the percentage of affordable units is set through GNLP policy, based on the most up to date evidence at the time of any planning application (currently it is anticipated as being 33%). GREENFIELD - The concept of Village Clusters has been tested through the Examination of the GNLP. The VCHAP forms part of the overall strategy for development across the Greater Norwich area, which aims to focus as much development on suitably located brownfield sites as possible; however, it is not possible to deliver the required level of housing solely on brownfield sites.		

9. Bunwell

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Settlement Limit, 9.3	2819	Support	Bunwell has an ideal windfall site GNLP 2126 of 0.52 hectares. The Settlement Limit currently passes across one third of the site. The original SN VC Site Assessment Form Part 7 concluded it was 'Reasonable Alternative: Yes'. However, we are now told that the principle concerns for not changing the SL are the trees and retention of the linear form?? 'Suitability' stated 'Potentially just large enough to allocate for 12 dwellings' and 'constrained by existing trees which would limit the number of dwellings that could be accommodated below the allocation level' ?? Why was the SL not changed?	No changes proposed	The Council assessed SN2126 as part of the site assessment process and in accordance with the agreed criteria. As noted in this representation the site is already partially within the settlement limit and as such could be suitable for development subject to the usual planning application process. The land to the south (rear) of the site is excluded from the settlement limit and is constrained by trees that contribute to the streetscene. The Council remains of the opinion that there could be scope for small scale development along the site frontage but that the remainder of the site is not suitable for inclusion in the settlement limit. This representation does not relate to the soundness of the VCHAP.	1359	No action required
VC BUN1, 9.5	2825	Object	-The visual effect of this site should not be underestimated - it is a significant development when entering the village; - The rear boundary of BUN 1 has now been further extended back well beyond the settlement limit, increasing the adverse visual appearance as you enter the village and use the footpath FP4; and - Opposite this site are the low level Greenways bungalows.	The rear boundary line of the site should be moved towards the road and coincide with the settlement Limit of the directly adjacent development, currently in the final stages of construction. This will mitigate the side-on view of the housing estate which is not in keeping with the linear form of adjacent houses and the current pleasing open countryside break.	The Council carefully considered the boundaries of the allocation site during the site selection process, recognising the gateway position of the site on the entrance to the village. A Landscape Visual Appraisal has also been undertaken and forms part of the evidence base that has informed the Plan. The Council considers that the north boundary of the site follows the existing rear boundaries of properties located on Bunwell Road, beyond the previous allocation site, and that this is an appropriate extension to the settlement. The policy recognises the location of the site on the approach to the village, as well as within the wider landscape, and this is reflected in the requirements set out in bullet point 1 of the policy. The Council does not consider that this representation relates to the soundness of the Plan and does not consider that changes to the site boundary to be necessary.	1354	No action required

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VC BUN1, 9.8	2826	Support	- The Bunwell vacuum sewage system has been blighted with issues for decades and the presence of Anglia Water continues on a regular basis replacing equipment and pumping out. The planned developments and the 7 house development now nearing completion will add a significant load to the system and we have asked AW for a current status update and their thoughts on the planned additional loading. Mention has been made, apparently, that the increased volume could alleviate the problems but we wish to be convinced; and - Road surface water has also been a significant issue along Bunwell street and is a concern.	No changes proposed	The Council has engaged with Anglian Water throughout the production of the VCHAP, through both the production of the Water Cycle Study and directly as a technical consultee, as well as with the Lead Local Flood Authority, the Environment Agency and Norfolk County Council in its role as Highways Authority. Engagement with these consultees has informed both the site selection process and the detailed policy criterion, as reflected in bullet point 3 of the policy which requires earlier engagement between Anglian Water and the site developer. None of the consultees have raised an objection to the allocation of VC BUN2 in response to the publication of the Regulation-19 Plan and the Council is satisfied that the site is suitable for development and that this comments do not relate to the soundness of the Plan.	1353	No action required
VC BUN2, 9.13	2827	Support	In addition to mention of The Cottage, Bunwell Manor is also a significant part of this landscape.	No changes proposed	Following a further review of the Heritage Impact Assessment (HIA) and discussions with Historic England the Council is proposing a review of the HIA and policy wording.	1350	The Council intends to review both the HIA and the policy wording and update them if appropriate. The Council will need to determine whether any changes proposed to the policy or supporting text arising constitute either main- or minor modifications to the VCHAP and proceed accordingly.
VC BUN2, 9.15	2828	Support	The same problems arise with this site as apply to BUN1 in relation to the vacuum sewage system. This needs to be addressed before or during the planning process. It is accepted that this has been stipulated but assurances must be received from AW that there will be no further issues and indeed the current problems are resolved.	No change proposed	Bullet point 4 of the site specific policy requires the site developer to seek early engagement with Anglian Water regarding connectivity to the existing sewer system in the settlement. Anglian Water have commented on this policy requirement and have not raised an objection to the allocation of the sites in Bunwell but have confirmed that the small scale nature of the proposed allocations are not anticipated to adversely impact on the existing infrastructure. This representation does not relate to the soundness of the Plan.	1349	No action required
Policy VC BUN1: Land to the north of Bunwell Street	3166	Support	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.	No changes proposed	The Council welcomes the comments of Historic England who have not raised any concerns about the allocation of VC BUN1 in their response.	1352	No actions required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC BUN1: Land to the north of Bunwell Street	3229	Support	We support the policy requirement to engage with us [Anglian Water] as early as possible on connections to the vacuum sewer network in Bunwell. However, as raised previously, the small-scale nature of the proposed site should not require a need to determine the capacity of the receiving WRC.	Modify policy text to read: Early engagement with Anglian Water to identify possible infrastructure crossing the site, and the capacity to connect to the current vacuum sewer system.	The Council welcomes the comments and clarification provided by Anglian Water in response to VC BUN2. The Council has included a requirement for early engagement with Anglian Water within the policy and does not consider the proposed amendment to the policy wording to be a soundness matter however should the Inspector be minded to update the policy to reflect the wording proposed by Anglian Water the Council would not object.	1351	The Council does not consider this to be a matter of soundness however should the Inspector be minded to amend bullet point 4 the Council would agree with the wording proposed by Anglian Water: "Early engagement with Anglian Water to identify possible infrastructure crossing the site, and the capacity to connect to the current vacuum sewer system".
Policy VC BUN2: Land opposite Lilac Farm, Bunwell Street	3167	Object	Summary of comments submitted by Historic England in response to VC BUN2: - Lilac Farmhouse (grade II listed) lies opposite the site, and Bunwell Manor Hotel and The Cottage, also grade II listed, lie to the north of the site - development could impact on these heritage assets; - Not all of the recommendations in the HIA have been included in the policy requirements; - In bullet point 1 it would be helpful to make clear that the views should link Lilac Farmhouse (grade II) to the open countryside; - Criterion stating development to be set back from the road frontage should be included in the policy; and - Bullet point 2 would be reworded to also reference Bunwell Manor Hotel.	Amend bullet point 1 to make it clear that the views should link Lilac Farmhouse (grade II) to the open countryside. Add criterion to state that development should be set back from the road frontage to retain an open setting. Bullet point 2 would be reworded to also reference Bunwell Manor Hotel.	The Council welcomes the advice provided by Historic England (HE) in response to the publication of the Regulation-19 Plan and following receipt of these comments the Council sought further engagement with HE, including an in-person site visit to discuss the wording of the allocation. As a result the Council considers that the HIA would benefit from an update to the presentation of the map and that some amendments to the policy wording would improve its clarity. We note that HE have suggested an additional bullet point should be included within the policy to reflect the findings of the HIA however the Council does not consider that this is either necessary or appropriate in this instance. The detailed site layout would be assessed at the planning application stage however the site lies between road frontage development and as such any proposals for the site would reflect this pattern of development. In addition, the policy requirements include an area of open space to the south east of the site which will retain long views across the site and protect the amenities of the adjacent residential occupiers, creating an open aspect to the site. The Council would note that the site selection and allocation process must balance a number of different factors (for example, highways, landscape, heritage, on-site constraints etc) in contrast with the supporting HIA which focuses on heritage matters only. For this reason the Council may, on occasion, determine that not all of the recommendations in the HIA are suitable for inclusion in the final policy wording (whilst continuing to have appropriate regard to the impact of development on heritage assets).	1348	The Council will update the Heritage Impact Assessment to reflect the discussions that have taken place with Historic England following receipt of their Regulation-19 comments. The Council will reflect on the wording of Policy VC BUN2 following completion of this update to determine whether any amendments are required to either the supporting text or the site specific policy and whether these would constitute either main- or minor modifications to the Plan.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC BUN2: Land opposite Lilac Farm, Bunwell Street	3230	Support	We support the policy requirement to engage with us [Anglian Water] as early as possible on connections to the vacuum sewer network in Bunwell. However, as raised previously, the small-scale nature of the proposed site should not require a need to determine the capacity of the receiving WRC.	Modify policy text to read: Early engagement with Anglian Water to identify possible infrastructure crossing the site, and the capacity to connect to the current vacuum sewer system.	The Council welcomes the comments and clarification provided by Anglian Water in response to VC BUN2. The Council has included a requirement for early engagement with Anglian Water within the policy and does not consider the proposed amendment to the policy wording to be a soundness matter however should the Inspector be minded to update the policy to reflect the wording proposed by Anglian Water the Council would not object.	1347	The Council does not consider this to be a matter of soundness however should the Inspector be minded to amend bullet point 4 the Council would agree with the wording proposed by Anglian Water: "Early engagement with Anglian Water to identify possible infrastructure crossing the site, and the capacity to connect to the current vacuum sewer system".

11. Carleton Rode

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC CAR1: Land west of Rode Lane	3168	Object	Whilst there are no designated heritage assets within the site boundary there are two grade II listed buildings (Flaxlands Farmhouse and The Plough Inn) on the opposite side of the road. Any development of the site has the potential to impact on the significance of these designated heritage assets. We appreciate that this site was allocated in the previous local plan and indeed has an existing planning permission. We welcome the reference in the policy criteria to Flaxlands Farmhouse, but the policy should also mention the Plough Inn (also grade II listed).	Add reference to the Plough Inn in the second bullet point.	With regard to heritage, Section 16 of the NPPF and Policy DM4.10 of the South Norfolk LP requires Local Planning Authorities to assess the impact of any development on the significance of heritage assets. Furthermore, Sections 16 and S66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 state that local planning authorities must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. The Council is aware that one listed property (the Plough Inn) sits directly across the road from the development with a further one close to the north (Flaxlands Farmhouse). Reserved matters approval 2021/0289 demonstrates that development of an appropriate scale, design and materials on the site can be in keeping with the character of the street scene and not detract from the significance of the heritage assets. An existing planning permission for 3 dwellings on the site remains valid. The Council remains of the opinion that VC CAR1 is sound in its proposed form however should the Inspector be minded to modify the policy text in accordance with the comments of Historic England the Council agrees with adding the proposed reference for the purpose of clarity.	1238	The Council considers Policy VC CAR1 to be sound however should the Inspector be minded to modify the policy in response to these comments the Council suggests the following modification: "A layout and design that has regard to the setting of Flaxlands Farmhouse to the north-east and the Plough Inn to the south-east of the site".

12. Dickleburgh

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Settlement Limit, 12.8	3009	Object	We have submitted this site for consideration as a matter of soundness relating to the existing settlement limit for Dickleburgh (para 12.8). The site is included within the red line boundary of the attached plan. As a consequence we do not consider that the proposed settlement limit is sound. We believe that the site is a logical extension to the village. The site is considered to a sustainable location due to its close proximity to the village and existing residential development nearby.	It is requested that the LPA considers incorporating the potential development site into the settlement limit for Dickleburgh.	The Council acknowledges the submission of a new site for consideration within Dickleburgh during the Regulation-19 publication period. Dickleburgh and Rushall Neighbourhood Neighbourhood Plan, which has recently been subject to a formal Regulation-14 consultation, is seeking to allocate sufficient sites for residential housing in accordance with the housing numbers provided by the Greater Norwich Local Plan. For this reason the Village Clusters Plan is not seeking to allocate sites within Dickleburgh. Reflecting this position, and to ensure consistency with previous promoted sites within the NP area, the Council has forwarded the submission onto the Neighbourhood Plan group for their consideration but will not be considering this site for allocation within the VCHAP.	1255	None required.

13. Ditchingham, Broome, Hedenham and Thwaite

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Ditchingham, 13.1	2465	Support	A small amount of development suitable for single people or couples at an affordable price (not 4/5 bedroom detached!), would be a great addition and help support local facilities. We should be promoting high standards of design in all our developments and small affordable new build properties are in short supply. These enable young people to stay in the area and could possibly have self build options.	No changes specified.	The Council welcomes the support for this settlement limit extension. However, it does note that plans should be considered as illustrative only at this time as they do not have the benefit of planning permission and an alternative scheme may come forward on the site. The site layout and design of the site would be required to comply with existing development management policies, including having regard to the amenities of neighbouring properties.	1326	None required.
Ditchingham, 13.1	3011	Object	Clarification has been provided around ownership and availability of the site. Detailed site specific representations relating to trees, landscape, site accessibility to services and highways matters in order to prove the deliverability of SN0078. Allocation of the site would help to meet local housing need whilst providing proportionate growth of Ditchingham.	Allocate SN0078 for 15 residential dwellings.	Clarification regarding site ownership and availability is welcomed and it is noted that the proposed number of dwellings has been reduced to 15. However, no arboricultural assessment has been provided to provide detail about the condition of the trees, nor of impact and mitigation on the adjacent Priority Habitat. There are also concerns about the potential shading impact of trees located either on the site boundary or adjacent to the boundary, particularly the tension that this could cause for future residents of the site. Furthermore, Highways Authority comments on the possible need for junction improvements at the Station Road/Loddon Road/Hollow Hill Road junction have not been addressed. Overall the Council does not consider the omission of this site from the VCHAP to be a matter of soundness.	1325	None required.
Ditchingham, 13.2	2473	Support	Let provide opportunities for small scale developments by individuals and families to self build sustainable housing.	No changes specified.	The Council welcomes the support for this settlement limit extension. However, it does note that plans should be considered as illustrative only at this time as they do not have the benefit of planning permission and an alternative scheme may come forward on the site. The site layout and design of the site would be required to comply with existing development management policies, including having regard to the amenities of neighbouring properties.	1327	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Ditchingham, 13.11	3205	Object	Ditchingham Farms Partnership believe SN0345 should be included in the plan. The site has no constraints to development and very well related to the existing built-up area. A high-quality vehicular access is available with opportunities for pedestrian access. It is important that a range of sizes and types of sites are provided.	To make the plan sound further sites such as SN0345 should be allocated in order to provide a wider range of opportunities for local housebuilders.	The Council maintains that the overriding concerns outlined in the site assessment remain and for these reasons the Council does not consider the omission of this site from the VCHAP to be a soundness matter. Clarification on the provision of a footway link to the west is welcomed. However, the Highways Authority have previously commented on the need to widen the Loddon Road to 5.5m and remove trees from the site frontage to allow for access and visibility splays. Providing a road safety record does not provide sufficient evidence to reject this road widening against Highways Authority advice. Furthermore, no arboricultural assessment has been provided to provide detail of impact and mitigation on the hedgerow and mature trees along the southern boundary of the site.	1329	None required.
Ditchingham, 13.11	2307	Object	Ditchingham Parish Council opposes the use of Hamilton Way as a single access point. Further development on this site should provide an access via Thwaite Road and Waveney Road. The issue of upgrading the Ditchingham Water recycling centre has not been addressed.	Provide an access via Thwaite Road and Waveney Road.	Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have included consideration of preferred allocation site alongside the permitted scheme at Hamilton Way (2018/0121 and 2019/1925) and have led to the site-specific policy criterion. During consideration of outline 2018/0121 the applicants advised that access from Waveney Road was not feasible due to land ownership issues and, at that time, NCC Highways raised no objection to a single access from Hamilton Way. The formal comments of the Highways Authority received in response to the Regulation-19 Plan confirm a requirement for access to VC DIT1 to be via Hamilton Way. Anglian Water have also been engaged throughout preparation of the VCHAP, with opportunities to contribute at the site assessment, Water Cycle Study and consultation stages. Policy VC DIT1 references “the need to phase the site for possible upgrades to the Ditchingham Water Recycling Centre” (WRC). At the Reg-19 publication of the VCHAP Anglian Water stated that the scale of the proposed development posed no concerns regarding the capacity of the WRC. The Council does not consider that any of the issues raised relate to the soundness of the VCHAP.	1328	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Ditchingham, 13.11	2461, 2462, 2463, 2464, 2482, 2503, 2679	Support	Summary of representations received in response to para 13.11: Support housing, work and facilities for local people in a cost of living crisis. Support sustainable, eco-friendly and self-build development. Meet evidenced local housing need rather than assign proportionally across the district.	No changes proposed in response to para 13.11	The Council welcomes the support for this settlement limit extension. However, it does note that plans should be considered as illustrative only at this time as they do not have the benefit of planning permission and an alternative scheme may come forward on the site. The site layout and design of the site would be required to comply with existing development management policies, including having regard to the amenities of neighbouring properties.	1256	No actions required.
Broome, 13.12	3203	Object	SN0346 has no constraints which could not be overcome and should be included in the VCHAP. Housing was recently delivered nearby and the site could deliver flexible amounts of housing adjacent to the SL.	Inclusion of SN0346 in the VCHAP.	The Council maintains that the overriding concerns outlined in the site assessment remain and for these reasons the Council does not consider the omission of this site from the VCHAP to be a soundness matter. Designation of the site as a Local Nature Reserve has ecological significance and insufficient evidence (e.g. habitat surveys) has been provided to prove otherwise. Impact on the setting of Broome Heath County Wildlife Site has also not been addressed and the Council remains of the opinion this site is not appropriate for allocation in the VCHAP.	1330	None required.
VC DIT1, 13.16	2391	Object	Access to the site via Hamilton Way is not sound due to local road network capacity issues.	Alternative access is available via Thwaite Road and/or Waveney Road.	Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions alongside consideration of the residential development at Tunney's Lane Field off Hamilton Way (consents 2018/0121 and 2019/1925) have led to the criteria in the Policy. During consideration of outline 2018/0121 the applicants advised that access from Waveney Road was not feasible due to land ownership issues and, at that time, NCC Highways raised no objection to a single access from Hamilton Way. The acceptability of this single access has therefore already been established through the previous approval. NCC comments received at the Reg-19 publication of the VCHAP reiterate their requirement for an access off Hamilton Way.	1331	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC DIT1, 13.18	2566	Object	Anglian water have advised their facilities have no spare capacity.	Commitment from developer to work with Anglian Water to upgrade the sewage and waste waters and contribute to costs due to the upgrade.	The Council has engaged with Anglian Water (AW) in their role as technical consultee throughout the production of the VCHAP. The Council notes the email comments of Anglian Water to the the respondent and also welcomes the comments of Anglian Water in response to the Regulation-19 publication of the Plan. Anglian Water has not objected to the allocation of VC DIT1 in their response to the Regulation-19 Plan and paragraph 13.18 of the supporting text for Policy VC DIT1 includes reference to AW network assets and potential constraints on the wastewater capacity. Policy VC DIT1 also requires that developers engage with Anglian Water to identify assets on site and potentially phase the site in line with capacity at the local Water Recycling Centre (WRC). The Council considers that the matter raised has been addressed in the Plan and does not consider it to be a matter of soundness.	1263	None required.
Policy VC DIT1: Land at Thwaite's and Tunneys Lane	3073	Object	The Highway Authority previously expressed support for access to the site via Hamilton Way to the south. The access from Hamilton Way through the consented development (2019/1925) does not extend to the allocation boundary, potential resulting in an undeliverable allocation.	The boundary of VCDIT1 requires modification to ensure it can be accessed from the estate road of application 2019/1925.	The Council will review the boundaries of the allocation site however this is not considered to be a soundness matter and the Council considers that this would be most appropriately dealt with as a minor modification to the Plan, if the Inspector is minded to do so.	1332	The Council will review the boundaries of the allocation site however this is not considered to be a soundness matter and the Council considers that this would be most appropriately dealt with as a minor modification to the Plan, if the Inspector is minded to do so.
Policy VC DIT1: Land at Thwaite's and Tunneys Lane	3231	Support	We can confirm that we have network assets crossing the site. The policy should remove the word 'possible' to provide certainty. Our draft DWMP states that the medium-term strategy to 2035 for Ditchingham WRC is transfer between catchments and using SuDS as part of a mixed strategy to address surface water flows into our networks. Given the scale of development we do not consider that there needs to be a policy requirement for phasing in relation to upgrades to the receiving WRC.	Modify policy text to read: Early engagement with Anglian Water (AW) to identify infrastructure crossing the site.	The Council has engaged with Anglian Water (AW) in their role as technical consultee throughout the production of the VCHAP. The Council welcomes the comments of Anglian Water in response to the Regulation-19 publication of the Plan. Anglian Water has not objected to the allocation of VC DIT1 and paragraph 13.18 of the supporting text for Policy VC DIT1 includes reference to AW network assets and potential constraints on the wastewater capacity. Developers are encouraged to enter into early engagement with Anglian Water in order to understand available capacity within the network when preparing for development of the site. The Council considers that the inclusion of this reference within the supporting site allocation text is sufficient, of continued relevance and sound in its current form however if the Inspector is minded to modify the policy to address the comments raised the Council would support this modification.	1262	The Council does not consider that a modification to the site-specific policy is necessary to make the Plan sound however if the Inspector is minded to modify the policy to address the comments raised the Council suggests the following wording: "Early engagement with Anglian Water to identify infrastructure crossing the site".

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Policy VC DIT1: Land at Thwaite's and Tunneys Lane	3085	Object	Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy VC DIT1 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognise that underlain mineral resource has been included in the supporting text; however, we request inclusion of the text in the policy itself. The policy can be made sound by including the wording below, which was contained in the response by the Mineral Planning Authority, to the Regulation 18 consultation.	Amend policy VC DIT1 to add the following wording as a policy requirement: ‘The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - ‘safeguarding’ (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.’	The Council notes the comment of the Mineral Planning Authority but does not consider this to be a soundness matter. The Council has included within the supporting policy text reference to the site being underlain, or partially underlain by safeguarded resources and has highlighted the need for development to comply with the relevant policy within the Minerals and Waste Local Plan. It is not considered necessary to repeat this information within the site-specific text as all development is required to comply with the requirements of the Local Plan, which includes the Minerals and Waste Local Plan.	1261	The Council does not consider the issues raised within the response of Norfolk County Council Mineral Planning Authority to be soundness matters however should the Inspector be minded to modify Policy VC DIT1 the Council suggests the following addition to the policy wording: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - ‘safeguarding’ (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority".

14. Earsham

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC EAR1, 14.5	2919	Object	- Concern about landscape impact on the Waveney River Valley if site extended east; and - It is unsound to develop beyond the existing linear building line and impact on the setting of the River Waveney and wider Broads setting.	Scale of site reduced to linear infill of frontage.	The Council has considered the landscape impact of development in this location during the course of the site selection process. This has included engagement with consultees and the production of a Landscape and Visual Appraisal (LVA) which forms part of the evidence base. Both the LVA and the Heritage Impact Assessment also prepared for the site recognise the sensitivities of the landscape and this has informed the site specific policy requirements. Bullet point 1 of the policy requires developers of the site to ensure that the design and layout of the site responds to the sensitivities identified in these documents. The Council recognises that there will be some landscape impact arising but remains of the opinion that the scale of development proposed for this site is appropriate for the context and that the policy requirements, including design, layout and landscaping of the site, can address this impact. For these reasons the Council does not consider this to be a matter of soundness.	1355	None required.
VC EAR1, 14.6	2922	Object	Unacceptable heritage impacts in conflict with NPPF and local Design Guides.	Scheme should be reduced in size and scale to linear infill development to prevent isolated 'backland development'.	Revision of the site boundaries following the Reg-18 consultation removed the eastern half of the site and mitigates concerns around long-distance views across the Waveney Valley. A revised Heritage Impact Assessment (HIA) prepared as part of the evidence base for the VCHAP found that the site would be acceptable in heritage terms provided the existing hedge-line is continued along the eastern edge of the site. Bullet point 1 of the policy requires site developers to have regard to the sensitivities identified in both the HIA and the Landscape Visual Appraisal prepared for the site whilst bullet point 2 of the policy requires landscaping of the eastern boundary to be appropriately addressed at the planning application stage. The Council has also engaged with Historic England (HE) throughout the production of the VCHAP. The comments submitted by HE in response to the publication of the Regulation-19 document have been reviewed and responded to separately in response 1373. Suggested amendments to the policy wording in response to the comments of Historic England are not considered by the Council to be soundness issues, and the Council will recommend that these can be most appropriately incorporated as minor modifications to the Plan.	1356	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC EAR1, 14.7	2923	Object	Concern that The Rectory may be third-party land, making access difficult.	Scale of site reduced to deliver a private driveway access rather than estate road.	The Council has explored this issue with the site promoter and from the evidence submitted is satisfied that The Rectory and all other land covered by VC EAR1 are held in a single ownership and is deliverable. The Highways Authority has been engaged throughout the production of the VCHAP, with the proposed boundaries of the site updated to reflect the earlier comments received from them. The Highways Authority has not raised a soundness objection to the inclusion of this site in the VCHAP and the Council is satisfied that this is not a soundness matter.	1357	None required.
VC EAR1, 14.7	2695	Object	Concern over existing road safety issues being exacerbated by new development.	Review the entirety of School Road and its environs before adding more outlets to the road.	Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy, including a revision to the site area and access between the Regulation-18 and Regulation-19 stages of the Plan production NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds and the Council is satisfied that highway safety relating to this allocation is not a matter of soundness.	1313	None required.
VC EAR1, 14.8	2696	Object	Earsham has suffered from flooding in recent years, including near the site.	The site should not be developed at all on the basis of flood risk.	The Council has proactively engaged with the Lead Local Flood Authority (LLFA) and the Environment Agency (EA) throughout preparation of the VCHAP and no concerns have been raised over the potential flood risk of VC EAR1. The evidence base for the VCHAP includes the Stage 1 Strategic Flood Risk Assessment (SFRA) completed through the Greater Norwich Local Plan (GNLP), as well as updated work to support the VCHAP and specific Stage 2 reports for identified sites, including VC EAR1. The boundary of the allocation site excludes land further to the east which is identified as being a floodplain associated with the River Waveney and the Stage 2 SFRA did not raise any site-specific concerns. As set out in the supporting text (paragraph 14.8), a flood risk assessment (FRA) will be required alongside any planning application for the site due to the size of the site area. The Council therefore considers an appropriate approach to be achievable and does not consider this to relate to the soundness of the Plan.	1360	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC EAR1, 14.8	2813	Support	Earsham Parish Council welcomes a Flood Risk Assessment being undertaken due to history of flood events in the village (including in December 2021)	No changes identified.	The Council welcomes Earsham Parish Council's support for a Flood Risk Assessment to be undertaken alongside any future planning application on VC EAR1. As part of the evidence base to support the selection of sites for the VCHAP the Council has undertaken Stage 2 Strategic Flood Risk Assessment of the site. Whilst the overall site assessment notes the presence of the floodplain to the east of the site this does not extend into the site boundaries and the Lead Local Flood Authority has not raised an objection to the allocation of this site in their Regulation-19 response. The Council is satisfied that with appropriate design and mitigation measures a suitable scheme can come forward on this site, informed by the appropriate technical surveys.	1358	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC EAR1, 14.9	2697, 2925	Object	A summary of representations received in response to paragraph 14.9: - Development extends outside the village boundary; - Development is at odds with the local heritage and landscape setting; and - Development could impact on future expansion of the school.	Changes proposed to the Plan in response to paragraph 14.9: - A maximum of five houses on this site. - Additional housing should be on other sites throughout the village.	The Council has sought address the key issues raised in response to paragraph 14.9 by subject matter: Landscape and visual impact Landscape and heritage issues have been considered throughout the production of the VCHAP, with a Landscape and Visual Appraisal and a Heritage Impact Assessment conducted as part of the evidence base to support the selection of this site. Whilst VC EAR1 will extend further east than the existing development, the Council considers that this impact can be mitigated appropriately through the application of the policy criterion which include requirements relating to both layout and design and the landscaping of the site to minimise its visual impact. Principle of development All sites proposed for allocation in the VCHAP currently lie outside existing defined boundaries (or 'settlement limits') but on allocation will be included within revised boundaries. This process is part of the managed release of land that the Council is required to undertake to ensure a sufficient delivery of homes throughout the District and the scale of development proposed is considered suitable for the settlement. The Council does not consider this issue to relate to the soundness of the plan. Impact on the adjacent school site The site lies adjacent to Earsham CEVA Primary School, as noted in the supporting text. Throughout the production of the VCHAP the Council has engaged with Norfolk County Council in their role as Education Provider. The County Council has not raised an objection to the allocation of VC EAR1 either in terms of capacity or in terms of proximity of the site to the school. The school is not land-locked as a result of this allocation. The Council does not consider that any of the matters raised in these representations relate to the soundness of the Plan.	1361	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC EAR1: Land east of School Road	3169	Object	There are no designated heritage assets on site. The Close, listed at grade II, lies to the south of the site. The grade I listed All Saints Church lies to the north 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 assets. We welcome the preparation of the HIA. The HIA makes a number of helpful recommendations in relation to site density and views of the church. We broadly welcome bullet points 1,2 and 4 of the policy but consider that bullet point 1 could be more specific in relation to density on the eastern part of the site and views of the church. Bullet point 4 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 4 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	Amend bullet point 1 to reference lower density on eastern part of site and views of the church. Amend criterion 4 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	The Council welcomes the support for bullet points 1, 2 and 4 of Policy VC EAR1. Modifying bullet point 1 to refer specifically to a lower density on the eastern part of the site is not considered necessary as this is already set out in supporting paragraph 14.6. Neither is the lack of direct mention of views towards the church in the policy considered a soundness matter. In terms of archaeology, the Council considers that bullet point 4 is sound. Policy VC EAR1 highlights the need for archaeology to be considered; however, the Council's experience is that the need for field evaluation prior an application being determined is rare and can be required under NPPF paragraph 194 if necessary.	1373	The Council does not consider changes to bullet points 1 and 4 to be a soundness issue as they are already covered by supporting paragraph 14.6 and NPPF paragraph 194 respectively. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England for bullet point 4 and changing bullet point 2 to read: Lower density development towards the east of the site and landscaping of the east boundary to minimise the visual impact of the development on views towards the church and to reflect the edge of settlement location;
Policy VC EAR1: Land east of School Road	2829	Object	Earsham Parish Council previously set out concerns regarding development in the village on the grounds of infrastructure, traffic and flood zone constraints. A reduction in site area and the number of proposed properties alongside an improved access are appreciated. However, parish councillors still feel the problems with EAR1 for any density of building will exist because of its proximity, nearby school and local businesses located at The Old Mill.	Earsham Parish Council would like further consideration to be given to reduce the number of proposed housing even further for site EAR1 if it is not to be discounted altogether.	The Council has explored the issues raised by Earsham Parish Council throughout the production of the VCHAP through engagement with a number of consultees at every stage. These include Norfolk County Council in its role as Highways Authority and Education Authority; Lead Local Flood Authority; Environment Agency; and Historic England. Matters relating to flood concerns, heritage impacts, highways safety, townscape and proximity to the school have been addressed in detail by the Council in response to paragraphs 14.6, 14.7, 14.8 and 14.9. Reasonable modifications responding to these concerns have been made following the Reg-18 consultation and the issues moderated as detailed. Therefore, the Council does not consider that any of the matters raised in these representations relate to the soundness of the Plan.	1372	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC EAR1: Land east of School Road	2698, 2927	Object	A summary of representations received in response to Policy VC EAR1: - Loss of high quality agricultural land and important wildlife habitats. - Concerns about flooding on site. - Land ownership issues. - Development could impact on future expansion of the school.	Changes proposed to the Plan in response to Policy VC EAR1: - A maximum of five houses on this site. - Additional housing should be on other sites throughout the village.	Landscape and visual impact: Landscape and heritage issues have been considered throughout the production of the VCHAP, with a Landscape and Visual Appraisal and a Heritage Impact Assessment conducted as part of the evidence base to support the selection of this site. Whilst VC EAR1 will extend further east than the existing development, the Council considers that this impact can be mitigated appropriately through the application of the policy criterion which include requirements relating to both layout and design and the landscaping of the site to minimise its visual impact. All sites proposed for allocation in the VCHAP currently lie outside existing defined boundaries (or 'settlement limits') but on allocation will be included within revised boundaries. This process is part of the managed release of land that the Council is required to undertake to ensure a sufficient delivery of homes throughout the District and the scale of development proposed is considered suitable for the settlement. The Council does not consider this issue to relate to the soundness of the plan. Loss of agricultural land and wildlife habitat: As noted in the site assessment there would be no loss of high-grade agricultural land through VC EAR1. There is a policy requirement to protect and reinforce the Priority Habitat hedgerow along the south boundary of the site and site developers will be required to include biodiversity mitigation as part of any future development of the site. Miscellaneous: Matters relating to flood concerns, heritage impacts, land ownership, highways safety, townscape and proximity to the school have been addressed in detail by the Council in response to paragraphs 14.6, 14.7, 14.8 and 14.9. The Council does not consider that any of the matters raised in these representations relate to the soundness of the Plan.	1362	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC EAR1: Land east of School Road	3080	Object	Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy VC EAR1 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognise that underlain mineral resource has been included in the supporting text; however, we request inclusion of the text in the policy itself. The policy can be made sound by including the wording below.	Amend Policy VC EAR1 to add the following wording as a policy requirement: 'The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'	The Council notes the comment of the Mineral Planning Authority but does not consider this to be a soundness matter. The Council has included within the supporting policy text reference to the site being underlain, or partially underlain by safeguarded resources and has highlighted the need for development to comply with the relevant policy within the Minerals and Waste Local Plan. It is not considered necessary to repeat this information within the site-specific text as all development is required to comply with the requirements of the Local Plan, which includes the Minerals and Waste Local Plan.	1314	The Council does not consider the issues raised within the response of Norfolk County Council Mineral Planning Authority to be soundness matters however should the Inspector be minded to modify Policy VC EAR1 the Council suggests the following addition to the policy wording: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority".

15. Forncett St Mary and Forncett St Peter

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Settlement Limit, 15.3	3100	Object	The Plan is potentially unsound with the omission of my clients' site (ref. SN5027) as an allocation. The site is suitable, available and achievable. Further representation is provided on overcoming site constraints, notably site access.	Allocate SN5027 for residential development (possibly self-build) as part of the emerging VCHAP process.	The Council maintains that the overriding concerns outlined in the site assessment remain and for these reasons the Council does not consider the omission of this site from the VCHAP to be a soundness matter. The site is a considerable distance from the settlement limit and is in an unsustainable location for development. Comparison with the residential development of Hunt's Mead is undermined by the latter's previous brownfield use. Redevelopment of the Hunt's Mead site was considered to remove existing hazards and improve the attractiveness of the site, factors which are not applicable to SN5027. The promoter's suggestion that a new site access further to the east would satisfy highways concerns has previously been considered and rejected by the Highways Authority. Adjacent road alignment and forward visibility concerns remain and are compounded by a lack of footway connections to the local primary school.	1312	None required.

16. Gillingham, Geldeston, and Stockton

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Gillingham, 16.1	2436, 2438, 2443, 2479, 2737, 2798, 2823, 2867, 2920, 3003, 3029, 3037, 3055	Object	Summary of representations submitted in response to paragraph 16.1: - The z-bends are a consistent problem with the current traffic levels and increased housing will make this harder for both existing and new residents; - When traffic is diverted through the village due to accidents the road simply cannot take the increased traffic; - The development of VC GIL1 will not enhance the rural community and would be gross over-development of a service village; - The effects of the Daisy Way and Tulip Close developments are not yet known; - Proposed site VC GIL1 is c.2.36 hectares in size and therefore more than double the size of sites identified within the NPPF; - The number of houses proposed in addition to recent development is disproportionate to the size of the village and exceeds the JCS figures; - Proposals are not in keeping with Objective 3 of the VCHAP; - Inadequate infrastructure locally as existing facilities are at/ beyond capacity; - Development of this site would harm views out of the 2 main parts of the village into open countryside; and - The area is in flood risk zone 3, as confirmed by the environment agency and therefore should only be built on in very extreme circumstances (when all other possibilities have been explored).	Summary of changes proposed in response to paragraph 16.1: - An alternative route for the new houses planned to keep new traffic away and reduce existing traffic from the current residents; - The plans for the development of the estate to be cancelled. I do not want another housing estate to look at, it will ruin the beautiful public foot path I use on a daily basis. Gillingham lacks pavements and the footpath across the fields is used by dog walkers and families; - Review this allocation; - There are no changes that could be made to this plan which would make it acceptable to, or safer for, the residents of Gillingham; - The plans need to amended or rejected unless a reduction to existing traffic levels is incorporated into the plans; - The dangerous bend is unavoidable and unchangeable - if any new houses are built in the area then the access needs to be via the A146 or A143 via newly constructed roundabouts; and - No new roadways coming onto The Street.	The Council has reviewed the representations submitted in response to paragraph 16.1 and does not consider that any of the matters raised relate to the soundness of the Plan. The Council has responded in full to the key issues in response to VC GIL1 but would note in a summary response to these comments that the production of the VCHAP has been supported by extensive assessments and technical appraisals, as well as site specific discussions with technical consultees. No objections were raised by these consultees (which included Norfolk County Council's highways authority) in response to the formal publication of the Regulation-19 version of the Plan. Site specific matters relating to landscape, highways, flood zones and the impact on the local footpath network are specifically addressed in both the supporting text for the policy and the policy itself, reflecting the evidence base prepared in support of the VCHAP. References to both the settlement hierarchy within the Joint Core Strategy and the current suite of undetermined planning applications are not considered to be of direct relevance to VC GIL1 as they either relate to superseded information or speculative proposals for an alternative (and significantly larger) form of development locally.	1505	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Gillingham, 16.2	2384, 2444, 2797, 2824, 2924, 3030	Object	Summary of representations received in response to paragraph 16.2: - Para 16.2 16.2 states that "the parish is well served by the A146 and A143", however access is only via travel along The Street and specifically the blind Z-bends within Gillingham; - In response to 2022/1993 the Highways Authority have said that these bends cannot cope with the additional traffic that these proposed developments would bring; - The description that the village is served well by the A143 and A146 is misleading as the proposed sites can only be accessed via the Street, which as has been outlined on many occasions is already encountering dangerous levels traffic; - The nearby main A roads are good to have but they all have to be accessed via The Street; - The proposed housing developments and expansion of the service area would substantially change the character of the village, turning it into an urbanisation rather than a rural village; - Development of this site would harm views out of the two main parts of the village into open countryside to the south and south west; - Development will also potentially cause pollution to the river Waveney and risk of surface water flooding to new and existing properties; and - As noted in Natural England's response to 2022/1993 this development could have potential significant impacts on Broadland Ramsar, Broadland Special Protection Area (SPA), The Broads Special Area of Conservation (SAC), Barnby Broad & Marshes Site of Special Scientific Interest (SSSI), Geldeston Meadows SSSI, Stanley & Alder Carrs, Aldeby SSSI. It may also affect additional European designated sites scoped into the Norfolk Green Infrastructure and Recreational disturbance Avoidance and Mitigation Strategy ('GIRAMS').	Summary of changes proposed in response to paragraph 16.2: - The allocation of VC GIL1 is not in line with the NPPF or the objectives of the Village Clusters Plan and should be reviewed; - Any development must be sensitive to the rural nature of the village and enhance it rather than destroy and degrade it; - The plans need to amended or rejected unless a reduction to existing traffic levels is incorporated into the plans; - Any in-fill sites should be used rather than block erection of new estates; and - This site is in a sensitive landscape area and should not be considered as a priority site.	The Council has identified three key issues within the representations submitted in response to paragraph 16.2 - highways concerns, landscape-and environmental matters. The Council does not consider these to be soundness matters and has responded to each of these matters in full in response to the representations received in response to VC GIL1. However in brief, the Council can confirm extensive engagement with a wide range of technical and non-technical consultees (including Norfolk County Council in its role as Highways Authority) throughout the assessment and site selection process, as well as the production of an evidence base that includes Landscape Visual Appraisals, Habitat Regulations Assessments and other relevant technical assessments. These have been used to inform the site selection, as well as the detailed policy requirements and the Council considers that these matters have been appropriately considered throughout the production of the VCHAP. Additional issues raised by the recent submission of a suite of planning applications in Gillingham relate to wider site areas as well as higher numbers of residential development than those proposed in the VCHAP as well as additional commercial development. As such issues raised in response to these planning applications are not directly related to the proposed allocation of VC GIL1 and the Council does not consider it appropriate to respond to matters relating to these applications here.	1504	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Services and Community Facilities, 16.5	2385, 2445, 2517, 2870, 3031	Object	Summary of representations received in response to paragraph 16.5: - No medical, dental or social care provision - these are in Beccles and are operating at capacity; - Expansion to the existing village needs to address how the capacity measures will be addressed now and not at some point in the future; - VC GIL1 is not in accordance with the requirements of paragraph 79 of the NPPF; - Gillingham Primary School is operating at capacity; - The road network through Gillingham is at capacity and the drainage system would need to be upgraded; - The facilities at the A146/A143 should be described in greater detail in relation to planning application 2020/0491 which includes a farm shop and application 2023/0187 (still to be determined) which seeks to provide an electric vehicle charging hub and associated shop, a drive-thru cafe/restaurant/sandwich shop/bakery and two buildings for use within Class E (g) (iii), B2 and B8 including trade counters and ancillary showrooms. The area provides both services to the residents of the village as well as job opportunities. The ongoing expansion of the area can help to support the housing increase; and - The services at the roundabout have encouraged the frequency of anti-social behaviour and this could potentially become a bigger problem with the expansion of these services.	Summary of changes proposed in response to paragraph 16.5: - The plan needs to directly and expressly address how medical, dental or social care provision is to be expanded if the village is to grow; - The facilities at the A146/A143 should be described in greater detail in relation to planning application 2020/0491 which includes a farm shop and application 2023/0187 (still to be determined) which seeks to provide an electric vehicle charging hub and associated shop, a drive-thru cafe/restaurant/sandwich shop/bakery and two buildings for use within Class E (g) (iii), B2 and B8 including trade counters and ancillary showrooms; and - Build a medical centre on the services area not more fast food outlets.	The Council acknowledges the comments made in these representations but does not consider them to be matters that relate to the soundness of the Plan. The Council recognises the concerns regarding capacity of medical facilities throughout the area however as widely reported this is part of a wider medical / social care resource issue currently being experienced at a national level and is not a situation that is unique to the Gillingham/ Beccles area. Representatives of the Integrated Care System have been engaged with both the Greater Norwich Local Plan and the VCHAP in order to inform their ongoing healthcare strategies and future investment plans and the Council has also engaged with Suffolk County Council to address cross-boundary issues arising as a result of growth proposed. With regards to education, Norfolk County Council Education Services have reiterated their earlier advice that throughout Norfolk there has been a decline in birth rates which is impacting on the entry years and subsequent years in schools; it is anticipated that this will take effect within the next 2-3 years as higher numbers of pupils transition through the primary schools. Increased pupil numbers locally will support the ongoing future of rural schools throughout the village cluster area. Furthermore, as previously noted throughout the VCHAP, children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the school. To avoid future 'landlocking' of the Gillingham Primary School site policy VC GIL1 includes a policy requirement for 0.5ha of the site to be safeguarded for the future expansion of the school as required. Finally, comments relating to the existing undetermined planning application 2023/0187 are noted but any reference to the facilities proposed in this application would be premature as the application is still under consideration.	1502	No action required

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Gillingham, 16.6	2504, 2518, 2930	Object	Summary of representations submitted in response to paragraph 16.6: - The Street can not cope with more traffic - the blind corner is dangerous as it is; - This road leads around to the school so during certain times of the day is busy with pedestrians and vehicles and high school buses; - The boundary of the Settlement Limit (red line) around Daisy Way and Tulip Close does not encompass all of the dwellings which have been approved and built. A strange 'gap' has been created between the boundary of the proposed allocation and the proposed settlement boundary; - Gillingham has had a 9% increase in houses in the village with Daisy Way and an additional 35 properties is a total increase of 23% which will add huge pressure to local infrastructure; and - The Joint Core Strategy identifies Gillingham as a Service Village allocated for small scale growth (10-20 dwellings).	Summary of changes proposed in response to paragraph 16.6: - Road from Gillingham services for access; - Encompass all of the dwellings which have been approved and built around Daisy Way and Tulip Close; and - No new allocations are appropriate adjacent to Daisy Way.	The Council has worked alongside technical consultee to prepare a robust evidence base to support the assessment and selection of sites for the VCHAP. This has included both technical consultations and site specific meetings with the Highways Authority to assess the suitability of sites in highway safety terms as well as accessibility. The Council did not receive an objection to VC GIL1 from the Highways Authority in response to the publication of the Regulation-19 Plan and whilst it acknowledges the concerns raised does not consider this to be a matter of soundness. With regards to the proposed settlement limit boundary the Council welcomes this comment and proposes a minor modification to the accompany policy map to correct this error. Finally, the Council notes the comments regarding the level of growth proposed at Gillingham. The Council has carefully considered the most sustainable development options throughout the District, reflecting on existing patterns of growth as well as the availability of services and facilities. This has included within the cluster as well as the proximity and accessibility of the settlement to the nearby market town of Beccles. The Council is satisfied that the level of growth currently proposed in the VCHAP is at an acceptable level and would note that the Greater Norwich Local Plan has updated the settlement hierarchy and reference to the hierarchy established in the Joint Core Strategy is therefore no longer of direct relevance. The Council does not consider that any of these comments relate to the soundness of the Plan.	1501	Minor modification required to the settlement limit map for Gillingham to regularise the boundary around the Daisy Way development.

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VC GIL1, 16.8	2294, 2447, 2519, 2931	Object	Summary of representations received in response to paragraph 16.8: - The site does not provide access to any worthwhile services; - Medical and dental facilities are in Beccles and are overstretched already; - Beccles has substantial development planned which is putting extra pressure on those medical services which Gillingham residents also have to use; - The linear layout of the village along The Street means that all traffic has to negotiate the blind bend along The Street. This access can not cope with the additional level of vehicles the new houses would bring; - Gillingham primary school is operating at capacity; - The Fieldgate Reach site [Daisy Way] was only completed in 2022 and its effects locally are not yet understood; and - In addition to the reference to 'services,' there should be a reference to local employment opportunities offered by the facilities.	Summary of changes proposed in response to paragraph 16.8: - Removal of this site from the Plan; - The Beccles expansion programme should be taken into account and if so the Gillingham development wouldn't be required; and - The in combination effects of each of these developments [VC GIL1, Daisy Way and Beccles expansion] should be assessed within the Village Clusters Plan and any development plans should clearly set out what additional services will be provided to cope with the number of houses that are proposed within the area.	The Council acknowledges the concerns that have been raised in these representations regarding the availability of services and facilities at a local level however for the reasons set out below the Council does not consider that they relate to the soundness of the Plan. All sites have been assessed for their accessibility to a range of different services and facilities, as set out in the individual site assessment forms. The cluster has a range of facilities with a number of these being within reasonable walking/ cycling distance from the site. The primary school is immediately adjacent to the site. As noted in these representations Gillingham also lies within close proximity to Beccles, a town which offers a wider range of services and facilities. The Council has actively sought engagement with a wide range of consultees throughout the production of the VCHAP. This has included Norfolk County Council in its role as Education Provider, Suffolk County Council and neighbouring authorities and the Integrated Care System (ICS) which has responsibility for planning and co-ordinating the provision of healthcare services and facilities in the area. No objections have been raised by any of these parties in response to the allocation of this site, either on its own merits or in-combination with other recent or planned growth within the immediate and wider areas. A key objective of these discussions has been to inform these third parties of the proposed growth locations in the VCHAP to enable them to provide their own feedback to the plan and allocate their own resources appropriately. With specific reference to comments relating to the capacity of Gillingham Primary School the policy for VC GIL1 includes a requirement for 0.5ha of land to be safeguarded for expansion of the school to allow for its future expansion. Overall, the County Council has advised that the level of growth planned within the VCHAP can be accommodated within the existing school network, including in this cluster. NCC Education notes that some schools do act as overflows to some strategic areas but that this pressure will be released in the future as new school sites are delivered. The planned growth in Beccles includes a new primary school.	1497	No action required

VC GIL1, 16.9	2293, 2386, 2437, 2439, 2449, 2738, 2868, 3004, 3018, 3036	Object	Summary of representations received in response to paragraph 16.9: - VCHAP does not account for further properties adding traffic congestion to The Street which is virtually a one-way street with no opportunities for road widening; - Accidents have occurred here but those without injuries are not recorded so it appears that there is not an issue; - The access into Daisy Way does not provide suitable access onto The Street for the additional traffic that would be generated and NCC Highways have confirmed in their response to planning application 2022/1993 that this is not safe and that a secondary entry/exit point is required; - The Highways Authority have already confirmed that the Z-bends cannot cope with the additional traffic that these proposed developments would bring; - This area lies within a Flood Risk Zone 3 and access would be unsafe when flooded; - Regarding local improvements made on the site frontage, a newly paved walkway along the single access point is bare minimum and also not in keeping with the aesthetic of the walkway either side of the new development; - The proposal for a single access and exit point to an estate which will have over 100 vehicles using it is not safe and is therefore unacceptable as the local road network and blind bends can not cope; - The Street is unsafe for current residents; - The entire site lies within Flood Risk Zone 3b, as confirmed by the Environment Agency (response to 2022/1993) and safe access and egress can not be provided at times of flooding; - There are flooding issues in the new estate, not unexpected as the entire area lies in Flood Risk Zone 3 confirmed by the Environment Agency, this will cause access issues when it occurs and may result in run-off issues to other properties; - Daisy Way is an unadopted private road which is not constructed for this scale of development and would not safely accommodate traffic during construction; - Traffic will also worsen if the school is extended, further supporting the need for two accesses; and - The current entrance/exit at Daisy Way is very near a bend and another road junction so is already	Summary of changes proposed in response to paragraph 16.9: - Either refuse planning permission or a car park to be provided on land east of Daisy Way on the first bend in The Street coming from the Beccles direction for residents of The Street only so that parking outside of the houses is stopped and thus allowing full vehicle access in both directions, double yellow lines to be placed on both sides of The Street to enforce compliance; - At least two access points should be provided; - The area also lies in a flood risk zone and appropriate measures need to be taken to mitigate the risk especially for existing residents of the street as current houses are situated at the bottom of the hill near the blind bend; - No extension to Daisy Way and removal of site from the VCHAP; and - As there does not appear to be an alternative point of access I can see no viable change other than to abandon the housing scheme.	The Council is aware that a number of issues have been raised regarding highways matters both in response to the proposed allocation of VC GIL1 and in response to planning application 2022/1993 which covers a wider area than VC GIL1. This application is also being considered alongside two further planning applications; one for residential development north of The Street and the other for further commercial development off the A146 roundabout. Whilst the Council is continuing to explore matters raised with technical consultees it would also highlight that (a) comments on the planning applications relate to a different set of proposals and scale of growth locally and that (b) ongoing discussions have taken place with Norfolk County Council (in its role as Highways Authority) as part of the preparation of the VCHAP. Concerning VC GIL1, no objections were submitted to the formal publication of the Regulation-19 VCHAP by the Highways Authority to the allocation of this site on any of the grounds set out either in these representations, or for those set out in the response to the planning application by the Highways Authority.	1490	Further discussions to be arranged with Norfolk County Council's Highways team to consider matters raised both in response to the Regulation-19 publication period and as part of planning application 2022/1993.

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			a busy junction. The addition of more housing and therefore more vehicles will make it an even busier junction.				

VC GIL1, 16.10	2387, 2440, 2450, 2740, 2796, 3005, 3025	Object	Summary of representations received in response to paragraph 16.10: - Para 16.10 understates the impact of the site and is in conflict with para 16.2; - Maintaining the rural character of the village and avoiding urbanisation should be at the heart of any strategy for Village Clusters; - Development of this site would have a permanent devastating impact on the rural outlook to the south and southwest of the village; - Natural England have raised concerns in response to planning application 2022/1993 about the potential impact on significant sites; - The suggested development will impact negatively on the residents who look out to the south and south west; - Proposed additional housing would deprive residents of the rural aspect, views to open countryside and health benefits currently enjoyed; - This development will deprive the local community of an important public footpath that provides a route to the local river and an enjoyable walk promoting exercise and mental well being; - This development will damage the views of the village and existing residents views will suffer and it will not be in keeping with the villages characteristics; - Allocation of VC GIL1 conflicts with statements elsewhere in the VCHAP and will result in views out of the two main parts of the village into open countryside to the south and south-west being irrevocably harmed; - The SA identified sites to the north and east of the District having the greatest sensitivity in terms of proximity to designated sites of international biodiversity significance associated with the Broads and VC GIL1 is within 1km of the Broadland Special Protection Area (SPA) and the Broads Special Area of Conservation (SAC); - The Sustainability Appraisal also identifies VC GIL1 as having potential landscape impacts on the setting and character of the Broads National Park; - Development of this site is not in keeping with the objectives of the Village Clusters Plan or the NPPF and, given the increased impacts development at this location would have on protected sites and features compared to other sites, this site should not be allocated for development; and	Summary of changes proposed in response to paragraph 16.10: - Reconsider the scale of this allocation and/or do not allocate this site; - The site needs to maintain the inherent rural character of the village, avoiding over-development and urbanisation. Landscaping alone cannot offset the requirement to open views which are characteristic to this rural village location; - The development is detrimental to the rural nature of the village and in conflict with the Village Clusters Plan. There are no changes which would alter these facts; and - Restrict development to the north.	The Council has noted the comments submitted specifically relating to the landscape context of the site but does not consider these to be matters relating to the soundness of the Plan. Both paragraph 16.10 and bullet point 5 of policy VC GIL1 clearly acknowledge the landscape sensitivities of the site, including its proximity to the Broads Authority area. The developer of the site will be required to undertake a Landscape and Visual Impact Assessment (LVIA) to assess the landscape impact and inform the detailed development of the site. A previous landscaping scheme associated with the earlier allocation of GIL1 (now Daisy Way) was agreed and the Council will require a consideration of this landscaping alongside a new landscaping scheme for VC GIL1. Opportunities to repair and enhance the existing landscaping exist as part of VC GIL1. With regards to concerns about the impact of VC GIL1 on the existing footpath network the Council refers to bullet point 3 of the site specific policy as this makes provision for either (a) the formal diversion of this Public Right of Way or (b) incorporation of the route into the site layout and design.	1485	No action required

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			- Landscaping to the recently built estate is poor, existing established hedging/trees were removed resulting in loss of habitat for local wildlife which hasn't been adequately replaced.				
VC GIL1, 16.11	2451, 3033	Object	Summary of representation received in response to paragraph 16.11: - The Environment Agency's holding objection to 2022/1993 highlighted that the site is located in fluvial and tidal Flood Zone 3 and this is without inclusion of the nearby unnamed watercourse that flows south along Rectory Road before crossing the A143 into Gillingham; - Safe access and egress can not be provided in times of flooding; - The Developers of the recently completed Fieldgate Reach development confirmed issues with the foundations for these housings due to flood risk. This site is therefore inappropriate for development; - The LLFA has objected to the 2022/1993 due to inadequate consideration for the GIL1 (existing Daisy Way) site; - This area of Gillingham has had extensive recent changes including large areas of hardstanding at Daisy Way development and by the recent service area extension (nearby across the field). In an area known to flood, these developments need to settle in to the landscape such that their effects are understood prior to further development; and - The cumulative impacts of 2022/1897 and 2023/0187 also need to be considered.	Summary of changes proposed in response to paragraph 16.11: - The Village Clusters Plan should be updated to remove this site from its allocation	The Council recognises the concerns that have been raised and continues to liaise with both the Environment Agency and the Lead Local Flood Authority regarding flood risk matters relating to this site, particularly as additional evidence becomes available via the current planning application for the wider site area (2022/1993). However, the Council would also note that it has undertaken significant engagement with these technical bodies throughout the course of preparing the VCHAP and it has not received an objection to the allocation of this site in response to the publication of the Regulation-19 Plan. The Council remains of the opinion that the site is suitable for allocation, with developers required by the site-specific policy to undertake a Flood Risk Assessment that will be informed by the Strategic Flood Risk Assessment (FRA) that has been prepared to support the production of the Plan. This FRA will inform both the site layout and design and mitigation measures.	1498	The Council continues to liaise with both the Environment Agency and the Lead Local Flood Authority about site-specific matters raised in their Reg-19 responses as part of the ongoing production of the SFRA. However, the Council does not consider that these matters relate to the overall soundness of the plan.

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VC GIL1, 16.12	2872, 3039	Object	Summary of representation received in response to paragraph 16.12: - If a new school is built it will also have a massive impact on the cars using "The Street" as not all the children walk to school - some drive from Beccles; - The NCC response to 2022/1993 states that the school is currently over-subscribed so has not have any capacity for new people from these sites; - Provision of extra land will not help in the mid-term as there are no plans for the use of this land; and - As this land is adjacent to Daisy Way, it can be reasonably assumed that there will be an access created to the school from Daisy Way and there has been no consideration of the impact of that in either this Plan or in the above Planning Application.	Removal of the site from the Plan	The Council has engaged with Norfolk County Council in its role as Education Provider throughout the production of the VCHAP. In terms of the capacity at the local primary school, Norfolk County Council Education Services have reiterated their earlier advice that throughout Norfolk there has been a decline in birth rates which is impacting on the entry years and subsequent years in schools; it is anticipated that this will take effect within the next 2-3 years as higher numbers of pupils transition through the primary schools. Increased pupil numbers locally will support the ongoing future of rural schools throughout the village cluster area. Furthermore, as previously noted throughout the VCHAP, children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the school.? In addition, as set out in the supporting text and bullet point 6 of the site specific policy the Council has recognised that development of VC GIL1 could 'landlock' the existing school site and as such has required the safeguarding of a 0.5ha parcel of land to enable the expansion of the school site as appropriate. The Council does not consider that the matters raised in these representations relate to the soundness of the Plan.	1499	No action required
VC GIL1, 16.13	2452	Object	- Natural England have returned comments to a recent planning application at the same location (2022/1993) to highlight that the application could have potential significant impacts on a number of protected sites and features; - Given the increased impacts development at this location would have on designated protected sites and features compared to the other sites assessed, this site should not be allocated for development.	Given the increased impacts development at this location would have on designated protected sites and features compared to the other sites assessed, including the site north of The Street, this site should not be allocated for development and the Village Clusters Plan should be updated to reflect this.	The Council is aware of the comments that have been submitted in response to planning application 2022/1993 and will review the additional evidence as appropriate as it becomes available. However the Council has engaged extensively with both technical and local consultees regarding ecological matters relating to the allocation of all sites and has not received an objection to the allocation of VC GIL1 on these grounds. Furthermore, the preparation of the VCHAP has been informed by an extensive evidence base, including a Habitats Regulation Assessment which has assessed the impact of development on sensitive sites. As noted in the supporting text planning applications for the site will be subject to consultation with Natural England, as has occurred on the current planning application. The Council does not consider this to be a matter relating to the soundness of the Plan.	1500	No action required

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Policy VC GIL1: South of Geldeston Road and Daisy Way	2647	Object	This allocation is in relatively close proximity to Geldeston Meadows SSSI, a floodplain grazing marsh and component of the Broads SAC/Broadland SPA which is currently in an 'unfavourable condition' with a small part in an 'unfavourable declining' condition. National Planning Policy Framework (NPPF) 180: 'When determining planning applications, local planning authorities should apply the following principles: b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted.....'	- Recommend that Policy VC GIL1 should be updated to reflect para 180 wording of the NPPF, with clear signposting for the need to review any potential indirect disturbances to Geldeston Meadows SSSI; and - Recommend that any policy wording also includes reference to the need for an appropriate great crested newt assessment prior to determination, in order to ensure that the allocation is supported by the appropriate ecological evidence.	The Council notes the comments of Norfolk Wildlife Trust but does not consider that they relate to the soundness of the Plan as it is not considered to be good practice to repeat existing planning policy guidance or legislation in Local Plans. The production of the VCHAP has been supported by the production of a Habitats Regulations Assessment which has assessed the impact of sites on sites of interest. It has not raised concerns about the impact of VC GIL1 on Geldeston Marshes SSSI. With reference to the changes proposed to the Plan by Natural England the Council has clearly set out in paragraph 16.13 of the supporting text the need for liaison by the site developer with Natural England for development of over 10 dwellings and considers that this is sufficient. However, should the Inspector consider that a modification to either the supporting site text and/or the site specific text to reflect the comments of Natural England the Council would not object.	1484	The Council does not consider this to be a matter of soundness as the NPPF clearly sets out the relevant guidance and should not be repeated within the VCHAP. However, should the Inspector be minded to modify either the supporting text and/or the site specific policy to make reference to the specific areas referred to by Natural England (i.e. Geldeston Meadows SSSI) the Council would not object.
Policy VC GIL1: South of Geldeston Road and Daisy Way	2621	Object	The 5th bullet point needs to mention assessing potential impact on the Broads, as is written in para 16.10. Where it says in 5th bullet point there is a need for a fill Landscape Assessment, is that a LVIA? Does it need to mention the term LVIA to make it clear what is required? For example, this policy talks about a Landscape Assessment whereas policy VC ROC1 talks about a Landscape and Visual Impact Appraisal. Why the difference?	No changes proposed	The Council does not consider that these comments relate to the soundness of the Plan. Paragraph 16.10 of the supporting text makes clear reference to the wider landscape context and sensitivities, including to the Broads Authority area. The Council does not consider it necessary to repeat this level of detail in the site specific policy however should the Inspector be minded to modify bullet point 5 of the policy to reflect the comments of the Broads Authority the Council would not object. Similarly should the Inspector be minded to modify the policy to read 'Landscape Visual Impact Assessment' for clarity and consistency the Council would not object.	1483	The Council does not consider this to be a soundness issue however should the Inspector be minded to update bullet point 5 to reflect the comments of the Broads Authority to make reference to the Broads Authority and clarify it is a Landscape Visual Impact Assessment that is required the Council would not object to this modification.

Policy VC GIL1: South of Geldeston Road and Daisy Way	2301, 2361, 2419, 2448, 2453, 2520, 2530, 2560, 2818	Object	A number of representations were submitted in response to VC GIL1. For ease of reference these have been summarised and grouped by topic area below: Principle of development and housing numbers - Previous 2015 Local Plan development has only just been completed and has not been taken into account when allocating extra housing in Gillingham leading to concern that in a few years time there will be further housing; - Over-development of the village when taken alongside the 2015 allocation; - Local housing requirement has not changed much in the last 7 years; - The number of houses proposed (c.35) in addition to the recently developed Fieldgate Reach Site (22 houses) is disproportionate to the size of the village and far in excess of that which was set out in the Joint Core Strategy (Policy 15); - This level of growth is not in keeping with the Village Clusters Plan key objective SNVC 3 – to protect the character of villages and their setting; - VC GIL1 and the recent planning applications have all been submitted in a matter of months and it is unclear how Gillingham can be the focus of multiple large scale development which will severely impact the rural character of the village and its surrounds; - VC GIL1 will not enhance the rural community; - Large scale development in Beccles (c.450 homes) not considered in this plan; - VC GIL1 is c. 2.36ha in size and therefore more than double the size of sites identified in para 69 of the NPPF; Highways - Highway concerns recorded for sites SN0274REVA and REVB are applicable to VC GIL1 and should result in the site being discounted; - Clear issues with safe access along The Street and the acute blind bend (see NCC highways response to 2022/1993). The response of the Highways Authority to the planning applications should be taken into consideration for this site; - The road through Gillingham is restricted by parked cars, leading to single track working which is dangerous. The parked cars have nowhere else to go as they are in-front of houses. Surveys carried	- Include a date which sets out when further planning permissions can be applied for so that residents have realistic expectations; - VC GIL1 should be removed from the site; - If VC GIL1 remains in the Plan there should be a different access point (i.e. not through The Street or Daisy Way); - No further building in Gillingham; - Traffic problems through The Street need to be addressed to alleviate the problems with parked cars on the roadside; - Flooding risks on the site need to be solved in a satisfactory way; - The cumulative effects of VC GIL1 and recent developments should be considered; and - The North site (SN2074) should be properly considered with an exit onto the roundabout via Hearts services.	The Council has grouped its response as per the grouping of the representations. Overall, the Council does not consider that any of the matters raised relate to the soundness of the Plan, but it continues to review relevant evidence submitted to support the current suite of planning applications as appropriate. Principle of housing development and housing numbers The requirement for new development is set at a national level, with the detailed housing requirement for the VCHAP area identified within the GNLP. The Council has noted that allocations made within the earlier 2015 allocations plan and the emerging VCHAP appear to have been conflated within a number of representations, with an assumption that the earlier Joint Core Strategy set a finite level of growth. In practice, the Greater Norwich Local Plan will replace the Joint Core Strategy, providing both an updated settlement hierarchy and an updated housing requirement figure. This is in accordance with the requirements set by national government. As part of this process the VCHAP seeks to manage the strategic release of land to accommodate the identified housing need over the Plan period and this document will also be updated and reviewed in due course. With regards to the on-site numbers proposed for VC GIL1 the Council has assessed both the site and the availability of local services and facilities and has allocated a scale of development it considers to be appropriate for the settlement. The Council is currently considering how the proposals set out in planning application 2022/1993 relate to VC GIL1. Highways matters Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds. The Council is aware of comments submitted by the Highways Authority in response to the current suite of applications at Gillingham and will continue discussion about these. However, the Council does not consider the HA comments to be reflective of the detailed site description for the VCHAP or directly applicable to VC GIL1 due to the nature of these planning applications.	1482	The Council will continue to engage proactively with the Highways Authority, Lead Local Flood Authority and the Environment Agency.

		out of residents by Gillingham Parish Council rejected any option to introduce no waiting restrictions; - The proposals involve an overlong cul de sac as it gains access through the existing Daisy Way; Flood risk - Concerns about the risk of flooding on this site as I have witnessed the site flood annually for the last 50 years; - The EA have provided a holding objection to planning application 2022/1993 (VC GIL1) on flood risk grounds; - EA maps show the site is within fluvial and tidal Flood Zone 3; - The 2015 GIL1 site allocation stated: “The extent of the new housing allocation is limited to land that is within Flood Risk Zone 1. It is not appropriate to allocate a larger site due to the surrounding land being at a higher risk of flooding. Within the land allocated, an allocation of approximately 10 dwellings is considered appropriate to reflect the form and character of existing built development to the west of the site”; Landscape and environment - Concerns about noise, lights and highways safety; - Impact on wildlife and local environment; - Natural England have commented on the recent planning applications to highlight the potential significant impacts on a number of protected sites and features; - The SA identifies VC GIL1 as having potential landscape impacts on the Broads National Park, as well as the being within 1km of the Broadland Special Protection Area (SPA) and the Broads Special Area of Conservation (SAC); - Landscape impacts should consider the combined impact of VC GIL1 and the recent development at Fieldgate Reach [Daisy Way]; - Development on open greenfield sites should be avoided while other solutions less harmful to the environment and countryside are investigated. It is clear that there are sufficient allocated sites for housing within the existing Joint Core Strategy without the need to consider developing unallocated sites; - Local significant adverse impacts on rural character and on nationally designated sites		Flood risk matters Development of the VCHAP has been informed by the production of a Strategic Flood Risk Assessment as well as liaison with technical consultees including the Environment Agency and the Lead Local Flood Authority. At the time of preparing this response (September 2023) the Council is continuing in its engagement with these statutory consultees, and further evidence is being made available via the current planning application on the wider site (2022/1993). The Council has also recognised the flood zone constraints, as set out in both the supporting text and the detailed policy requirements for VC GIL1. These policy requirements include the preparation of a Flood Risk Assessment to inform the development and appropriate mitigation measures. Flood mitigation measures may include, for example, storm water attenuation systems which decrease the speed at which water is released into the infrastructure and these can improve existing greenfield runoff rates which may in turn improve the current situation. Landscape and environment matters As part of the evidence base preparation and the site selection the process the Council has considered the impact of proposed allocations on the local environment (including biodiversity) and the immediate and wider landscape. The Council recognises the sensitivities of the landscape in this location, including its proximity to the Broads Authority area to the south, and this is specifically highlighted in paragraph 16.10 of the supporting text and bullet point 5 of the policy. Production of the VCHAP has been supported by the preparation of a Landscape Visual Appraisal and a Habitats Regulation Assessment which considers the impact of new development on protected sites. This document refers to the proximity of the site to the Broadland SPA, Broadlands Ramsar and Broads SAC and also considers the likely recreational impact of development (including in-combination with other plans and projects). Technical consultees have also been engaged throughout the process. In terms of mitigation the Council has adopted the Norfolk-wide GIRAMS strategy which seeks to mitigate adverse impacts that may arise from visitor recreational pressures related to new developments on identified	

			including Broadlands SPA and Broads SAC; - When the demand is for us to 'go green' SNC is proposing extensive builds that will swallow up land and greenspace, footpaths and pollute a rural landscape; Alternative sites SN2074REVA and SN2074REVB - Allocation of land to the north of The Street (SN2074) could provide much needed amenities (such as playground and MUGA); - Affordable housing in Gillingham could be increased by the construction of additional units; - Development of SN2074 would allow for the continuous flow of housing; - Land to the north of The Street (SN2074) would not be subject to nutrient neutrality constraints and could make a contribution to the housing provisions of the Plan – the Plan is over-optimistic regarding the impact of nutrient neutrality on allocations and therefore fails the test of soundness; Miscellaneous - There are no plans for extra school or health facilities which are at a premium; - Lack of services within Gillingham (dental, doctors, social care) and lack of capacity in Beccles; - This is not an extension to a village but a plan to create a town on a flood plain; and - Previous consultation responses have not been responded to.		sensitive sites and this requirement will apply to all allocations made via the VCHAP. Alternative sites SN2074REVA and SN2074REVB The Council has previously assessed the sites to the north of The Street that were promoted as potential allocation sites. The site assessments for these sites set out the conclusions and these sites have been classified as Reasonable Alternative sites, as per these assessments. The Council has noted that a number of site benefits associated with SN2074 REVA and REVB have been suggested within these representations however the provision of proportionate levels of affordable housing, playspace and new housing are considered to be standard requirements. With regards to nutrient neutrality the Council considers this to be a short term constraint on the delivery of housing within the District whilst the VCHAP is planning for long-term strategic growth. For this reason the Council does not consider this to be a matter of soundness. Miscellaneous The Council recognises local concerns regarding the availability of local services throughout the District. A key objective of the VCHAP is supporting existing services and facilities. The Council has sought engagement with both the Integrated Care System (ICS) setting out the planned growth within the VCHAP area. Similarly the Council has engaged proactively with Norfolk County Council (in its role as education provider) regarding school places and planned growth. The developer of the site is required, in accordance with Policy VC GIL1, to provide a 0.5ha area of land to enable the future expansion of the adjacent primary school. This reflects discussions with the education provider (NCC). Norfolk County Council in its role as Education Provider has not raised any objections to be proposed allocation of VC GIL1. Finally, the Council has noted concerns expressed about the earlier consultation comments and in particular that these have not been responded to. The Council published a Statement of Consultation in January 2023, alongside the Regulation-19 version of VCHAP, which included detailed responses to comments submitted during the Regulation-18 consultation. This remains available to view on the Council's VCHAP web pages alongside the full evidence base for the	

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					emerging Plan. Where appropriate the Council has explored further the matters raised in the response to the Regulation-18 consultation and this process has helped to inform the site selection process.		
Policy VC GEL1: North of Kell's Way	2869	Object	This proposal will only make matters worse along "The Street" in Gillingham on the dangerous ninety degree bend where it is not only "single file" traffic but also a blind ninety degree with cars parked on the road. Anyone in these new dwellings will need use that bend to get to Beccles for any shopping etc.	Do not build in this location	The Council does not consider that the concern raised relates to the soundness of the Plan. The Council has liaised with Norfolk County Council in its role as Highways Authority throughout the preparation of the VCHAP and NCC has not raised an objection to the allocation at the Regulation 19 stage on highways grounds. The scale of development proposed on this site is not considered to be significant and it is not considered that the traffic generated will have a significant impact on highways safety, particularly in an area in a neighbouring village. (These comments have been attributed to the proposed allocation in Geldeston although they relate to The Street in Gillingham, a road close to the preferred allocation site within Gillingham. However, as traffic from Geldeston passes along The Street in Gillingham to reach Beccles they could relate to either allocation site. Due to their attribution however the Council has considered it appropriate to respond to these comments in the context of VC GEL1.)	1481	No action required

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Policy VC GEL1: North of Kell's Way	3218	Support	Summary of representation for VC GEL1: - We believe that the draft VCHAP is basically sound, as the strategy proposed is essentially justified and effective and provides a range of sites by which growth can come forward. The site to the north of Kell's Way in Geldeston, offers a very good opportunity to deliver growth in a manner that provides an appropriate to the sustainable objectives of the emerging VCHAP and NPPF; - We believe with a suitably designed scheme, which recognises the constraints of the site could be delivered in such a way as to minimise landscape harm with the ecological and recreational benefits it potentially would bring - the site has a realistic prospect of being delivered within 5 years; and - We are seeking amendments to the policy to increase the potential number of units on the site. Having undertaken some initial work on the site, we believe that the site is capable of delivering up to 25 units.	Uplift in housing numbers allocated on site to "up to 25 dwellings"	The Council recognises and welcomes the ongoing support of both the site promoter and the developer for the allocation of this site within the VCHAP. As set out within VC GEL1 the site is preferred for the allocation of up to 20 dwellings, a scale and density of development which the Council continues to consider to be appropriate in this location due to the topography of the site and the wider landscape context. The Council does not consider that the number of dwellings proposed in this allocation should be modified.	1480	No action required
Policy VC GEL1: North of Kell's Way	3170	Object	There are no designated heritage assets on site. However, the site is adjacent to the Gedleston 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. We welcome the preparation of the HIA. The HIA recommends that development needs to respect the form and layout of the Kells Estate. This is reflected in criterion 2. Bullet point 4 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 4 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	Amend criterion 4 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	The Council welcomes the support of Historic England for the production of the Heritage Impact Assessment as part of the wider evidence base. In terms of archaeology, the Council considers that bullet point 4 is sound. Policy VC GEL1 highlights the need for archaeology to be considered; however, the Council's experience is that the need for field evaluation prior an application being determined is rare and can be required under NPPF paragraph 194 if necessary.	1479	The Council does not a modification to the policy to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.

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Policy VC GEL1: North of Kell's Way	2620	Object	- 2nd bullet point of the policy needs to mention assessing potential impact on the Broads, as is written in para 16.17; - Where it says in 2nd bullet point there is a need for a full Landscape Assessment, is that a LVIA? Does it need to mention the term LVIA to make it clear what is required?	No changes proposed in response to VC GEL1	The Council recognises the relationship of the site with the surrounding landscape and built environment, as set out in paragraphs 16.17 and 16.18 of the supporting text and bullet point 2 of the site specific policy VC GEL1. For clarity and consistency with other policies within the VCHAP the terminology set out in bullet point 2 of VC GEL1 could be improved so that it reads 'Landscape Visual Impact Appraisal' as suggested in this representation from the Broads Authority however the Council considers that the additional detail set out in the supporting text at paragraph 16.17 specifically relating to the inclusion of the Broads area is sufficient and does not need to be repeated in the policy. The Council does not consider either of these matters to relate to the soundness of the Plan.	1478	The Council does not consider either of these matters to relate to the soundness of the Plan however for clarity and consistency with other policies within the VCHAP the terminology set out in bullet point 2 of VC GEL1 could be improved so that it reads 'Landscape Visual Impact Appraisal' as suggested in this representation. Should the Inspector be minded to update bullet point 2 of the policy to include specific reference to the Broads Authority area the Council would not object.

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

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Services and Community Facilities, 17.11	2799	Object	Hales and Heckingham does not have a range of social and community facilities/services. Concern about strain on local services including health and education.	We would like you to consider the creation of a community hall/shop/café to support and enhance village life which bring people together and provide a sense of community and togetherness.	The detailed services and facilities in Hales were correct at the time of writing and should be viewed proportionately to the size of the village and in comparison with the other village clusters. Provision of a community hall through an S106 is not likely due to the limited scale of development across both allocations and there does not appear to have been any active engagement from the Parish Council or other community organisation regarding the provision of a facility and its longer-term management/maintenance etc. Developments of this size are asked to provide a proportionate amount of affordable housing and open space, as has already been secured for consent 2022/0287 on the VC HAL2 site and will also apply to VC HAL1. Loddon has a relatively small but healthy town centre with a range of services and facilities that are accessible to existing and future residents of Hales, including by continuous footway and regular bus service. In respect of local healthcare provision, capacity is widely recognised as a national issue. Nevertheless, representatives of the Integrated Care System have been engaged with both the Greater Norwich Local Plan and the VCHAP in order to inform their ongoing healthcare strategies and future investment. In terms of the capacity at the local primary school, Norfolk County Council Education Services have reiterated their earlier advice that throughout Norfolk there has been a decline in birth rates which is impacting on the entry years and subsequent years in schools; it is anticipated that this will take effect within the next 2-3 years as higher numbers of pupils transition through the primary schools. Increased pupil numbers locally will support the ongoing future of rural schools throughout the village cluster area. Furthermore, as previously noted throughout the VCHAP, children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the school. The Council does not consider the issues raised to relate to the soundness of the Plan.	1430	None required.

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VC HAL1, 17.17	2801	Object	No vehicular access given to Briar Lane from the VC HAL1 and HAL2 development. There appears to be creep of the boundary line onto Briar Lane and West toward a property's boundary since 2018.	No changes identified.	VC HAL2 is a carried forward allocation intended to be brought forward in accordance with the existing planning permission (2022/0287) which will be accessed only from Yarmouth Road to the south of the site. After the Reg-18 consultation it was highlighted that the enlarged site area for VC HAL2 (Application 2022/0287) also included land within the proposed VC HAL1 site. In addition, further discussion with the LLFA indicated that the surface water flow path running north/south through the site would need to remain free from development. Consequently, the area promoted for allocation has been extended to the whole of the proposed site. This avoids leaving an unusable area of land at the northern end of the site and allows for a comprehensive scheme which addresses the identified constraints. NCC has also been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including VC HAL1. Those discussions have led to the criteria in the Policy, which stipulates vehicular access from the south via the VC HAL2 allocation only. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds.	1431	None required.

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Policy VC HAL1: Land off Briar Lane	3171	Object	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. We welcome the preparation of the HIA and revised HIA for the enlarged site. We have some concerns for the north eastern portion of the site. We welcome the reference in paragraph 17.16 of the supporting text to views and heights and layout. However, this should be incorporated into the policy itself. The policy should be amended to include a new criterion to read, Protect views of the grade II listed Hales Hospital from Briar Lane, careful layout, design and landscaping, including 1 and 1.5 storey dwellings in the north east of the site to protect and enhance the listed building as recommended in the HIA. Bullet point 5 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 5 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	Protect views of the grade II listed Hales Hospital from Briar Lane, careful layout, design and landscaping, including 1 and 1.5 storey dwellings in the north east of the site to protect and enhance the listed building as recommended in the HIA. Amend criterion 5 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	The Council welcomes the advice provided by Historic England (HE) and following receipt of these comments has sought further engagement with HE, including an in-person site visit to discuss the wording of the allocation. We note that HE has suggested an additional bullet point should be included within the policy to reflect the findings of the HIA however, given the supporting text in para 17.16, the Council does not consider that this is necessary for the soundness of the plan. The detailed site layout would be assessed at the planning application stage, including against other national and local policies concerning designated heritage assets, enabling a design-led approach sympathetic to the listed building. The Council would note that the site selection and allocation process must balance a number of different factors (for example, highways, landscape, heritage, on-site constraints etc) in contrast with the supporting HIA which focuses on heritage matters only. For this reason the Council may, on occasion, determine that not all of the recommendations in the HIA are suitable for inclusion in the final policy wording (whilst continuing to have appropriate regard to the impact of development on heritage assets). In terms of archaeology, the Council considers that bullet point 5 is sound. Policy VC HAL1 highlights the need for archaeology to be considered; however, the Council's experience is that the need for field evaluation prior an application being determined is rare and can be required under NPPF paragraph 194 if necessary.	1434	The Council does not consider the wording of Policy VC HAL1 is a soundness issue. However, should the Inspector consider a modification is necessary, the Council would not object to wording which requires an assessment of building heights and a proposed layout which respond to site levels and the retention of existing views, as part of a design-led approach that is sympathetic to the former hospital. The Council does not consider changes to bullet point 5 to be a soundness issue as it already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC HAL1: Land off Briar Lane	3058	Object	Lack of primary school in Hales will increase car movements to Loddon. Several constraints were identified as part of the site assessment, including flooding and sewerage capacity. Concerns about impact on the Hales Hospital listed building. Briar Lane suffers from poor visibility and is not suitable as a site access.	No changes identified.	The Council does not consider any of the issues raised to be related to the soundness of the Plan. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy, which stipulates access from the south via the VC HAL2 allocation only. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds. Pedestrian access to Loddon was deemed satisfactory, with a safe walking route to local amenities and the primary school a key consideration of the site assessment. There is also a regular bus service between Hales and Loddon. The scale of development proposed at Hales is unlikely to significantly impact on existing traffic volumes. The potential impact on heritage assets was identified at the site assessment stage and explored through the production of a Heritage Impact Assessment. Historic England have been engaged throughout the site assessment process and plan preparation. Historic England comments made at the Reg 19 publication stage have been considered and following an on-site visit with HE the Council is considering minor modifications to the policy requirements. Detailed site layout and design would be addressed through a future planning application. With regard to flooding and sewerage concerns, the Lead Local Flood Authority (LLFA), Environment Agency (EA) and Anglian Water (AW) have been consulted at each stage of the VCHAP process. AW advise that the Sisland Water Recycling Centre has available capacity for VC HAL2 s well as VC HAL1. Neither the LLFA nor EA have raised any objection on flood risk grounds at Regulation 19. Comments relating to the overall aims of the VCHAP have been addressed elsewhere.	1432	Review of the policy wording with regard to heritage matters.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC HAL1: Land off Briar Lane	2327	Support	FW Properties consider VC HAL1 to be a suitable and deliverable location for new homes within the village. Development in this location, which is close to an established community, represents sustainable development as defined within the National Planning Policy Framework. The site is immediately available and its development for 35 homes is considered to be viable and deliverable. The site is not subject to any constraints which would prevent its development for housing and FW Properties believe that the site specific requirements attached to this draft allocation can all be fulfilled. Therefore VC HAL1 should be taken forward for allocation.	No changes identified.	The Council welcomes the continued support of the landowner for the allocation of VC HAL1 and is reassured of the delivery of this site through the VCHAP. The Council notes the contents of the promoter engagement form and welcomes the commitment to deliver the Policy aspirations of VC HAL1. The Council will review all information submitted by site promoters in due course and will see further information / clarification if this is considered to be appropriate.	1378	None required.
Policy VC HAL1: Land off Briar Lane	3083	Object	Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy VC HAL1 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognise that underlain mineral resource has been included in the supporting text; however, we request inclusion of the text in the policy itself. The policy can be made sound by including the wording below, which was contained in the response by the Mineral Planning Authority, to the Regulation 18 consultation.	Amend Policy VC HAL1 to add the following wording as a policy requirement: 'The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'	The Council notes the comment of the Mineral Planning Authority but does not consider this to be a soundness matter. The Council has included within the supporting policy text reference to the site being underlain, or partially underlain by safeguarded resources and has highlighted the need for development to comply with the relevant policy within the Minerals and Waste Local Plan. It is not considered necessary to repeat this information within the site-specific text as all development is required to comply with the requirements of the Local Plan, which includes the Minerals and Waste Local Plan.	1377	The Council does not consider the issues raised within the response of Norfolk County Council Mineral Planning Authority to be soundness matters however should the Inspector be minded to modify Policy VC HAL1 the Council suggests the following addition to the policy wording: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority".

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC HAL2: Land at Yarmouth Road west of Hales Hospital	3172	Object	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. We welcome the preparation of the HIA and revised HIA for the enlarged site. We appreciate that this site was allocated in the previous local plan and also has the benefit of planning permission and that development has commenced. Reference should be made to the nearby listed Hales Hospital with the addition of a criterion to read: ‘Protect and enhance the grade II listed Hales Hospital through careful layout, design and landscaping’. Bullet point 4 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 4 should be amended to read, ‘Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.’	Add criterion to read: ‘Protect and enhance the grade II listed Hales Hospital through careful layout, design and landscaping’. Amend criterion 4 to read ‘Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.’	VC HAL2 is a carried forward allocation intended to be brought forward in accordance with the existing planning permission (2022/0287). The potential impact on heritage assets was addressed at the application stage. Ground levels across VC HAL2 are lower than the Hales Hospital and visual separation is provided by an established tree belt. Therefore, it was judged that the potential harm arising to the heritage asset would be less than significant. In terms of archaeology, the Council considers that bullet point 4 is sound. Policy VC HAL2 highlights the need for archaeology to be considered; however, the Council's experience is that the need for field evaluation prior an application being determined is rare and can be required under NPPF paragraph 194 if necessary.	1435	The Council does not consider changes to bullet point 4 to be a soundness issue as it already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC HAL2: Land at Yarmouth Road west of Hales Hospital	3059	Object	Lack of primary school in Hales will increase car movements to Loddon. Several constraints were identified as part of the site assessment, including flooding and sewerage capacity. Concerns about impact on the Hales Hospital listed building. Briar Lane suffers from poor visibility and is not suitable as a site access.	No changes identified.	The Council does not consider any of the issues raised to be related to the soundness of the Plan. VC HAL2 is a carried forward allocation intended to be brought forward in accordance with the existing planning permission (2022/0287) construction of which commenced in 2023. Due to the early stage of development on site, the Council has included the site as a carried forward allocation to ensure any potential detailed site design continues to reflect the requirements of the Council. Following discussion with the Norfolk County Council (NCC) Highways team this access will be from Yarmouth Road to the south of the site. NCC has also raised no objection to the allocation at the Regulation 19 stage on highways grounds. Pedestrian access to Loddon was deemed satisfactory, with a safe walking route to local amenities and the primary school a key consideration of the site assessment. Assumptions of increased vehicle movements are therefore unsubstantiated and not considered a soundness issue. There is also a regular bus service between Hales and Loddon. The potential impact on heritage assets was also addressed at the application stage. Ground levels across VC HAL2 are lower than the Hales Hospital and visual separation is provided by an established tree belt. Therefore, it was judged that the potential harm arising to the heritage asset would be less than significant. A flood risk assessment was submitted by the applicants, which was judged acceptable by the Lead Local Flood Authority following clarification. The proposed layout takes account of a surface water flow path which extends into the north-western section of the site. Anglian Water have confirmed that foul drainage from the proposed development is within the catchment of Sisland Water Recycling Centre and would have available capacity. Comments relating to the overall aims of the VCHAP have been addressed elsewhere.	1433	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC HAL2: Land at Yarmouth Road west of Hales Hospital	3259	Support	We welcome the policy wording for hedgerows/trees in Policy VC ROC. We recommend that similar policy wording is applied to this policy to ensure this approach is applied consistently across the Local Plan.	Where removal of a tree or any part of a hedgerow is unavoidable, we recommend that policy wording includes reference to mitigation measures, reflecting the updated biodiversity duty required in the 2021 Environment Act to have regard to the enhancement of biodiversity.	The Council considers the policy to be sound in relation to the protection of ecological features. Site assessment identified a hedgerow along the eastern boundary of VC HAL2 which is subject to 1997 regulations. The Council does not consider it appropriate to repeat the requirements of existing legislation or policies within the site specific policy text therefore does not consider it necessary to update the policy to reflect the above comments. Consideration will continue to be given to the protection of existing established trees along the site boundary in conjunction with the Councils' own arboricultural officers.	1379	Consideration will continue to be given to the protection of existing established trees along the site boundary in conjunction with the Councils' own arboricultural officers.

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

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC HEM1: Land at Millfields	3256	Object	Hempnall Parish Council states that the recent development at Willow Drive together with infill (windfall) developments and the hoped for provision of social housing on the site now called VC HEM1 is considered the right amount of new housing for the village.	Non-inclusion of any further sites in Hempnall other than VC HEM1.	The Council welcomes Hempnall Parish Council's support for the VC HEM1 allocation. However, it does note that plans should be considered as illustrative only at this time as they do not have the benefit of planning permission and an alternative scheme may come forward on the site. The site layout and design of the site would be required to comply with the allocation-specific policies and existing development management policies, including having regard to the amenities of neighbouring properties. Hempnall Parish Council's comments regarding the village clusters approach are addressed separately. The Council is not proposing any residential allocations in Hempnall beyond VC HEM1.	1375	None required.
Policy VC HEM1: Land at Millfields	3173	Object	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 asset. We welcome the preparation of the HIA. The HIA makes a number of helpful recommendations. We welcome the references to the HIA and recommendations in paragraph 18.15 and also in bullet points 1 and 2 of the policy. However, not all of the recommendations are reflected in the policy. Therefore, we suggest the addition of a bullet point to read: 'Careful layout and design to keep views open, retain visual prominence of windmill and incorporate views of windmill from public spaces'. Bullet point 6 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 6 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	Add criterion to read: 'Careful layout and design to keep views open, retain visual prominence of windmill and incorporate views of windmill from public spaces'. Amend criterion 6 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	The Council welcomes the support for bullet points 1 and 2 of Policy VC HEM1. The Council considers that Hempnall Mill has been given due attention through supporting paragraph 18.15. Therefore, the lack of direct reference to the heritage asset in the policy text is not considered a soundness matter. In terms of archaeology, the Council considers that bullet point 6 is sound. Policy VC EAR1 highlights the need for archaeology to be considered; however, the Council's experience is that the need for field evaluation prior an application being determined is rare and can be required under NPPF paragraph 194 if necessary.	1374	The Council does not consider changes to bullet points 1 and 6 to be a soundness issue as they are already covered by supporting paragraph 18.15 and NPPF paragraph 194 respectively. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.

22. Kirby Cane and Ellingham

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Form and character, 22.1	3049	Object	Already had enough infill in our village and the proposed 'village cluster' is extending our village beyond its boundary and creating a whole new estate. Ellingham is a small, quiet, country village, and the villagers have moved here for that reason. With the flooding of the road, a blind bend, a poor sewerage system that brings waste into back gardens, and loss of our country views, the effect it will have on the health, safety and overall quality of village life here is unreasonable and undeserving.	Find another safer location for development.	The Council does not consider the issues raised to relate to the soundness of the Plan. The aim of the VCHAP is to deliver sustainable growth across the villages clusters or South Norfolk. Development in these areas can help support local services, such as the Local Primary School, post office and local businesses, as well as help deliver housing to support local people who wish to remain in the area and attract new residents to support the sustainability of the villages. Anglian Water and Norfolk County Council as the Local Lead Flood Authority have been engaged throughout the preparation of the VCHAP. This has involved discussions and requests for comments on the allocated sites. Neither Anglian Water or Norfolk County Council in their role as the Lead Local Flood Authority have raised objections to the allocated sites in relation to flooding and sewerage. Anglian Water have informed the Council that they are currently conducting investigative work in the area. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. Both policies outline the required highway mitigation works including work on visibility splays, carriageway widening on Mill Road and provision of a footway. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds.	1371	No action required.
Services and Community Facilities, 22.2	2935, 3042	Object	Sewerage and wastewater backs up and causes houses along Mill Road to have toilets backed up and therefore unable to use them until cleared by Anglian Water at least 48 hours later. Wastewater can also back up into gardens. These houses are at the end of the sewer pipe run opposite where the new house are proposed. Anglian Water have been out many times because of this.	The sewage and waste water network needs to be upgraded to be fit for purpose as is currently inadequate and certainly upgraded to take the effluent from additional housing and people. Otherwise the system needs to be completely replaced. Alternatively find a different location for the houses.	The Council does not consider the issues raised to relate to the soundness of the Plan. Anglian Water have been engaged throughout the preparation of the VCHAP. This has involved discussions and requests for comments on the allocated sites. Anglian Water have informed the Council that they are currently conducting investigative work in the area and did not raise any objections to these sites in relation sewerage, or reference any of the call out situations that have been referenced to in the representations.	1370	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Services and Community Facilities, 22.2	2876	Object	The plan is unsound because it does not fulfil the objective “to protect village communities and support rural services and facilities” No indication that wider services such as health and education, already under significant strain, would be improved. Fails to comply with the duty to co-operate as it does not take account of the concerns of the community about this. Also, residents voiced concerns about whether the sewage system could deal with existing demand, let alone 25 more properties.	Greater attention needs to be paid to wider service and infrastructure issues to take an holistic approach to development.	The Council does not consider the issues raised to relate to the soundness of the Plan. Representatives of the Integrated Care System have been engaged with both the Greater Norwich Local Plan and the VCHAP in order to inform their ongoing healthcare strategies and future investment. The have not raised any objections to Policies VC ELL1 or ELL2 during the Regulation 19 consultation. In terms of the capacity at the local primary school, Norfolk County Council Education Services have reiterated their earlier advice that throughout Norfolk there has been a decline in birth rates which is impacting on the entry years and subsequent years in schools; it is anticipated that this will take effect within the next 2-3 years as higher numbers of pupils transition through the primary schools. Increased pupil numbers locally will support the ongoing future of rural schools throughout the village cluster area. Furthermore, as previously noted throughout the VCHAP, children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the school. The Council considers that it has met its duty to co-operate with the relevant public bodies as set out in legislation. The VCHAP has also been subject to two rounds of public consultation in 2021 and 2023. Any relevant planning or soundness matters raised during these periods have or will be addressed by the Council. Anglian Water have been engaged throughout the preparation of the VCHAP. This has involved discussions and requests for comments on the allocated sites. Anglian Water have informed the Council that they are currently conducting investigative work in the area and did not raise any objections to these sites in relation to sewerage.	1369	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC ELL1, 22.5	2874	Object	The plan is unsound because it did not fulfil the objective “to protect village communities and support rural services and facilities”. There is no indication that Mill Road would be improved despite being considered by residents not to be fit for purpose. Furthermore, in the site assessment document, in spite of the NCC Highways score being Red, the site score for this section is given as Amber. Regardless of improvements to the site access, Mill Lane is too narrow, and the western end towards the school plagued with hazards, leading to the dangerous junction with Church Road. Concerns also raised about the junction onto the A143, where joining vehicles have to deal with poor visibility while trying to turn into 50-mile-an-hour plus traffic.	Significant improvements need to be made to the whole of the road system, not just close to the site(s), through the village in the interests of the safety.	The Council does not consider the issues raised to be related to the soundness of the Plan. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. Specifically, bullet point 1 of Policy ELL1 outlines the required highway mitigation works including work on visibility splays, carriageway widening on Mill Road and provision of a footway. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds.	1367	No action required.
VC ELL1, 22.5	2489, 2509, 2938, 3034	Object	Greenfield site outside of settlement boundary. Access is narrow with poor visibility. Visibility improvements at junction with Church Road would be required due to traffic from A143, parked cars and turning in junctions. Mill Road is inadequate for large vehicles. Bends in road force large vehicles to mount pavement and are blind when hedgerows are in leaf. Parents park along road at school pick up and drop off. Lack of pavement continuity along Mill Road. Already dangerous and will only get worse with development. Further flood risk to carriageway due to extensive concrete bases of houses. Also exacerbated by bends in road where water accumulates. Recent attempts to mitigate this have failed.	The houses should be built on an alternative site or site is amended to the original allocation of 12 dwellings. Improve existing drainage network substantially. Widen Mill Road and provide passing places or make one way system. Suggest Church Road considered for such an exit. Extend and provide continuity of pedestrian pavement all along Mill Road Cut off blind bit of play area.	The Council does not consider the issues raised to relate to the soundness of the Plan. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. Specifically, bullet point 1 of Policy ELL1 outlines the required highway mitigation works including work on visibility splays, carriageway widening on Mill Road and provision of a footway. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds. Norfolk County Council as the Local Lead Flood Authority have been engaged throughout the preparation of the VCHAP. This has involved discussions and requests for comments on the allocated sites. Norfolk County Council in their role as the Lead Local Flood Authority have not raised objections to this site in relation to flooding and sewerage. The Settlement Limit has been prepared to focus development of less than 12 dwellings that has not been allocated within the existing development where it is more sustainable. Site allocations have been proposed both within and outside Settlement Limits in order to provide opportunities for some larger scale development. The site size is 1.87ha, and therefore any development of less than 25 could contradict the NPPF requirement of 'making effective use of land'.	1346	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC ELL1, 22.7	3054	Object	When the original seven houses were built they were not built at road level as planned. Being higher the water comes off the driveways and field, and causes flooding. They were not compliant with the plans and they did not co-operate with us because they refused to answer the telephone when we tried to get in touch to point out the risk of flooding. There is nothing 'compliant' here and no 'duty to co-operate' either.	The villagers who have to put up with the extra builds need to be listened to, and the building work should be monitored and seen that it is done as planned at all times.	The Council does not consider that the issues raised relate to the soundness of the Plan. Norfolk County Council as the Local Lead Flood Authority have been engaged throughout the preparation of the VCHAP. This has involved discussions and requests for comments on the allocated sites. Norfolk County Council in their role as the Lead Local Flood Authority have not raised any objections to this site in relation to flooding. The Council considers that it has met its duty to co-operate with the relevant public bodies as set out in legislation. The VCHAP has also been subject to two rounds of public consultation in 2021 and 2023. Any relevant planning or soundness matters raised during these periods have or will be addressed by the Council.	1345	No action required.
VC ELL1, 22.8	2877	Object	The plan is unsound because the site as presented in the Regulation 19 consultation completely encloses one property as well as impacting others in the vicinity.	Consider previous layouts proposed for the site.	The Council does not consider the issues raised to relate to the soundness of the Plan. The site assessment for the allocated site outlines the process that was followed when considering the other potential layouts. This option as considered to be the preferred option due to it being able to avoid the high-pressure pipeline and would allow more of the longer views to the south to be retained, providing protection for the setting of the grade I listed St Mary's Church, Ellingham Conservation Area and the Broads.	1344	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC ELL2, 22.14	2881	Object	The plan is unsound because it does not “protect village communities and support rural services and facilities”. No indication that the whole of Mill Road would be improved. Mill Road is too narrow and the western end towards the school plagued with hazards, leading to the dangerous junction with Church Road. Concerns also about the junction onto the A143, which has poor visibility leading into 50-mile-an-hour plus traffic. This site will put more pressure on junction of Mill Lane and Mill Road, classified Red by NCC Highways, although a HELAA score of Amber is given. The existence of a footpath from Florence Way to the Mill Lane/Mill Road junction has no bearing on car access. Concern was also raised about the ability of the existing private highway infrastructure within the Florence Way development to cope with the extra traffic. Councillors took the view that the policy does not comply with the duty to cooperate as residents' views have not adequately been taken into consideration. The attached image shows how far vehicles need to pull into Mill Road from Mill Lane in order to gain visibility for turning right.	The plan needs to make provision for significant improvements need to be made to the whole of the road system, not just close to the site(s), through the village in the interests of the safety.	The Council does not consider the issues raised to relate to the soundness of the Plan. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. Specifically, bullet point 4 of VC ELL2 states that off-site highways works will include improvements to the existing access onto Florence Way and a widening of Mill Lane to the north of Florence Way. These resulted from discussions with the Highways Authority as noted in the site assessment. The Highways Authority in these notes do state that there is the potential for limited development on this site if highways improvements are brought forward. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds. The Council considers that it has met its duty to co-operate with the relevant public bodies as set out in legislation. The VCHAP has also been subject to two rounds of public consultation in 2021 and 2023. Any relevant planning or soundness matters raised during these periods have or will be addressed by the Council.	1337	No action required.
VC ELL2, 22.16	3088	Support	Norfolk County Council notes that the VCHAP has included supporting text regarding safeguarded mineral resources where sites are under the threshold of 1 ha and therefore the Minerals and Waste Policy CS16 does not apply. Therefore, the support text paragraph 22.16 can be removed from this paragraph.	Remove "The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan" from the supporting text.	The Council does not consider this to be a soundness matter however should the Inspector be minded to modify the Plan the Council would not object to the removal of paragraph 22.16 from the supporting text in the Kirby cane and Ellingham chapter of the VCHAP.	1336	The Council does not consider this to be a soundness matter however should the Inspector be minded to modify the Plan the Council would not object to the removal of paragraph 22.16 from the supporting text in the Kirby cane and Ellingham chapter of the VCHAP.
Policy VC ELL1: South of Mill Road	2622	Object	Site is approximately 300m north of the nearest BA boundary. The LVA does not fully consider impacts on the Broads. However, it acknowledges that there will be long views to the site from the Broads Authority area to the south and identifies a need for substantial planting to contain the site along the southern boundary. Bullet point 4 does not really reflect what it is in the LVA which indicates a need for substantial planting, but the importance is not portrayed in the policy wording.	Amend bullet point 4 to reflect the LVA regarding the need for substantial planting along the southern boundary.	The Council does not consider the issues raised to relate to the soundness of the Plan. Bullet point 3 of Policy VC ELL1 outlines the requirement for a Landscape Visual Impact Assessment to be submitted with any planning application. It also makes specific reference to the need to consider views to and from the Broads area. It is the Council's view that there is no need to include a specific requirement for the Broads as these should be identified in the submitted Landscape Visual Impact Assessment along with other mitigation measures.	1343	No action required.

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Policy VC ELL1: South of Mill Road	3071	Object	Removal of the hedge at the south side of Mill Road would be required between house number 81 and the recreation ground to enable a satisfactory layout. It does not appear feasible to achieve acceptable visibility splays within the proposed narrow site access corridor.	To make the allocation sound, the Highway Authority will require that it is extended to include the full frontage of Mill Lane from number 81 to the recreation ground.	The Council does not consider the changes requested necessary to make the Plan sound. Paragraph 22.6 states that while the hedgerow may need to be removed to achieve the necessary visibility splays, the whole frontage of Mill Road has not been included in order to retain the views of the grade I listed St Mary's Church and Ellingham Conservation Area, as well as to limit impacts on the landscape of the Broads. However should the Inspector be minded to modify the site plan for Policy VC ELL1 to include the full frontage of Mill Lane from number 81 to the recreation ground.	1342	The Council does not consider the changes requested necessary to make the Plan sound. However should the Inspector be minded to modify the site plan for Policy VC ELL1 to include the full frontage of Mill Lane from number 81 to the recreation ground.
Policy VC ELL1: South of Mill Road	3084	Object	Policy VC ELL1 is currently unsound as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognise that underlain mineral resource has been included in the supporting text; however, we request inclusion of the text in the policy itself.	Amend policy VC ELL1 to add the following wording as a policy requirement: 'The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'	The Council does not consider the issues raised within the response of Norfolk County Council Mineral Planning Authority to be soundness matters however should the Inspector be minded to modify Policy VC ELL1 the Council suggests the following addition to the policy wording: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority".	1341	The Council does not consider the issues raised within the response of Norfolk County Council Mineral Planning Authority to be soundness matters however should the Inspector be minded to modify Policy VC ELL1 the Council suggests the following addition to the policy wording: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority".
Policy VC ELL1: South of Mill Road	3174	Support	We welcome the references to the Conservation Area and Church in bullet point 3.	No changes submitted.	The Council welcomes the support for bullet point 3 of Policy VC ELL1.	1340	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC ELL1: South of Mill Road	2978	Support	On behalf of the landowner we support this site in line with our previous representations made in July 2021. 1.87ha of land for 25 dwellings is a much more rational site area and will ensure the delivery of a more appropriate density of development. Continue to agree that the necessary access requirements from Mill Road and offsite highways improvements to make this development acceptable. We agree with the promotion of 30mph speed limit on Mill Road policy requirement. Acknowledged the particular landscape sensitivities with this site. Should be noted that these sensitivities apply to the entire village. We agree that any planning application will need to be supported by an LVIA and increased preferred site area provides additional opportunities to deliver a sensitively designed scheme. Recognise and agree need to sensitively consider the layout and boundary treatment to ensure transition from the village to the rural area. We agree that the impact on the residential amenity of existing properties on Mill Road will need to be considered carefully. Consider the site to be suitable, available and achievable, and therefore deliverable within the Plan period.	No changes submitted.	The Council welcomes the support for Policy VC ELL1.	1339	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC ELL1: South of Mill Road	2488, 2511, 3044	Object	Views that the site and Policy VC ELL1 are unsound. Would need sewerage works on Mill Road as is not fit for present dwellings. Currently can back up drains that new site will connect to. Surface water drainage issues and flooding on road despite recent efforts to mitigate this. Rainwater floods nearby driveways of bungalows and sometimes even reaches front doors. Major issues with visibility with the site exit blind to the left. Road is too narrow for cars to pass a bus. Road expansion would be needed. Residential amenity on Mill Road will be affected. Open views to Ellingham Mill Conservation Area and church would be compromised. Site is outside the development area. 25 dwellings is too large for a village cluster.	Either removal of allocation or reduction to 12 dwellings.	The Council does not consider the issues raised to relate to the soundness of the Plan. Anglian Water and Norfolk County Council as the Local Lead Flood Authority have been engaged throughout the preparation of the VCHAP. This has involved discussions and requests for comments on the allocated sites. Neither Anglian Water or Norfolk County Council in their role as the Lead Local Flood Authority have raised objections to this site in relation to flooding and sewerage. Anglian Water are currently in the process of conducting investigative work in the area. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. Specifically, bullet point 1 of Policy ELL1 outlines the required highway mitigation works including work on visibility splays, carriageway widening on Mill Road and provision of a footway. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds. Bullet point 5 of Policy ELL1 specifically requires that the impact on residential amenity of existing properties on Mill Road is minimised. Bullet point 3 of Policy ELL1 requires the preparation of a Landscape Visual Impact Assessment, with specific reference being made to views to and from the Ellingham Conservation Area and St Marys Church. The site located outside of the Settlement Limit for Kirby Cane and Ellingham. The Settlement Limit has been prepared to focus development of less than 12 dwellings that has not been allocated within the existing development where it is more sustainable. Site allocations have been proposed both within and outside Settlement Limits in order to provide opportunities for some larger scale development. The site size is 1.87ha, and therefore any development of less than 25 would contradict the NPPF requirement of 'making effective use of land'.	1338	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC ELL2: Land at Florence Way	2623	Object	No landscape or visual amenity issues identified in the LVA. However, the LVA does not fully consider impacts on the Broad. If site-specific mitigation measures identified in LVA are implemented there would be no concerns. ELL2 is very close to ELL1 and therefore needs to include the criterion in ELL1 that refers to the Broad (including improvements that are needed as set out in our rep to that policy) and in the relevant supporting text. It is not clear why this wording is in one policy and not the other. It needs to be in both.	ELL2 is very close to ELL1 and therefore needs to include the criterion in ELL1 that refers to the Broad (including improvements that are needed as set out in our rep to that policy) and in the relevant supporting text.	The Council agrees that Policy VC ELL2 should include a criterion relating to the landscape impact on the Broad.	1335	VC ELL2 will be updated to include a criterion that requires mitigation for the landscape impact on the Broad.
Policy VC ELL2: Land at Florence Way	2513	Support	The extension to Florence Way development of 12 houses would be acceptable as part of the infrastructure is already present. It will have less impact on the landscape and be a safer alternative on the road system.	No changes submitted.	The Council welcomes the support for Policy VC ELL2.	1334	No action required.
Policy VC ELL2: Land at Florence Way	2838	Support	We support the proposed allocation Policy VC ELL2.	No changes submitted.	The Council welcomes the support for Policy VC ELL2.	1333	No action required.

23. Little Melton and Great Melton

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC LM1, 23.9	3221	Support	Support the allocation. Considered to be legally compliant, sound and comply with the duty to co-operate. Would suggest that a minor drafting error at paragraph 23.9 in changing 'ariel' to 'aerial' and does not bring into the question the soundness of the plan.	Revise the final line of paragraph 23.9 changing the word 'ariel' for 'aerial' so that this line reads "Archaeological investigation was undertaken for the development of the adjacent site (2019/2485) and will also be required prior to the development of this site, particularly as linear ditch lines are visible in aerial photographs of the site."	The Council welcomes the support for Policy VC LM1.	1380	Spelling correction from 'ariel' to 'aerial' in paragraph 23.9.
Policy VC LM1: South or School Lane and East of Burnthouse Lane	3222	Support	Support the allocation of land south of School Lane and east of Burnthouse Lane as defined on the Little Melton Policies Map under allocation VC LM1.	No changes submitted.	The Council welcomes the support for Policy VC LM1.	1402	No action required.
Policy VC LM1: South or School Lane and East of Burnthouse Lane	3223	Object	Support broad aims of the policy to deliver approximately 35 new homes. Object to Policy VC LM1 in its current drafting as it is not considered to be sound. In particular the policy is neither justified as it is not an appropriate strategy, nor effective in terms of being deliverable over the plan period (paragraph 35 of the Framework 2021). The policy is inconsistent with other policies in the plan in that it does not set out the area of land to be developed in hectares, nor the number of dwellings. Therefore the policy should be updated to include the following: '3ha of land is allocated for approximately 35 dwellings' consistent with paragraph 23.13. This revision to the policy would ensure that the policy is sound. This provides the opportunity to address 2 drafting errors: 1) The policy title should change 'or' for 'of' so this reads "South of School Lane...." and 2) The penultimate bullet point should see 'tress' replaced with 'trees.' These 2 drafting errors in isolation do not raise concerns with the soundness of the plan and can be addressed through modifications. The site remains available, deliverable and viable, as set out in the attached Site Promoter Engagement Form.	The policy should be updated to include the following: '3ha of land is allocated for approximately 35 dwellings' consistent with paragraph 23.13.	The Council agrees that Policy VC LM1 should include the site area and approximate number of dwellings to be delivered. The Council also agrees that the drafting errors should be addressed.	1401	Update the policy to include the following: '3ha of land is allocated for approximately 35 dwellings' Change 'or' to 'of' in policy title Change 'tress' to 'trees' in bullet point 8 of the policy

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC LM1: South or School Lane and East of Burnthouse Lane	2648	Object	This site is within an amber zone for great crested newts. This species is protected in the UK under the Wildlife and Countryside Act, 1981. It is a Priority Species under the UK Post-2010 Biodiversity Framework. It is also listed as a European Protected Species under Annex IV of the European Habitats Directive. Joint Core Strategy for Broadland, Norwich and South Norfolk (Adopted 2014) Policy 1: 'All new developments will ensure that there will be..... no adverse impacts on European protected species in the area and beyond....'	Recommend that any policy wording includes reference to the need for an appropriate great crested newt assessment prior to determination, in order to ensure that the allocation is supported by the appropriate ecological evidence.	The Council does not consider the issue raised to relate to the soundness of the Plan. As stated in the representation, Great Crested Newts are protected under UK Law, as a Priority Species and as a European Protected Species. The representation also outlines the approach taken in the existing Joint Core Strategy. The emerging Greater Norwich Local Plan takes a similar approach in its protection of Priority Species. Prior to any development taking place on the site, the developer will be required to procure the appropriate licensing. Therefore it is the Council's view that there is no need to specify requirements for Great Crested Newts in Policy VC LM1 as these requirements are already included in other policies and national law and it is not considered necessary to repeat them in the policy. It is the Council's view that this issue will be considered at the planning application stage.	1384	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC LM1: South or School Lane and East of Burnthouse Lane	3175	Object	The grade II listed barn at Elm Farm lies within the site. Therefore any development has the potential to impact upon its significance. We welcome the preparation of the HIA. We welcome the references in paragraph 23.8 and in bullet points 4, 5 and 6 of the policy which reflect the recommendations. Concerns about the possibility of one part of the site being accessed across the open land by the barn. Any access road is likely to also include lighting etc and would harm the significance of the listed barn through development within its setting. It would be preferable for that part of the site to be accessed either through the development that is currently being built, or alternatively directly off Burnthouse Lane. We recommend that alternative access options be explored, and the policy wording amended accordingly. Bullet point 7 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application.	Explore opportunities to access the far part of the site by alternative means (not across the open area to protect the setting of the barn). Amend policy wording accordingly. Amend criterion 7 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	The Council does not consider the issue raised in relation to access to the grade II listed Elm Farm barn to relate to the soundness of the Plan. Specific discussions have been held post Reg-19 with Historic England, including concerning this site. The policy does include the requirement for the south eastern portion of the site to be left undeveloped to protect the setting of the barn. This criteria also includes a requirement for the design and layout of the adjoining areas to consider the setting of the barn. The following criterion also specifies that access between the two sections of the site to be developed will need to be sympathetic to the setting of the barn. The Council does not seek to include street lighting in new residential developments and advised Heritage England of this positions accordingly. Therefore any potential impacts on the barn from access to this area will need to be considered during the design of any development on this site in order for it to be considered acceptable. No issues relating to the potential for access from the open area were raised in the HIA. The access requirements have been discussed and agreed with Norfolk county Council as the highways authority. Burnthouse Lane was not considered appropriate for access to the site due to it being too narrow. The Council agrees with the proposed amendments to criterion 7.	1383	Amend criterion 7 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'
Policy VC LM1: South or School Lane and East of Burnthouse Lane	3249	Support	Anglian Water agrees with the approach taken regarding the site allocation policies for Wicklewood where matters regarding cumulative/in-combination effects with the development identified in the GNLP may require the phasing of development beyond the early years of the plan, are addressed in the supporting text and therefore a policy requirement is not considered necessary. We suggest that the same approach is taken with Policy VC LM1. The small-scale nature of these allocations is unlikely to require phasing in respect of Whitlingham WRC and therefore the policy requirement can be removed.	Removal of policy requirement regarding need to phase development within the catchment of Whitlingham WRC.	The Council agrees that the requirement for the need to phase development within the catchment of Whitlingham WRC can be removed. The Council does not consider this to be a soundness matter, but should the Inspector be minded to do so, the Council would not object to the removal of the phasing requirement from Policy VC LM1 (bullet point 9).	1382	Remove bullet point 9 outlining the requirement for the need to phase development within the catchment of Whitlingham WRC from Policy VC LM1.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC LM1: South or School Lane and East of Burnthouse Lane	3204	Object	Proposed development in neighbouring villages, will put further pressure on existing infrastructure within Hethersett e.g. local schools, doctor's surgery. Hethersett Surgery currently has a patient count of 22,083, making it the fourth largest in the county. Any increase in housing within its catchment areas will further exacerbate its capacity.	No changes submitted.	The Council does not consider the issues raised to relate to the soundness of the Plan. Infrastructure and service providers have been engaged throughout the preparation of the VCHAP and any issues raised relating to capacity or provision have been addressed in the Plan. Specifically in terms of the capacity at the local primary school, Norfolk County Council Education Services have reiterated their earlier advice that throughout Norfolk there has been a decline in birth rates which is impacting on the entry years and subsequent years in schools; it is anticipated that this will take effect within the next 2-3 years as higher numbers of pupils transition through the primary schools. Increased pupil numbers locally will support the ongoing future of rural schools throughout the village cluster area. Furthermore, as previously noted throughout the VCHAP, children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the school. Representatives of the Integrated Care System have been engaged with both the Greater Norwich Local Plan and the VCHAP in order to inform their ongoing healthcare strategies and future investment. They did not submit any objections to Policy VC LM1 during the Regulation 19 consultation.	1381	No action required.

25. Mulbarton, Bracon Ash, Swardeston and East Carleton

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
East Carleton, 25.7	3099	Object	- SN5000SL should be included in the VCHAP as we plan a very small-scale, self-build, single development in a garden plot, well inside the exiting settlement limit, which already has services and is situated alongside a track (Rectory Loke) where there already is a precedent for residential dwellings; and - Other development in East Carleton live with the constraint of distance to local services.	Inclusion of SN5000SL within the VCHAP	The Council understands the issues raised by the site promoter in this representation which requests that their site, SN5000SL, is included within the VCHAP. The site is of small scale and is for a single dwelling and as such would be considered as an extension to an existing Settlement Limit. East Carleton does not currently benefit from a defined Settlement Limit (as defined for planning purposes) and the Council does not propose the introduction of a Settlement Limit as part of the VCHAP. For this reason the Council does not consider it appropriate to include SN5000SL within the VCHAP and does not consider that the omission of this site from the Plan is a soundness matter.	1324	No action required
Services and Community Facilities, 25.8	2288, 2702	Object	Summary of representations received in response to paragraph 25.8: - Services in Mulbarton are overstated; - Quality of the bus service is overstated; and - Access between Swardeston and Mulbarton is only achievable by car.	Summary of changes proposed in response to paragraph 25.8: More consideration needs to be given to improving the access between Swardeston and Mulbarton by pedestrians and cyclists if the services in Mulbarton are to be accepted as part of the plan for further Swardeston growth.	The Council recognises that since the original data was gathered about the facilities in Mulbarton the One-Stop shop with Post Office has ceased trading, however the village continues to be well-served by a local supermarket. Other comments relate to the availability of takeaway food services (which at the time of preparing this response remain at 4) and the regularity of the bus service. Paragraph 25.8 sets out that there is a regular bus service to Norwich and more limited services to Diss and East Harling. The Council has responded to the comments of Swardeston Parish Council relating to the connectivity between Swardeston and Mulbarton in its response to paragraph 25.22. The Council does not consider any of these matters to be issues of soundness however should the Inspector be minded to recommend the supporting text is updated to reflect the current availability of retail outlets in Mulbarton the Council would suggest the following amendment to paragraph 25.8, "...which includes a surgery, pharmacy, shop, village hall...".	1323	The Council does not consider any of these matters to be issues of soundness however should the Inspector be minded to recommend the supporting text is updated to reflect the current availability of retail outlets in Mulbarton the Council would suggest the following amendment to paragraph 25.8, "...which includes a surgery, pharmacy, shop, village hall...".

Mulbarton and Bracon Ash, 25.9	3211	Object	Summary of representations received in response to paragraph 25.9: - Site SN2087REVA is available for approximately 7 dwellings on a parcel of land between 1.7 and 2.3ha; - The site could contribute to the GNLP targets; - The site is well located for services & facilities in Mulbarton and adjoins development in Bracon Ash; - Landscape appraisal suggests a limited scheme of 7 dwellings with enhanced planting could acceptably mitigate any impacts; and - Site would be characteristic of the relatively settled nature of the area and would respond to recently permitted development in the vicinity.	Summary of changes proposed in response to paragraph 25.9: - Inclusion of site SN2087REVA within the VCHAP	The Council remains of the opinion that SN2087REVA is not suitable for allocation in the VCHAP for the reasons set out in the original site assessment. The proposal for 7 dwellings on a site of between 1.7-2.3ha is considered to be an inefficient use of land, and would deliver a smaller scale of development than the VCHAP seeks to allocate (the VCHAP seeks minimum allocations of 12 dwellings in order to secure affordable housing). Alternatively, inclusion of the site as an extension to the existing Settlement Limit could result in a significantly larger scheme being promoted on a large site in an area that the Council does not consider to be suitable for further development. The Council remains concerned about the landscape and townscape impact of development in this location, with particular reference to encroachment into the landscape gap between Mulbarton and Bracon Ash. The site promoter has made inaccurate assertions regarding the contribution that the site could make to the identified housing requirement of the VCHAP, as well as the contribution the site could make towards the delivery of self- and custom build housing in the District. As set out above, SN2087REVA has not been promoted for the minimum site number of 12 dwellings that the VCHAP seeks to allocate. To reiterate, the site is considered to be unsuitable for this scale of development due to the landscape impact and loss of separation between settlements that would arise. As a settlement limit extension this site would not contribute towards the identified requirement for 1200 homes within the South Norfolk village clusters (as incorrectly stated in this representation) but would instead be considered as windfall if development was considered to be acceptable in this location in the future. With regards to the contribution the site could make to the delivery of self- and custom build permissions the Council recognises that the wider nutrient neutrality issue has impacted on the approval of planning permissions in catchment areas affected by this issue. However, as this site would also be affected by nutrient neutrality to assert that this site could contribute towards meeting the local need is inaccurate. Historically the Council has been able to deliver the required level of self- and custom build housing and once the nutrient neutrality matter is resolved is confident of doing so again.	1322	No action required

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					The Council remains of the opinion that SN2087REVA is not suitable for allocation or as a settlement limit extension and does not consider the omission of the site from the Plan to be a soundness matter.		
Policy VC MUL1: Land east of Bluebell Road and north of The Rosery	3064	Support	Representations received in response to VC MUL1: - Remain supportive of the inclusion of the site but continue to promote up to 200 dwellings on a larger site area to achieve sustainable development; - Mulbarton remains a sustainable location to accommodate new development. Village population is in excess of 3,500 residents and approaching 1,500 dwellings. It is well served by local education, sports and community facilities with good transport links to Norwich.	Summary of proposed changes to VC MUL1: - Continue to suggest that the wider available site could be utilised to provide a greater level of growth, given the acknowledged sustainability credentials of Mulbarton.	The Council welcomes the ongoing support of the site promoter for the allocation of VC MUL1. The continued promotion of a wider site area is recognised but, as previously set out in both the site assessments and the Council's Regulation-18 response, the Council does not support this scale of development as part of the VCHAP. To repeat the Council's earlier stance: "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 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. 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 Council remains of this opinion and does not consider the omission of the larger site area from the VCHAP to be a soundness matter.	1316	No action required

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Policy VC MUL1: Land east of Bluebell Road and north of The Rosery	2728	Object	Representation received in response to VC MUL1: - The Plan has not been sufficiently justified by evidence and is unsound; - This relates to judgement by NCC Highways that Bluebell Road is unsuitable for access, supported by concerns raised in the Mulbarton Neighbourhood Plan; and - The proposed number of dwellings appears to have been increased after discussion between the landowner and developer rather than taking into account available evidence.	Summary of changes proposed to VC MUL1: - VCMUL1 site should be considered unsuitable for development on grounds of inadequate safe access according to current evidence; - Should a site inspection be undertaken and indicate that limited development may be possible then I would propose that the development is capped at 10-20 dwellings in accordance with the Mulbarton Neighbourhood Plan; and an approach for construction traffic directly from the A140 to the site via the Eastern end of The Rosery be considered, which would limit the channelling of construction vehicles through the centre of Mulbarton.	The Council has undertaken extensive engagement with the Highways Authority as part of the preparation of the VCHAP. This has included both technical responses to public consultations as well site-specific meetings to clarify or seek further understanding about matters raised through the process. As set out in the conclusion to the updated site assessment (published as part of the Regulation-19 evidence base) the Highways Authority have accepted that whilst constrained up to 35 dwellings would be achievable on this site without compromising highway safety. This is reflected in the site specific policy wording in the Regulation-19 document. NCC Highways has raised no objection to the allocation at the Regulation 19 stage on highways grounds (either during the construction phase or occupation of the site) and the Council is satisfied that this allocation is sound. The Council responded to comments about Mulbarton Neighbourhood Plan in its response to representations submitted to the Regulation 18 consultation. The Council would re-iterate these comments which acknowledged the preferences set out in the Neighbourhood Plan but also recognised that an assessment of the sites that could have met the requirements of the Neighbourhood Plan policies raised a number of other concerns that would be difficult to overcome. The Council remains of the opinion that VC MUL1 is suitable for allocation and these comments do not relate to the soundness of the Plan.	1315	No action required

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VC SWA1, 25.16	2701, 2703	Object	Summary of representations received in response to paragraph 25.16: - Additional pedestrian movements across the B1113 to reach the services and facilities in the village, including Norwich bound public transport; - Steps should be taken to enforce limits and enhance speed-limiting through the village - consideration should be given to the joining up of the two 30mph limits at the edges of Mulbarton and Swardeston (a 40mph limit through a relatively windy and narrow section of roadway), as well as a pedestrian crossing in Swardeston across the B1113 being stipulated as a requirement of any planning consent; - Services in Mulbarton have been overstated; - The bus service (incorporating Swardeston) is limited with no evening service to Norwich, the daily service to Diss/East Harling is at the wrong time of day to allow a round trip in a single day; and - Pedestrian and cycle access to Mulbarton from Swardeston is hazardous and the majority of trips between the villages are made by car.	Summary of changes proposed in response to paragraph 25.16: - i) A pedestrian crossing on the B1113 in Swardeston should form part of any development consent. ii) Speed reduction measures on the B1113 in Swardeston should form part of any development consent; and - More consideration needs to be given to improving the access between Swardeston and Mulbarton by pedestrians and cyclists if the services in Mulbarton are to be accepted as part of the plan for further Swardeston growth.	Whilst the VCHAP seeks to disperse development throughout the clusters to the most sustainable locations, it recognises the inherent tensions between accessibility and planning for growth in rural areas. The Mulbarton, Bracon Ash, Swardeston and East Carleton cluster is well served by services and facilities which, as noted in the supporting text, are predominantly based in the nearby village of Mulbarton. The Council recognises that since the original data was gathered about the facilities in Mulbarton the One-Stop shop with Post Office has ceased trading, however the village continues to be well-served by a local supermarket. Paragraph 25.8 sets out that there is a regular bus service to Norwich and more limited services to Diss and East Harling. Paragraph 25.18 notes the existing pedestrian connectivity between Swardeston and Mulbarton, including that in places this is of limited width and some localised off-site highway works may be required to upgrade this. The same paragraph also notes that upgrades to the proposed access into the site may also be appropriate. Extensive engagement has occurred during the production of the VCHAP with Norfolk County Council's Highways Authority. These highways discussions have included site specific matters such as site access, pedestrian connectivity and capacity and suitability of the wider road network. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds.	1321	No action required
VC SWA1, 25.18	2704	Object	Swardeston Parish Council makes the following submissions in respect of the South Norfolk District Council Village Clusters Plan. VC SWA1 development will result in additional traffic entering and exiting the B1113 – now a major feed route into and out of Norwich, Swardeston sees in the region of 5m traffic movements on this road each year. Consideration needs to be given to a) controlling traffic speed through the village more than is being done at present and b) improvements to the junction of Bobbins Way/B1113. The routing of development VC SWA2 through the same Bobbins Way access will exacerbate this issue. Comments regarding improvement of the pedestrian and cycle access between Swardeston and Mulbarton are welcome, as this would be necessary if such access of the Mulbarton facilities is to be encouraged.	Consideration needs to be given to a) controlling traffic speed through the village more than is being done at present b) improvements to the junction of Bobbins Way/B1113.	The Council has engaged proactively with Norfolk County Council Highways Authority throughout the production of the VCHAP with this ongoing engagement informing both the final site selection and the detailed policy requirements. The site specific highways requirements for VC SWA1 have been updated following these discussions to include improvements to the site connectivity to both the village and local recreational routes, as well a reinforcement of the existing 30mph speed limit through the village via the site layout. The Highways Authority has not objected to VC SWA1 in their response to the publication of the Regulation-19 Plan and the Council does not consider this to be a matters of soundness.	1320	No action required

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VC SWA1, 25.19	3089	Support	Norfolk County Council notes that the South Norfolk Village cluster plan has included supporting text regarding safeguarded mineral resources where sites are under the threshold of 1 ha and therefore the Minerals and Waste Policy CS16 (or any successor policy) does not apply. Therefore, the support text referring to "The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan" can be removed from this paragraph.	Remove "The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan" from the supporting text.	The Council does not consider this to be a soundness matter however should the Inspector be minded to modify the Plan the Council would not object to the removal of paragraph 25.19 from the supporting text in this chapter of the VCHAP.	1319	The Council does not consider this to be a soundness matter however should the Inspector be minded to modify the Plan the Council would not object to the removal of paragraph 25.19 from the supporting text in this chapter of the VCHAP.
VC SWA2, 25.22	2705	Object	Consideration needs to be given to a) controlling traffic speed through the village more than is being done at present b) improvements to the junction of Bobbins Way/B1113 if VC SWA2 is to be accessed via that route. Comments regarding improvement of the pedestrian and cycle access between Swardeston and Mulbarton are welcome, as this would be necessary if such access of the Mulbarton facilities is to be encouraged.	Consideration needs to be given to a) controlling traffic speed through the village more than is being done at present. b) improvements to the junction of Bobbins Way/B1113.	The Council has engaged proactively with Norfolk County Council Highways Authority throughout the production of the VCHAP with this ongoing engagement informing both the final site selection and the detailed policy requirements. The original 2015 site specific highways requirements for VC SWA2 have been updated following these discussions to include improvements to the site connectivity to both the village and local recreational routes, as well a reinforcement of the existing 30mph speed limit through the village via the site layout (and more specifically frontage development of the site). The Highways Authority has not raised an objection to VC SWA2 being included as a carried forward allocation in their response to the Regulation-19 publication of the VCHAP and the Council does not consider this to be a soundness matter.	1311	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC SWA1: Land off Bobbins Way	2505	Support	Bennett Homes support the allocation of this site but consider that 25 dwellings could be provided in this location mindful of site constraints and in line with the objectives of the South Norfolk Village Clusters Housing Allocation Plan.	Increase VC SWA1 to 25 dwellings.	The Council previously engaged with the site promoter of VC SWA1 to determine the scale of development that would be achievable on this site. As noted in this representation a site area of 1.2ha was promoted at that time for approximately 25 dwellings, as shown on the submitted plan. The Council reviewed this proposal alongside both the existing allocation to the north (VC SWA2) and the approved development to the south (2014/1642) and considered that the proposed eastern boundary would result in an unfortunate staggered boundary line across the three sites. To achieve a more cohesive boundary line the Council considered it appropriate to reduce the site area and site numbers, effectively resulting in a single boundary when viewed from the east. The Council remains of the opinion that VC SWA1 is sound in its current form and the site area should not be enlarged to accommodate the additional dwellings proposed. It is however noted that there is a discrepancy in the boundary line as shown on the Regulation 19 plan as the northeast corner of the site was intended to meet the south-east corner of VC SWA1. Should the Inspector be minded to do so, the Council considers that this could be updated as a minor modification to the VCHAP.	1318	Should the Inspector be minded to do so, the Council considers that the Plan for VC SWA1 could be updated as a minor modification to the VCHAP to ensure that the north east corner boundary of the site connects to the south-east corner of VC SWA2 to the north.
Policy VC SWA1: Land off Bobbins Way	3082	Object	Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy VC SWA1 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognises that underlain mineral resource has been included in the supporting text, however, we request inclusion of the text in the policy itself. The policy can be made sound by including the wording below, which was contained in the response by the Mineral Planning Authority, to the Regulation 18 consultation.	Amend VC SWA1 to add the following wording as a policy requirement: 'The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'	The Council notes the comment of the Mineral Planning Authority but does not consider this to be a soundness matter. The Council has included within the supporting policy text reference to the site being underlain, or partially underlain by safeguarded resources and has highlighted the need for development to comply with the relevant policy within the Minerals and Waste Local Plan. It is not considered necessary to repeat this information within the site-specific text as all development is required to comply with the requirements of the Local Plan, which includes the Minerals and Waste Local Plan.	1317	The Council does not consider the issues raised within the response of Norfolk County Council Mineral Planning Authority to be soundness matters however should the Inspector be minded to modify Policy VC HAD1 the Council suggests the following addition to the policy wording: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority".

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Policy VC SWA2 Land on Main Road	3232	Support	This policy is an allocation brought forward from the 2015 Local Plan and therefore we consider that the policy text should recognise our feedback on allocation VC SWA1 where no such requirement is included regarding wastewater infrastructure capacity - as confirmed by the Water Cycle Study.	Remove policy requirement that "Wastewater infrastructure capacity is confirmed prior to development taking place."	Whilst the Council does not consider this to be a soundness matter should the Inspector be minded to remove this part of the policy requirement (bullet point 5) from the site specific policy the Council would not object. This policy requirement previously formed part of the 2015 allocation policy requirements and was therefore carried forward into this allocation too for completeness.	1310	The Council does not consider this to be a soundness issue but should the Inspector consider it appropriate to remove bullet point 5 from VC SWA2 the Council would not object.
Policy VC SWA2 Land on Main Road	3176	Object	Bullet point 3 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view [Historic England], some assessment is needed to inform any planning application. We therefore advise that bullet point 3 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	Amend criterion 3 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	In terms of archaeology, the Council considers that bullet point 3 is sound. Policy VC SWA2 highlights the need for archaeology to be considered; however, the Council's experience is that the need for field evaluation prior an application being determined is rare and can be required under NPPF paragraph 194 if necessary.	1301	The Council does not a modification to the policy to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.
Policy VC SWA2 Land on Main Road	3077	Object	Comments relating to VC SWA2: Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy VC SWA2 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognises that underlain mineral resource has been included in the supporting text; however, we request inclusion of the text in the policy itself.	Changes proposed in response to VC SWA2: Amend Policy VC SWA2 to add the following wording as a policy requirement: 'The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'	The Council notes the comment of the Mineral Planning Authority but does not consider this to be a soundness matter. The Council has included within the supporting policy text reference to the site being underlain, or partially underlain by safeguarded resources and has highlighted the need for development to comply with the relevant policy within the Minerals and Waste Local Plan. It is not considered necessary to repeat this information within the site-specific text as all development is required to comply with the requirements of the Local Plan, which includes the Minerals and Waste Local Plan.	1300	The Council does not consider the issues raised within the response of Norfolk County Council Mineral Planning Authority to be soundness matters however should the Inspector be minded to modify Policy VC HAD1 the Council suggests the following addition to the policy wording: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority".

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC SWA2 Land on Main Road	2644, 3260	Mixed	Summary of comments received in response to VC SWA2: - This allocation is in close proximity to Swardeston Common CWS which is well used for recreation and has a network of paths running through it (2 of the ponds in this CWS have been severely affected by run-off from the road.) The allocation for approx. 30 dwellings could potentially cause additional adverse impacts on this CWS due to increased visitor pressure; and - We recommend that the policy wording relating to hedgerows/ trees in VC ROC is applied to VC SWA2. Where removal of a tree or any part of a hedgerow is unavoidable, we recommend that policy wording includes reference to mitigation measures, reflecting the updated biodiversity duty required in the 2021 Environment Act to have regard to the enhancement of biodiversity.	Summary of changes proposed in response to VC SWA2: Policy wording should reflect the proximity to the CWS and any application should review any potential indirect disturbances to it in an ecological assessment.	The Council does not consider the issues raised in these representations to be matters of soundness however should the Inspector be minded to include reference to the County Wildlife Site in the supporting text for this policy the Council would not object. The Council has adopted a GIRAMS policy which seeks to both divert and deflect residents from visiting Habitats Sites on a regular basis (through the provision of new areas of green infrastructure) and also provide for mitigation measures via developer contributions. The Council does not consider it appropriate to repeat the requirements of existing legislation or policies within the site specific policy text therefore does not consider it necessary to update the policy to reflect the above comments.	1299	No action required
Policy VC BRA1: Land at Norwich Road	2646	Object	The proposal is in close proximity to Bracon Hall County Wildlife Site, which is sensitive to changes in water quality that would result from run-off from the application site. The current active planning application for this allocation site proposes directing run-off water from the site, via a road side ditch, to an attenuation pond immediately adjacent to the CWS, but it is unclear if the CWS is safeguarded from overspill from the attenuation pond.	Policy wording should reflect the proximity of the CWS and include a requirement for any application to ensure indirect impacts on the CWS are avoided, in particular from off-site routing of run-off water.	The Council considers that the specific comments relating to the current planning application are most appropriately dealt with as part of that process and the comments have been forwarded onto the case officer to review. The County Council's Ecology Team has not raised an objection at the Regulation-19 stage to this site being carried forward as an allocation in the VCHAP. Should the Inspector consider it appropriate to update the supporting text to make reference to the presence of Bracon Hall County Wildlife Site the Council would not object to this being inserted into the supporting text for this policy.	1288	No action required
Policy VC BRA1: Land at Norwich Road	3177	Object	Summary of comments of Historic England in response to VC BRA1: - Designated heritage assets off-site and development has the potential to impact upon the significance of these heritage assets; - Recognise that the site was previously allocated and a planning application for the site is currently pending determination; - Welcome reference to heritage assets in bullet point 2 of the policy; and - Recommend alternative wording relating to the requirement for archaeological surveys.	Summary of suggested changes to VC BRA1: Amend criterion 4 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	In terms of archaeology, the Council considers that bullet point 4 is sound. Policy VC BRA1 highlights the need for archaeology to be considered; however, the Council's experience is that the need for field evaluation prior an application being determined is rare and can be required under NPPF paragraph 194 if necessary.	1287	The Council does not a modification to the policy to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.

Policy VC BRA1: Land at Norwich Road	3111, 3213	Object	Summary of representations received in response to carried forward allocation VC BRA1: - The allocation of VC BRA1 is unsound because the evidence it is based on is out of date and no longer relevant (the local housing need assessment); - The Sustainability Assessment is out of date due to the population changes in Mulbarton and Bracon Ash since it was completed; - 23 houses have been built in the village since the 2015 Local Plan; - The additional housing in Mulbarton (200+) should be taken into consideration; - Services in Mulbarton are approximately 1km away and are oversubscribed (school and GP); - The site is unsustainable as Bracon Ash has no services; - There would be no economic benefit or net gain arising from this development in Bracon Ash- only additional traffic, flooding and loss of agricultural land; - The footpath to Mulbarton is unsafe and substandard (adjacent to the B1113); - Requirement to front houses as well as access onto B1113 will impact on road safety; - Urban development in a rural village fails to meet the NPPF objectives - scale and density of the proposal remains unacceptable; - The policy does not take into account other approved industrial development around the village (solar farms, pylons) that risk turning it into an urban and industrial area; - Residents support infill development in the village; - Local community engagement has been unanimously negative about VC BRA1 - negative social impact, environmental impact, scale, urbanisation, highway safety and lack of services; - Previous planning application 2016/0713 was refused due to the unacceptable urbanisation of the area; - Drainage is a major concern - the ditch shown in the application does not belong to the site; - Surface water run-off could damage the Bracon Ash County Wildlife Site;	Removal of the site from the Village Cluster Plan	The production of the VCHAP has been supported by the preparation of a robust evidence base which has informed the site selection process. This evidence base considered growth throughout the village clusters. The evidence base to support the VCHAP also includes work undertaken as part of the Greater Norwich Local Plan. The GNLP has included this carried forward allocation as an existing commitment within its own evidence base. Where appropriate addendums to the GNLP evidence base have been prepared. The Council therefore strongly disagrees with the comments relating to the relevance of the evidence base and does not consider this to be a soundness matter. Comments relating to the SA that supported the preparation of the Joint Core Strategy are also disputed, as set out in the Council's response to the comments received as part of the Regulation-18 consultation. For clarity these are reiterated here: "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 targets 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". The Council remains of the same opinion on this matter. Reference to the Council's decision made in response to refused planning application 2016/0713 is also considered to be inaccurate as this application sought permission for a significantly larger number of dwellings on a larger site area (a total of 53 dwellings). The Council is currently in receipt of a revised planning application for the allocation site (2021/2579) which is pending determination subject to the wider nutrient neutrality matter. This application proposes a scale of development that better reflects the 2015 allocation. Detailed matters relating to the planning application, including highways safety and site drainage, are being assessed appropriately as part of the planning application process. There have been no objections from the technical consultees in response to the publication of the Regulation-	1283	No action required

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			- Main sewers in the village can not cope currently; - The Sustainability Appraisal prepared for the Joint Core Strategy suggested that (amongst others) the allocation at Bracon Ash could be removed due to the limited facilities and planning permissions granted at that time; and - The Parish Council believes that there has been sufficient new homes built in the parish to satisfy demand.		19 document relating to this carried forward allocation and the Council therefore considers that this site remains suitable for inclusion in the VCHAP.		

26. Needham, Brockdish, Starston and Wortwell

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Needham, 26.9	2767	Object	The Needham settlement limit should have been extended to the east of the village from Harmans Lane towards the A143/Harleston roundabout, to the south of High Road where there are already a number of residential/commercial developments. This would have potentially avoided the need for site VC NEE1 to be allocated and prevented loss of a valuable open greenfield site. The current settlement boundary in conjunction with VC NEE1 does not comply with paragraph 7c of the NPPF by not "making effective use of land".	Extend the Needham settlement limit to include 11 High Road, Needham (Greenacres) and the road frontage of Elm Farm.	The Council considers that the Settlement Limit and Policy VC NEE1 to be sound. Paragraph 26.9 of the VCHAP states that flood zones 2 and 3 are located to the north and east of the settlement, which also covers the existing development adjacent to the A143/Harleston roundabout. Therefore further development in this area is not considered to be suitable or sustainable due to the risk of flooding in the area. The Settlement Limits have been drawn to concentrate development within the existing village core away from the flood risk areas. Policy VC NEE1 will allow for development that sympathetic to the existing form and scale of development. Paragraph 26.15 also states that the site would fill an open gap within the streetscene. Therefore, the Council considers the allocation of the site to be an effective use of land in line with the NPPF.	1286	No action required.
Wortwell, 26.13	2832, 3185	Support	Proposed Settlement Boundary for Wortwell is sound. The site north east of High Road (SN5045SL) was submitted during the Call for Sites and assessed by the Council to be 'reasonable' with capacity for 8 dwellings. The site scored 'green' on almost all metrics with any 'amber' conclusions, such as landscape and heritage impacts, deemed surmountable. Assessment concluded that the site was available and achievable. Any application will need to be supported by an ecological survey. Landowners confirm that the site included within the Settlement Limit remains available and confident that the issues highlighted can be addressed. The site is in a sustainable location forming an 'infill' gap. Logical location for housing development. Wortwell is outside of Nutrient Neutrality meaning any development can come forward without delay.	No changes submitted.	The Council welcomes the support for the Settlement Limit Extension to Wortwell. The VCHAP is a long term allocation document and therefore Nutrient Neutrality is not considered to be of relevance in selecting sites.	1298	No action required.

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Wortwell, 26.13	3180	Object	Although this is not an allocated site in the Local Plan, the Settlement Limit is being amended to incorporate this land. Although the land does not include any designated heritage assets, the site is located between two grade II listed buildings, the United Reform Church and 155 High Road. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets. There does not appear to be an HIA for this site. We recommend the preparation of an HIA for this site ahead of the EIP. Notwithstanding this, we have some reservations about the approach to the extension of settlement limits because it is unclear how site-specific policy requirements e.g. mitigation measures recommended in an HIA, can be secured in the absence of a site-specific policy.	Prepare a Heritage Impact Assessment for the Settlement Limit Extension.	The Council does not consider the issues raised to relate to the soundness of the Plan. Settlement Limit extensions have been included in the VCHAP to provide opportunities for small scale 'windfall' development within the VCHAP area. All Settlement Limit extensions allow for development of less than 12 dwellings and can offer 'self-build' opportunities. The Council considers that it is appropriate for windfall development to be assessed against the policies within the Development Plan and as such does not consider it appropriate to include specific policies for these sites within the VCHAP. However, the Council will undertake an HIA for the site to confirm its suitability for inclusion within the settlement limit and will review the supporting text for the settlement to determine whether a textual update making reference to the HIA is required. In this specific case, the site is well contained by the A143, existing vegetation and existing development around the site. It is a clear gap within the built up area and therefore a logical area for a small amount of development. The site assessment also states that the existing car park and access already separate the site from the church. The church is also orientated to be viewed from the front. No significant issues were identified.	1308	Prepare an HIA to inform the proposed amendment to the settlement limit.

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Wortwell, 26.13	2574	Object	The land next to the chapel opens onto High Road. Parish Council wish to ensure that a layby arrangement off the road entrance be provided as part of the development to ensure no parking spills onto the High Road which is the main thoroughfare through the village. The land cannot sustain the number of houses proposed and would be a dominant new 'estate' in the middle of the village next to a listed building. The council does not necessarily object to a development here as a natural infill but the proposal is for too many dwellings. Consider 5 to be the maximum that this land can support including parking and driveways and the ability to turn within the land rather than having to back onto a main road.	Reduction of housing proposal to ensure space to park, turn and enter and exit the highway safely.	The Council does not conclude that the issues raised relate to the soundness of the Plan. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this Settlement Limit extension. NCC has raised no objection to the extension at the Regulation 19 stage on highways grounds. The site assessment did acknowledge the potential for landscape impacts from development on the site. However, it did also conclude that these impacts could be appropriately addressed through a planning application. The Settlement Limit extension does not specify the amount of development that would be expected on the site as it does not have a specify policy accompanying it. As stated in the VCHAP, Settlement Limit Extensions are sites for less than 12 dwellings, however this does not mean all will be able to achieve the maximum amount of development. Detailed development proposals for the site would need to respond appropriately to site constraints including the immediate context and the adjacent listed building. Any future proposals for the site would be assessed against the relevant policies in the development plan.	1309	No action required.
VC NEE1, 26.19	3090	Support	Norfolk County Council notes the VCHAP includes supporting text regarding safeguarded mineral resources where sites are under 1ha therefore Minerals and Waste Policy CS16 does not apply. Therefore this can be removed from the supporting text.	Remove "The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan" from the supporting text.	The Council does not consider this to be a soundness matter however should the Inspector be minded to modify the Plan the Council would not object to the removal of paragraph 26.19 from the supporting text in the Needham, Brockdish, Starston and Wortwell chapter of the VCHAP.	1285	The Council does not consider this to be a soundness matter however should the Inspector be minded to modify the Plan the Council would not object to the removal of paragraph 26.19 from the supporting text in the Needham, Brockdish, Starston and Wortwell chapter of the VCHAP.
VC WOR1, 26.21	2572	Support	The partnership between two landowners either side of the High Road has been fully explored and discussed at Council meetings and the Council is in favour of the representation of up to 12 dwellings across the two sites.	No changes proposed.	The Council welcomes the support for Policy VC WOR1. The policy states that the site has been allocated for at least 12 dwellings.	1294	No action required.

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VC WOR2, 26.28	2573	Object	Following meetings with South Norfolk District Council the Parish Council can support original allocation of up to five dwellings but any more would cause concerns relating to access, dominance and flooding as well as other issues. Documents were submitted in 2020 and 2021 outlining reasons for this. Development on this site will mean that the land will not be able to handle the run off without endangering local buildings such as listed pub and road.	Contain the development to only five dwellings maximum. Provide attenuation basin and flooding protection. Ensure the access is not inhibiting the already busy crossroads between High Road Low Road and Tunbeck Close.	The Council does not consider the issues raised to relate to the soundness of the Plan. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria and the number of dwellings allocated in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds. As stated in paragraph 26.28, the site has been allocated for approximately five dwellings due to the substantial highways requirements that would be required for increased development on this site. Bullet point 4 of Policy VC WOR2 and Paragraph 26.29 both outline that a site specific Flood Risk Assessment will be required to inform the layout of the site at the planning application stage. Norfolk County Council as the Local Lead Flood Authority have also been engaged throughout the preparation of the VCHAP. NCC in its role as the Lead Local Flood Authority has not raised an objection to the allocation at the Regulation 19 stage on flooding grounds.	1284	No action required.

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Policy VC WOR2: land at the junction of High Road and Low Road	3182	Object	No designated heritage assets within the site. The grade II listed Bell Inn lies opposite the site. Grade II listed Premises of Mr Brown lies to north. Any development has the potential to impact upon the significance of these assets. The site is an important rural gap in the village and consideration should be given to that role in combination with the setting of the heritage assets. Welcome preparation of HIA which includes a number of helpful recommendations. Bullet point 3 reflects recommendation related to historic grain. The policy should also include a criterion reflecting the HIA recommendation in relation to landscaping to read, 'Enhance landscaping along the west boundary, particularly behind the village green' Bullet point 2 states that the HER should be consulted to determine the need for archaeological surveys prior to development. Our view is that some assessment is needed to inform any planning application. Advise that bullet point 4 should be amended to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	Add criterion to read 'Enhance landscaping along the west boundary, particularly behind the village green' Amend criterion 2 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	The Council does not consider the issues raised to relate to the soundness of the Plan. The role of this site in contributing to the character of the area and the setting of heritage assets is acknowledged by the Council. Bullet point 3 of Policy VC WOR2 has been included to require this consideration as part of any development on the site. The HIA identifies that consideration of the layout of the site is needed in order to protect the setting of the grade II listed Bell Inn. This has been included in Policy VC WOR2 as stated above. The western boundary of the site was identified as a potential enhancement and therefore the Council does not see its inclusion as necessary to make the policy sound as it is not required for development to be acceptable. In terms of archaeology, the Council considers that bullet point 2 is sound. Policy VC WOR2 highlights the need for archaeology to be considered; however, the Council's experience is that the need for field evaluation prior an application being determined is rare and can be required under NPPF paragraph 194 if necessary.	1304	The Council does not believe a modification to the policy to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.
Policy VC WOR2: land at the junction of High Road and Low Road	3262	Support	Particularly welcome policy wording in Policies VC ROC and VC LM1 relating to the protection and enhancement of ecological/biodiversity features and recommend that similar policy wording is applied to VC WOR2. Where removal is unavoidable policy should make reference to mitigation measure to reflect 2021 Environment Act. Local Authorities have a duty under NPPF (paragraphs 62b and 179), NERC Act 2006 and Environment Act 2021 to have regard to conservation and enhancement of priority habitats, including hedgerows. NPPF paragraph 131 outlines the importance of trees to local character and urban environments and how they can help mitigate the effects of climate change. Plans provide fuller and more comprehensive protection and should secure long-term maintenance of newly planted trees and retainment of existing trees.	Add suggested wording from policies VC ROC and VC LMI to provide further protection for biodiversity and ecological features such as trees and hedgerows.	The Council considers the policy to be sound in relation to the protection of ecological features. The site is predominantly open grassland and does not extend to the established trees to the east of the site. The vegetation around the rest of the site is relatively limited. A general criteria protecting ecological features is not considered to add any significant value to the policy due to the lack of features identified on the site. Also as stated national planning policies also provides general protection for these features. The Council would not seek to repeat existing polices or legislation within the VCHAP.	1303	No action required.

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Policy VC NEE1: Land north of High Road and east of Harmans Lane	3261	Support	Particularly welcome policy wording in Policies VC ROC and VC LM1 relating to the protection and enhancement of ecological/biodiversity features and recommend that similar policy wording is applied to VC NEE1. Where removal is unavoidable policy should make reference to mitigation measure to reflect 2021 Environment Act. Local Authorities have a duty under NPPF (paragraphs 62b and 179), NERC Act 2006 and Environment Act 2021 to have regard to conservation and enhancement of priority habitats, including hedgerows. NPPF paragraph 131 outlines the importance of trees to local character and urban environments and how they can help mitigate the effects of climate change. Plans provide fuller and more comprehensive protection and should secure long-term maintenance of newly planted trees and retainment of existing trees.	Add new criterion using wording from VC ROC1 to provide further protection for biodiversity and ecological features such as trees and hedgerows.	The Council considers the policy to be sound in relation to the protection of ecological features. An assessment of the site did not identify any habitats or trees of high value that would require specific protection within the policy. Existing legislation and planning policies are considered to provide appropriate protection to the existing features and the Council would not seek to repeat these within the VCHAP.	1307	No action required.
Policy VC NEE1: Land north of High Road and east of Harmans Lane	3178	Object	No designated heritage assets within this site. The grade I listed Church of St Peter, its grade II listed boundary wall and grade II listed Ivy Farmhouse lie to the south west of the site. Therefore, any development of this site has the potential to impact upon the significance of these. The site 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. We welcome the preparation of the HIA. Although there are views along the road of the church from in front of the site, the site itself is set back. We welcome the reference to appropriate boundary treatments in the supporting text and policy. Bullet point 4 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application.	Amend criterion 4 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	The importance of this site to the character of the area and its associated heritage assets is acknowledged by the Council in both the HIA and the subsequent policy. Bullet point 3 refers to the consideration of boundary treatments in order to ensure the protection of the rural context of the site. In terms of archaeology, the Council considers that bullet point 4 is sound. Policy VC NEE1 highlights the need for archaeology to be considered; however, the Council's experience is that the need for field evaluation prior an application being determined is rare and can be required under NPPF paragraph 194 if necessary.	1306	The Council does not consider a modification to the policy to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.
Policy VC NEE1: Land north of High Road and east of Harmans Lane	3233	Support	Suggest the supporting text and the policy are amended to provide clarity regarding the context of providing foul drainage to the site, given that it is not in close proximity to our WRC network, and other options such as package treatment plants are for the developer to consider and to obtain the necessary permit from the Environment Agency.	Modify supporting text to read: The site currently has no network connectivity to the sewer system, therefore early engagement with Anglian Water is recommended regarding the requisitioning of new connection or the developer to consider alternative on-site treatment subject to the necessary permits. Modify policy text to read: Early engagement with Anglian Water regarding the requisitioning of new sewer connection or the developer to consider alternative on-site treatment.	The Council welcomes the support for Policy VC NEE1. Whilst the Council does not consider Anglian Water to raise an issue that is a matter of soundness relating to the VCHAP, the Council would accept the proposed points of clarity to the supporting text and the site-specific policy should the Inspector be minded to accept the recommendations of Anglian Water.	1297	Although not a matter of soundness, the Council would accept Anglian Water's proposed wording as paragraph 16.18 and in VC NEE1 should the Inspector be minded to make this recommendation.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC NEE1: Land north of High Road and east of Harmans Lane	3113	Object	VC NEE1 needs to be considered in conjunction with the site opposite the village hall and church to contribute to regional housing shortage and enhance sustainability. Reasons for site opposite village hall/church not being considered suitable for development as stated in the site assessment are incorrect. The surrounding area has limited visibility from the Angles Way, with only the church tower being visible, however when trees are in leaf it cannot be seen. Therefore we consider this to not be fully justified. River Valley is also obscured from roadway by various trees growing on borders of various fields. Does not provide any uniqueness that could be offset by benefits of development. Site could be developed to maintain views to church entrance and provide space for parking for the church and village hall, which is a known issue. Has been considered in the past to be suitable for development by social housing providers. It would compliment the already allocated site and enhance utility and sustainability of the village. Site has also been approached in the past to improve drainage in the area. Footpath provision along High Road could be improved.	The development of site VC NEE1 should be considered in conjunction with the site opposite the Village Hall and Church. This will provide housing benefit and has the potential to enhance the village services by the provision of additional parking for the village hall and church. The original decision to exclude was made on inaccurate assumptions.	The Council does not consider the issues raised to relate to the soundness of the Plan. The site assessment for the alternative site being referenced (SN0156) concluded that the site was not suitable for development due to the impacts on the setting of the Grade I listed St Peter's Church located on the opposite side of the road. The church currently has unrestricted views across the valley, making it a key landmark for the area. Any development on this site would have a detrimental impact on the setting of the church and the surrounding landscape. The site visit conducted during the site assessment identified the long views from High Road across the valley, which are shared by the church and village hall. Any form of development would severely inhibit these views which are considered to be integral to the value of the landscape as a whole. The site being suggested has been subject to planning applications for 7 dwellings and garages in the past (DE\6944\ in 1970, DE\8996\ in 1972) both of which were refused. DE\7818\ in 1971 for a bungalow and a garage was also refused on the site. No records exist to determine the reasons for these refusals. The site therefore has a planning history comprising refused planning application for residential development. Although the policy context has been significantly updated since these applications in the 1970s, the principle of development in this location is still not considered acceptable.	1296	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC NEE1: Land north of High Road and east of Harmans Lane	2842	Object	Policy VC NEE1 results in loss of valuable open greenfield site on the edge of Needham when there is a more 'reasonable alternative' as defined by the NPPF opposite at Greenacres. This site would have a less damaging impact on rural setting as it is already a residential plot with screening. VC NEE1 is not consistent with NPPF paragraphs 8c and 119 and therefore 'unsound'. Site at Greenacres is a large residential garden and paddock (0.8ha). Occupied by detached dwelling with outhouses, all in poor state of repair and garden is unmaintained. Not included in 'Call for Sites' for VCHAP but was submitted for previous Local Plan review. Site Assessment, Landscape Visual Appraisal and Aboricultural Report all submitted to support site. Due to proximity results mostly mirror VC NEE1. These were not prepared by South Norfolk Council but prepared as objectively as possible. VC NEE1 is important in retaining rural character of the village as an important buffer preventing sprawl. Greenacres is very well screened in all directions by hedgerows and trees. Would also focus development in single area rather than linear stretch. Public views on the River Waveney Valley to the rear of Greenacres are very limited and visual impact would be significantly reduced by retention of treeline. Overall visual impact already adversely affected by neighbouring farm buildings. Aboricultural report identified trees of high, medium and low quality. Development would require most trees of varying quality which are not on boundaries to be removed. This should be balanced against retention of greenfield space opposite. Also if not developed, any future occupant is likely to undertake significant pruning and tree removal. Concluded that development could be accommodated however retention of valuable trees would reduce density. Anticipated that 12 dwellings could be accommodated.	Remove site VC NEE1 from the allocation or materially reduce it in size. Instead allocate the site opposite (Greenacres, 11 High Road) as it is already a residential plot with significant roadside screening. Alternatively extend the Needham settlement limit to include Greenacres, 11 High Road and the frontage of Elm Farm.	The Council does not consider the issues raised to relate to the soundness of the Plan. The site assessment for Policy VC NEE1 did not identify any significant potential for habitats or species to be located on the site, with the exception potentially being the hedgerows. Therefore, while it is accepted that development on VC NEE1 would result in the loss of a greenfield site, the potential impact on habitats and species is likely to be low. It is anticipated that development on the site could contribute to biodiversity net gains for the area. In comparison, development on the alternative site at Greenacres would lead to the loss of significant trees in the area. While it is accepted that these trees do vary in quality, the loss of at least some good quality trees would be unavoidable. This therefore makes the impact on development on Greenacres greater in ecological terms than that on VC NEE1. The Council has assessed the site at Greenacres using the same processes as all sites considered for the VCHAP. The site visit did raise the potential for further habitats to be located on the site due to the unmaintained nature of the site. This increases the potential impact of any development on this site. The potential actions of future residents of this site, such as pruning of trees, cannot be considered a planning justifications for allocating the site. Paragraph 26.15 of the VCHAP outlines the justification for a more linear form of development in the area. VC NEE1 is more in keeping with the existing form of development in the area. Also, the site is a clear gap within the built form due to the existing development on the southern side of the site. Development on Greenacres, especially development in a grouped form rather than linear, would not complement the existing development and would likely appear out of place. A full site assessment for the site known as 'Greenacres' (SN6002) is available as part of the Council's evidence base for the VCHAP.	1295	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC WOR1: North and south of High Road	3181	Object	Whilst there are no designated heritage assets on the site, grade I listed Redenhall Church is very visible from northern part of the site. Welcome reference to grade I listed St Mary's Church, Redenhall in paragraph 26.23 and reference to design and layout including building heights to reflect prominence of the site in River Valley Landscape. Also welcome bullet point 4. Recommend an HIA is prepared for site to fully address impact and ensure appropriate mitigation is in place within the policy.	Prepare HIA and amend policy, if necessary, with appropriate mitigation measures.	The Council agrees that the preparation of a Heritage Impact Assessment would help identify the potential impacts on heritage assets from development on this site and inform mitigation measures as appropriate.	1305	The Council will prepare a Heritage Impact Assessment for the site and include identified mitigation measures to the policy where appropriate.
Policy VC WOR1: North and south of High Road	2821, 3148	Support	Support for the inclusion of the allocation. Site is still available, deliverable and viable. Application is anticipated within six months of adoption of the VCHAP. Proposal has been adapted over time in consultation with the community and Parish Council. Landowners have also considered request for a dog exercise area.	No changes proposed.	The Council welcomes support for Policy VC WOR1. The Council is aware that the landowner of Policy VC WOR1 has promoted an area of land for a dog walking site alongside the land proposed for housing. For clarity however, the Council confirms that the proposed dog walking area can not be secured as part of the site allocation as it would not conform with the requirements of the NPPF. As such, this proposal has not been considered as part of the assessment of the site.	1293	No action required.
Policy VC WOR1: North and south of High Road	2571, 2583	Support	We are pleased to support VC WOR1 to be included in the VCHAP/LDS, on the basis of compliance to the duty to co-operate and its soundness in terms of its preparation, justification, effectiveness and consistency to national policies.	No changes proposed.	The Council welcomes the support for Policy VC WOR1.	1292	No action required.
Policy VC WOR1: North and south of High Road	2537, 3067, 3068	Support	Support for Policy VC WOR1. Provision of affordable housing for the area is supported. Dog exercising area is supported.	Affordable housing for people within 1 mile radius of Wortwell.	The Council welcomes the support for Policy VC WOR1. The VCHAP does not have the remit to determine the type of affordable housing allocated sites will deliver or how these will be sold or distributed. However, this will be in accordance with GNLP Policy 5: Homes. The Council is aware that the landowner of Policy VC WOR1 has promoted an area of land for a dog walking site. However, this has not been part of the consideration of the merits of the site.	1291	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC WOR1: North and south of High Road	2285, 2565	Support	Will create much needed housing in Wortwell including affordable housing so the younger generations don't have to move away from rural villages. Low impact of flooding at this end of the village, properties proposed are in keeping with surrounding houses, also would be a plus extending the 30mph speed limit as cars tend to speed out of the village into Redenhall.	No changes proposed.	The Council welcomes the support for Policy VC WOR1. The policy states that the developer will be required to work with the Highway Authority to promote an extension to the existing 30mph speed limit. A final decision relating to an extension of the 30mph speed limit will lie within the remit of Norfolk County Council in its role as Highways Authority.	1290	No action required.

27. Newton Flotman and Swainsthorpe

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Newton Flotman, 27.4	3206	Object	- The Plan is unsound as it does not include SN0594 which was promoted on behalf of Gosford Limited for approximately 33 dwellings and has been subject to a number of technical studies by the site promoter since the Regulation 18 stage of the VCHAP; - A Transport Technical Note (July 2021) summarised discussions with the Highways Authority on a proposed access solution and confirmed NCC HA considered the proposal acceptable in principle; - The submitted LVA found very limited effect on the landscape or visual amenity - we disagree with the Council's reason for rejection on landscape grounds; - Newton Flotman should accommodate additional housing to the proposed allocation - site SN0594 should be allocated as well; - SN0594 is already partially developed with a number of different structures on site; - The site would provide pedestrian access through the site to facilitate access to Smockmill Common - an important public benefit of the site;	We consider that that our client's site reference SN0594 should be allocated for up to 30 residential dwellings and that the limit of the main built form of the settlement should at least be extended to include the site. Furthermore, we consider that 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.	Following the submission of the additional technical information at Regulation-18 in support of SN0594 the Council sought advice from the Highways Authority. It is the Council's understanding that whilst the access solution may be considered acceptable in principle this does not constitute highways support for the site and a number of highways matters would continue to require consideration, including maintaining a safe highways access to the existing businesses opposite the site (Seastar Superbikes and ARTS). The separation of the site from the remainder of the village on the opposite side of the A140 remains a significant concern, as to does the urbanisation of the land to the east of this Corridor of Movement. Therefore the Council also continues to maintain its landscape concerns about this site. For these reasons the Council does not consider the omission of this site from the VCHAP to be a soundness matter.	1277	No action required
Policy VC NEW1: Land off Alan Avenue	3234	Support	We propose that the wording of the policy requirement regarding liaison with Anglian Water is amended to reflect the need for early engagement but given the scale of development we do not consider that there needs to be a policy requirement for phasing in relation to upgrades to the receiving WRC.	Modify policy text to read: Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network.	The Council has engaged with Anglian Water in their role as technical consultee throughout the production of the VCHAP. The Council welcomes the comments of Anglian Water in response to the Regulation-19 publication of the Plan. Anglian Water has not objected to the allocation of VC NEW1 and paragraph 27.9 of the supporting text for Policy VC NEW1 includes reference to potential constraints on the wastewater capacity. Developers are encouraged to enter into early engagement with Anglian Water (AW) in order to understand available capacity within the network when preparing for development of the site. The Council considers that the inclusion of this reference within the supporting site allocation text is sufficient and that the policy is sound in its current form however if the Inspector is minded to modify the policy to address the comments raised the Council would support this modification.	1260	The Council does not consider that a modification to the site-specific policy is necessary to make the Plan sound however if the Inspector is minded to modify the policy to address the comments raised the Council suggests the following wording: "Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC NEW1: Land off Alan Avenue	2485	Support	The completed Regulation 19 Promoter Engagement Form for VC NEW1 is attached.	None required.	The Council notes the contents of the promoter engagement form and welcomes the commitment to deliver the Policy aspirations of VC NEW1. The Council will review all information submitted by site promoters in due course and will see further information / clarification if this is considered to be appropriate.	1258	None required.
Policy VC NEW1: Land off Alan Avenue	2484	Support	FW Properties consider Site VC NEW1 to be a suitable and deliverable location for new homes within the village. Development in this location, which is close to an established community, represents sustainable development as defined within the National Planning Policy Framework. The site is immediately available and its development for 25 homes is considered to be viable and deliverable. The site is not subject to any constraints which would prevent its development for housing and we believe that the specific requirements attached to this draft allocation can all be fulfilled. Site VC NEW1 should therefore be taken forward for allocation.	None required.	The Council welcomes the continued support of the landowner for the allocation of VC NEW1 and is reassured of the delivery of this site through the VCHAP.	1257	None required.
Policy VC NEW2: Land adjacent Alan Avenue	3263	Support	We welcome the policy wording for hedgerows/trees in Policy VC ROC. We recommend that similar policy wording is applied to VC NEW2 to ensure this approach is applied consistently across the Local Plan.	Where removal of a tree or any part of a hedgerow is unavoidable, we recommend that policy wording includes reference to mitigation measures, reflecting the updated biodiversity duty required in the 2021 Environment Act to have regard to the enhancement of biodiversity.	The Council considers the policy to be sound in relation to the protection of ecological features. The Council does not consider it appropriate to repeat the requirements of existing legislation or policies within the site specific policy text therefore does not consider it necessary to update the policy to reflect the above comments.	1443	None required.
Policy VC NEW2: Land adjacent Alan Avenue	3235	Support	The supporting text has clarified that the application has been recommended for approval subject to the applicant being able to address nutrient neutrality. For the reasons stated above for Policy VC NEW1, and the application has been through the relevant consultation process, we suggest that the following clause can be removed.	Remove policy text "Liaison with Anglian Water regarding foul water capacity and the potential need to phase the site to later in the plan period;"	The Council welcomes the constructive engagement with Anglian Water during the consultation process for the application on VC NEW2 and the feedback received on the policy and text wording. The Council has included the policy requirement for engagement with Anglian Water to ensure that in the event of potential future amendments to either the site developer or the planning proposal for the site this requirement is clearly set out in the site-specific policy text.	1259	The Council does not consider that a modification to the site-specific policy is necessary to make the Plan sound however if the Inspector is minded to modify the policy to address the comments raised the Council suggests removal of the final policy requirement: "Liaison with Anglian Water regarding foul water capacity and the potential need to phase the site to later in the plan period".

28. Pulham Market and Pulham St Mary

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC PSM1: Land north of Norwich Road and west of Poppy's Lane	2834	Support	We support this allocation. The site is in a sustainable location and is the result of significant discussion with the strategic planning team, including amendments made in response to concerns raised. The site can be delivered as per the policy wording below, and has the added benefit of lying outside of the Nutrient Neutrality catchment. This means not only that the housing is deliverable within the Plan period, but also that it can compensate for inevitable delays in delivering housing elsewhere within the district, much of which is within the catchment.	No changes proposed	The Council welcomes the continued support of the site promoter to the allocation of VC PSM1 in the VCHAP, as well as the engagement that has occurred to date. However, the Council remains of the opinion that the wider nutrient neutrality issue is a short-term issue and the location of a site outside a nutrient neutrality catchment area should not be considered as an overriding benefit when assessing sites for allocation within this long-term Plan.	1276	No action required
Policy VC PSM1: Land north of Norwich Road and west of Poppy's Lane	3183	Support	Although Hill Farmhouse, grade II listed lies to the north of the site, the site is screened by the intervening woodland and so no impact would be had on the significance of this asset.	No changes proposed	The Council welcomes the comments of Historic England which do not raise any soundness issues relating to the allocation of this site in the VCHAP.	1275	No action required
Policy VC PSM1: Land north of Norwich Road and west of Poppy's Lane	2333	Object	Having this amount of dwellings with all the recent dwellings erected in Pulham market will put a massive strain on the amenities in the area and also cause a huge amount of traffic to a small picturesque village which it will no longer be. It will cause devaluation to lots of properties in the area that bowed from having country views etc. it's will have a loss of privacy to certain houses, drainage issues, appearance of the buildings, residential amenity issues, traffic parking safety on the main road. List is endless. Effect on listed buildings in surrounded areas, noise.	For them not to be built and leaving the country side/farm land a countryside/farm land rather than erecting building that won't last longer than 40 years creating mass destruction in the future. We will eventually have no where to grow produce or have livestock. Harleston is massive and has a huge effect on surrounding areas with its traffic issues parking and noise etc. schools, doctors childcare etc is strained.	Whilst the Council recognises the concerns that have been raised in this representation they are not considered to be matters of soundness. The village cluster comprises two settlements (Pulham St Mary and Pulham Market) which offer a wide range of services and amenities. They are also in close proximity to the market town of Harleston which is accessible by public transport. The Council has proactively engaged with technical consultees including the Highways Authority, the LLFA and Historic England throughout the preparation of the VCHAP and has not received any objections to the allocation of the site in response to the publication of the Regulation-19 version of the Plan. Site specific matters relating to the layout, appearance and existing and future amenities of residents will be most appropriately assessed through a planning application and the Council remains of the opinion these can be addressed through appropriate design.	1274	No action required

29. Rockland St Mary, Hellington and Holverston

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Rockland St Mary, 29.1	2948, 3000, 3002, 3020, 3026, 3032	Object	Summary of representations received in response to paragraph 29.1: - The village has sufficient housing; - Proposed sites do not maintain the linear character of the village or its rural quality; - Sites to the north of The Street have been rejected due to landscape and townscape impacts so why is the Council taking a different response to VC ROC2?; - Visually [the developments] will spoil the view by encroaching down the field; - Development would impact on the landscape environment and habitats of a number of species; - The roads can not cope with any additional traffic; - Access to any new development is a concern as the visibility is poor and road is busy; - The bus service is irregular and does not allow for commuting, or easy recreational use; - Specific concerns raised about VC ROC2 relating to impacts on the landscape, highways, residential amenity, ecology, flood risk and utilities*; and - GP service runs limited hours and the primary school has poor access. *NOTE: this representation (no. 3000) is a duplication of a representation submitted by the same respondent in response to VC ROC2 and has therefore not been set out in detail here.	Summary of changes proposed in response to paragraph 29.1: - Less housing; - More affordable housing; - Reject the proposals on the grounds of compromising the character and rural quality of the village; and - Vast reduction in the number of properties.	The Council has reviewed the comments submitted in response to paragraph 29.1 and does not consider any of the issues raised to be matters of soundness relating to the plan. All responses have been prepared to these issues in response to VC ROC1. As noted, VC ROC2 is no longer included in the VCHAP. PRINCIPLE The Council has prepared this housing allocation plan in accordance with the national requirements to plan for growth in a sustainable manner. The objectives of the VCHAP are to support existing rural settlements through the allocation of small-medium sized sites which will provide opportunities for communities to grow at a sustainable level. The level of growth proposed at Rockland St Mary is considered to be reasonable, and takes into account the availability of existing services and facilities for residents. FORM OF DEVELOPMENT The village has developed in a linear form along The Street, as recognised in the VCHAP document as well as the supporting evidence base. However there is also existing development in depth (both historic and recent) that extends away from the linear pattern along The Street (for example, Bee Orchid Way, School Lane and St Margaret's Way). In general terms, the continued linear expansion of settlements is not always the most appropriate form of development, either in terms of an efficient use of land or the resulting landscape impact. HIGHWAYS The Highways Authority (HA) has been engaged throughout the production of the VCHAP and these discussions have informed both the site selection process and the detailed policy wording which sets out both on- and off-site highways requirements. The Highways Authority responded to the Regulation-19 version of the Plan in response to VC ROC2. Following the close of the Reg-19 period the Council was made aware that the site was no longer available for allocation and the Council has subsequently removed this site from the VCHAP.	1241	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Rockland St Mary, 29.2	2601, 2951, 3012	Object	Summary of representations in response to paragraph 29.2: - The area to the east of the village has high landscape value consisting of gentle hills with wildlife friendly hedges, scrub and trees It marks the gradual end of a natural ridge and provides good walking and excellent views in almost all directions as the footpath winds through the landscape to Claxton , along the "Beck" and back to the staithe; - Eel Catcher Close has broken into th[e] vista and it appears that 25 houses will almost certainly destroy this wonderful area of the village; - The increase in housing will spoil the village's pleasant rural character; - The village does indeed have a 'pleasant rural character' - mainly due to the quality of farmland; and - The loss of this Grade 2 agricultural land when agricultural production needs to be intensified is unjustifiable and contravenes Natural England policy (TIN049).	Summary of changes proposed in response to paragraph 29.2: - Prioritise the landscape rather than building; - Less housing; and - Brownfield sites or areas of poorer farmland should be used for development leaving best quality land for sustainable food production now and in the future.	The Council recognises the landscape value in and around the village of Rockland St Mary, due in part to its proximity to the Broads Authority area, but remains of the opinion sensitively designed schemes can be accommodated in this location. The site-specific policy requires the preparation of a Landscape and Visual Appraisal for VC ROC1, with early engagement with the Broads Authority recommended to inform this assessment. This work would inform the evolution of the site to ensure that it responds to the sensitivities of the landscape appropriately. It is inevitable, however, that there are changes to shorter views around new sites. The Broads Authority has engaged with the technical consultation as part of the preparation of the VCHAP and has not objected to proposed development at Rockland St Mary. As a point of clarity with regards to the Agricultural Land Classification the land around the settlement has been confirmed as being Grade 3 (good-moderate) agricultural land, https://publications.naturalengland.org.uk/publication/127056?category=5954148537204736.	1244	No action required
Services and Community Facilities, 29.5	2952	Object	The bus service is limited and has been reduced in recent years, meaning more people rely on cars and consequently bus services being used less and causing a downward spiral. This is very difficult for elderly.	More public transport	The Council notes that this is a wider issue and recognises that public transport options can be limited within rural communities (relative to more urban environments) and that there remains a reliance on private vehicles for travel. Within Rockland St Mary however there continues to be a reasonable bus service that operates between Claxton-Surlingham-Norwich a number of times a day (Monday-Saturday). There are bus stops at both the east and the west of the village, improving the accessibility of the service for users. The Council does not consider this to be a matter of soundness. More generally, declining passenger numbers and the viability of routes is recognised as a wider issue and is one that is considered county-wide as part of the Government's 'Bus Back Better' Strategy. Further details can be found in Norfolk County Council's 'Bus Service Improvement Plan'.	1240	No action required

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Rockland, 29.6	2598, 2714, 2954, 2979, 2999	Object	Summary of representations submitted in response to paragraph 29.6: - Concerns that the settlement limit can be revised by the Council to accommodate new sites; - Changes proposed will impact on the linear form of the existing settlement and be out of character with the existing development; - Existing houses at Eel Catcher Close were built for the benefit of local people; - Detrimental to the rural feel of the village and landscape; - New development would require extensions to the settlement boundary; - The village has already had several developments; - 25 houses on this site would involve an excessive increase in traffic through the village and the site access is dangerous; - There is no support for the suggested extension to the settlement limit; and - Concerns that allocation of either site will set a precedent for further 'back' development on agricultural land at Rockland.	Summary of changes proposed in response to paragraph 29.6: - Rockland has had sufficient new building in the recent past (Eel Catchers Close (ECC), Bee Orchid Way (BOW) and various infills) and has reached the stage where further development should be halted. 25 new houses on an estate just round the corner from two other estates will increase the number of vehicle movements on a crowded road unacceptably; - Provide further details about the changes to the settlement limit as well as further consultations about settlement limit changes; and - If there must be development in this area it should be reduced in size and continue the linear development of Eel Catcher Close.	The Council does not consider the matters raised in response to the changes to the settlement limit to be issues of soundness related to the plan. The settlement limit is a planning tool that is used to define the extent of the defined boundaries for the purposes of determining appropriate locations for new development. Periodically these are reviewed in response to either changes that have occurred since the last review, or as part of a managed release of land to facilitate future growth. The Council proposes including sites that are allocated within the VCHAP in the settlement limits. With regards to Rockland St Mary in particular, both sites are located adjacent to the existing settlement limits and are considered to be appropriate extensions to this boundary. The Council recognises that there is a linear form of development through the centre of the village however there are also pockets of development throughout the village which do not follow this form. More generally, a continued linear expansion of settlements can have a greater visual impact on- and intrusion into- the surrounding countryside than appropriate grouping of new development. Matters relating to highways and the principle of earlier development at Eel Catcher Close have been responded to in more detail in response to VC ROC1.	1237	No actions required.

VC ROC1, 29.8	2634, 2670, 2691, 2734, 2893, 2955, 2981	Object	Summary of representations received in response to paragraph 29.8: Highways - Road safety will be compromised; - The village is already congested with on street parking in particular the area from the surgery and shop up to School Lane; - Traffic diverts from the A146 whenever there are issues with that road; - The village is the route for Langley School minibuses(6) and there is a regular bus service; - The site is a long way from the hub of the village meaning residents are likely to use their cars to access amenities; - The site access is very dangerous and the site will add to the already often heavy traffic load; - The pavement is too narrow and has an adverse camber; - The layby at the top of New Inn hill encroaches onto the main road causing a very dangerous obstruction to vehicles; - The increase in traffic pollution would impact the outcomes of all residents; and - The proposed footpath is within 1m of the listed building and does not provide safe access to the road access proposed. Landscape, visual impact and ecological matters - The proposals are not linear and any development will be on a prominent ridge, overpowering the local landscape; - The site is too close to Rockland Staithe and Broad and is within 350 yards of a CWS; - Development will ruin the rural nature of the nature reserve, the Broads and local marshes; - The run off from proposed houses could flood houses near the Beck and pollutants would destroy the common spotted orchid; - The housing allocation is within site of the Broads area, and will destroy the rural nature of the landscape and will make the area less attractive for tourism as well as affecting the ecological value for wildlife; - Development of the site would be seen for miles	Summary of changes proposed in response to paragraph 29.8: - Development should be linear with restricted height to prevent dominating the landscape; - Only allow a few houses on the site, for them to be small and unobtrusive viewed the local footpaths; - The proposal should be limited to 1-2% increase in housing restricted to first time buyers, social housing and bungalows for the elderly; - No buy to let or second homes should be permitted; - All homes should be future proofed for climate change; - No housing; and - Ensure that extensive research has been undertaken with due diligence.	The Council recognises the concerns expressed in response to the allocation of VC ROC1 but does not consider these to affect the soundness of the Plan. Extensive work has been undertaken to support the allocation of sites within the VCHAP, as set out in the evidence base for the Plan. In recognition of the concerns raised about the Heritage Impact Assessment and following discussion with Historic England the Council is reviewing this section of the evidence base and prepare an updated assessment to inform development on VC ROC1. HE have not objected to the allocation of VC ROC1 but have recommended a modification to the policy to respond to the adjacent heritage assets. In addition, through the Regulation-19 consultation the Council has been made aware of a covenant that may affect part of the site and this is currently subject to legal review by the authority. More generally, the Council has responded in brief to the matters raised in response to paragraph 29.8 below. As many of the same issues have been repeated a more comprehensive response has been prepared in response to the main policy paragraph, VC ROC1. Highways The Council has sought technical advice from NCC Highways Authority throughout the production of the Plan and this has informed the site-specific policy requirements set out in VC ROC1. The village is accessible by public transport and benefits from a good pedestrian connectivity to the services and facilities which are available within a reasonable distance from the site. The Highways Authority has not objected to the allocation of this site in response to the Regulation-19 publication of the Plan and the Council remains of the opinion that this site remains suitable in highway safety terms. Landscape, visual impact and ecological matters Landscape Visual Appraisals have been prepared for all sites preferred for allocation at Regulation-19. These form part of the evidence base and have informed the site selection stage, as well as the drafting of policies for these sites. Due to the proximity of the site to the Broads area the policy includes a requirement for the site developer to prepare a Landscape and Visual Impact Assessment with early engagement with the Broads Authority recommended to inform this. The Council recognises the potential landscape sensitivity of the site but considers	1236	Whilst the Council does not consider any of the issues raised to be matters of soundness, the Council will review the HIA and as appropriate will prepare an update to VC ROC1.

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			around and be hugely detrimental to the existing landscape and open skylines in an area known for its natural, unspoilt beauty; - The site is less than 350 metres from Hellington Nature Reserve and Rockland Broad. Rockland Broad is part of the Broads National Park, a designated SSSI and part of the Yare Broads and Marshes SSSI; - The site acts as a green buffer corridor between the denser housing of the main village and the much more loosely spread, small pockets of housing on the outskirts of the village; - The area is popular with local and visiting birdwatchers and naturalists due to its wide variety of flora and fauna; and - The green space helps maintain the sense of an open, rural and tranquil landscape for both people and wildlife. Miscellaneous - The drains can't cope; - The Heritage Impact Assessment does not adequately assess the impact on the listed buildings; and - There is a covenant from the Land Registry stating that no dwelling/housing to be built on that land.		that the scale of development proposed in this location would be acceptable. Whilst there will be some changes to the landscape resulting from development in this location these will be viewed in the context of the existing ribbon development at the edge of the village. A Habitats Regulation Assessment is included within the evidence base for the Plan and the Council has also engaged with the County Council Ecology team as part of the site assessment. Appropriate boundary treatments, as well as the protection of the trees to the east of the site, will provide both landscape and ecological mitigation.		
VC ROC1, 29.9	2637, 2692, 2713, 2983	Object	Summary of representations submitted in response to paragraph 29.9: - The proposed area is at odds with the linear village; - The highways and infrastructure can not support the additional housing; - Site access is on a section of highway with limited visibility; - Farm vehicles access the land via the site; - Eel Catcher Close was a Rural Exception Site and does not set a precedent for further development; and - The site area exceeds 1ha set out in A7 and the guidance in the NPPF.	Summary of changes proposed in response to paragraph 29.9: - Reduce development to linear form only; - Abandon the plan - the environmental impact is too great; - Areas within the stated National Policy need to be identified; and - No further development at a Rural Exception Site.	The Council has reviewed the comments submitted in response to 29.9 but does not consider that the matters raised relate to the soundness of the VCHAP. The Council has responded in full to the issues raised here in the detailed response to VC ROC1.	1235	No actions required.

VC ROC1, 29.10	2586, 2671, 2693, 2733, 2841, 2957, 2984	Object	Summary of representations received in response to para 29.10 (grouped by topic area): Eel Catcher Close - The site is inaccurately described as being to the west of Eel Catcher Close as it is to the west and south of this development; - With the exception of a few properties, every house in the village benefits from fields to the rear and Eel Catcher Close residents will lose this; - Eel Catcher Close would have a busy road to the front and houses to the rear, destroying the 'village feel' for these residents; and - Eel Catcher Close residents have small gardens and will lose their privacy; Impact of development - Two plots of land have been joined to create a 'block' on the only open area of the village where the village can be accessed and seen; - The visual impact of more housing on this site will be seen for miles; - Housing of this scale would be unbearable in what is a beautiful and special natural environment; - Development behind Eel Catcher Close would destroy all access, open views and result in the loss of privacy; - Properties opposite Eel Catcher Close have significantly added to the housing in the village and created a 'full to bursting point' sewerage and utilities situation; and - Visual impact will make the area less attractive as a tourist destination; Principle of development - Site is too large - the guidelines suggest 1ha is the average and appropriate for a cluster but this is far larger; - There has been development of 30 houses in the last two years; - Development behind Eel Catcher Close has been rejected twice; - Eel Catcher Close was a Rural Exception Site for social housing only and we were given assurances that this would not set a precedent for development of the adjoining land;	Summary of changes proposed in response to para 29.10: - Reduce to 6/7 dwellings sideways on to the road running southwards to reduce the visual impact and not enclose houses in Eel Catcher Close; - No development in this location; and - One / two properties may be acceptable but no more.	The Council recognises the concerns that have been raised relating to the allocation of VC ROC1 but does not consider them to be matters that affect the soundness of the Plan. Extensive work has been undertaken to support the allocation of sites within the VCHAP, as set out in the evidence base for the Plan. In recognition of the concerns raised about the Heritage Impact Assessment the Council is reviewing this section of the evidence base. In addition, through the Regulation-19 consultation the Council was made aware of a covenant on part of the site and this has been subject to legal review by the authority. More generally, the Council has responded in brief to the matters raised in response to paragraph 29.10 below. As many of the same issues have been repeated a more comprehensive response has been prepared to these in response to VC ROC1. Principle of development The Council is required to identify and allocate sufficient land for development in accordance with government policy. The form of development proposed is considered to be consistent with the objectives of the VCHAP, is adjacent to existing development and the existing settlement boundary (which would be extended to incorporate the site) and therefore is considered to be acceptable. The site has previously been considered suitable for shortlisting within earlier Local Plan allocation processes - this does not mean that the site was rejected for development. There is no other planning history on the land. Eel Catcher Close Whilst the Council recognises that there will be a change in outlook for the residents of Eel Catcher Close this is not considered to be unacceptable. Although Rockland St Mary is predominantly linear village it is not unusual for tandem or small estates to be sensitively developed within villages as these settlements expand. Through appropriate site layout and design new development to the rear of Eel Catcher Close will not result in a lack of privacy for the existing or future residents of these developments. A number of comments relate to the principle of further development alongside Eel Catcher Close, a Rural Exception Site. Reference to the principle of development within the site assessment refers primarily to the development on the brow of the hill (i.e. impact within the landscape) and in combination with other site assessment	1234	Whilst the Council does not consider any of the issues raised to be matters of soundness, in recognition of the concerns raised about the findings of the Heritage Impact Assessment the Council will review this part of the evidence base to determine whether an update is required. At the time of preparing this response the Council is also currently seeking legal advice about the covenant on land to the rear of Eel Catcher Close.

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			- It is incorrect to state that Eel Catcher Close set a precedent for development; and - Village limit will be breached; Miscellaneous - Covenant on the land behind Eel Catcher Close prevents houses being built there; - SNC failure to identify the historic significance of Old Hall, the significance of the farmstead and the impact of development; - The proposed footpath does not lead anywhere; - Highways is listed as both amber and red; - Reduction of habitat space for various birds and animals such as badgers; - We can not afford the loss of anymore mature trees and the mature oaks on the site boundaries should be protected; - The site is over 1km from the GP and shop/post office facilities and over 1.5km from the primary school, so most people who live at this end of the village access these by car; - Walking to school is via the existing footpath (much of which does not conform to current safe path widths alongside a busy road) on the opposite side of the road and involves crossing 3 hazardous roads/junctions (New Inn Hill, Surlingham Lane corner and the junction with School Lane); - Concerns about existing speeding vehicles entering and leaving the village; and - The field to the west (behind the Old Hall) will be inaccessible to agricultural vehicles.		considerations the Council remains of the opinion that the site is suitable for development. Landscape and visual impact Within the evidence base the Council has undertaken a Landscape Visual Appraisal. Due to the proximity of the site to the Broads area the policy includes a requirement for the site developer to prepare a Landscape and Visual Impact Assessment with early engagement with the Broads Authority recommended to inform this. The proposed policy protected the trees along the eastern boundary however since the Regulation 19 publication period the Council has reviewed these trees and they are now subject to provisional Tree Preservation Orders, affording them further protections both now and in the future. This will also ensure that they continue to provide some visual screening of the site within the wider landscape. Furthermore, the site will be viewed within the context of the existing village and residential properties. Ecological enhancements will be required as part of any development of the site in accordance with local and national policy and overall the scale of development proposed is not considered to result in a significant landscape impact.		

VC ROC1, 29.11	2336, 2645, 2672, 2725, 2732, 2839, 2958, 2985	Object	Summary of representations received in response to paragraph 29.11 (grouped by topic area): SITE ACCESS - The access to the site has restricted view due to bends, trees and hill crest - the safe access and egress of potentially 40-50 vehicle movements a day puts the risk of accident very high; - The road access to the proposed site is at a very dangerous stretch of road close to junctions with Green Lane and Eel Catcher Close; - The existing entrance to Eel Catcher Close has resulted in accidents and many near misses; and - Alternative planning in the location has been refused due to the safety of vehicular access and movements. PEDESTRIAN CONNECTIVITY - The additional footpath next to the Old Hall Barn would be of no real benefit and end on the road with no footpath other than that on the north side of The Street; - Old Hall Barn is a listed building - this dictates that the footpath must be at least a metre from the boundary; - Footpath would need to cross the road to join the footpath in the village; - Existing footpaths are narrow and difficult for two or more people to pass each other without stepping into the road; - The informal footpath, created during Covid, should not be kept; and - The proposed route of the pathway to the back of Eel Catcher Close, would intrude on their short gardens and impact on the privacy of residents. MISCELLANEOUS - Up to 40% of the traffic (SAM2 data for 2022) entering and leaving the village is exceeding the speed limit in this area; - 25% of vehicles entering the village are travelling at greater than 30mph into the village; - Increasing housing density in this area will increase road traffic throughout the village and put more pressure on parking spaces around the shop and school; - Amber listing for the Highways safety is far too	Summary of changes proposed in response to paragraph 29.11: - No access from New Inn Hill or The Street; - Delete mention of the Old Hall Barn footpath/ cycleway; - Has access for agricultural vehicles been considered?; - Use and routes of existing footpaths should be reconsidered - current crossing point on New Inn Hill is on a blind bend; - Plan should be abandoned and development stopped; - No housing; - Review the proposed footpath to be beneficial for use; and - Review NCC Highways concerns regarding the access and visibility at this site.	The Council does not consider the matters relating to highways to be a soundness matter. The Council has proactively engaged with NCC Highways in their role as technical consultee throughout the site selection process for the VCHAP. This has included through the during both the Regulation-18 and Regulation-19 consultations, as well as a number of meetings to discuss site-specific matters in further details. Due to the scale of development proposed it is not considered that additional vehicular movements through the village will have a significant impact on existing traffic movements. The Council has clearly noted in the supporting text that the established tree on the site frontage may require removal in order to create a safe access into the site with appropriate visibility. Removal of existing vegetation along the site frontage may improve visibility along New Inn Hill, improving highway safety. NCC Highways have not raised an objection to the allocation of this site at Regulation-19, and the Council has sought to address the earlier observations of the highways team in the site-specific policy wording. The policy requires the addition of a pedestrian footpath along the site frontage to connect with the existing footpath adjacent to Eel Catcher Way, as well as a secondary footpath through the site adjacent to Old Hall Barn. The frontage footpath is a requirement of NCC Highways and reflects the comments within the site assessment form. This can be provided on the site and is considered achievable. Local concerns regarding the crossing of New Inn Hill to connect to the existing footpath to the north of this road are noted however this is considered to be an acceptable solution and is not a soundness matter. Similarly, the requirement of a secondary pedestrian access adjacent to Old Hall Barn is not considered to be a soundness matter. This additional footpath will enhance the pedestrian network locally and provide an additional access point into the site. It also provides an opportunity to connect with the formal Public Right of Way network to the east of the village.	1226	No action required

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			low a risk factor for this new junction; - Original NCC Highways assessment was RED; and - NCC Highways has raised concerns about vehicular access and the need for suitable visibility splays – how can traffic volume along this single linear settlement be monitored. Residents have raised concerns about Highways monitoring and volume limits.				
VC ROC1, 29.12	2649, 2716, 2986	Object	Summary of representations received in response to paragraph 29.12: - The site is a prominent location on the ridge which looks out across the Yare valley to the east and overlooks the surrounding countryside; - There is evidence of historical workings and heritage and this would be lost if this site is developed; - Development could destroy important archaeological features due to the proximity to the Broads and the medieval peat workings; - There are a number of concerns raised with regards to the Heritage Impact Assessment undertaken by SNDC, including the omission of one of the listed buildings from the assessment, a failure to assess the link between the listed buildings and the agricultural and preparation of the HIA by the Council itself; - An independent HIA commissioned by a parishioner has different conclusions to the Council's HIA; - Historic Environment Records should be consulted as within this zone there has been Medieval pottery finds, found in 1995 at Eel Catcher Close. Also, various Neolithic hand axe finds in this zone.	Summary of changes proposed in response to paragraph 29.12: - Undertake an independent Heritage Impact Assessment; - An archaeological survey would need to be carried out in advance of the works. All development would need to reflect the findings; and - A full scale geo-archaeological assessment should be undertaken.	The Council is aware of the concerns that have been raised regarding the Heritage Impact Assessment and has continued to engage with Historic England about the proposed allocation of VC ROC1 following receipt of their representations during the Reg-19 period. The Council will consider whether it is necessary to review the HIA that has previously been prepared as part of the evidence base. With regards to the concerns raised about the potential presence of archaeological remains on the site (based upon finds within the locality), the Council has included a requirement for engagement between the developer and the Historic Environment Record (HER) to determine the need for archaeological surveys on the site prior to development. Whilst concerns about the loss of currently unknown archaeological finds are noted, the Council would emphasis the opportunities that development offers for advancing knowledge about the historic environment. The NPPF policy of proportionality is followed within the VCHAP and the Council does not consider the potential presence of archaeological remains on the site to be a soundness matter.	1225	The Council will consider whether the existing Heritage Impact Assessment requires review. this has included a site visit with Historic England to discuss the merits and constraints of the site. The Council is currently reviewing the Heritage Impact Assessment following these discussions and will also review the site-specific policy wording as appropriate.

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VC ROC1, 29.13	2959	Object	Groundwater from other housing developments, such as Bee Orchid Way, have found their way into the Staithe and it is likely that groundwater from this development will eventually go into the Staithe and then the Broad.	No housing.	The Council has engaged with technical consultees including the Lead Local Flood Authority, the Environment Agency and the Broads Authority and has not received an objection to the allocation of this site in the VCHAP because of concerns about the impact on the nearby Staithe. Developers will be required to liaise with the Environment Agency to ensure that the drainage of the site does not impact on the Groundwater Source Protection Zone, as recognised in supporting paragraph 29.13 however as set out in the document the presence of a Groundwater Source Protection Zone does not preclude development of the site. This is not considered to be a soundness issue.	1224	No action required.
VC ROC1, 29.15	2673, 2735, 2960, 2987	Object	Summary of representations received in response to paragraph 29.15: - Concerns have been raised as to whether the drainage and sewage systems have the capacity to serve another 25/50 dwellings as residents consider the drainage and sewage to the east of the village to be at capacity; - Water frequently cut off or reduced in pressure; - Site is a flood plain and increased run off down New Inn Hill would cause flooding at the Staithe and contaminate the River Yare; - To rectify the power, water and drainage issues to accommodate such an increase in housing would require a huge investment and disruption; - Extra housing is leading to more water being used, and the increased use of either water from rivers or abstraction is reducing the flow of freshwater down the river Yare and more frequent and severe saltwater incursions; and - UK Power Network have stated that there is no spare capacity for electrical supplies.	Summary of changes proposed to paragraph 29.15: - Difficult to comment until AWA is approached; - Maximum of 5 dwellings would minimise the visual and environmental impact; and - No housing.	The Council has engaged with Anglian Water throughout the production of the VCHAP, both as a technical consultee and via the production of the Water Cycle Study (WCS) which forms part of the evidence base for the Plan. Anglian Water has not objected to the allocation of sites in Rockland and has advised that the small scale nature of development proposed will not have a significant impact on the existing infrastructure. A note regarding early engagement with AW has been included in the supporting text, as well as a policy requirement for the same. The Council is satisfied with the response of Anglian Water and does not consider this to be a soundness matter however comments relating to the water pressure within the village have been referred to Anglian Water for their review. AW have advised that improvements have been made to the network and that a development of this scale could be easily accommodated. With regards to comments about off-site flooding, in accordance with policy requirements the development will be required to provide on-site drainage solutions that do not exacerbate or contribute to existing flooding. Neither the Lead Local Flood Authority (LLFA), nor technical consultees concerned with ecological matters, have raised objections to the allocation of VC ROC1 and the Council is satisfied that this is not a soundness matter. Similarly, UK Power Networks has not raised an objection to the allocation of any sites within the VCHAP and due to the small scale nature of development proposed throughout the clusters it is not expected that connection to the electricity network will be an issue.	1223	No action required.

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VC ROC1, 29.16	2717, 2736, 2793, 2988	Object	Summary of representations received in response to paragraph 29.16: PRINCIPLE OF DEVELOPMENT - 21 houses already built opposite the site and only finished 2 years ago; - extension beyond the village boundary; - there is no other area in the line of houses which stretch for over a mile where there are open views of the river valley; - no precedent for housing in this location and development has been refused in previous plans; and - the revised single scheme of 1.47ha is more than the 1ha advised for small and medium villages (NPPF, para 69). LANDSCAPE AND VISUAL IMPACT - Destruction of the visual beauty of the rolling hill landscape and fails to meet Objective 3 - 'Protect the character of villages and their settings'; - the proposed site is situated on the brow of a hill, 18 metres above sea level, and can be seen for miles around - it is the only open view of the adjoining valley in the village and overlooks marsh lands, water meadows, RSPB reserves, conservation areas and fields; and - views back towards the hilltop will be obstructed and diminished and this is the only aspect from which the listed buildings can be seen. RESIDENTIAL AMENITY - Impact on the residents of Eel Catcher Close which have small gardens - properties enclosed by a busy road to the north and to the south by housing, loss of privacy and field views. MISCELLANEOUS - land to the rear of Eel Catcher Close is protected by a covenant.	Suggested changes submitted in response to paragraph 29.16: - remove site from the Plan; - 3-5 houses only adjacent to Eel Catcher Close (but not behind); and - reduction in number and type of houses proposed.	The Council is satisfied that none of the matters raised in the representations submitted in response to paragraph 29.16 relate to the soundness of the Plan. The issues raised repeat the concerns set out at VC ROC1 and a detailed response has been included by the Council in response to that section of the VCHAP, including matters relating to the covenant on the land. Please see that response for full details however below is a concise response to the other issues raised here. The Council is currently managing the release of land throughout the VCHAP area to meet the identified housing requirement and has clearly set out the objectives of the Plan. Para 69a of the NPPF notes the importance of sites up to 1ha in size for the more efficient delivery of housing but this does not preclude delivery of larger sites. Para 69 sets out a minimum requirement of 10% of sites being no larger than 1 ha which the VCHAP satisfies. The site has been considered in previous plans and was a shortlisted site in the 2015 Local Plan. This does not mean that the site was rejected, rather an alternative site was preferred for allocation at that time. Allocation of the site has been supported by a Landscape Visual Appraisal and there is a policy requirement for the scale, design and layout of the site to be informed by the production of a Landscape and Visual Impact Appraisal. This recognises the landscape sensitivities of both the site and the wider context and developers are expected to liaise with the Broads Authority to ensure that appropriate viewpoints are considered during the site planning process. With regards to the impact on Eel Catcher Close this would be assessed in detail at the planning application stage however the Council consider that through good design and layout the impact on the residential amenities of both existing and future occupiers will be acceptable.	1222	No actions required.

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VC ROC2, 29.17	2674, 2888, 2990, 3010	Object	Summary of representations received in response to paragraph 29.17: - The site is 1.33ha and larger than the 1ha set out in the NPPF for small and medium villages; - This development would choke the village and destroy its character; - Too many parked cars on The Street due to the shops, businesses, school etc and the pavement is too narrow with an adverse camber which is not suitable for wheelchairs; - Any increase in the number of parked cars will exasperate this problem of safety as well as compromising the amenity of residents due to noise, air pollution and the fact that driveways are not easily accessible; - Run off from the proposed houses could flood houses near the Beck and pollutants would destroy the Common Spotted Orchid; - The main drains can't cope; - The site is not visually contained from School Lane or St Mary's Close, the oldest part of the village; and - The massive increase in traffic pollution would effect the lives of residents.	Summary of changes proposed in response to paragraph 29.17: - Refuse this development; - Any development should be 1-2% of current housing. This proposal is a 16% increase of village . It would not be easily absorbed; - The housing should be linear in keeping with the village; - We need homes for first time buyers, bungalows for the elderly and social housing. Buy to let and second homes should be banned. We do not need anymore executive homes as we have plenty already in Bee Orchid Way; - Housing should be climate future proofed with solar, e.v sockets and heat pumps; and - Developments should be planned on sites that do not increase vehicle congestion and therefore danger in villages - particularly one street villages.	The Council has undertaken an extensive site assessment process which has included technical consultees, as well as the production of additional material to support the site selection process. Whilst the Council does not consider that the issues raised within these representations are matters of soundness the Council has been made aware that the site is no longer considered to be available for allocation at this time and it is therefore not being progressed within the VCHAP.	1250	No action required.

VC ROC2, 29.18	2335, 2675, 2686, 2848, 2851, 2889, 2900, 2961, 2991, 3006, 3035	Object	Summary of representations received in response to paragraph 29.18: - Access between nos. 24 & 26 is inadequate for a Type 6 road; - Highway bends for 3.5 miles from this access point; - Unclear how the footway from the proposed access road and 34 The Street would accommodate the adjacent pond; - Third party land is not available to create the required access and visibility splay; - Access [via the doctor's surgery] would be difficult because of close proximity to the only shop in the village; - Access would be difficult, especially when considering the main road through Rockland itself is narrow; - There would be too many cars entering and exiting from a very narrow point with many cars overtaking parked cars at the shop - traffic converges at this point; - VC ROC1 and VC ROC2 equates to a potential 250 vehicle movements daily and the village is already congested with school parking and bus routes through the village; - The vehicular access point creates new dangers and the increase of pedestrians on existing inadequate safe footpaths increases chances of accidents at dangerous bends and necessary crossing points; - Concerns also about the existing telegraph poles and highways signage that would also impede access; - Clarification needed for how agricultural vehicles will access the farmland, as well as for the protection of the orchid meadow; - Much is made of the linear shape of the village and this development would be in keeping, however it will impact enormously for houses which border the site and alter the character significantly; - Any run off from a building site would run down the field towards the Rockland & Hellington Nature Reserve; and - The size of the development seems excessive for the village.	Summary of changes proposed in response to paragraph 29.18: - Demonstrate how the pond can be retained to address the loss of habitat; - Reduce the number of houses, or remove from the Plan completely; - Two lane road access plus addition of wide pavements, to be as safe as possible for pedestrians and vehicles; - More appropriate sites should be found for the Plan; -	Throughout the preparation of the Plan the Council has liaised extensively with the Highways Authority and has also been in discussion with the site promoter to discuss access arrangements for the site. At the time of the final site selection the Council was reassured that a solution was available to create a suitable access to the site that would meet the highways requirements however the Council has subsequently been advised that this is not possible at the current time and the site is no longer considered to be available for inclusion in the VCHAP.	1251	No action required.

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VC ROC2, 29.19	2688, 2890, 2992, 3015	Object	Summary of representations received in response to paragraph 29.19: - Development of VC ROC2 would encroach on the wildlife using the ancient hedges and trees as their thoroughfare; - The site and its boundaries provide valuable habitats to a number of species - development here would decrease this biodiversity and conflict with NPPF 179; - The site is situated on the side of a valley with any water runoff due to development draining into Hellington Low Common and beck, an area of even greater biodiversity and a Norfolk Wildlife Trust county wildlife site; - Note NWT support for the site but query whether they have considered the site relative to the location of the site; - Development would not be visually contained for the residents of School Lane and St Marys Close - the Lane is not a back fill but a historical part of the village leading to the school and the church. All the properties on the Lane were built onto a field with field views - this would be lost alongside the historical pattern of the street; - Concerns have been raised regarding the extent of research undertaken to find out the ecological impacts in the event this site is approved for development; and - There is a listed traditional thatched building on School Lane.	Summary of changes proposed in response to paragraph 29.19: - Retain all hedges and trees so not to upset the wildlife; - Development should maintain the linear design of the village which is impossible at this location; and - Ensure extensive research is undertaken with due diligence.	The Council has considered the representations received in response to paragraph 29.19 and considers that all of the matters raised could be addressed through appropriate site design and mitigation at the planning application stage. However, at the time of preparing responses to comments received, the Council has been made aware that the site is currently no longer available for allocation and as such it is no longer being progressed through the VCHAP.	1252	No action required.
VC ROC2, 29.20	2962, 2993	Object	Summary of representations received in response to paragraph 29.20: - There is already too much extraction of freshwater either from rivers or abstraction in the area; and - The drainage and sewage systems are already under considerable stress and do not have the capacity to serve another 25/50 dwellings.	Summary of changes proposed in response to paragraph 29.20: - No development; and - Liaise with Anglian Water to ensure the systems are able to serve the community effectively including the increase in proposed dwellings.	The Council has engaged with technical consultees throughout the production of the VCHAP, including both the Environment Agency and Anglian Water. No objection was received from these consultees in response to the publication of the Regulation-19 version of the Plan and these matters are not considered to be issues of soundness. However, at the time of preparing this response that Council has been advised by the site promoter that the site is no longer available for allocation at this time and therefore the site is no longer being progressed through the VCHAP.	1253	No action required.

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VC ROC2, 29.21	2676	Object	The drainage and sewage systems in the village are already under considerable stress and there is not the capacity to serve another 25 and certainly not 50 houses if both developments were to go ahead.	Reduction in the number of properties.	The Council has engaged with technical consultees throughout the production of the VCHAP, including Anglian Water. No objection was received in response to the publication of the Regulation-19 version of the Plan and this is not considered to be a matter of soundness. However, at the time of preparing this response that Council has been advised by the site promoter that the site is no longer available for allocation at this time and therefore the site is no longer being progressed through the VCHAP.	1254	No action required

Policy VC ROC1: Land south of New Inn Hill	3130	Object	Having visual difficulties and having confirmed with a member of the MIND team the website fails to conform to the web accessibility legislation 2018. I and 8 neighbours in Eel Catcher Close have found the website impossible to navigate, impossible to register (no password code sent after email put in) and PDFs on the site will not magnify or indicate letters large enough. Eel Catcher Close would be enclosed by houses destroying access to fields. There is a covenant protecting the land behind Eel Catcher Close for social housing. We have just had 21 new houses built at Bee Orchid Way opposite and there is no excuse to exceed the village boundary.	Restart the consultation with a policy compliant website	The representation refers to accessibility issues with 'the website'. During the Regulation 19 consultation period, there were effectively three different websites in service to support the process – the South Norfolk Council website (which hosts the main Village Clusters Housing Allocations Plan web page), the web-based consultation platform which is hosted by JDi, and the virtual exhibition room which was developed on our behalf by AECOM. South Norfolk Council's website is supported by an Accessibility Statement (available to view at: www.southnorfolkandbroadland.gov.uk/accessibility). This page explains the accessibility (and limitations) of the Council's website. It states that the website is partially compliant with the Web Content Accessibility Guidelines version 2.1AA standard, due to certain specified non-compliances and exemptions. One of these specified non-compliances relates to the Village Clusters Housing Allocations Plan. This paragraph states: 'We have taken all the steps we can towards WCAG 2.1 AA compliance for the PDFs relating to the development of the Village Clusters Housing Allocations Plan. The 'South Norfolk Level 2 SFRA Hydraulic Modelling Report' is partially compliant due to non-text elements missing alternate text on page one (the cover page). This fails criteria 1.1.1 Non-text Content and 1.3.1 Info and Relationships. As we have fixed what we can on this document, we believe any further time spent fixing the remaining issue will be a disproportionate burden within the meaning of the Accessibility Regulations 2018.' The Council also has written confirmation from both JDi and from AECOM that both of their respective web platforms conform to the WCAG 21. AA standards. As referenced in the Accessibility Statement above, all PDFs relating to the Reg. 19 consultation were checked using the Adobe accessibility checker and any resulting errors addressed within the documents prior to publication. The only exception was the 'South Norfolk Level 2 SFRA Hydraulic Monitoring Report' document, referred to above, which was only partially compliant. PDFs could be magnified in the usual manner, using the '+ / -' or '%' zoom functions in the toolbar at the top of the PDF reader. The Council is aware that some individuals had initial difficulties in retrieving their	1514	No action required

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					registration email (automatically generated by the consultation system once an account has been created), but that (following discussion) this was subsequently to be found in their spam / junk items folder on their email server. The Council is not aware of anyone else who wasn't eventually able to create an account in order to take part in this consultation. In order to assist anyone who may have been facing difficulties, the Council Place Shaping Team's telephone number and email address was included on the website and in hard copy material in order that anyone who may have been experiencing difficulties could contact a member of the team and have their issues resolved. The Council has responded in full to site specific matters in its response to VC ROC1 (response no. 1214).		
Policy VC ROC1: Land south of New Inn Hill	3184	Object	Representation submitted by Historic England to VC ROC1: - 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 on the western end of the site. We welcome the preparation of the HIA. - We disagree that the impacts Old Hall Barn and Farmhouse will be negligible. The collection of farm buildings has a relationship to the wider landscape. There needs to be a degree of set back and open space in the far western portion of the site to reduce the impact on these listed buildings. This should be added as a new policy criterion. - The HIA also suggests that the footpath link near the barn would need to consider the relationship to the barn and use appropriate materials. This should be included in the policy at criterion 4 to read 'Careful consideration should be given to the relationship of the footpath to the listed barn and appropriate materials used'. - Bullet point 5 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 5 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	Add wording to criterion 4 to read 'Careful consideration should be given to the relationship of the footpath to the listed barn and appropriate materials used'. Add new criterion to read: 'The most western part of the site should be left open to protect and enhance the setting of the listed buildings.' Amend criterion 5 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	The Council notes that Historic England has not objected to the allocation of VC ROC1 and has continued to engage with Historic England about the detailed policy criterion that would be considered appropriate for this allocation, including a site visit to discuss the opportunities and constraints of the site. The Council is currently reviewing the HIA which forms part of the evidence base in response to these discussions in conjunction with the Regulation-19 policy wording and will consider modifications as appropriate.	1221	The Council will review the HIA and the policy wording for VC ROC1, as well as whether any alterations constitute main- or minor modifications.

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Policy VC ROC1: Land south of New Inn Hill	3250	Support	Summary of Anglian Water (AW) comments to VC ROC1: - Matters regarding cumulative/in-combination effects with the development identified in the GNLP may require the phasing of development within the catchment of Whitlingham WRC beyond the early years of the plan and this is addressed in the supporting text.	The small-scale nature of these allocations is unlikely to require phasing in respect of Whitlingham WRC and therefore the policy requirement can be removed.	The Council welcomes the support from Anglian Water to the wording included in the supporting text for Policy VC WIC1 and does not consider inclusion of a policy requirement for early engagement with AW to be a soundness matter. However, following the advice of AW, should the Inspector be minded to remove this policy requirement the Council would not object.	1220	The Council does not consider this to be a matter of soundness however following the advice of AW, should the Inspector be minded to remove this policy requirement the Council would not object.
Policy VC ROC1: Land south of New Inn Hill	3078	Object	Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy VC ROC1 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognise that underlain mineral resource has been included in the supporting text; however, we request inclusion of the text in the policy itself. The policy can be made sound by including the wording below, which was contained in the response by the Mineral Planning Authority, to the Regulation 18 consultation.	Amend Policy VC ROC1 to add the following wording as a policy requirement: 'The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'	The Council notes the comment of the Mineral Planning Authority but does not consider this to be a soundness matter. The Council has included within the supporting policy text reference to the site being underlain, or partially underlain by safeguarded resources and has highlighted the need for development to comply with the relevant policy within the Minerals and Waste Local Plan. It is not considered necessary to repeat this information within the site-specific text as all development is required to comply with the requirements of the Local Plan, which includes the Minerals and Waste Local Plan.	1219	The Council does not consider the issues raised within the response of Norfolk County Council Mineral Planning Authority to be soundness matters however should the Inspector be minded to modify Policy VC HAD1 the Council suggests the following addition to the policy wording: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority".
Policy VC ROC1: Land south of New Inn Hill	2454	Object	Summary of comments from the promoter of SN0531: - Site SN0531 included an area of land from the south of New Inn Road to land west of Lower Road, Rockland St Mary - the northern part has been included as part of allocation VC ROC1 however this representation relates to the omission of the part of the site not proposed for allocation; - The landowner disagrees with the assessment that the site does not lend itself easily to a reduction in size - the part of the site that fronts Lower Road, Rockland St Mary can be reduced in size and brought within the scope of the Village Clusters Housing Allocations Plan to accommodate up to 15 dwellings; - This may require an additional area of settlement boundary but there are other settlements that have their boundaries in different clusters, rather than contiguous; - The landowner considers that the assessment of a smaller site would be considerably different from the original site assessment with identified issues not as evident and more easily mitigated	Request that the Council consider the inclusion of the frontage land of site SN0531 in the Village Clusters Housing Allocations Plan for up to 15 dwellings.	The Council will undertake a desktop assessment and technical consultation to assess the suitability of the amended site. The Council notes the proposal for fewer dwellings on a reduced site. Whilst the amended proposals have sought to address some of the concerns raised within the assessment of SN0531, the Council remains concerned about the impact new development would have in this location on the local character of the area, as well as the impact on highway safety. The site would be detached from the existing Settlement Limit and the Council would need to be satisfied that the introduction of a new settlement limit in this location was appropriate. The site will be subject to a further assessment however the Council does not consider that the omission of SN0531 is a soundness issue relating to the VCHAP.	1218	An amendment to SN0531 has been promoted in response to VC ROC1. The Council will undertake a desktop assessment to assess the suitability of the amended site for inclusion in the VCHAP.

Policy VC ROC1: Land south of New Inn Hill	2652, 2720, 2844, 2849, 2866, 2878, 2885, 2891, 2910, 2916, 2921, 2928, 2932, 2933, 2936, 2940, 2989, 3001, 3008, 3013, 3017, 3028, 3050, 3102	Object	Summary of objections received in response to VC ROC1 (grouped by topic area): BIODIVERSITY & ECOLOGY - Various wildlife on the site including bats and badgers, as well as within the wider area; - Proximity of the site to Hellington Nature Reserve, Rockland Broad and an undesignated marshy field with Common Spotted Orchids; - Urbanisation will lead to greater surface water run-off, increasing flood risk and altering the chemical balance of the ecosystem, including the nitrate levels that drain into the Yare; - Mature trees and their root systems need protecting; - Site is a green buffer between denser housing in the village and housing pockets on the outskirts of the village and is a green space that creates an open, rural and tranquil landscape for people & wildlife; and - No mention of a Habitats Regulation Assessment. HIGHWAYS & CONNECTIVITY - Site access requires review as unsuitable for 25 dwellings - restricted visibility for emerging vehicles with access near to the brow of New Inn Hill, a blind bend and close to Green Lane. The 'amber' Highways score drastically underestimates the risk at the proposed intersection/ access point; - Site is over 1km from services and 1.5km from the primary school therefore encourages car use; - Pedestrian access and connectivity (including wheelchair access) to services is not achievable. The proposed footpath entrance would not connect to a footpath on The Street and is on a blind corner; - Increasing school numbers will increase parking issues associated with the school and new footpaths would not address the existing hazardous walk to school; - Site access is near to the brow of New Inn Hill, a blind bend and close to Green Lane; - Speed data demonstrates consistent speeding through the village; - Significant vehicular impact will result across the whole village; - New Inn Hill is part of Route 1 of the National Cycleway and Wherryman's Way national trail and	Suggested changes to VC ROC1 have been summarised below, grouped together by topic area: BIODIVERSITY & ECOLOGY - Mitigation should be required depending on ecological survey; - Protection of the trees and wildlife would need adopting by a developer; - Plan needs to consider an already threatened ecosystem and encourage biodiversity, rather than destroying or damaging fragile habitats; - How does it safeguard mature trees, wildlife hedging?; and - Long term as well as short term assessments of the impact on the local habitat/environment - especially where it is likely increasing the load on an already overloaded Broad i.e. Rockland Broad & Surlingham Broad; HIGHWAYS & CONNECTIVITY - Suitable access identified to the highway to prevent potential incidents; - Evidence concrete ideas for how to make footpaths and connections viable and safe for pedestrians; - How does it encourage residents at site to cycle or walk rather than drive into village?; and - Plans to improve travel links through the village and the link to Norwich for bikes, cars and pedestrians; AFFORDABILITY - Evidence affordability allocation for housing as well as evidence allocation priority for locals and, at least, Norfolk residents; - Provide information regarding social/affordable housing at the proposed site; and - All houses to be affordable. UTILITIES & INFRASTRUCTURE - Show engagement with Anglian Water to ascertain drainage plan and issues - existing settlements subject to water flooding; - Improvements to infrastructure required as part of plans - such as water & electrical supply to accommodate additional load on system; and	Due to the number of representations received the Council has grouped together its responses as set out below: BIODIVERSITY & ECOLOGY The Council recognises concerns about the impact of development on local biodiversity and ecology, particularly in relation to the development of greenfield sites, however it does not consider the concerns raised in these representations to be a soundness matter. The supporting evidence base for the VCHAP includes a Habitat Regulation Assessment (published within the evidence base), and technical consultees - alongside wider interest groups such as the Norfolk Wildlife Trust - were invited to comment on this allocation site at both the Regulation 18 and Regulation 19 stages of the plan production. The Council also engaged with the County Ecology team at the time of the site assessment, as well as with the Council's own ecologist in response to comments received at Regulation-19. No technical objections were received from these consultees in response to the proposed allocation of VC ROC1 in the REG-19 document. Comments relating to the off-site presence of Common Spotted Orchids have been noted and it has been confirmed that this plant is the most common of all the UK orchids with legislative protection limited to unauthorised picking only. Appropriate design and drainage both on and off the site, as well as Biodiversity Net Gain, will provide ecological mitigation for VC ROC1. As a separate matter, since the publication of the Regulation-19 version of the VCHAP, the Council has put in place a number of Provisional Tree Preservation Orders (TPOs) on trees adjacent to the eastern site boundary. As a consequence these trees are afforded additional protections. HIGHWAYS & CONNECTIVITY The site has been subject to assessment by NCC Highways as part of the site assessment process, as well as the formal consultation process at both the Regulation-18 and Regulation-19 stages of the process. Comments received from NCC Highways have been reflected in the site-specific policy wording. The Council has not received a soundness objection from NCC Highways in relation to this site and does not consider these representations to raise soundness issues.	1214	The Council is undertaking a review of the Heritage Impact Assessment and this will inform a modification to the policy as appropriate.

		the designated footpath is used by walkers and ramblers; and - Poor road, cycle and public transport links to and from the nearest employment areas and amenities. UTILITIES & INFRASTRUCTURE - Water pipe has frequent failures between the source and the village; - Current utilities infrastructure operates at capacity which will result in increased flooding, health hazards and increase problems - there have been several instances of sewage spillage in recent years near the site; - Surface water run-off down New Inn Hill is a concern; - UK Power Network have stated that there is no spare capacity for electrical supplies; and - Disruption resulting from required upgrades to the existing infrastructure (electrical, water supply and drainage). RESTRICTIVE COVENANT - The owners of The Old Hall are benefit to a Restrictive Covenant that clearly states that they will have a right of veto over any development. This was instigated with the sole purpose of protecting the Farmstead and its environs - the costs of implementing the restrictive covenant will need to be covered by the Council; HERITAGE IMPACT ASSESSMENT (HIA) & HERITAGE IMPACTS - The HIA is substandard and fails to consider the negative impacts on The Old Hall Farmstead; - Impact on views towards the heritage assets from the local footpaths; - The heritage significance [of the farmstead] lies in its architectural and historic interest as a group of agricultural buildings and associated farmhouse, typical of the region and periods, and their setting, which is rural in character and includes the agricultural land immediately adjacent to the farmstead to the South and East with which these buildings have had a long standing historical functional relationship. Development of VC ROC1 would be detrimental to an understanding of the historic significance of these listed buildings giving rise to substantial harm and is not recognised in the Council's HIA; - An externally commissioned Heritage Impact	- Impact assessment on flooding from additional run-off with realistic practical long term methods of mitigation. HERITAGE & HIA ISSUES - Development should not proceed due to the inadequacy of the HIA and failure to liaise adequately with Historic England's preferred assessment methodology; - At the very least the external HIA should be reviewed and adopted; and - Structural assessment of the effect of the footpath on the closest LB. FORM & CHARACTER OF DEVELOPMENT - The height, number and location needs to be identified to prevent impact on Yare valley views and surrounding valleys; - No development of this size should be considered in the village in order to preserve the existing character of Rockland St Mary; - Smaller scale development to mirror the development at Eel Catcher Close and share an access; and - Development to be in linear form only. MISCELLANEOUS - Provide the outcome of the 'amber' flag issues raised at Regulation 18.	As a point of clarification, it would appear from some comments submitted that a minority of respondents believe that vehicular access to the site would be obtained via the footpath to the west of the site. This is incorrect and the site benefits from direct road frontage access along New Inn Hill. The connectivity of the site to existing facilities and services has been considered during the site assessment process and has been found to be acceptable. The VCHAP recognises the challenges of regular public transport links within a rural environment, however Rockland benefits from a reasonable bus service that operates between Claxton and Norwich from Monday-Saturday. The connections between the site and the existing pedestrian footpath network are recognised. Due to the limited scale of development proposed it is not considered that the allocation of this site will have a significant impact on existing traffic movements through the village. Whilst the Council acknowledges these local concerns, the Council does not consider them to be issues of soundness. LANDSCAPE & VISUAL IMPACT The site allocation process has been supported by the preparation of Landscape and Visual Appraisals which form part of the evidence base. The Council has recognised the sensitivities of the landscape to the east of the village, most specifically the proximity of the site to the Broads area. The Broads Authority have not raised an objection to the allocation of the site and the request for a Landscape and Visual Impact Appraisal (LVIA) to be prepared as part of any planning application on the site has been incorporated into the site specific policy requirements. This LVIA will help inform the design, scale and layout of the site, as well as the associated landscaping requirements. The policy also requires specific consideration to be given to the landscaping of the boundaries of the site, in particular the mature TPO trees. Comments referring to a refused planning application (2017/0638) and in particular the landscape reason for refusal have been noted. This application proposed a new dwelling to the north of New Inn Hill, opposite the allocation site. Whilst the Council is aware of the local concerns about the perceived inconsistency between the consideration of the landscape between the proposals, the Council is currently managing the release of land to meet an identified housing need, rather than reacting to a		

		Assessment has objectively concluded ‘the assessment of South Norfolk District Council to date has not adequately appraised of recognized the significance nor potential impact on these statutorily designated heritage assets’; - The HIA has wrongly located 134B building and an adjoining building, siting them as on the road frontage, when in fact they immediately adjoin the western site boundary. 134B is entirely outward looking onto the proposed site. Given that the visual and physical relationship with these building and the site has been completely incorrectly interpreted, the impact appraisal from the council cannot be relied upon. The HIA refers to List Entry 1050429 as Old Hall Barn. This property is not Old Hall Barn but Tall Barn; - Deeds to all properties contain covenants stating that residential development cannot ensue without consent of the owners of The Old Hall. These restrictions in themselves highlight the strong historical connection between the farmstead and its setting; and - The Introduction to the Heritage Impact Assessment states that Grade II listed buildings are classed as having “Medium” significance. This does not correspond with their conclusion that the impact of any development would be “neutral”. By definition, a Grade II listed building is one which “is recognised as being of national importance” and statute dictates that the setting of that building is integral to its heritage value; LANDSCAPE AND VISUAL IMPACT - Rural landscapes will be undermined, impacting on the character of the village in conflict with Objective 3 of the VCHAP; - Site assessment focuses unduly on the landscape from The Street but not from other vantage points in the village; - Development will be seen for miles around and be detrimental to the existing landscape and open skylines; and - Existing linear pattern of development with housing having open access to fields behind. MISCELLANEOUS - Impact on the success of the holiday cottages opposite the site, both during construction and as a result of the change in the outlook, as well as the wider impact on tourism and visitors to the Broads area; - Eel Catcher Close was an exception site and		speculative proposal. The Council recognises that there will be an effect on the landscape but considers that this has been addressed by the policy requirements and does not consider this to be a soundness matter. HERITAGE & HIA ISSUES The Council is aware of the concerns that have been raised in relation to the HIA prepared to support the allocation of this site. The Council has continued to engage with Historic England, including through an on-site meeting, following the publication of the Regulation-19 Plan and is currently reviewing the HIA to respond to these discussions. For clarity, the Council confirms that it also engaged with Historic England during the preparation of heritage assessment procedures (including agreeing a site assessment criteria), and that the HIAs were prepared in conjunction with the Council's own Design and Heritage Officer. MISCELLANEOUS The Council notes the additional objections raised to the proposed allocation of VC ROC1 but does not consider any of them to raise matters of soundness. The objectives of the VCHAP are clearly set out at the start of the Plan, as is the scale of development proposed within the village clusters. Development within Rockland is considered to be of an appropriate scale, reflecting the availability of existing services and facilities, without having a significant impact on them. Development delivered as part of the VCHAP will be expected to deliver a policy compliant level of affordable housing in accordance with the requirements of emerging GNLP Policy 5. To support the allocation of sites developers have been asked to confirm the viability of sites, including the delivery of appropriate levels of affordable housing. The Council has also undertaken a broad viability assessment to support the VCHAP. This is available to review within the evidence base supporting the Plan. The sensitivity of the adjacent Broads area is recognised and has been addressed within the policy wording. It is not considered that development of the scale proposed will have an adverse impact on overall tourism and visitors to the Broads, and any impacts arising during the construction phase will be of a temporary nature only. Comments relating to the adjacent development at Eel Catcher Close are noted.		

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			assurance was given of no further development; - Refusal for planning applications in this area (2017/0638) - this should be considered as a precedent for development and this development would have a greater impact on the character and landscape; - Impact of further development on the existing medical facilities; - Potential for further development in the future; - Loss of agricultural land; - Proposed development combined with recent development will see an increase in the village of 20% which is far more than necessary in a rural village and disproportionately large for the cluster; - Appearance and physical impact of the proposed footpath to the west of the site in terms of privacy and risks to the structural integrity of the building; - The plan has changed since the original call for sites; - Previous objections have been ignored – the combination of sites makes no sense to the objections received; - It will destroy the only breathing space where all the villagers walk their dogs; - We villagers have had enough of large developers trying to cash in on rural landscape; - VC ROC2 is more centrally located for the school, shop and GP surgery; and - The consultation process needs to be re-started with a new compliant website.		Reference to the precedent set by the development of this earlier exception site refers to the landscape impact and the development on the ridge of New Inn Hill, rather than the general principle of development outside the settlement limit. To clarify, VC ROC1 abuts the settlement limit which includes Eel Catcher Close, and if allocated the settlement limit will include this site in the future.		

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Policy VC ROC2: South of The Street	2650, 3134, 3186	Mixed	Comments received in response to VC ROC2: - Welcome policy wording for hedgerows/ trees; - The existing GP Surgery access is not sufficiently wide to enable it to be upgraded to an adoptable standard estate road. Visibility splays and footway improvements would also be necessary to enable safe access; these safety improvements require third party land, resulting in an undeliverable allocation; - Access between 24 and 26 The Street may be appropriate subject to suitable design. However, there is concern that suitable visibility splays may not be achievable within highway and may require third party land resulting in an undeliverable allocation; - The Highway Authority would request that ROC2 is removed from the draft plan; and - An HIA should be prepared for this site site to justify its inclusion in the VCHAP.	Summary of changes proposed to VC ROC2: - The Highway Authority would request that ROC2 is removed from the draft plan.	The Council recognises both the supportive comments, as well the concerns raised by consultees in these representations. At the time of preparing this response the Council has been made aware that the site is no longer available for allocation as part of the VCHAP. The Council considers therefore that no further action is required at this time regarding VC ROC2.	1249	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC ROC2: South of The Street	2337, 2855	Support	Summary of representations submitted in support of VC ROC2: - The site is considered to be suitable and deliverable; - Development would be in close proximity to an established community and be sustainable in accordance with the NPPF; - Rockland St Mary is an appropriate location for growth due to its current provision of services and amenities; - The site is viable and deliverable and will provide a mix of dwelling types and sizes to meet local need; - Vehicular and pedestrian access from The Street to VC ROC2, together with the connections to services, will be provided by way of a new adopted road to be constructed on the existing field access between 24 and 26 The Street. A new pedestrian footway will also be provided along the southern edge of the Street to connect into existing footways outside 34 The Street; - FW Properties believe that the site specific requirements attached to this draft allocation can all be fulfilled; - FW Properties' intend to progress the development of these new homes as soon as possible but the timing is likely to be dictated by our discussions with Anglian Water and their proposed improvement works to the Whitlingham Water Recycling Centre; - The proposed dwellings are desperately required in the village due to the shortage of affordable housing stock being faced at present; - The village lacks homes up to £300k which is pricing local people out of the area; - The Council need to ensure a mix of affordable housing (not shared ownership) to address this issue;	No changes proposed in response to VC ROC2.	The Council welcomes the comments of support for the site, in particular the general support for additional housing to address a shortfall of affordable housing within the village. This response highlights one of the key matters the VCHAP is seeking to address through its distribution strategy, in accordance with the objectives set out at the start of the Plan. Affordable housing will be required at 33% on each site in accordance with the emerging policies set out in the GNLP. Notwithstanding this observation however the Council has been made aware that this site is no longer considered available for delivery at this time and the site is no longer being progressed through the VCHAP. The Council is currently exploring alternative sites and/or options to address this.	1248	No action required.
Policy VC ROC2: South of The Street	3251	Support	Anglian Water agrees with the approach taken regarding the site allocation policies for [Rockland St Mary] where matters regarding cumulative/in-combination effects with the development identified in the GNLP may require the phasing of development beyond the early years of the plan, are addressed in the supporting text and therefore a policy requirement is not considered necessary.	The small-scale nature of these allocations is unlikely to require phasing in respect of Whitlingham WRC and therefore the policy requirement can be removed.	The Council welcomes the comments of Anglian Water however this site is not currently considered to be available for allocation within the VCHAP (see the Council's response to VC ROC2). If this situation changes the policy text could be updated to reflect these comments should the Inspector be minded to accept this as a modification to the policy requirements.	1246	No action required.

Policy VC ROC2: South of The Street	2283, 2395, 2399, 2597, 2639, 2668, 2687, 2710, 2727, 2847, 2864, 2886, 2901, 2907, 2908, 2913, 2926, 2994, 2995, 3014, 3019, 3023, 3046, 3047, 3048, 3109, 3114	Object	Summary of representations received in response to VC ROC2. (For ease of reference these have been grouped by topic): HIGHWAYS - Concerns that the access is insufficient for the proposed development and does not allow for two-way traffic and pedestrian access – a Type 6 road is not achievable; - Difficulties in turning right out of the development, particularly with the existing on road parking of customers for the shop and post office and that the resultant increased traffic joining/using The Street is detrimental to the safe-crossing of school children, the elderly and disabled people; - During school pick up and drop off times the traffic flow is particularly congested. The pavement is heavily used by pedestrians and in these peak times particularly parents, buggies and children. If you add a further junction with a further flow of traffic you will significantly increase the risk of accident and injury and likely cause an accident black spot to the village; - Development of VC ROC2 will encourage the development of SN5039 which will be a direct danger to school children, the elderly and disabled people; - The footpath that runs through the village is narrow and less than the Disability Act and The Highways Act requires. No footpaths on site side of the road and no opportunity to create any; - Increased commuting and travel pressures would contribute to the use of less sustainable transport methods; - The Street is a major thoroughfare with a regular local private bus service to Norwich city which adds to traffic flows at peak times; - Traffic mitigation could be achieved by reducing number of housing units to 8-10 but highway access and new footpath requirements remain unachievable as they cross significant third party private property and road signage, telegraph poles; and - We can confirm our clients are not willing to sell the third party land needed and therefore the required access and visibility splays cannot be achieved and the site is not deliverable or developable. LANDSCAPE & ECOLOGY - Negative impact on both the climate and wildlife,	Summary of changes proposed in response to VC ROC2: - Improved access arrangements to the site given the existing traffic flow in the area; - Change the plan to reject all the sites to the south of The Street and New Inn Hill since they constitute a danger to school-children, the elderly and disabled, and environmental pollution through increased traffic, joining and using the Street, whilst irrevocably destroying a far more beautiful long-view than any of the northern sites, which have been rejected on such grounds; - Southern sites will destroy natural habitats which promote biodiversity, including the Common Spotted Orchid which grows wild in this southern valley but not on land adjoining northern sites. If northern sites have been rejected on panoramic/environmental grounds, then the plan must be changed to reject all proposed and revised southern sites too; - Development not to proceed in this location; - Significantly reduce the number of proposed dwellings on the site – more than 10 would be disproportionate; - The scale of development and impact on the landscape needs to be reconsidered to meet Objective 3. Landscape and heritage concerns shouldn't only consider the primary linear development but also wider views and footpaths; - The Plan should address NPPF Annex 2 requirements for affordable housing; - Planning in a climate crisis must be designed to ensure transition to carbon neutral and lowering carbon footprints - this plan shows problems in walking and footpath connectivity that cannot be resolved; - There is no information about low impact energy provision and eco building credentials - again a must as per NPPF undertaking on Climate mitigation; - Developers should set out plans for green infrastructure and landscaping mitigation at this early stage - planting of trees, cycle and walking friendly infrastructure, drought tolerant planting, local community food growing allocations for localism plans and food security; - Developers should be obliged to set out specifically how they will engage with third parties for access, pathways, disabled access etc;	The Council has considered all of the issues raised in response to the proposed allocation of VC ROC2 and remains of the opinion that the scale, form, landscape and townscape, ecological and amenity matters raised can be addressed appropriately through a planning application. However, the Council has been made aware that the site is currently no longer available for allocation and it is therefore no longer being considered as part of the VCHAP at this time.	1245	No action required.

			including concerns about the presence of the Common Spotted Orchid in the valley directly adjoining sites south of The Street; - Development will adversely affect the long view and the appearance of the village – northern sites have rejected for this same reason – including from Public Rights of Way; - Loss of hedgerows, green space and habitat; - Changes to groundwater and surface water flows could adversely affect downstream ecosystems and designated sites; - The site assessment focuses unduly on landscape from 'The Street' but not from other vantage points in the village, fields and valley; - Development within the District and County must be balanced against environmental protection; and - Proposed density of housing will increase surface water flood risk and increase flows to Hellington Beck. TOWNSCAPE - The proposed allocations are not sympathetic to the intrinsic character of the area or local communities and thus would conflict with the underlying rationale of the NPPF and Policy DM1.3; and - SN2064REV / VC ROC2 would introduce an estate like pattern of development to the centre of the village which has retained its historic linearity and character. Allocation of SN2064 /VC ROC2 would not only detract from the linearity of the village would restrict the views to the south that typify the area. MISCELLANEOUS - Development would be outside the settlement limit and exceeds 1ha in size. Proposed developments at Rockland St Mary are disproportionate to the size of the cluster and therefore does not comply the NPPF requirements for housing allocations to reflect the pattern and scale of the overall plan; - The proposal fails to protect the historic character of the village in terms of position and density. The proposal does not relate well to the existing built environment and does not represent a logical extension to the settlement; - No consideration given to the need for farm machinery to continue to access the field - currently access for farm vehicles is between nos.	- The NPPF guidance suggests 1 hectare maximum for a site for small scale rural housing development. The sites should not exceed this guide amount; - Given the harm identified and the fundamental access constraints it is clear this proposed allocation is unsound and alternative sites should be considered in place of this site, which respect the existing character of development within Rockland St Mary; and - Reassess SN5039 as an alternative site to VC ROC2.			

			24 and 26 The Street; - 25 dwellings is too high for the village - a smaller number would be appropriate for a village of this size. Meeting national housing needs is not to come at the cost of local communities; - Affordable/social housing must be the most important addition to the village, not large expensive houses but no evidence has been provided to demonstrate the provision of this; - The promoter has not provided any evidence of viability. The purchase of additional land to facilitate the required access and visibility splay would impact on the viability of such a scheme and whether critical elements of such a scheme, such as affordable housing requirements are deliverable as part of the development - this also justifies the rejection of this proposed site; - Existing pond is within the proposed access splay - how will this be retained?; - Loss of prime agricultural land that is currently in use. The agricultural land classification should be confirmed; - Concerns about the proposed increases in traffic fumes and noise pollution; - Departure from the NPPF re working to transitioning to a low carbon future; - Level of growth proposed exceeds the identified level of sustainable growth for Rockland St Mary risking the character of the area and quality of life for residents; - Now housing provision must be planned around infrastructure and service capacity along with an overarching protection of the landscape and the environment. The HELAA scores rank services and facilities on proximity not capacity and is therefore not indicative of whether there is sufficient service capacity to serve the level of growth proposed; - It is difficult to see how a sympathetic application can come forward on a site that is unsympathetically located and with proposed density that could only be achieved with a layout uncharacteristic of the area; - Risk of overlooking, loss of privacy and potential for noise and disturbance for existing and future occupiers, including from traffic movements alongside the private areas of the properties adjacent to the access track; - Negative impact on residents of The Street and School Lane who have always enjoyed an open				

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
			landscape to the south; - It will create a precedent for backland areas and open up access to continue to build behind properties creating townscape concerns; - What infrastructure is there for sewage/ water drainage of the site? Concerns expressed about surface water flooding on the site, in particular the proposed access track as well as the sewers that cross the site and are likely to have protective easement zones either side; - An alternative site (SN5039) is available for allocation and should be an alternative to VC ROC2; and - Impact on an existing owl sanctuary which is adjacent to the site.				

30. Roydon

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Diss and District Neighbourhood Plan, 30.1	2882	Support	Diss is not a settlement forming part of the South Norfolk Village Cluster mentioned in 30.1 above. See Statement of Representations Procedure which states that it is NOT a Village Cluster parish. Perhaps it should omitted for consistency.	No changes proposed.	For clarity, Diss has not been included within the VCHAP (due to the scale of the settlement Diss is considered by the Greater Norwich Local Plan). The Council considered it appropriate to include all settlements covered by emerging Neighbourhood Plans within the VCHAP for clarity and consistency but has not allocated sites in settlements which are subject to allocations within advanced Neighbourhood Plans. The Council considers that the supportive text is clear about the role of the DDNP in allocating housing sites within the villages included within the Neighbourhood Plan. This is not considered to be a soundness matter.	1197	No action required.
Diss and District Neighbourhood Plan, 30.4	2902, 2929	Object	A minimum housing requirement of 25 homes for the Burston, Shimpling and Gissing cluster, 25 homes in the Roydon Cluster and 50 homes in the Scole Cluster is identified in this Plan. This reflects the proposed allocation within the submitted Diss and District Neighbourhood Plan. In Roydon the unsuitable site (GNLP0526) was first put forward by the DDNP Steering Group. On rejection, Roydon Parish Council commissioned a second residents' survey on an assumed pretext that 25 homes were 'non-negotiable' from the GNLP process. This subsequently led to the site DDNP8 being offered by a developer. Thus, this specific site has been proposed, not by residents but by misguided coercion, irrespective of any allocation of 25 homes in Roydon that might eventually contribute to the GNLP requirement for the South Norfolk Village Clusters. Other sites within Roydon Parish have been included within allocations to Diss (including Roydon)	No changes proposed.	The Council notes the concerns raised within this representation but does not consider that the VCHAP is the appropriate forum in which to raise them. The Neighbourhood Plan Steering Group for the DDNP has been responsible for identifying, assessing and allocating sites within their area (in accordance with the overall housing requirement provided by South Norfolk Council). It is not unusual for an authority to repeat a 'Call for Sites' exercise to identify appropriate land for allocation however any concerns about the process undertaken as part of this should have been raised as part of the recent DDNP examination. The DDNP steering group and the qualifying body are currently waiting for the Inspectors report to be issued.	1198	No action required.
Settlement Limit, 30.10	2977	Object	The Settlement Limit for Roydon is fully supported. However, it is contrary to the Proposed Diss & District Neighbourhood Plan, which proposes development outside the Settlement Limit. The Settlement Boundary for Roydon is only supported on the basis that land is not allocated within the Diss & District Neighbourhood Plan that is contrary to the objectives of the Settlement Limit i.e. to maintain the separation of Roydon and Diss. Failure to do this would result in the Plan being unsound on the basis that it does not represent an appropriate strategy and, therefore, is not justified.	Confirmation needs to be provided that development outside the proposed Settlement Limit for Roydon that will contribute to the coalescence of Roydon and Diss will not be supported.	Roydon is included within the Diss and District Neighbourhood Plan (DDNP) which is at an advanced stage and is currently at Examination. The Local Authority and the qualifying body expect the Inspectors report to be issued imminently. The Council does not consider it appropriate to comment on the content of the DDNP as part of this process and has included the settlements covered by emerging Neighbourhood Plans for clarity and consistency purposes only. The Council does not consider the matter raised to be a soundness issue for the VCHAP and is of the opinion these comments relate to the DDNP rather than the village clusters plan.	1196	No action required.

31. Saxlingham Nethergate

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Settlement Limit, 31.4	2831, 3179	Support	The settlement limit has been sensibly drawn to allow modest infill and extension and we find this to be sound.	No changes proposed.	The Council recognises this support for the settlement limit. For clarification, the Council has not (and is not) proposing any alterations to the existing settlement limit at Saxlingham Nethergate and the site to which this comment relates (SN4007SL) is already within the settlement limit. There is no intention to amend the settlement limit in order to remove this site.	1195	No action required.

32. Scole

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Settlement Limit, 32.10	3200	Support	We [Hopkins Homes] are aware that the proposed site allocations for Scole are being deferred to the emerging Diss & District Neighbourhood Plan, and in this regard, we are engaging with both Scole Parish Council and the Neighbourhood Plan Steering Group to discuss potential development options on land east of Norwich Road. Whilst the Neighbourhood Plan is making clear and positive progress, in the event that circumstances changed and the Neighbourhood Plan did not progress as expected, the site could form part of the emerging South Norfolk Village Clusters Housing Allocations Document, with the settlement limit for the village extended to encompass the totality of this site.	Whilst the current omission of the site from the South Norfolk Village Clusters Housing Allocations Document is not considered to make the Document unsound, in the event that circumstances change and the Neighbourhood Plan is not progressed as expected, the site could be proposed as an Allocation within the emerging South Norfolk Village Clusters Housing Allocations Document, with the settlement limit for the village correspondingly extended to encompass the totality of this site.	The village of Scole is included within the Diss and District Neighbourhood Plan (DDNP) which is currently at an advanced stage and is currently at Examination. The Local Authority and the qualifying body expect the Inspectors report to be issued imminently. The Council does not therefore consider it either necessary or appropriate to include sites within the DDNP area within the allocations in the Village Clusters Housing Allocations Plan. The Council acknowledges the comments of the site promoter for land in Scole, as well as the engagement that they have entered into with both the Parish Council and the Neighbourhood Plan Steering Group. The ongoing support of site promoter for the site is recognised.	1194	No action required.

33. Seething and Mundham

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Seething, 33.5	3210	Support	Otley Properties also SUPPORTS the proposed Settlement Limit extension west of Seething Road to include existing development as well as site refs: SN0406SL, SN0587SL and SN0588SL.	No changes proposed.	The Council notes the support of the landowner for the inclusion of these smaller sites within the settlement limit for Seething. The Council recognises the importance of the smaller sites for delivering small-scale infill development within existing settlements throughout the VCHAP area.	1193	No action required.
Seething, 33.5	3187	Object	Summary of comments received from Historic England in response to paragraph 33.5: - Part of this land is either within or adjacent to the Seething Conservation Area with LBs opposite; - HIAs have been completed for two of the three sites - an additional HIA should be prepared for SN0588SL; and - It is unclear how recommendations in the HIAs will be carried forward as there is no site specific policy text for settlement limit extensions.	Prepare an HIA for SN0588SL.	The Council has not prepared an HIA for SN0588SL as the inclusion of this site within the settlement limit is simply regularising an existing development that has subsequently been granted planning consent and substantially completed. In common with all infill/ windfall development matters relating to the heritage impact of development in this location will have been assessed at the planning application stage. The Council opted to undertake HIAs for those settlement limit extension sites it considered to potentially fall within sensitive areas (in terms of heritage impacts) however proposals on these sites will be assessed in more detail and most appropriately when the detailed design of the site is known at the planning application stage. The Council does not consider it necessary to include detailed policies within the VCHAP for settlement limit extensions, and considers that an assessment of detailed proposals at the planning application stage against the current Local Plan policies is the most appropriate route for consideration of site specific matters for these smaller sites. The Council does not consider that either of these matters are soundness issues.	1192	No action required.
VC SEE1, 33.9	3091	Support	Norfolk County Council notes that the South Norfolk Village cluster plan has included supporting text regarding safeguarded mineral resources where sites are under the threshold of 1 ha and therefore the Minerals and Waste Policy CS16 (or any successor policy) does not apply. Therefore, the support text referring to "The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan" can be removed.	Remove "The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan" from the supporting text.	The Council does not consider this to be a soundness matter however should the Inspector be minded to modify the Plan the Council would not object to the removal of paragraph 33.9 from the supporting text in the Seething and Mundham chapter of the VCHAP.	1191	The Council does not consider this to be a soundness matter however should the Inspector be minded to modify the Plan the Council would not object to the removal of paragraph 33.9 from the supporting text in the Seething and Mundham chapter of the VCHAP.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC SEE1: West of Mill Lane	3236	Support	We support the clause regarding the need to address our infrastructure both within and close to the proposed allocation. We suggest that the wording of the clause is amended to address the need to engage with us regarding these matters and the requisitioning of a new sewer connection which should appropriately address the necessary matters for this site in terms of ensuring our own assets are protected and the necessary infrastructure requirements can be assessed.	Modify policy text to read: Early engagement with Anglian Water regarding their infrastructure on and adjoining the site and connecting to the local water recycling network.	The Council welcomes the comments of Anglian Water regarding this allocation and notes the suggested amendments to the the site-specific policy. The Council does not consider this to be a matter of soundness, rather a matter of clarity, however should the Inspector recommend an update to the policy text to reflect the comments of Anglian Water the Council would be supportive.	1190	The Council does not consider this to be a soundness issue however if the Inspector is minded to modify the policy the Council suggests the following wording: "Early engagement with Anglian Water regarding their infrastructure on and adjoining the site and connecting to the local water recycling network."
Policy VC SEE1: West of Mill Lane	3209	Support	The Landowner/Developer (Otley Properties) SUPPORTS the proposed allocation of their land at Seething (SEE 1). The Landowner/Developer confirms that the land is available for and suitable for development and are committed to bringing the site forward for residential development as soon as possible. A Site Promoter Confirmation of Availability, Deliverability and Viability is appended to this submission. Otley Properties also SUPPORTS the proposed Settlement Limit extension west of Seething Road to include existing development as well as site refs: SN0406SL, SN0587SL and SN0588SL.	No changes proposed to VC SEE1.	The Council welcomes the continued support of the landowner for the allocation of VC SEE1, and notes the submission of a detailed Promoter Engagement Form which includes confirmation of the site's viability as well as the anticipated timescales for delivery on the site. The Council is reassured of the delivery of this site through the VCHAP.	1189	No actions required.

34. Spooner Row and Sutton

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Settlement Limit, 34.3	3016	Object	Map 17, the development boundary in School Lane adjacent to the playing field (SPO3) was created in the current Local Plan for new houses but it continues to have serious highway safety issues for pedestrians and flooding on the highway and surrounding land. The SPO3 site was historically, and still is a drainage field. Was this site ever sound and viable in the first place for extending the settlement boundary? The description says School Playing Field; it is the Village Playing Field and held in trust by the Community Council for residents. The school is granted use of it only.	Reassessment of the proposed settlement boundary due to the long-term safety issues at SPO3. Correction to reflect that it is a Village Playing Field.	The Council believes that the reference to map 17 relates to the adopted 2015 Local Plan Site Specific Allocations & Policies DPD map locations (nb. the correct reference would be map 18 for Spooner Row). Site specific matters relating to VC SPO3 and its status as a carried forward allocation within the VCHAP have been dealt with in detail in response to representations received to Policy VC SPO3. The Council does not consider the matters raised in this comment to be issues of soundness but would accept a correction to the description of the playing field in paragraph 34.3 should the Inspector be minded to amend the text in response to these comments.	1188	If the Inspector is minded to update the comments to reflect the description of the playing field the Council would accept a correction to paragraph 34.3 so that it reads: "The Settlement Limit has been drawn to include the main built form of the settlement but excludes the playing field." This is considered to be a factual correction rather than a matter of soundness.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC SPO1: Land west of Bunwell Road	2599	Support	Part of land off Bunwell Road has been proposed as a draft housing allocation for 15 dwellings (Policy VC SPO1: Land west of Bunwell Road). Fully support the allocation of this site for housing; however the site could accommodate up to 45 homes and the council's own evidence demonstrates a larger allocation is appropriate. Spooner Row is a sustainable settlement which benefits from key services meaning the village can accommodate growth and indeed new housing is essential if the village is to thrive. Previous site allocations have had mixed success and may not meet needs. The council's own Sustainability Appraisal is clear that Spooner Row can accommodate a larger quantum of development and the site can sustainably deliver a greater number of homes than is currently planned. A larger allocation can deliver a wider range of benefits to the village such as the provision of more extensive open space, a larger quantum of affordable housing, greater highway improvements (such as footpath links), improvement to the existing watercourse, etc. Such benefits may not be realised from a smaller allocation and smaller planning permissions in the village have not unlocked any particular additional benefits locally. Conversely, a larger development on this site can provide measurable benefits for the community. The site could accommodate 45 dwellings while avoiding land within flood zones 2 and 3. The land is enclosed and would not merge the four existing groupings which form the existing character. The Landscape Visual Appraisal only considers the impacts of 15 dwellings. Therefore, whilst the allocation of the site is sound in principle the failure to allocate the site for a larger quantum of development is unsound as it is not positively prepared and does not deliver sufficient development in the identified suitable areas it is needed.	Despite the evident settlement sustainability and a need for new housing, the draft plan allocates the site for only 15 dwellings due to perceived townscape (clustering) and flood risk concerns. These representations demonstrate a larger development of 45 units can be delivered without compromising the existing flood zones or townscape.	The Council welcomes the ongoing support for the smaller allocation site in this location and acknowledges the ongoing promotion of a larger sites for an increased number of dwellings. Generally the VCHAP seeks to allocate sites of between 12-50 dwellings across the village clusters of South Norfolk in order to promote sustainable development in rural areas in accordance with paragraph 79 of the NPPF, with the focus being on smaller sites unless there is a benefit associated with the delivery of a larger site. Paragraph 34.5 of the VCHAP sets out the Council's reasons for choosing a reduced site for allocation in the VCHAP. A smaller scale of development limits the impact on the undeveloped gap between The Orchards, Queen's Street and Bunwell Road whilst maintaining a linear form of development which is characteristic of the area. Spooner Row has a total of 4 sites in the VCHAP, of which 2 are carried forward from the 2015 site allocations. The VCHAP must also have regard to the cumulative impact of these developments on the settlement, particularly in the context of the objectives of the VCHAP. The Council does not consider the issues raised to relate to the soundness of the Plan.	1474	No action required.
Policy VC SPO1: Land west of Bunwell Road	3237	Support	As the written justification and WCS suggest, there is limited capacity regarding future connections to our foul drainage network given that the existing WRC only serves a small number of properties in the settlement. The supporting text should emphasise that Spooner Row WRC is constrained due to the small number of properties it serves. Both policies should therefore reference early engagement with Anglian Water to address future connection requirements or the developer to consider alternative on-site treatment subject to the necessary permits.	Modify policy text to include the following criterion for consistency with similar site allocation policies where water recycling centres are particularly constrained: Early engagement with Anglian Water regarding connecting to the local water recycling network.	The Council has acknowledged the limited capacity at Spooner Row WRC in paragraph 34.9 of the supporting text, as well as the need for upgrades to this to support the allocations in Spooner Row. The Council does not consider the comments of Anglian Water to be a matter of soundness as developers are also advised to enter into early engagement with Anglian Water to address this issue. However should the Inspector be minded to append the additional text to paragraph 34.9 the Council would not object.	1187	The Council does not consider this to be a soundness matter however if the Inspector is minded to modify paragraph 34.9 of the supporting text the Council would suggest the following wording: "Spooner Row Water Recycling Centre (WRC) is small and consequently development of VC SPO2 may have a disproportionate impact on the WRC, which may require upgrades. Early engagement with Anglian Water is recommended to address connecting to the local water recycling network."

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC SPO1: Land west of Bunwell Road	3188	Object	Summary of Historic England representation to VC SPO1: - Any development of this site has the potential to impact upon the significance of The Orchards to the south. We appreciate that the property is well screened by existing landscaping; - We welcome paragraph 34.8 and the second bullet point of the policy in relation to strengthening boundary vegetation; and - Bullet point 5 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application.	Amend criterion 5 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	The Council welcomes the support of Historic England for the approach taken to the setting of The Orchards to the south of VC SPO1. The Council considers the policy to be sound. In terms of archaeology, the Council considers that bullet point 34.8 is sound. Policy VC SPO1 highlights the need for archaeology to be considered; however, the Council's experience is that the need for field evaluation prior an application being determined is rare and can be required under NPPF paragraph 194 if necessary.	1186	The Council does not a modification to the policy to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.
Policy VC SPO2: South of Station Road	3212	Support	The purpose of this representation is to: a) Support the continued allocation of the site for residential development and to confirm that Alfred Charles Homes Ltd are committed to working with the Council to deliver the aspirations as set out in draft Policy VC SP02; b) Object to the specific wording of the proposed policy and propose alternative wording and seek amendments to the text to ensure that the policy is justified and effective; and c) Respond to other policies of relevance to delivering our proposals, where comment is necessary. We believe that the draft VCHAP is basically sound, as the strategy proposed is essentially justified and effective and provides a range of sites by which growth can come forward. The site to the south of Station Road in Spooner Row, offers a very good opportunity to deliver growth in a manner that provides an appropriate to the sustainable objectives of the emerging VCHAP and NPPF. By undertaking this form of development on this site in a sustainable manner it would support the emerging VCHAP.	We wish to see the following changes to the wording of the policy: 1.67ha of land is allocated for at least 25 dwellings. The developer of the site will be required to ensure that: - Access from Station Road only with off-site highways works to include a pedestrian footpath along the site frontage or within the site and a crossing point to connect to Spooner Row Primary School; - Protection and enhancement of the trees and hedgerows on the east and west site boundaries and an appropriate boundary to the south of the site, which both contains the site and integrates it with the wider rural landscape; - Site Layout and design to include linear development facing Station Road frontage.	The Council has continued discussions with the site promoters of VC SPO2 following the publication of the Regulation-19 Plan having noted the disjointed responses submitted in response to this allocation. The Council has subsequently received confirmation that the full allocation site area has transferred back to the landowner and the developer (Alfred Charles) no longer has an interest in the site. The Council is advised that this allocation is now being promoted solely by the landowner. The Council does not consider the comments submitted on behalf of the site developer to be matters of soundness relating to the VCHAP.	1363	No action required

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Policy VC SPO2: South of Station Road	3238	Support	As the written justification and WCS suggest, there is limited capacity regarding future connections to our foul drainage network given that the existing WRC only serves a small number of properties in the settlement. The supporting text should emphasise that Spooner Row WRC is constrained due to the small number of properties it serves. Both policies should therefore reference early engagement with Anglian Water to address future connection requirements or the developer to consider alternative on-site treatment subject to the necessary permits.	Modify policy text to include the following criterion for consistency with similar site allocation policies where water recycling centres are particularly constrained: Early engagement with Anglian Water regarding connecting to the local water recycling network.	The Council has acknowledged the limited capacity at Spooner Row WRC in paragraph 34.17 of the supporting text, as well as the need for upgrades to this to support the allocations in Spooner Row. The Council does not consider the comments of Anglian Water to be a matter of soundness as developers are also advised to enter into early engagement with Anglian Water to address this issue. However should the Inspector be minded to append the additional text to paragraph 34.17 the Council would not object.	1183	The Council does not consider this to be a soundness matter however if the Inspector is minded to modify paragraph 34.17 of the supporting text the Council would suggest the following wording: "Spooner Row Water Recycling Centre (WRC) is small and consequently development of VC SPO2 may have a disproportionate impact on the WRC, which may require upgrades. Early engagement with Anglian Water is recommended to address connecting to the local water recycling network."
Policy VC SPO 3: Land at School Lane	3264	Support	We welcome the policy wording for hedgerows/trees in Policy VC ROC. We recommend that similar policy wording is applied to the policies listed below to ensure this approach is applied consistently across the Local Plan. Where removal of a tree or any part of a hedgerow is unavoidable, we recommend that policy wording includes reference to mitigation measures, reflecting the updated biodiversity duty required in the 2021 Environment Act to have regard to the enhancement of biodiversity. VC BB1, VC BRE1, VC HAL2, VC SWA2, VC NEE1, VC WOR2, VC NEW2, VC SPO3, VC TAS1, VC BUR1, VC WIN1.	No changes proposed	VC SPO3 includes reference to both the existing protected tree on School Lane as well as the retention, protection and reinforcement of existing hedgerows along the site boundaries wherever possible. The Council does not consider it either appropriate or necessary to repeat existing policy or legislation in site specific policies. The Council does not consider this to be a matter of soundness.	1364	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC SPO 3: Land at School Lane	3140	Object	Comments of the Highway Authority to VC SPO3: The current South Norfolk Local Plan includes this site as allocation allocation SPO 2. Requirement 2 of that policy states "Pedestrian refuge should be provided on the western side of School Lane to improve pedestrian access to the school. The Highway Authority would acknowledge that the site is an existing allocation and consent for 7 dwellings was granted as per 2016/0627. The current proposed policy VC SPO 3 includes a requirement to ensure "Off-site highway works to include improvements to the provision for pedestrian safety in the immediate area of the development site, details of which to be agreed with the Highways Authority and the LPA." The less specific policy requirement is noted. The ability of the development to provide suitable measures to make it acceptable to the Highway Authority has not been demonstrated. Notwithstanding the earlier allocation, in the absence of evidence to the contrary, it is considered that School Lane is substandard in nature, without scope for development to provide appropriate highway improvements. Should the existing permission expire, the Highway Authority would not wish to support re-allocation of site.	The Highway Authority would request that VC SPO3 is removed from the draft plan	The Council would re-iterate that existing planning consent 2016/0627 has been implemented and therefore the developer can continue to develop the site in accordance with the requirements of this planning permission. Within this context the Council considers the permitted scheme to be the fallback position for this site. It is therefore prudent to retain an allocation policy for this site within the VCHAP because of the limited implementation of the planning permission to date. In the event an alternative scheme is promoted on the site, retention of the allocation enables the Council to ensure that it does so in an appropriate manner. The Council would also note that the Highways Authority engaged in the planning process during the determination of the 2016 application, including in discussions about the alternative off-site highway options, as set out in the application documentation. The planning permission for the development of 7 dwellings on this site has been implemented and therefore can not expire, and the Council does not consider the comments of the Highways Authority to be a matter of soundness.	1182	No action required.

Policy VC SPO 3: Land at School Lane	2667, 2726, 2739, 2879, 2997	Object	The following is a summary of objections received to carried forward allocation VC SPO3. SITE DRAINAGE - Omission of the original SuDS requirement from this policy (as previously required in the original 2015 SPO2 allocation); - Attenuation pond opposite residential driveway, at the lowest point of the road; - Pond overflows into a blocked ditch; - Highway flooding is worse due to blockages in drains on third party land; - Existing drainage beneath the road can not cope during periods of significant rainfall resulting in the road flooding; and - Development of the field will increase surface water run off and the situation will worsen. HIGHWAYS - If the footpath can not be delivered due to the road width then it is questionable whether SPO2 was ever fit for purpose; and - An off-site pedestrian refuge does not provide safety for walking to school. GENERAL - No material change to School Lane in the intervening period	Summary of changes proposed to carried forward allocation VC SPO3: - Substantial drainage system to be included; - Attenuation pond to be moved to an area of the site with no properties opposite; - Pipe at the corner of the site needs to be unblocked; - Further capacity downstream is required; - Protection of the existing drainage ditches and retention of access for maintenance; - Retain earlier wording re. drainage and for the footpath for reasons of public safety;	As part of the preparation of the Village Clusters Plan the Council considered the existing allocations in the current Local Plan to determine whether they were suitable for inclusion in the emerging VCHAP. The Council is satisfied that VC SPO3 (formerly SPO2 in the 2015 document) remains a suitable allocation site. As part of this process the Council reviewed the planning history of the site, and also revisited the earlier site specific policy requirements. It should be noted that this site benefits from an extant planning permission for 7 dwellings (2016/0627), development having commenced on site and the first CIL payment having been received in March 2021. This planning permission is therefore recognised as a 'fallback position' for the site however the Council also considered it appropriate to reallocate the site as it has not yet been substantially developed and an alternative scheme could be submitted by a developer. As noted in the representations two site specific requirements were omitted from VC SPO3 and these related to drainage and highways matters. The Council therefore considers it appropriate to continue to guide the development of the site via an allocation policy. With specific reference to the SuDS the Council has reviewed the inclusion of this policy requirement within all carried-forward allocations. In recognition of this being a requirement of other local and national policies the Council determined that it was not necessary to replicate it in the site-specific detail of VC SPO3, in accordance with paragraph 16 (f) of the NPPF. Details of a water management scheme were agreed as part of planning application 2016/0627 and secured by planning condition. The maintenance of the existing ditches remains the responsibility of the landowner. The LLFA was invited to comment on the Regulation-19 consultation and did not raise an objection to VC SPO3. The Council also determined that it was no longer appropriate to require the provision of a pedestrian refuge on School Lane within the carried forward allocation. This decision was based upon the discussions that took place at the time of the 2016 planning application which ascertained that School Lane was of insufficient width to accommodate a refuge area. Various alternative options were discussed at the time of the application with representatives of the Town Council, the developer and NCC Highways Authority. A	1181	Should the Inspector be minded to, the Council would support an amendment to the wording of the policy introduction so that it reads "This site is expected to be built out in accordance with the existing planning permission 2016/0627 and subsequent variations" to address concerns of local residents. The Council considers this to be a minor modification only.

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					solution was reached and secured via the associated s106 agreement. In the event an alternative scheme is promoted, the Council has included a policy requirement for off-site highway works to improve pedestrian safety to be agreed with the Highways Authority and the LPA. This offers an opportunity for a replacement scheme to promote an alternative solution should this be achievable. The Council does not consider that the concerns raised are a soundness matter and considers VC SPO3 to have been updated appropriately to reflect the current position.		
Policy VC SPO4: Land at Chapel Road	3239	Support	For clarity and consistency, we would suggest that the wording in the policy is amended to refer to Anglian Water as the 'appropriate water authority' or sewerage undertaker.	Advice is sought from Anglian Water regarding the need for relocation of the existing nearby sewage pumping station, to facilitate maintenance.	The Council does not consider the proposed alteration to be a soundness matter however should the Inspector be minded to agree to the textual update the Council would support this.	1180	The Council does not consider the proposed alteration to be a soundness matter however should the Inspector be minded to agree to the textual update the Council would suggest the following wording: "Advice is sought from Anglian Water regarding the need for relocation of the existing nearby sewage pumping station, to facilitate maintenance".

35. Stoke Holy Cross, Shotesham and Caistor St Edmund & Bixley

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC ST01: Land north of Long Lane	2542	Object	The following is a summary of the Parish Council representation submitted in response to Policy VC ST01: - Infrastructure within the village has required upgrades (specifically a need for a replacement village hall) and not enough investment has been received from recent development in the village to facilitate this. The PC has obtained planning permission for replacement hall, which would include improved accommodation for the pre-school, but still requires substantial funds to enable these plans to be realised; - The PC accepts VC ST01 as a logical extension of the village but disagrees with the site assessment which includes the presence of the existing village hall as a justification for the allocation; - The policy requires updating to include a financial contribution towards a new village hall/ community facilities to replace the existing; - The developer who holds the option on the site has agreed a negotiated contribution to the PC of £370000 towards the replacement pavilion. The Parish Council has supported this land being allocated on the basis that the contribution above will be forthcoming via a 106 agreement as a condition of granting planning permission. The PC considers this requirement to accord with both the JCS and the NPPF; and - The Parish Council considers that Policy VC ST01 fails to meet these requirements by not addressing the negative impact that the resultant housing development would have on the existing community facilities in the village. It would therefore not deliver sustainable development and is unsound, unless modified to include a financial contribution to rectify this.	The Parish Council considers that there should be an additional requirement in policy ST 01 for a financial contribution to be made towards a new village hall/community facilities that would facilitate replacement of the existing Pavilion that is now too small, outdated, and unsustainable as a village hall serving Stoke Holy Cross.	The Council is aware of both the recent growth experienced at Stoke Holy Cross, as well as the concerns of the Parish Council about the adequacy of the existing community facilities. As noted in the Parish Council response, earlier developments within Stoke Holy Cross have provided proportionate contributions towards facilities within the village. The Council must be assured that all contributions within a S106 agreement accord with Regulation 122 of the CIL Regulations being a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development. The Council has not included a requirement for a financial contribution to be included within the site-specific policy requirements for VC ST01 and does not consider it appropriate to do so. Firstly, the Council has not determined that the contribution that has been agreed between the parties would satisfy the the requirements of Regulation 122 as set out above. Secondly, the developer of the site will be required to ensure that the allocation accords with all policy requirements (including the delivery of affordable housing in accordance with emerging Policy 5 of the GNLP) , as well as be able to meet all other infrastructure costs arising as part of the development of the site. Finally, the Council notes that the sum has been agreed with the developer who currently holds the option on the site however, should the parties involved in bringing forward this site change in the future a policy requirement for a financial contribution agreed privately between the existing parties could affect the viability and therefore the delivery of this site. Whilst the Council recognises the aspirations of the Parish Council it is not considered appropriate to include the suggested policy requirement within VC ST01 and the Council does not consider that this affects the soundness of the VCHAP. The Council has not included the financial contribution referred to in this representation in its assessment of the site, nor has it been a consideration in the site selection process.	1179	No action required.

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Policy VC STO1: Land north of Long Lane	3021, 3022	Support	The following is the response of the site promoter for VC STO1: The site can be developed to ensure the identified points are considered and addressed, this follows detailed discussions with NCC Highways and specialist surveys undertaken by ecologists and arboriculturalists during the consultation process and as part of pre-application discussions. Sufficient land is available to provide new planting and landscaping features to link to existing. There are public benefits proposed associated with this site. Namely, funding to be allocated to facilitate the construction of the new Village Hall via a S106 agreement, as well as the provision of a footpath along the site frontage with Long Lane for public use. The Parish Council support the development of this site for housing as a method of enabling the village hall development, as confirmed during pre-application discussions with SNDC. Ingram Homes has developed a scheme which could be progressed via a formal planning application.	No changes proposed to VC STO1.	The Council welcomes confirmation of the ongoing support of the site promoter for the inclusion of VC STO1 in the VCHAP, as well as the information relating to discussions that have taken place to support the development of a policy compliant scheme on the site. However, the Council also notes the comments relating to funding of the village hall and whilst the Council positively acknowledges the engagement that has clearly taken place between the proposed site developer and the Parish Council, South Norfolk Council has not been part of these discussions and does not consider it appropriate to include a requirement for a financial contribution towards the new village hall within the site-specific policy text. In order for such a contribution to be included within a S106 agreement (as proposed by both the site promoter and the Parish Council) the Council would need to be assured that the contribution met the requirements of Regulation 122 of the CIL Regulations. The Council has not considered this as part of its assessment of the site, nor when selecting VC STO1 for allocation. Furthermore, the Council will expect VC STO1 to deliver affordable housing in accordance with emerging Policy 5 of the GNLP, as well as meet all other identified infrastructure costs associated with the development of the site.	1178	No action required.
Policy VC STO1: Land north of Long Lane	2291	Support	This is exactly the type of small scheme the village needs. It proposes a good proportion of much needed bungalows suited to older people and those less mobile who are seeking to downsize. The proposed developer is well known for building high quality well designed properties. There are not likely to be any overlooking issues if the proposed developer is able to proceed.	No changes proposed to VC STO1.	The Council welcomes the support for this allocation however it does note that plans should be considered as illustrative only at this time as they do not have the benefit of planning permission and an alternative scheme may come forward on the site. However, there is a requirement for 1 and 1.5 storey dwellings along the eastern boundary of the site to minimise the visual impact of the development on the approach along Long Lane from the east. More generally, the site layout and design of the site would be required to comply with existing development management policies, including having regard to the amenities of neighbouring properties.	1176	No action required.

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Policy VC STO1: Land north of Long Lane	2638, 2843, 2909	Object	Summary of representations received objecting to VC STO1: HIGHWAYS - Frontage development not a suitable solution for traffic calming; - A roundabout at the entrance to the village [opposite Broomefield Road] would be a more effective traffic calming measure; - Widening the existing Harrold Place access could lead to access and safety issues for existing residents; - Additional development along Long Lane will be a danger for children, parents and motorists; and Existing access to Harrold Place suffers with congestion at school start and finish times. DRAINAGE & INFRASTRUCTURE - Drainage issue in the field with water affecting gardens of the Harrold Place homes; - Large pool of water near entrance of field recently; - Concern that Harrold Place roads and sewers have not been adopted due to sewage issues at the Hopkins Homes development opposite the site; - Unacceptable smells resulting from the pumping station in the Hopkins development when it is in operation; and - Concern that additional development will exacerbate the issues at Harrold Place. MISCELLANEOUS - Concern that the PC support for the site has been influenced by a developer contribution promised towards a replacement pavilion in the village; and - Land required to facilitate development is owned by the residents of Harrold Place (via the management company).	Proposed changes suggested to VC STO1: - Remove from the VCHAP; - Roundabout to be built opposite Broomefield Road; - Address the sewage and drainage issues; - Limit buildings to single storey height only; and - Reduce number of dwellings proposed.	With regards to the objections submitted to VC STO1 the Council does not consider any of the comments to affect the soundness of the VCHAP. The Council has proactively engaged with technical consultees throughout the site selection process, including NCC Highways Authority, Anglian Water and the Lead Local Flood Authority. There have been no objections received to the allocation of VC STO1 from any of these consultees in response to the Regulation 19 publication period and the Council considers that appropriate design solutions can be achieved to address highways, drainage and surface water management matters. The issues raised relate to existing developments along Long Lane, rather than the preferred allocation site. Notwithstanding this point, the Council will raise the concerns of the residents of Harrold Place with Anglian Water. Previous site-specific discussions with Anglian Water have confirmed that they do not have either a sewerage network or pumping station in the vicinity of Harrold Place at the present time. In addition, concerns have been raised about land ownership of the land between Harrold Place and VC STO1, as well as the reasons for the Parish Council support for this site. Firstly, the Council has sought assurances from the site promoter that access into the site is achievable. Legal representation for the site promoter has been able to confirm that access rights have been retained across this land therefore this is not considered to be an issue. Finally, the Council is aware of the representation submitted by the Parish Council advising of their support for VC STO1, alongside their expectation of a financial contribution towards a new village hall. South Norfolk Council has not been involved in these discussions and does not consider it appropriate to include this within the site-specific policy requirements for VC STO1. The Council has not included this within its assessments of the site when considering the allocation of VC STO1. The Council will maintain its requirement for the site to be policy compliant, including the delivery of the requisite level of affordable housing on the site, as well as meeting any other costs associated proportionately and directly with the development of the site.	1175	Forward concerns of Harrold Place residents to Anglian Water for their consideration.

36. Surlingham, Bramerton and Kirby Bedon

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Bramerton, 36.3	2947, 2949	Object	Representations submitted in response to paragraph 36.3 focussed on the rejection of SN5017. The summarised comments below relate specifically to SN5017: HIGHWAY MATTERS - single track road without passing places; INFRASTRUCTURE - Constraints to the existing sewage system locally; - ECOLOGY - Ecological impact arising from the development of the site - Great Crested Newts adjacent to the site, bats, nesting birds, birds of prey, small mammals and deer present on and adjacent to the site. AMENITIES - Distance of the site from the centre of the village and the available amenities; - No significant facilities within the village; LANDSCAPE, TOWNSCAPE & CONSERVATION AREA IMPACT - High density development would detract from the rural character.	No changes identified.	The Council recognises the local concerns about SN5017 and remains of the opinion that the site is not suitable for development at the scale proposed when originally promoted. The Council's reasons remain as set out in the site assessment form. As a point of clarification, many of the respondents referred to the proposals for SN5017 being a planning application however this is incorrect as the site has been promoted for allocation in response to the Council's Call for Sites as part of the Local Plan process. This is separate from any planning application that may be submitted for development on the site.	1470	None required.
Bramerton, 36.8	2871	Support	An amendment to SN5017 has been promoted in response to paragraph 36.8. The submission reduces the site area and seeks to address earlier concerns raised in the site assessment for SN5017.	Inclusion of amended site within the Settlement Limit of Bramerton.	The Council will undertake a desktop assessment to assess the suitability of the amended site for inclusion within the Settlement Limit, as well as a focussed technical consultation should this be considered appropriate following the desktop assessment. The Council notes the proximity of the site to the existing Settlement Limit, as well as the reduced site area and the proposal for fewer dwellings in this location. Whilst the amended proposals have sought to address some of the concerns raised within the assessment of SN5017, the Council remains concerns about the impact new development would have in this location on the local character of the area. The site also remains detached from the existing Settlement Limit, separated by small areas that have also been excluded, and at this time the Council has some concerns about an extension to the existing boundary around these areas. The site will be subject to a further assessment however the Council does not consider that this is a soundness issue relating to the VCHAP.	1174	Council to undertake a desktop assessment of the amended site, as well as a focussed technical consultation if this is considered to be appropriate.

Bramerton, 36.8	2525, 2526, 2538, 2602, 2619, 2678, 2894, 2950, 2953, 2956, 3108	Mixed	Representations submitted in response to paragraph 36.8 focussed on the rejection of SN5017. There was also support for the rejection of SN0366REV. The summarised comments below relate specifically to SN5017: HIGHWAY MATTERS - single track road without passing places; - existing rural roads inadequate for increased traffic and/or larger vehicles; - Local roads are not treated in poor weather conditions; - The new TROD footpath should not be considered favourably for the development of the site; - Wherryman Way footpath follows the lane but there is no safe footpath; - Little opportunity for cycling locally due to highway safety; and - Reliance on private transport would be contrary to the NPPF. INFRASTRUCTURE - No existing drainage and a number of longstanding issues now being resolved; - Worsening of current low water pressure in the area; - Constraints to the existing sewage system locally; - No existing street lighting, as well as concerns about increased lighting; and - Risk of flooding associated with development of the site has not been given enough weight. AMENITIES - Distance of the site from the centre of the village and the available amenities; - Infrequent bus service; - No significant facilities within the village; - No school within the village; and - Impact on the local bridleway network. ECOLOGY - Ecological impact arising from the development of the site - Great Crested Newts adjacent to the site,	No changes have been proposed in response to paragraph 36.8.	The Council recognises the local concerns about SN5017 but remains of the opinion that the site is not suitable for development at the scale proposed when originally promoted. The Council's reasons remain as set out in the site assessment form. As a point of clarification, many of the respondents referred to the proposals for SN5017 being a planning application however this is incorrect as the site has been promoted for allocation in response to the Council's Call for Sites as part of the Local Plan process. This is separate from any planning application that may be submitted for development on the site.	1172	No action required.

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			bats, nesting birds, birds of prey, small mammals and deer present on and adjacent to the site; and - Loss of the hedgerows to create access and highway improvements. LANDSCAPE, TOWNSCAPE & CONSERVATION AREA IMPACT - Proximity to the Broads Authority area; - Adverse impact on the Conservation Area, as well as both designated and non-designated heritage assets; - Impact on the landscape; - Loss of best and most versatile agricultural land; - High density development would detract from the rural character; - Existing development is either rural in character or set back from the road frontage; and - Required highway works to the land would impact negatively on the character of the area.				

37. Tacolneston and Forncett End

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Services and Community Facilities, 37.5	2944	Support	I agree that the parish /Village has a range of facilities including a primary school, pub, social club, church all within the conservation area. Although SNDC fail to have an adopted conservation appraisal available, therefore can't correctly assess impact further development in the village will have on the conservation area, historical asset, facilities within. Commuting pressure can have greater impact on assets/conservation areas than development within the area it's self, directly benefit historical (public) assets to remain viable, sustainable, including supporting development to support works required or bring approved planning/Listed BC applications to come to fruition.	No changes proposed in response to paragraph 37.5.	The Council currently has a programme in place for updating all Conservation Areas within the District, with Tacolneston a settlement that is still be reassessed as part of this update. The Council has a dedicated team of Conservation & Design Officers who have been involved within the site assessment process and have previously provided detailed advice about the impact of a new dwelling in this location on the identified heritage assets (including the wider Conservation Area). These comments remain valid.	1171	No action required.
Settlement Limit, 37.6	2859	Object	I object to this statement- The main settlement of Tacolneston was established well before the Domesday Book of 1086, this is the north area of the village where the Church, Pub and village primary school are located within the conservation area which also includes the southern gardens of the estate development of Dovedale, Knipe built in the 60's. (Not as suggested above) A further settlement limit 1200m south offers no facilities/amenities, only housing established in more recent years.	A more transparent character appraisal correctly identifying the center of the old established village including amenities (location).	The purpose of paragraph 37.6 is not to identify the heritage of the settlement, nor its growth over time. Rather this paragraph provides a brief description of the location of the two distinct Settlement Limits within the village. The Settlement Limits are designated for planning purposes and do not correspond with other designations (for example, the Conservation Area boundary). For the purposes of clarity however there is a minor overlap between the Settlement Limit and the Conservation Area boundary (the primary school site to the north of the village). The Settlement Limit denotes a consolidated built-up area within which further development would be considered acceptable in principle (subject to site specific considerations). These comments are not considered to be a soundness matter.	1168	No action required.

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Settlement Limit, 37.6	3224	Object	With respect to the proposed Village Clusters Housing Allocations Plan (VCHAP) published by South Norfolk Council Tacolneston Parish council would like to make the following submission. This submission is made following an Extraordinary Meeting of the Parish Council which was well attended by parishioners. Tacolneston Parish Council agree in principle to modest, well planned, development in the village. However, we have concerns on the soundness and appropriateness of these proposals. The proposals are unsound as the plans are inaccurate with anomalies in boundaries, size of plots and a general lack of clarity meaning that meaningful analysis and consultation is not possible. Our first concern is over the proportion of social housing to be included in the development. We ask that any development includes social and market housing, and that housing be targeted at the needs of local people and families. Secondly, we ask that the development should include a mix of building types, in keeping with existing housing in the area. This would conserve the contour and aspect of the village. Thirdly, we ask that we be provided with accurate and informative plans and maps. These should give accurate indications of the size of the proposed areas for development and clearly show the proposed and existing settlement boundaries. Fourthly, we require information on how issues resulting from problems of drainage and increased traffic flow will be managed. Finally, we request an extension of the consultation period to allow for consideration by the council and parishioners of the updated proposals and materials.	Our first concern is over the proportion of social housing to be included in the development. We ask that any development includes social and market housing, and that housing be targeted at the needs of local people and families. Secondly, we ask that the development should include a mix of building types, in keeping with existing housing in the area. This would conserve the contour and aspect of the village. Thirdly, we ask that we be provided with accurate and informative plans and maps. These should give accurate indications of the size of the proposed areas for development and clearly show the proposed and existing settlement boundaries. Fourthly, we require information on how issues resulting from problems of drainage and increased traffic flow will be managed. Finally, we request an extension of the consultation period to allow for consideration by the council and parishioners of the updated proposals and materials.	The Council has responded to this representation in full in response to the same comments submitted to VC TAC1 and VC TAC2. Please refer to these responses.	1169	No action required.

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Settlement Limit, 37.6	2946	Support	I support - Extension settlement limits -site submission GNLPSL0016 , GNLPSL0016REV, GNLPSL0016REVB. Site assessment has't followed due process. It isn't subject to section 4, Offers vehicle access (granted 1949). The footpath directly connects site/facilities,. I disagree with highways- a 2 m footpath is't required in a rural community not urban. Site assessment fails to include planning history 2021/1044, 2021/1045 granted- a benefit to the historical (public) asset-conversion of building to create annex to the listed building. An extension to the settlement boundary would be enabling, 2020/0048 demonstrates open space is achievable, removal -septic tank (AW) drains enables neutrality.	No changes have been proposed in response to paragraph 37.6.	The Council has robustly assessed this site in various forms, as demonstrated in the site assessment forms, as well as the planning history of the site. The Council remains of the opinion that this site is not suitable for inclusion within the Settlement Limit for the reasons set out in the conclusion of the site assessment form, as repeated here: "The site is an UNREASONABLE site for both allocation and extension to the settlement limit. The fundamental issues remain as highlighted in the previous Regulation 18 Site Assessment SN0016REV, the most recently refused planning application for one dwelling (October 2020) and the dismissed Appeal (May 2017). The reduced site area does not change the previous conclusion. Development would have an unacceptable impact on the setting and significance of the Listed Buildings and Conservation Area. The traditional verdant setting of the group of dwellings at number 116 and 122 Norwich Road will not be preserved and development of this site would erode the character of the conservation area. Concerns have also been maintained about the provision of a suitable vehicular access into the site and the provision of acceptable visibility splays." This representation does not alter the position of the Council and the Council does not consider the omission of this site from the Settlement Limit to be a soundness matter.	1170	No action required.
VC TAC1, 37.7	2860	Object	I don't agree with part of the above statement- To the north of the site is a linear development of 4-5 bungalows fronting west of B1113 Norwich Road. Bleach Cottage and its setting within the conservation area extends deep into Hall road, therefore there will be no separation from VC TAC1 across the E1 Ashwellthorpe plateau at this point.	Reword statement.	Paragraph 37.7 clearly states that the site is separated from Tacolneston Conservation Area by existing residential development immediately to the north. The Council recognises that a small section of the Conservation Area extends to the west along Hall Road but it is not considered that the Council's wording is either inaccurate or incorrect, and therefore this is not a soundness issue.	1167	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC TAC1, 37.8	2861	Support	I object that a continuous footpath on the other side of the road offers any benefit to the site. The volume of traffic parking on the B1113 extends far past the hairdressers south of the site, into Dovedale , north into Hall Road/the school. Crossing the road with limited visibility is detrimental to highways safety. I object to how the site assessments have been carried out, there is no coherence, site SN0016REV north of the school was considered to require a 2m footpath when a 1.5m path extends on the same side as the site throughout the village	No changes proposed in response to paragraph 37.8.	The Council considers that this representation has been submitted incorrectly and as such is being considered as a soundness objection, rather than a supportive comment for the Plan. Earlier discussions with the Highways Authority during the preparation of the VCHAP confirmed that the pedestrian crossing would provide both (a) a clear and safe crossing point across the B1113 and (b) traffic calming measures for the B1113. The requirement for the off-site highway works that connect to the existing public footpath in the village is considered to be both reasonable and beneficial. The Council does not consider this to be an issue of soundness relating to the allocation of VC TAC1.	1166	No action required.
VC TAC1, 37.11	2862	Object	All assessments of sites should be consistence and non bias.	Address Assessment of sites are consistences, transparent and non bias.	It is unclear how these comments relate specifically to paragraph 37.11 however for clarity, the Council has undertaken site assessments in a fair and consistent manner, as demonstrated in the supporting evidence base and the publication of all site assessments as part of the supporting material for the Plan. The Council assessed sites following an agreed methodology - an amended version of the Norfolk-wide agreed HELAA - which responded more appropriately to the South Norfolk area. All sites have been assessed using this same criteria, and these were updated as appropriate between the Regulation 18- and Regulation-19 publication periods.	1165	No action required.
VC TAC1, 37.12	2863	Support	I agree and the limited capacity at the receiving water recycling center (Forngett End) is critical. The three dwellings allowed at appeal 2016/2635 and a large development site south 2022/2400,2021/0205,2021/0206,2014/0812 approx 70m apart suggest releasing water into the road side ditch adjacent to B1113 in an area that suffers surface water flooding on the bend.	No changes proposed in response to paragraph 37.12.	The Council has acknowledged the potential capacity issues at the local Water Recycling Centre at Forngett End and has addressed this within the site specific policy requirements for Policy VC TAC1. However, in their response Anglian Water have made reference to their proposed programme of infrastructure improvements and this is not considered to prevent VC TAC1 from coming forward within the Plan period.	1164	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC TAC1, 37.13	2865	Object	I consider the Greater Norwich Local Housing Need Assessment (LHNA) is out of date and does not reflect an up to date need. If one and two bedroom dwelling don't accord why submit this as a statement within the consultation, its misleading. I note the same weight has not been applied to single 'self build' proposals, rather ignored in all supporting documents and written statements even when evidence is available on SNDC self build register.	State clear facts only.	The Council is satisfied that the Greater Norwich Local Housing Need Assessment (which was undertaken in published in June 2021) remains a current and relevant part of the evidence base. However, any concerns relating to either the relevancy or accuracy of this document are a matter for the Greater Norwich Local Plan, rather than the South Norfolk Village Clusters Housing Allocations Plan, and will be considered as part of the GNLP Examination. Reference to the number of one- and two-bedroom dwellings on the site in paragraph 37.13 refers specifically to the early concept drawing submitted by the site promoter and with specific reference to the numbers proposed for allocation on VC TAC1. This statement clarifies that should an alternative housing mix be submitted on this site the numbers of units achievable may be lower. The Council supports applications for self-build properties within the District, in accordance with national policy and the relevant Local Plan policies. The GNLP will also make provision for a proportion of self build dwellings within larger site allocations, as set out in emerging Policies 5 7.4 and 7.5.	1163	No action required.
Policy VC TAC1: Land to the west of Norwich Road	3074	Object	The site appears to be remote from the highway, the proposed allocation does not seem to include land required for suitable and safe access along with highway improvements (as per paragraph 37.11). It has not been clearly demonstrated that an acceptable means of access can be provided, which will require land beyond the proposed extents of allocation and highway. The earlier Highway Authority comments supported allocation of site reference SN1057 that had significant frontage at B1113 Norwich Road and was considered able to deliver the required highway improvements and this is reflected in the current policy wording.	The Highway Authority would wish for the allocation area to be revised to include suitable direct access to the highway and frontage at the B1113 Norwich Road to provide the required visibility splays and footway. This would make the allocation area consistent with the policy wording.	The Council has continued discussions with both the site promoter and the Highways Authority following the publication of the Regulation-19 version of the Plan. The site promoter has confirmed that an amended highways access is proposed for the site and that an amended red line is appropriate. The Council considers this to be a major modification to the VCHAP and as such is proposing to undertake a focussed consultation to include this amendment in due course. Discussions with the Highways Authority have also related to the provision of off-side highway works associated with the development this site. A crossing point across the B1113 to connect the site to the existing facilities and pedestrian footpath through the village is considered appropriate.	1366	An amended policy map outlining the revised red line is considered to be a major modification to the VCHAP and as such will be included in a focused consultation in due course.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC TAC1: Land to the west of Norwich Road	3240	Support	Anglian Water suggests that due to the relatively small-scale nature of the sites, that the policy requirement regarding the capacity of the WRC and phasing of development is unnecessary. The draft DWMP has identified growth for the WRC catchment area to 2050 and has included medium-term strategy to increase capacity and a long-term strategy for a new permit. The policy requirement should be amended to reflect that strategies are in place to increase capacity within the network.	Modify policy text to read: Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the local water recycling network.	The Council welcomes the capacity improvements being planned and delivered by Anglian Water to the local infrastructure network. The Council does not consider that this representation raises any issues relating to soundness however if the Inspector is minded to modify the policy to address the comments raised the Council suggests the following wording: "Early engagement with Anglian Water regarding connecting to the local water recycling network".	1161	The Council does not consider that a modification to the site-specific policy is necessary to make the Plan sound however if the Inspector is minded to modify the policy to address the comments raised the Council suggests the following wording: "Early engagement with Anglian Water regarding connecting to the local water recycling network".

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC TAC1: Land to the west of Norwich Road	3225	Object	Summary of comments by Tacolneston Parish Council: - The PC agree in principle to modest development in the village however do not consider these proposals to be sound or appropriate. The proposals are unsound as the plans are inaccurate with anomalies in boundaries, size of plots and a general lack of clarity meaning that meaningful analysis and consultation is not possible; - Development should include social and market housing, and that housing be targeted at the needs of local people and families; - Development should include a mix of building types, in keeping with existing housing in the area. This would conserve the contour and aspect of the village; - We require accurate and informative plans and maps. These should give accurate indications of the size of the proposed areas for development and clearly show the proposed and existing settlement boundaries; and - We require information on how issues resulting from problems of drainage and increased traffic flow will be managed; and - We request an extension of the consultation period to allow for consideration by the council and parishioners of the updated proposals and materials.	Our first concern is over the proportion of social housing to be included in the development. We ask that any development includes social and market housing, and that housing be targeted at the needs of local people and families. Secondly, we ask that the development should include a mix of building types, in keeping with existing housing in the area. This would conserve the contour and aspect of the village. Thirdly, we ask that we be provided with accurate and informative plans and maps. These should give accurate indications of the size of the proposed areas for development and clearly show the proposed and existing settlement boundaries. Fourthly, we require information on how issues resulting from problems of drainage and increased traffic flow will be managed. Finally, we request an extension of the consultation period to allow for consideration by the council and parishioners of the updated proposals and materials.	In response to the submission by Tacolneston Parish Council, the Council engaged with the PC to understand the concerns about the inaccuracies within the plans. These concerns specifically related to the omission of a label denoting the location of Tacolneston Primary Academy on the settlement map and the updates to the site references/ labels that reflected the preferred allocation status of a site (for example, SN1057 was amended to VC TAC1 within the Regulation-19 document). The Council updated the site labels to ensure a consistent approach to labelling within Regulation-19 and does not consider this, or the omission of a label for the primary school to be soundness matters. The PC was clearly reminded of the deadline for the submission of Regulation-19 representations during their correspondence with the Council and an extension of time for the submission of comments was not considered to be either necessary or appropriate. With regards to the comments regarding the proposed allocation, the Council will expect allocated sites to deliver the requisite level of affordable housing in accordance with emerging GNLP Policy 5. The level of affordable housing required (33%) has been determined following production of the Strategic Housing Market Assessment (June 2017) and the Greater Norwich Housing Needs Assessment (June 2021). In terms of design and compatibility with the existing housing, development proposals will be expected to respond positively to the existing context, including in terms of scale, layout and design, as set out in existing policies within the Local Plan. In separate correspondence the PC has raised concerns about the landscape and townscape impact of the site, making reference to the site assessment form. However, the Council considers that the planning permission for 3 detached bungalows along the road frontage (granted on Appeal in 2016) has to some extent eroded the gap within the landscape. Furthermore, the proposed allocation site would extend to the west away from the road frontage and therefore not further reduce the gap in the streetscene. Comments relating to highways matters are noted and the Council is aware of the presence of the protected tree along the site frontage, as reflected in Policy VC TAC1.	1160	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC TAC1: Land to the west of Norwich Road	2286	Support	As a community Tacolneston is badly lacking volunteers to serve the community. I believe that some new development could see an injection of new people into the community which would be beneficial to creating a more cohesive community. It is likely that on current demographics the school will in the years ahead see a reduction in numbers. New developments frequently produce more children of primary school age and this would help to future-proof sustainability of the school. A new crossing would also aid traffic calming much needed in this location.	No changes proposed in response to VC TAC1.	The Council welcomes support for sustainable growth in Tacolneston. The VCHAP is planning for small-medium scale growth throughout the rural areas of the District to support existing communities, facilities and services and the recognition of this is welcomed.	1159	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC TAC2: Land adjacent The Fields	3226	Object	Summary of comments by Tacolneston Parish Council: - The PC agree in principle to modest development in the village however do not consider these proposals to be sound or appropriate. The proposals are unsound as the plans are inaccurate with anomalies in boundaries, size of plots and a general lack of clarity meaning that meaningful analysis and consultation is not possible; - Development should include social and market housing, and that housing be targeted at the needs of local people and families; - Development should include a mix of building types, in keeping with existing housing in the area. This would conserve the contour and aspect of the village; - We require accurate and informative plans and maps. These should give accurate indications of the size of the proposed areas for development and clearly show the proposed and existing settlement boundaries; and - We require information on how issues resulting from problems of drainage and increased traffic flow will be managed; and - We request an extension of the consultation period to allow for consideration by the council and parishioners of the updated proposals and materials.	Our first concern is over the proportion of social housing to be included in the development. We ask that any development includes social and market housing, and that housing be targeted at the needs of local people and families. Secondly, we ask that the development should include a mix of building types, in keeping with existing housing in the area. This would conserve the contour and aspect of the village. Thirdly, we ask that we be provided with accurate and informative plans and maps. These should give accurate indications of the size of the proposed areas for development and clearly show the proposed and existing settlement boundaries. Fourthly, we require information on how issues resulting from problems of drainage and increased traffic flow will be managed. Finally, we request an extension of the consultation period to allow for consideration by the council and parishioners of the updated proposals and materials.	In response to the submission by Tacolneston Parish Council, the Council engaged with the PC to understand the concerns about the inaccuracies within the plans. These concerns specifically related to the omission of a label denoting the location of Tacolneston Primary Academy on the settlement map and the updates to the site references/ labels that reflected the preferred allocation status of a site (for example, SN1057 was amended to VC TAC1 within the Regulation-19 document). The Council updated the site labels to ensure a consistent approach to labelling within Regulation-19 and does not consider this, or the omission of a label for the primary school to be soundness matters. The PC was clearly reminded of the deadline for the submission of Regulation-19 representations during their correspondence with the Council and an extension of time for the submission of comments was not considered to be either necessary or appropriate. With regards to the comments regarding the proposed allocation, the Council will expect allocated sites to deliver the requisite level of affordable housing in accordance with emerging GNLP Policy 5. The level of affordable housing required (33%) has been determined following production of the Strategic Housing Market Assessment (June 2017) and the Greater Norwich Housing Needs Assessment (June 2021). In terms of design and compatibility with the existing housing, development proposals will be expected to respond positively to the existing context, including in terms of scale, layout and design, as set out in existing policies within the Local Plan. In separate correspondence there appears to be some confusion about the planning history of VC TAC2 and it seems prudent to clarify the position here too. SN0602 was the Council's shortlisted site at the Regulation-18 consultation is not subject to an undetermined planning application. A parcel of land adjacent to SN0602 has planning permission for 21 dwellings, with the Council currently considering a number of applications to discharge conditions. The PC is correct that the wider issue with nutrient neutrality has delayed the determination of these proposals however this is considered to be a short term issue whilst the VCHAP is proposing growth over a longer period of time.	1158	No actions required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC TAC2: Land adjacent The Fields	3189	Object	Bullet point 6 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 6 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	Amend criterion 6 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	The Council considers that the proposed archaeological requirements suggested by Historic England are too onerous and could result in unnecessary and costly field work, prior to the submission of a planning application. The Council has clearly highlighted within both the supportive text and the site-specific policy a requirement for the applicant of the site to liaise with the Historic Environment Service at what it considers to be both a proportionate and justifiable degree.	1157	Whilst the Council does not consider a modification to the policy to be necessary for soundness, should the Inspector be minded to update the policy to reflect the views of Historic England the Council suggests the following wording: "Historic Environment Record (HER) to be consulted at an early stage to determine the need for any archaeological surveys on site. Appropriate archaeological assessments to be undertaken and submitted in support of the planning application, as agreed with HER and the local planning authority".
Policy VC TAC2: Land adjacent The Fields	2287	Support	As a community Tacolneston is badly lacking volunteers to serve the community. I believe that some new development could see an injection of new people into the community which would be beneficial to creating a more cohesive community. It is likely that on current demographics the school will in the years ahead see a reduction in numbers. New developments frequently produce more children of primary school age and this would help to future-proof sustainability of the school.	No changes proposed to VC TAC2.	The Council welcomes support for sustainable growth in Tacolneston. The VCHAP is planning for small-medium scale growth throughout the rural areas of the District to support existing communities, facilities and services and the recognition of this is welcomed.	1156	No action required.

38. Tasburgh

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC TAS1, 38.7	2982	Object	This statement is unsound because the continuous access from Henry Preston Road is unsafe and contrary to the previous plan.	The plan should state 'vehicular access from Church Road and pedestrian/cycle access from Henry Preston road' as stated in emerging Neighbourhood Plan.	Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds. The Council has provided a response to highways concerns relating to VC TAS1 in its response to representations submitted on the policy itself.	1282	No action required.
Policy VC TAS1: North of Church Road	3190	Object	No designated heritage assets on the site. Grade II listed Old Hall Farmhouse immediately to the north west, scheduled monument to the north, which includes grade I listed Church of St Mary and grade II listed war memorial and rectory. Development on site has potential to impact significance of these. Do appreciate this is seeking to increase density of existing allocation. Welcome preparation of HIA but disagree with some of the findings. Development across whole site will affect setting of Old Hall Farmhouse. Recommend that one third of site left as orchard or playing field extension for school with no built development. Housing should be contained in south eastern two thirds. May not be possible to deliver 25 dwellings at a density in keeping with village character. Bullet point 4 states that the HER should be consulted to determine need for archaeological surveys prior to development. Some assessment is needed to inform planning application.	Policy should be amended to include area of open space/orchard/playing field and capacity should be reduced accordingly. Bullet point 4 should be amended to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	The Council acknowledges that development on this site could impact the settings of the nearby listed buildings and scheduled monuments. This has been acknowledged in the supporting text in paragraph 38.9 and in the policy in bullet point 2, which specifically references the Old Hall Farmhouse. Following further assessment of the site, it has been concluded that, rather than leaving a third of the site undeveloped, the allocation will be reduced to 20 dwellings. This will allow development to be designed and laid out to preserve the views of the Old Hall Farmhouse from Henry Preston Road. In terms of archaeology, the Council considers that bullet point 4 is sound. Policy VC TAS1 highlights the need for archaeology to be considered; however, the Council's experience is that the need for field evaluation prior an application being determined is rare and can be required under NPPF paragraph 194 if necessary.	1281	Policy VC TAS1 will be reduced to 20 dwellings to allow for the layout and design of the site to preserve the views of the Old Hall Farmhouse form Henry Preston Road. The Council does not consider a modification to the policy to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC TAS1: North of Church Road	3265	Support	Particularly welcome policy wording in Policies VC ROC and VC LMI relating to the protection and enhancement of ecological/biodiversity features and recommend that similar policy wording is applied to VC TAS1. Where removal is unavoidable policy should make reference to mitigation measure to reflect 2021 Environment Act. Local Authorities have a duty under NPPF (paragraphs 62b and 179), NERC Act 2006 and Environment Act 2021 to have regard to conservation and enhancement of priority habitats, including hedgerows. NPPF paragraph 131 outlines the importance of trees to local character and urban environments and how they can help mitigate the effects of climate change. Plans provide fuller and more comprehensive protection and should secure long-term maintenance of newly planted trees and retainment of existing trees.	Reword bullet point 5 to provide further protection for biodiversity and ecological features such as trees and hedgerows.	The Council considers the policy to be sound in relation to the protection of ecological features as bullet point 5 of Policy VC TAS1 states that the woodland to the north of the site should be protected and enhanced. As a part of the site assessment, this area of woodland was the only feature of significant biodiversity and ecological value identified. The site assessment also stated that any impact on biodiversity and ecology could be easily mitigated. A general criteria protecting ecological features is not considered to add any significant value to the policy due to the lack of features identified on the site. Also as stated national planning policies also provides general protection for these features. The Council would not seek to repeat existing policies or legislation within the VCHAP.	1280	No action required.
Policy VC TAS1: North of Church Road	3081	Object	Mineral planning authority considers the policy unsound as it is inconsistent with national policy and adopted Development Plan for Norfolk in relation to mineral resource safeguarding. Recognise underlain mineral resource is referenced in supporting text, however request this is included in policy.	Amend Policy VC TAS1 to add the following wording as a policy requirement: ‘The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - ‘safeguarding’ (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.’	The Council notes the comment of the Mineral Planning Authority but does not consider this to be a soundness matter. The Council has included within the supporting policy text reference to the site being underlain, or partially underlain by safeguarded resources and has highlighted the need for development to comply with the relevant policy within the Minerals and Waste Local Plan. It is not considered necessary to repeat this information within the site-specific text as all development is required to comply with the requirements of the Local Plan, which includes the Minerals and Waste Local Plan.	1279	None.
Policy VC TAS1: North of Church Road	2996	Object	First bullet point is unsound as continuous access from Henry Preston Road is unsafe and contrary to previous plan.	The first bullet point should state 'vehicular access from Church Road and pedestrian cycle access from Henry Preston road' as stated in the emerging Neighbourhood Plan.	Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions led to the inclusion of the first bullet point in Policy VC TAS1 requiring vehicular and pedestrian access from both Church Road and Henry Preston Road. The intention of the proposal is to reinforce all forms of connectivity between the site and Henry Preston Road, rather than having Henry Preston Road only having pedestrian and cycle access as included in the Neighbourhood Plan. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds.	1278	No action required.

39. Tharston, Hapton and Flordon

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Hapton, 39.8	2366	Object	Support the removal of SN4048SL from the VCHAP. In addition to the site assessment reasons the land in this area is very subject to flooding when there is very high levels of constant rain which will result in the houses along the street opposite this proposed site being flooded. The road through the village is very busy and access from this proposed site will be extremely dangerous as there is a blind corner just before it, lots of parked cars in the village obstructing the view and the cow Lane junction so it would be very dangerous to try and get in and out of the site safely. Traffic often comes through the village very fast. There is also no pavement along that section of road and this would make walking along the road very dangerous as well. We have no services in the village, no public transport and no employment opportunities so Hapton is not a good site	No changes proposed.	Whilst representation 2366 was submitted as an objection to the VCHAP having reviewed the comment the Council considers it to be in support of the removal of SN4048SL from the Plan, and therefore supportive of the VCHAP.	1155	No action required.
Flordon, 39.9	2578	Support	Summary of comments received in response top paragraph 39.9: - Agree with the rejection of SN5043 - single track access to the site; - Potential highway safety issues with traffic backing onto the main road; and - Access issues on refuse and garden waste collection days.	No changes proposed to paragraph 39.9.	The Council has rejected the allocation of SN5043 for the reasons set out in the site assessment, recognising the response of NCC Highways Authority (red rating) as well as the poor relationship development of this site would have with the existing dwellings and the landscape impact arising.	1154	No action required.

40. Thurlton and Norton Subcourse

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Thurlton, 40.2	2750	Object	The Parish Council wish to record that, as a village, we are not against development, but stress that it should be in agreement with both the needs of the village and the South Norfolk Council. During the last round of housing allocations, we were “allocated 12” and actually received 30 as a result of the Blacksmiths Gardens development. This represented roughly a 10% increase in the number of properties in the village – rising to 342 as a result. We therefore would argue that, at present, the village does not require further housing.	The Parish Council wish to record that, as a village, we are not against development, but stress that it should be in agreement with both the needs of the village and the South Norfolk Council. During the last round of housing allocations, we were “allocated 12” and actually received 30 as a result of the Blacksmiths Gardens development. This represented roughly a 10% increase in the number of properties in the village – rising to 342 as a result. We therefore would argue that, at present, the village does not require further housing. We would also highlight that both of the proposed site allocations will use the primary route into the village (Beccles Road C516) which will further increase traffic around the notorious problem corner at Hall Farm. This is a blind corner and subject to regular flooding. Highways have repeatedly tried to resolve but every fix is temporary. The Parish Council therefore ask that any agreement for the sites to be taken into planning MUST include a guarantee to provide a long-term solution to the corner.	The Council considers that the growth that has been experienced within Thurlton reflects the sustainable location of the settlement and the availability of services and facilities locally. The VCHAP makes allocations throughout the South Norfolk District in order to meet the housing requirements of the District, as required by national policy. The VCHAP has sought to disperse growth in order to support local communities and facilities, and avoid the stagnation of existing villages. The Council considers this approach to allocating sites to be sound. NCC Highways Authority has engaged with the preparation of the VCHAP throughout and has not raised an objection to the allocation of either THU1 or THU2 on the basis of the highway safety of the wider highway network.	1153	No action required.
Services and Community Facilities, 40.5	2751	Object	The Parish Council would also comment that the bus links to the village are poor and do not easily link the village to the local town Loddon, where the majority of the required services (Doctors, Dentists, Library, Supermarket, etc) thus requiring residents to rely on cars for access. The Bus service to both Norwich/Beccles and Loddon is provided by Our Bus. Should this company fail to operate then no bus service is available from the village.	We wish that the plan reflects the very limited bus service available	The Council has referred to the local bus services available to Thurlton residents in paragraph 40.5. It is recognised that the bus service within the village does not provide a peak-time route between Thurlton and Beccles/ Loddon, and it has not been assessed as such in the site assessment. It does, however, provide a useful public transport connection between the village and higher order settlements, including Norwich City Centre and as such is considered to be a service of note within the village. It is not unusual for a village (or route) within the rural parts of the District to be served by a single bus operator.	1152	No action required.

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Thurlton/Norton Subcourse, 40.6	2963	Object	We have submitted this site for consideration as a matter of soundness relating to the existing settlement limit for Thurlton and Norton Subcourse (para 40.6). As a consequence we do not consider that the proposed settlement limit is sound. We believe that the site is a logical extension to the village and comprises an infill opportunity between the existing settlement boundary and adjoining properties to the north and cluster of dwellings to the south. The site is considered to a sustainable location and would not set a precedent for further development to the south beyond the existing cluster (Norton Lodge). The site has recently been subject to an outline planning application which is currently pending consideration. A planning statement and site plans which supported the application (reference 2023/0489) were submitted alongside the representation.	The settlement boundary for Norton Subcourse should be extended to include the site within the red line boundary on the submitted plans under application 2023/0489 which is currently pending.	The Council does not consider the issues raised to relate to the soundness of the Plan. The site referenced in the representation was assessed using the same methods as those used to assess the other sites submitted for consideration for the VCHAP. The site assessment concluded that the site should not be included due to the potential biodiversity value of the site and the existence of a small water course, which further adds to the biodiversity value and potential flood risk issues. Comments were also sought from technical consultees on the potential of the site to be developed. Norfolk County Council Highways stated that acceptable visibility for access was unlikely to be achieved. Community Health and Environment colleagues also raised the potential for biodiversity value and the likely high water table relating to the stream. For these reasons it was concluded that the site should not be included within the VCHAP.	1473	No action required.
VC THU1, 40.7	2752	Object	The course of Thurlton FP3 must be retained in its existing location and guaranteed to be a safe / open footpath. It is in constant use by local residents for both access to the school and general walkers (including dog walkers). The Parish Council do not want to see fenced “dark alleys” created which could be a target for crime, nor do the Parish Council wish for street lighting to be installed to try and alleviate this as it would not be in keeping with the rest of the village or with Norfolk’s clear skies policy.	No changes proposed (response as per summary for para 40.7).	There is no suggestion that the route of the existing PRoW would be either altered or extinguished as a result of this allocation, and the Council has set out a requirement for appropriate boundary treatments to be incorporated in the site design within the supporting text for Policy VC THU1. The importance of the PRoW network, as well as pedestrian connectivity, has been recognised throughout the production of the VCHAP and has been reflected in the Regulation-19 document.	1149	No action required.
VC THU1, 40.8	2541, 2753	Object	(1) We live adjacent to the existing right of way and are concerned about the proximity of the proposed development to our property. We have a private plot at the moment and no wish to be overlooked by new builds which will affect our privacy and view. The boundary of the new development should not run too close to the existing public right of way. (2) The Parish Council stress that should the site be taken forward any development on this site MUST be sympathetic to the existing properties surrounding (on 3 sides) the proposed location. This should take into account the range of existing home bordering – both bungalows and houses – with regard to light pollution, overlooking and noise pollution.	(1) There must be adequate space between boundaries alongside the public right of way to ensure privacy for properties on Blacksmiths Gardens. (2) The Parish Council stress that should the site be taken forward any development on this site MUST be sympathetic to the existing properties surrounding (on 3 sides) the proposed location. This should take into account the range of existing home bordering – both bungalows and houses – with regard to light pollution, overlooking and noise pollution.	The site specific policy for VC THU1 requires the scale and layout of development to have regard to adjoining properties, with further information set out in the supporting text regarding the enclosure of the Public Right of Way. These matters will be considered in detail as part of an assessment of the detailed planning application should the Inspector be minded to support the allocation of VC THU1.	1148	No action required.

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VC THU1, 40.9	2480, 2754	Object	Summary of representations received in response to paragraph 40.9: AMENITY ISSUES: - Loss of privacy due to location of the access; - Increased noise; - Loss of hedging and view in front of property; - Disruption to residents during the construction phase; and - Potential damage to our property during construction & connection of services. HIGHWAYS MATTERS: - Damage to the existing road during construction phase; - All vehicular access to be via Blacksmiths Gardens; and - Access to rear of existing properties along Beccles Road to be retained but separated from Blacksmiths Gardens access. MISCELLANEOUS: - No extension of the site boundaries to accommodate 12 dwellings.	Summary of changes proposed in response to paragraph 40.9: - An alternative access to the site should be found; - All vehicular access to be via Blacksmiths Gardens; - Access to rear of existing properties along Beccles Road to be retained but separated from Blacksmiths Gardens access; - Consideration must be given to the impact of construction traffic, especially on PRow FP3; - Consideration must be given to future access of agricultural vehicles; - Consideration should be given to the access to the site from the adjacent fields; and - No extension to the site boundaries to accommodate 12 dwellings should this number not be possible on the site.	The Council considers that the amenity and highways matters raised in response to paragraph 40.9 will be dealt with at the planning application stage, with appropriate regard being paid to both site specific policy VC THU1 and the wider planning policy framework. The Council remains of the opinion that the VC THU1 allocation is sound.	1147	No action required.
VC THU1, 40.12	3086	Support	Norfolk County Council notes that the South Norfolk Village cluster plan has included supporting text regarding safeguarded mineral resources where sites are under the threshold of 1 ha and therefore the Minerals and Waste Policy CS16 (or any successor policy) does not apply. Therefore, the support text referring to "The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan" can be removed from this.	Remove "The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan" from the supporting text.	The Council does not consider this to be a soundness matter however should the Inspector be minded to modify the Plan the Council would not object to the removal of paragraph 40.12 from the supporting text in the Thurlton and Norton Subcourse chapter of the VCHAP.	1146	The Council does not consider this to be a soundness matter however should the Inspector be minded to modify the Plan the Council would not object to the removal of paragraph 40.12 from the supporting text in the Thurlton and Norton Subcourse chapter of the VCHAP.

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VC THU1, 40.13	2755	Object	The Parish Council also wish to stress that should 12 house not be feasible within the allocated site, that the size/area is not simply increased to allow it to fit. The village will have no chance to comment on such proposals, but have experienced exactly that with the existing Blacksmiths Gardens allocation.	The Parish Council also wish to stress that should 12 house not be feasible within the allocated site, that the size/area is not simply increased to allow it to fit. The village will have no chance to comment on such proposals, but have experienced exactly that with the existing Blacksmiths Gardens allocation.	The Council notes the concerns of the Parish Council. VC THU1 is considered to be an appropriate site for allocation and was originally considered able to accommodate a larger number of dwellings however the technical discussions with NCC Highways Authority has resulted in a lower number of dwellings being allocated in this location. The site boundaries have been amended to reflect the reduced number of properties that can access the site via the shared surface road through Blacksmiths Gardens. The Council has preferred an allocation for a minimum of 12 dwellings in this location in recognition of the sustainable location and that a highways solution may be achieved that could result in a slight uplift in housing numbers on this site, within the boundaries of the allocation. Separately (and for clarity) the Council notes comments made relating to future opportunities for the Parish Council (and local residents) to comment on future proposals for this site. In the event the Inspector is minded to allocate VC THU1, a planning application will be required and will be assessed in accordance with the Local Plan in the usual manner. There will be an opportunity for further community comment on the detailed matters at that time.	1145	No action required.

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VC THU2, 40.14	2618, 2758	Object	(1) 22 years ago this site had planning permission for 3 houses. I purchased Poppyfields knowing this and having consulted South Norfolk Council. The density of the present proposal greatly exceeds the size of the plot which slopes down to the flood plain. (2) The Parish Council wish to state that the proposal to squeeze 15 houses into an extremely small and problematic site is, in our opinion, flawed and should be removed from consideration. In addition to the 2016 application, 2 further applications were submitted to extend development on the site (2018/2593 & 2018/2594), but were subsequently withdrawn. However, in both cases Highways raised significant concerns about the standard of roadway through the development and the access to Beccles Road. In light of these the Parish Council ask that all 8 of the comments/recommendations from highways are considered again.	(1) The plot should be low density bungalows in order to respect its place in a traditional village setting. (2) In addition to the 2016 application, 2 further applications were submitted to extend development on the site (2018/2593 & 2018/2594), but were subsequently withdrawn. However, in both cases Highways raised significant concerns about the standard of roadway through the development and the access to Beccles Road. In light of these the Parish Council ask that all 8 of the comments/recommendations from highways are considered again.	The Council has a responsibility for allocating sufficient housing sites throughout the District to meet the housing requirement, as required by national policy. It is within this context the VCHAP has been prepared. If a site is appropriate for development it is not considered reasonable for the density to be constrained by previous planning permissions which underutilised the land. In accordance with paragraph 119 of the NPPF the Council must ensure that development makes effective use of land and the density proposed is considered to be acceptable within the context of the site. The Highways Authority have been engaged throughout the preparation of the VCHAP and have not raised an objection at Regulation-19 to the allocation of this site. The comprehensive redevelopment of this site as a single allocation (rather than the earlier piecemeal growth that had been proposed) provides an opportunity to improve the access arrangements agreed as part of the extant consent. A review of the earlier NCC Highways Authority comments on the withdrawn 2018 planning applications (2018/2593 and 2018/2594) includes a requirement for improvements to local bus stop provision and the installation of a footway from the site. These improvements have not been requested by the Highways Authority as part of the site allocation and the omission of these is not considered to be a soundness matter however the Council would accept a modification to the policy to reflect this requirement should the Inspector be minded to modify the policy accordingly.	1141	The Council does not consider the omission of the highways improvements suggested at the time of the 2018 planning application to be a soundness matter however if the Inspector is minded to modify the policy to include these matters the Council would suggest the following wording: "Off-site highway works to include liaison with the Local Planning Authority and the Highways Authority about the provision of a pedestrian crossing in an appropriate location to connect to the existing footpath on the opposite side of Beccles Road, as well as an investigation of the existing bus-stops within close proximity to the site and a proportionate contribution to the upgrade of these facilities to be agreed with the Local Planning Authority and the Highways Authority."
VC THU2, 40.15	2617, 2760	Object	(1) The site is bordered by areas inhabited by barn owls, egrets, kingfishers, deer, pheasants; all this natural beauty will be impacted by the proposed development. The surface water will pollute the beck which will destroy the watercress beds, fish and invertebrates. (2) The Parish Council wish to state that, should the site be taken forward, the protection of the wildlife habitats, trees and the pond are given priority. This area is a bio-diverse environment and should be maintained as such.	(1) This side of Thurlton's Beccles Road should not be developed. (2) The Parish Council wish to state that, should the site be taken forward, the protection of the wildlife habitats, trees and the pond are given priority. This area is a bio-diverse environment and should be maintained as such.	The site-specific policy requires the protection and enhancement of Priority Habitats, and the retention of significant trees and the on-site pond to the south of the site. Furthermore, in accordance with the requirements of the Local Plan policies as well as emerging legislation, the protection and enhancement of habitats within the site will be a priority when preparing a site layout and design and will be assessed in detail at the planning application stage.	1140	No action required.

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VC THU2, 40.16	2616	Object	The ground levels of the proposed site slopes downward towards my property, meaning surface water will run down and flood our front garden and entrance to our house. With the undulation of the site, should the proposed dwellings be houses, they would overlook our house, and a once traditional village cottage will become part of a housing estate.	Any building should be low level and be joined to the main sewage system, or have cess pits.	Detailed proposals for the site (including layout and technical drainage matters) will be submitted and assessed at the planning application stage. As set out in the Policy VC THU2, and in accordance with other policies within the Local Plan, the scheme will be expected to respond to the local context of the site, including the topography of the land and avoiding adverse impacts on adjacent properties. Furthermore, an extant planning consent on (part of) VC THU2 remains the fallback position for the site and is not considered to be significantly different to the proposed allocation in terms of its impact on Poppyfields to the north of the site. The Council does not consider this to impact on the soundness of the VCHAP.	1139	No action required.
VC THU2, 40.17	2615	Object	Surface water will be a problem as the plot slopes down towards the flood plain, as the Environment Agency has pointed out in plans. This is very near to our property and could compromise it.	Explain explicitly how this water will be dealt with. This land should have no further asphalt or concrete.	VC THU2 was assessed by the Lead Local Flood Authority (LLFA) as part of the technical consultation (with the LLFA comments set out in the site assessment). These comments have been reflected in the supporting text of the policy which highlights the presence of the surface water flowpath to the west of the site. A drainage strategy will be required as part of the planning application and in accordance with the planning framework must ensure that it does not exacerbate the existing situation. Similarly, it will be necessary for the site layout and design to respond to the wider context of the site. The Council considers an appropriate solution to be achievable and does not consider this to relate to the soundness of the Plan.	1138	No action required.
VC THU2, 40.18	3087	Support	Norfolk County Council notes that the South Norfolk Village cluster plan has included supporting text regarding safeguarded mineral resources where sites are under the threshold of 1 ha and therefore the Minerals and Waste Policy CS16 (or any successor policy) does not apply. Therefore, the support text referring to "The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan" can be removed from this paragraph.	Remove "The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan" from the supporting text.	The Council does not consider this to be a soundness matter however should the Inspector be minded to modify the Plan the Council would not object to the removal of 40.18 from the supporting text in the Thurlton and Norton Subcourse chapter of the VCHAP.	1137	The Council does not consider this to be a soundness matter however should the Inspector be minded to modify the Plan the Council would not object to the removal of 40.18 from the supporting text in the Thurlton and Norton Subcourse chapter of the VCHAP.

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VC THU2, 40.19	2614, 2759	Object	(1) The increase in cars will further exacerbate an already chronic problem with traffic along Beccles Road. Turning right onto Beccles Road is already potentially dangerous. (2) The Parish Council are extremely concerned with the access for the proposed site, based on the allocation. As highlighted the site slopes downwards East to South-West, meaning the access to Beccles Road will be also be sloped. For the proposed target of 15 houses (~30 cars) this is a significant risk accessing the Beccles Road. We also agree with highways that access to the site via Sandy Lane to the South should not be permitted.	(1) Lessen the density and thereby the impact of this proposed development. (2) The Parish Council are extremely concerned with the access for the proposed site, based on the allocation. As highlighted the site slopes downwards East to South-West, meaning the access to Beccles Road will be also be sloped. For the proposed target of 15 houses (~30 cars) this is a significant risk accessing the Beccles Road. We also agree with highways that access to the site via Sandy Lane to the South should not be permitted. In addition to the 2016 application, 2 further applications were submitted to extend development on the site (2018/2593 & 2018/2594), but were subsequently withdrawn. However, in both cases Highways raised significant concerns about the standard of roadway through the development and the access to Beccles Road. In light of these the Parish Council ask that all 8 of the comments/recommendations from highways are considered again.	The site-specific policy requires access to the site from Beccles Road only. NCC Highways Authority have not raised an objection at the Regulation-19 stage to the allocation of this site and discussions with both the site promoter and the Highways Authority indicate that the current approved access into the site can be improved as part of a comprehensive redevelopment of the site. An illustrative layout for the site demonstrates a proposed realignment of the access road that would address earlier concerns of the Highways Authority.	1136	No action required.
VC THU2, 40.20	2761	Object	The Parish Council stress that should the site be taken forward any development on this site MUST be sympathetic to the existing properties already bordering the proposed location.	The Parish Council wish to state that the proposal to squeeze 15 houses into an extremely small and problematic site is, in our opinion, flawed and should be removed from consideration.	Detailed design will be agreed at the planning application stage. Proposals for the site will be required to accord with the site-specific policy requirements, as well as the existing Development Management policies including Policy DM3.8. This comment does not raise a soundness issue.	1135	No actions required.
Policy VC THU1: Land north of Blacksmiths Gardens	3075	Object	Summary of representations received in response to VC THU1: - The existing shared surface road at the end of Blacksmith Way is appropriate to serve a maximum of 25 dwellings. Presently 14 dwellings are accessed via the shared surface road, providing scope for a further 11 dwellings rather than the 12 described in Policy VC THU1; - The proposed allocation area does not extend to the end of the road at Blacksmith's Gardens and requires revision to ensure the site could be accessed as per paragraph 40.9; and - The development must be laid out in such a way to prevent vehicles from accessing the existing public footpath Thurlton FP3.	Summary of changes proposed in response to VC THU1: - Paragraph 40.9 is revised to allocate 11 dwellings; - A policy requirement to prevent vehicles from VC THU1 accessing existing public right of way Thurlton FP3; and - The Thurlton & Norton Subcourse policy map is updated such that proposed allocation VC THU1 extends to meet the end of the Blacksmith's Gardens carriageway to ensure the site could be accessed as per paragraph 40.9.	Following receipt of these comments from the Highways Authority the Council has sought further engagement with this consultee to seek a further understanding about the issue relating to proposed numbers on this site. As a result of these discussions the Highways Authority has subsequently updated their position and agreed that an allocation for 12 dwellings from Blacksmiths Gardens is acceptable but that the policy should refer to a maximum number of dwellings on the site. The Council proposes a modification to VC THU1 to reflect this discussion. Having reviewed the additional matters raised the Council does not consider that they relate to the soundness of the Plan, nor that either the policy map or the text require further modification unless the Examiner is minded to do so.	1513	The Council does not consider this to be a soundness matter however for clarity it is proposing a modification to the site specific policy for VC THU1 so that the words "at least" are removed from the policy.

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Policy VC THU1: Land north of Blacksmiths Gardens	3191	Object	Whilst there are no designated heritage assets within the site boundary, the grade I listed All Saints Church lies to the north of the site. Therefore, any development of this site has the potential to impact upon the significance of this heritage asset. However, the church is at some considerable distance and there is substantial planting between the church and the site and therefore we do not consider it likely to have an impact on the heritage asset. Bullet point 3 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 3 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	Amend criterion 3 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	The Council welcomes the confirmation that the allocation is considered unlikely to have an impact on All Saints Church. However, the Council considers that the proposed archaeological requirements suggested by Historic England are too onerous and could result in unnecessary and costly field work, prior to the submission of a planning application. The Council has clearly highlighted within both the supportive text and the site-specific policy a requirement for the applicant of the site to liaise with the Historic Environment Service at what it considers to be both a proportionate and justifiable degree.	1144	Whilst the Council does not consider a modification to the policy to be necessary for soundness, should the Inspector be minded to update the policy to reflect the views of Historic England the Council suggests the following wording: "Historic Environment Record (HER) to be consulted at an early stage to determine the need for any archaeological surveys on site. Appropriate archaeological assessments to be undertaken and submitted in support of the planning application, as agreed with HER and the local planning authority".
Policy VC THU1: Land north of Blacksmiths Gardens	2835	Support	We support this allocation for at least 12 dwellings, which can be delivered as per the policy wording below. The upper limit has only been imposed due to road width restrictions, as the Council recognises that the site is in a sustainable location and is suitable for further development. Thurlton lies outside of the nutrient neutrality catchment area, so this allocation is deliverable in the short-term, whereas allocations within the catchment could face significant delays.	No changes proposed.	The Council welcomes the ongoing support of the site promoter for the allocation of VC THU1. With regards to the nutrient neutrality matter the Council considers this to be a short term matter whilst the VCHAP is planning for growth to 2038. Within this context the weight afforded to a site falling either within/ outside an affected catchment area is not considered to be significant.	1143	No action required.

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Policy VC THU1: Land north of Blacksmiths Gardens	2611, 2729, 2757, 3062	Object	Summary of representations received in response to VC THU1: HIGHWAYS: - Highway safety at the entrance to the village (at Hall Farm); - Increased traffic movements in the village and increased commuting; - Access via Blacksmiths Gardens only; - Development not to impact on existing access arrangements for existing dwellings along Beccles Road; and - Consideration of construction traffic and agricultural traffic movements. INFRASTRUCTURE - Inadequate infrastructure within the village; - Impact on the existing Public Right of Way; - No additional housing required in the village; and - School operating at capacity. MISCELLANEOUS - Concern about topography of the site and impact dwellings could have on the adjoining properties; - Concern about potential surface water flooding resulting; - Potential increase of crime within the village; and - Adverse impact on existing dwellings (loss of sunlight, reduced privacy); - New development to be sympathetic to adjoining properties; and - No increase to site allocation area if 12 dwellings can not be accommodated on this site.	Summary of suggested changes to the proposed plan in response to VC THU1: - Reduce the proposed number of new dwellings; - Natural infill in Thurlton only; - Development to the west of Beccles Road only to avoid impacting on existing dwellings and to avoid the Public Right of Way; - A long-term solution to highway safety at the corner by Hall Farm is required; - Thurlton FP3 must be retained in its existing location and guaranteed to be a safe / open footpath; - Development must be sympathetic to surrounding on development on all 3 sides of the site; - Access via Blacksmiths Gardens only; - Access to the rear of existing properties along Beccles Road to be retained but must not provide access into the site itself; - Impact of construction traffic - particularly on footpath FP3 - to be considered during the planning stage; - Adequate arrangements for agricultural vehicles to access adjacent land required; and - No increase in the site area to accommodate 12 dwellings.	The Council acknowledges the concerns submitted in response to Policy VC THU1 but considers that many of these issues will be addressed within the detailed site layout and design and assessed at the planning application stage and will be informed by existing planning policies within the Local Plan. As set out in the site-specific policy the Council will expect a site layout and design that responds appropriately to the adjoining properties, as well as vehicular access to be served from Blacksmith Gardens only. The supporting text also makes clear reference to the importance of avoiding enclosure of Public Right of Way FP3 (paragraph 40.8). The Council has engaged with technical consultees throughout the preparation of the VCHAP and no objection has been raised to the general principle of development in this location by NCC in their capacity as either Highways Authority or in their role as education provider. Overall development proposed in Thurlton is limited and will not generate a significant number of additional school pupils. Nonetheless it is not considered that there is a capacity issue at Thurlton Primary School and the suggestion that children at Haddiscoe would be within the catchment area of Thurlton are incorrect. (For clarity, the comment of the Highways Authority will be addressed in a separate response). The Council remains of the opinion VC THU1 is appropriate for allocation at the scale set out in the VCHAP and does not consider that any of the issues raised above relate to the soundness of this policy.	1142	No action required.

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Policy VC THU2: Land adjacent to Holly Cottage, west of Beccles Road	2613, 2654, 2762, 3038, 3061	Object	The following is a summary of the key issues raised in response to the allocation of VC THU2: (1) Development is too dense for the site; (2) Site SN0309 in Newton Subcourse should be reconsidered as an alternative site; (3) Newton Subcourse should be subject to allocations rather than Thurlton; (4) Concerns about highways safety, particularly with reference to access to Beccles Road; (5) Protection of wildlife habitats, trees and pond are a priority; (6) No access to Sandy Lane to the south; (7) Any development on the site must be sympathetic to the properties bordering the site; (8) The lower part of the site would likely need pumped sewerage with associated risks to the adjacent watercourse in the event of pumping failure; (9) The lower part of the site has flooded and should be avoided - but no objections to development to the north of the site; and (10) Likely to be insufficient capacity at the village school and proposed allocations in other settlements could also result in additional pressures on the school as well as associated highway impacts.	The following is a summary of the changes proposed in response to VC THU2: (1) A reduction in the number of proposed dwellings; (2) Removal of the site from the process; (3) Reconsider the allocation of SN0309 as an alternative site; (4) Consideration of the highways comments made in response to the 2018/2593 and 2018/2594 planning applications; (5) Biodiversity of the site should be maintained; and (6) No dwellings permitted on the lower part of the site.	Although the Council notes the concerns raised regarding the allocation of VC THU2 it remains of the opinion this allocation is sound, as too is the allocation of sites within Thurlton. Previous developments and allocations at Thurlton reflect the sustainability of the settlement, including the availability of services and facilities locally. SN0309 at Newton Subcourse was assessed in accordance with the agreed criteria and was rejected for a number of reasons which included specific-on site constraints and the landscape and townscape impact that would arise. The site promoter has submitted supporting evidence including an illustrative layout which demonstrates the proposed density would be within the local context and could include open space to the south of the site. Access into the site has been accepted in principle by the Highways Authority who have not raised an objection to this allocation at the Regulation-19 stage. Indeed, it is considered that a comprehensive re-development of the site would result in opportunities to improve the current approved access into the site. Policy VC THU2 stipulates that vehicular access should be from Beccles Road only, reflecting the discussions that have taken place with this consultee throughout the preparation of the VCHAP. Detailed matters relating to site layout, drainage, highways access and ecological mitigation would be agreed as part of the planning application process and would be expected to respond to the site-specific policy requirements. The Lead Local Flood Authority has also engaged with the VCHAP preparation and has not raised an objection to the allocation of the site and the Council therefore considers it reasonable to assume that an appropriate drainage scheme can be prepared for the site. As part of the VCHAP process the Council has proactively engaged with NCC Education who have not raised an objection to allocations within Thurlton. Furthermore, the representation that refers to the capacity of the school suggests that the Haddiscoe allocation would impact on Thurlton Primary, however the catchment primary for Haddiscoe is Glebeland Primary at Toft Monks (which has a continuous footway from Haddiscoe) and therefore this information is incorrect.	1134	No actions required.

41. Thurton and Ashby St Mary

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Form and character, 41.1	2577	Support	The parish council are in support of the South Norfolk Village Clusters Plan for the parish of Ashby St Mary.	No changes proposed	The Council notes these comments within the context that there is currently no allocation site preferred within Ashby St Mary.	1132	No action required

42. Tivetshall St Mary and Tivetshall St Margaret

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Tivetshall St Mary & Tivetshall St Margaret, 42.1	2749	Object	The last sentence is not accurate. There are also clusters of development in Hales Street, Moulton Road, Lodge Road and Ram Lane. These clusters of development further show the linear nature of development in The Tivetshalls and the large area the parish covers.	The final sentence of this paragraph needs to reflect that there are other clusters of development and that other buildings are not just farms and isolated properties.	The Council remains of the view that the existing wording of supporting paragraph 42.1 is proportionate and emphasizes the linear nature of development in the parish. The Council does not consider this matter to relate to the soundness of the plan.	1471	None required.
Settlement Limit, 42.3	2302	Object	Extra cars will create a problem as all services are located at the far end of the village. Walkers will also be hindered by this and it is requested that a footpath is included.	A footpath is needed along the development due to the excess traffic.	The Council does not consider this to be a soundness issue as all key services in the village of Tivetshall St Mary (including the post office, school and Old Ram public house) are within the established distance that was used as the baseline during the site assessment process. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this inclusion within the Settlement Limit. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds.	1271	None.
Settlement Limit, 42.3	3097	Support	Support inclusion of land as part of the Settlement Boundary Extension. Site remains available and appropriate for windfall development. The landowner concurs with the findings of the site assessment. Inclusion of the site contributes towards soundness of the plan. It will contribute towards bringing forward sufficient land (positively prepared), provides appropriate strategy commensurate with the Village Cluster's status (justified), will help deliver windfall development (effective) and will assist in meeting the 'tests' of the framework (consistent with national policy).	No modification to the Plan however some updates and clarifications to the site assessment have been suggested.	The Council welcomes the ongoing support of the site promoter for the inclusion of the site within the Settlement Limit. The Council has noted the additional comments relating to the site assessment and site specific matters and considers that these will be most appropriately resolved at the planning application stage.	1272	No action required.
Settlement Limit, 42.3	3192	Support	No designated heritage assets on the site. Two grade two listed buildings, Croft House and Croft Cottage, located to the south east of the site. Any development has potential to impact the significance of these. Welcome preparation of the HIA which identifies neutral impact and no mitigation recommended.	No changes suggested.	The Council notes the support for the Heritage Impact Assessment and the conclusions that this reaches.	1273	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC TIV1, 42.4	2756	Object	Old Ram Inn and A140 are some distance away with no footpaths leading to them as well as narrow roads and dangerous bends. Road to the primary school, village hall and recreation ground is also very narrow with a blind bend at the junction of The Street and Mill Road, which was identified as unsafe at Regulation 18.	Consistency in the description of distance to the A140 and The Old Ram, para 42.2 describes the location of the A140 in relation to the developed area more accurately.	The Council does not consider the references to the Old Ram Inn as a sound ness issue. However, paragraph 42.4 will be amended to keep the references to the distance to the Old Ram Inn consistent. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds.	1270	Amend paragraph 42.4 to remove the word 'nearby'.
VC TIV1, 42.5	2766	Object	In addition to protecting hedgerows, Church Lane should be protected with planting for screening, maintaining the quiet and secluded nature of Church Lane. Church Lane is identified as a non-designated heritage asset in the adopted Neighbourhood Plan.	Planting of hedging along the western boundary of the proposed site to preserve the nature of Church Lane, which is not overlooked by nearby housing along it's entire length.	Church Lane is located outside of the site, therefore direct planting in this area may not be possible. Policy VC TIV1 does state that retention, reinforcement and protection of the existing hedgerow along the southern boundary should be undertaken. The potential impact on heritage assets was identified at the site assessment stage. Historic England have been engaged throughout the site assessment process and plan preparation. Historic England did not identify any issues that would prevent development from taking place on the site. It is not considered that a policy update is required at this stage. Further assessments will be undertaken at the planning application stage once the site layout and design is known. The Councils does not consider these matters to relate to the soundness of the Plan.	1269	No action required.
VC TIV1, 42.6	2303, 2770	Object	Concerns raised over the number of extra vehicles that will result of development. No footpaths planned for the site. The Street in areas is very narrow. Rectory Road is also very narrow with 40mph speed limit that only ends around 1/2 mile from the village. Older people, pushchairs and cyclists are not able to move onto verges.	A footpath must be added to aid pedestrians. Clarity that extra vehicles will access the site from both directions and that pedestrians and cyclists also walk to the Post Office on Rectory Road and to the bust stops of the A140, not just towards the school and village hall. It also needs to be clear that there would be an increase in vehicles using these roads.	The Council does not consider the issues raised to relate to the soundness of the Plan. It is stated in the paragraph 42.6 while there are not continuous footways along The Street that the verges are wide enough to allow pedestrians to step off the road if needed. It is also stated that the speed limit along the Street is 30mph. It should be noted that the Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds.	1268	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC TIV1, 42.7	2776	Object	Too many dwellings have been allocated considering need to reflect form and character of the area as required by the Neighbourhood Plan. Neighbouring properties are all bungalows and their residential amenity must be protected. New dwellings close to these should also be bungalows.	No changes suggested.	Site VC TIV1, according to the policy, will be developed at a density of approximately 20 dwellings per hectare, which is considered to be appropriate and an effective use of land. Reducing the density or splitting the number of dwellings over smaller sites may have an impact on the deliverability of the dwellings and the ability to meet housing needs. The potential impact on the townscape and neighbouring properties has been identified during the plan preparation. Policy VC TIV1 includes a criteria stating that the overlooking and visual impact of the existing single storey dwellings should be minimised.	1267	No action required.

Policy VC TIV1: Pear Tree Farm, west of The Street	3060	Object	Mismatch between the allocation size (20) and the PAN for the local primary school (7). The village is relatively isolated with a limited number of services. Several on-site constraints were identified as part of the site assessment. Highways concerns were raised relating to the capacity of the local road network and lack of footpath connections and pedestrian safety, which would result in an increase use of unsustainable transport modes. Highways stated that 'there is no possibility of creating suitable access to the site'. Potential for land to be contaminated because of previous uses. Presence of a nearby non-designated heritage asset. There have been several unsuccessful applications on the site.	No changes proposed	The Council does not consider any of the issues raised to be related to the soundness of the Plan. In terms of the capacity at the local primary school, Norfolk County Council Education Services have reiterated their earlier advice that throughout Norfolk there has been a decline in birth rates which is impacting on the entry years and subsequent years in schools; it is anticipated that this will take effect within the next 2-3 years as higher numbers of pupils transition through the primary schools. Increased pupil numbers locally will support the ongoing future of rural schools throughout the village cluster area. Furthermore, as previously noted throughout the VCHAP, children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the school. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds. The potential for contamination issues was identified at the site assessment stage, however this potential was not considered sufficient to exclude the site from consideration. Policy VC TIV1 states that contamination issues will need to be identified and resolved at the planning application stage. The potential impact on heritage assets was identified at the site assessment stage. Historic England have been engaged throughout the site assessment process and plan preparation. Historic England did not identify any issues that would prevent development from taking place on the site. The VCHAP seeks to allocate sites for residential development in accordance with Local Plan requirements and manages the release of land for this purpose. Previous refused applications for the site have been speculative proposals (planning references 1985/1055 and 1986/0648) that have been refused for 5 dwellings and a shop. Due to the time that has passed since these applications were submitted no reports are available to determine why they were refused. However, again due to the time that has passed, the planning system and policies that they were	1266	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
					determined under have changed and therefore the reasons for their refusal should not be seen as relevant reasons for excluding the site now. The issues requiring mitigation have been identified as part of the site assessment process and through the various rounds of public consultation. These will need to be mitigated in order for planning applications to be considered acceptable.		

Policy VC TIV1: Pear Tree Farm, west of The Street	2974	Object	Adjacent to the village hall is a large playing field with children's play equipment established in 1951. Village pond upgrade was completed in 2023 providing improved accessibility. Changes to the settlement limit have an immediate impact on linear character of the area. Considered that there are no major differences with 3 sites proposed by Neighbourhood Plan Steering Group. There is no bus service through the village and closest bus stops are located over a mile away from site and involve crossing A140 if travelling to Diss. Rectory Road also has a coach pickup point for school children, where they are often dropped off by car due to distance and road safety issues. Would remove open countryside views for dwellings adjacent to site when all but 6 properties in village have at least one. It is possible to have development in the area whilst maintaining the linear character. Concerns that development on half the site that was originally proposed will eventually lead to other half being developed. Access to the other half already considered unsuitable and would result in major safety issues. Not considered to be in conformity with adopted Neighbourhood Plan Policies TIV 1 and TIV 8 regarding the established pattern of development and vehicular movements on The Street. The policy also contradicts the Neighbourhood Plan in relation to visual impact on existing dwellings.	Include in paragraph 42.2 that adjacent to the village hall is a large playing field with children's play equipment, which was established in 1951. Village pond upgrade was completed in 2023 providing improved accessibility. We believe it is possible to accommodate new homes in the Tivetshalls without losing its current linear characteristic in line with the adopted Neighbourhood Plan.	The Council welcomes the playing field and pond improvements, which will benefit existing and future residents in the settlement, however this is not considered to be a soundness issue. It is acknowledged in the supporting text for Policy VC TIC1 (paragraph 42.5) that the site does represent a departure from the established linear ribbon development. However, it is also stated that the site is well screened by existing development and hedgerows. It also avoids further intrusion into the open countryside. Due to this containment it is considered that the site would have a limited impact on the wider landscape compared to further linear development into the countryside. Access to public transport was considered as part of the site assessment process. It is recognised when planning for growth in rural communities that the provision of public transport is more limited in rural areas when compared to more urban settlements. While the distance from the local bus stops has been noted this was not considered to be a reason to dismiss the site for potential development. The site proposed for allocation should only be considered on its own merits. It is not appropriate to consider the potential for development in adjacent areas that are not being allocated. These would have to be considered if and when they are promoted, either through the Local Plan process or as part of a planning application. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds. The impact on the townscape and existing development was considered during the site assessment process. It was acknowledged that there are potential impacts on existing single storey dwellings and a requirement that this should be minimised has been included in policy VC TIV1. The right to a view and the potential impact on local property values however are not material considerations in planning and do not constitute reasons for development to not take place.	1265	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC TIV1: Pear Tree Farm, west of The Street	2304, 2506, 2567, 2568, 2569, 2570, 2777, 2914	Object	Principle of development generally accepted however the number of dwellings proposed is considered to be too high on this site. Development of this scale would detrimentally impact the character of the area. New dwellings may overlook existing dwellings, devalue them and would restrict the existing views of the open countryside. Lack of footpaths and other sustainable connections, such as bus services, in the area. Access to the site may not be suitable and difficult to achieve. Increase in traffic would detrimentally impact the area, especially increase in carbon emissions. Local services and facilities are not suitable to accommodate this level of development, most notably drainage and water supply. Impact on local wildlife and habitats.	Reduce number of dwellings allocated. New dwellings close to existing dwellings should be limited to bungalows at a lower density. Dwellings should be developed on a different site or multiple sites closer to A140 and services. Further investigation into access. Footpath provided between site and school. Increase protection offered to local wildlife and habitats. Require provision of more services and facilities such as a village shop. Control lighting from new development.	The Council does not consider any of the issues raised to relate to the soundness of the Plan. Site VC TIV1, according to the policy, will be developed at a density of approximately 20 dwellings per hectare. Reducing the density or splitting the number of dwellings over smaller sites may have an impact on the deliverability of the dwellings and the ability to meet local housing needs. The potential impact on the landscape and townscape was a key consideration during the site assessment process. Key stakeholders who consider the impacts on these, such as Historic England and the Norfolk Wildlife Trust, have also been engaged throughout the preparation of the VCHAP and did not raise any landscape or townscape concerns during the Regulation 19 consultation. The supporting text for the policy states that while the site does deviate from the mostly linear nature of the area, the site will be contained by existing development and the existing hedgerows which border the site. This will limit the impact on the landscape and townscape. Bullet point 2 of the site specific policy seeks the protect the amenity of existing and future residents. Any design submitted by developers will need to ensure that this criteria is met in order for any development on the site to be considered acceptable. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds. Anglian Water have been consulted as both a technical consultee and as part of the Water Cycle Study. They have not raised any objections to this policy. Statutory consultees such as the Environment Agency and Norfolk Wildlife Trust have been consulted throughout the preparation of this plan including at the site assessment stage. No objections have been raised in relation to the potential impact on local wildlife and habitats.	1264	No action required.

43. Toft Monks, Aldeby, Haddiscoe, Wheatacre and Burgh St Peter

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Aldeby, 43.15	3201	Object	Site SN5011SL would provide 2no. dwellings and present as a natural addition to the Settlement Limit. The Council has failed to visit The Site, resulting in an incorrect HELAA assessment, failing to meet the objectives of the South Norfolk Village Clusters Housing Allocations Plan (as set out at Paragraph A.1.). The assessment has not been informed by the on-the-ground conditions and is fatally flawed. A corrected HELAA assessment (for Amber and Red elements) is offered to assist consideration of The Site along with site photographs, to assist the Officers who have not visited The Site. The Council's own assessment fails against the published 'Soundness test', again an assessment against the 'Soundness' topics is provided to assist the Council. The Site presents a viable and deliverable opportunity to deliver 2no. windfall dwellings as envisaged by National and Local Planning Policy. Durrants would respectfully request that the Settlement Limit on this section of Lily Lane is reconsidered in light of the provided evidence.	Durrants would respectfully request that the Settlement Limit on this section of Lily Lane is reconsidered in light of the provided evidence.	The Council remains of the opinion that SN5011SL is not appropriate for inclusion in the Settlement Limit and does not agree amendments suggested to the site assessment form. The omission of SN5011SL from the Settlement Limit in Aldeby is not considered to be a soundness matter. As part of the site assessment process the Council conducted a desktop assessment of the site initially, followed by a site visit if this was considered to be an appropriate next step. As set out in the site assessment, SN5011SL was assessed via Google Street View with those images dated June 2019. The Council notes that even if a site visit had been undertaken in early 2022 (which is when sites submitted during the Regulation-18 stage were visited by officers) the works shown in the photographs would not have been present, as demonstrated in the current Google Street View pictures dated June 2022 which do not show these changes to the field access and the maintenance of the boundaries. Whilst an upgraded field access has been installed, and some works have been undertaken to manage the boundaries either side of Lily Lane, the Council does not consider that this significantly addresses the concerns of the highways authority which relates to safe pedestrian access between the site and the local facilities, the width of Lily Lane and the constrained nature of the local highway network. Many areas of development in rural locations are not considered suitable for additional housing because they do not encourage walking and cycling, or provide safe access to, local services and facilities, such as village halls, local shops and pubs, playing fields/sports clubs, bus stops, local employers etc. The representation proposes a number of additional changes are necessary to the site assessment form undertaken by the Council. Having reviewed these, the Council does not consider these changes to be either accurate or appropriate amendments and the original site assessment remains a fair assessment. For example, within the 'accessibility to local services a facilities' section of the assessment it is suggested that the bus service is incorrectly recorded as being 'infrequent'. In fact the bus timetable for the no. 86 included as Appendix 3 of this representation clearly	1130	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
					shows that the bus stops once a day (in each direction) at Aldeby Green rather than the 4-5 times daily set out in the 'corrected' assessment. This information has also been verified by confirming the most up-to-date timetable online. It is also the Council's opinion that the changes to the field access (as shown in the photographs submitted in support of the site) are incongruous in this rural context and simply highlight the adverse impact dwellings and associated landscaping and domestic paraphernalia would have in this location. It therefore remains fair to conclude that the site is clearly within the countryside and would have a landscape impact. The trees to the east of the site may form part of the boundary of the closest dwelling however they have been excluded from the Settlement Limit and form an attractive area that separates the built form from the surrounding countryside. Finally, the Council notes the comments made in relation to nutrient neutrality and the potential benefit to windfall housing numbers within the District should this site come forward outside of the constrained areas. However, the Council contends that the matter of nutrient neutrality is a short term issue and the VCHAP is planning growth over a longer period (up to 2038); it would not be appropriate to include sites simply to address this short term concern. It has not been considered appropriate to extend the Settlement Limit around this area and SN5011SL and the Council is satisfied that it should not be extended following the submission of this representation.		
Wheatacre & Burgh St Peter, 43.17	2833	Support	Please refer to detailed representations submitted on 6/3/23. In summary, we find the settlement boundary of Burgh St Peter to be sound. It allows for modest infill and extension. Burgh St Peter has the additional advantage of being outside of any Nutrient Neutrality catchment, meaning it can compensate for inevitable under-delivery of housing elsewhere in the district, some of which is within the catchment.	No changes proposed.	The Council welcomes the support for the changes proposed to the settlement limit at Burgh St Peter (for clarity, the inclusion of the VC BUR1 allocation) and notes that the detailed representation referred to in these comments relate to the support submit on behalf of the site promoter. These have been responded to separately. With regard to the comments relating to nutrient neutrality the Council considers that this is a short term issue and the VCHAP is planning for long term growth therefore this is not considered to be an overriding benefit.	1131	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC BUR1, 43.27	2588, 2653	Mixed	(1) This observation is correct (2) Facilities and services for Burgh St Peter are overstated and therefore have to be qualified. The Bus service is indeed limited, 1 bus per day between Monday to Friday, nothing weekends or Public Holidays. This will not enable any new residents to forgo their cars for Public Transport. School children will need either to be bussed or rely upon more cars.	(1) No changes proposed (2) New Houses need to be sited much closer to the vital arteries e.g. the Yarmouth Road to enable the residents to take advantage close proximity of Garage, Primary School and a regular bus service. Siting the new houses at the back end of BSP village puts them at the furthest possible distance from these facilities.	The Council has set out within the site assessment form and paragraph 43.27 the services and facilities within the Toft Monks cluster. As far as possible throughout the VCHAP the Council has sought to allocate sites that are accessible to local facilities and services however the rural nature of the village clusters area is reflected in the dispersed form of some of the individual clusters. The allocation of smaller sites is considered to be an appropriate approach to new development and will provide additional support for existing services and facilities throughout the cluster. Whilst the Council supports and promotes public transport options via the VCHAP it also recognises there will continue to be a reliance on private transport in the rural villages.	1074	No action required.
VC BUR1, 43.28	2589	Object	The “mature hedge” is at least one hundred and fifty years old, as it is visible in a photograph dated 1876. This hedge is a haven for our already dwindling wild bird population; as well as shrews, voles, hedgehogs and bats. Our wildlife is in decline through the removal of its natural habitat, as would clearly be the case here, and such removal would effectively be an environmental crime. A harsh statement, but it’s a fact, as replanting will not be habitable for some years, so that hedge needs more than just the utmost consideration and protection.	There is part of the hedge, which is the same width as the road, which is mainly brambles; this section would facilitate an entrance for a service road and allow maximum retention of the hedge. This would mean a reduction to the stated minimum of twelve dwellings.	Access into this site will necessitate either in part, or in full, the removal of the hedgerow along the site frontage in order to facilitate safe access. This is recognised in the supporting text for the site specific policy. However, there is not an assumption towards total hedgerow loss and minimising the removal of the hedgerow as far as possible will need to be a priority in the site design in order to be considered in accordance with the existing Development Management policies within the Local Plan (in particular DM Policy 4.8).	1075	No action required.
VC BUR1, 43.28	2656	Object	At the present moment residents on the south side of Staithe Road (opposite your site) enjoy visibility northwards viewing the Waveney Valley and high ground beyond to Somerleyton etc. It is noted that you are prepared to erect a screening of trees to blank the new houses from the Broads Authority land but what about our view where Valley will be replaced the new houses. Destruction of the ancient hedgerow is another way our rural outlook is going to be radically changed for the worse.	Resite nearer to existing facilities.	The Council recognises that there will be a change of outlook for those properties opposite development sites and has included requirements within the site-specific policy to address this as far as possible. These measures include the avoidance of harsh boundary treatments along the site frontage and a site layout and design to reflect the rural context of the site. The Council has existing Development Management policies in place to protect the private amenities of existing (and future) residents however it should be noted that the loss of a private view is not a planning consideration.	1077	No action required.

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VC BUR1, 43.29	2591, 2655	Mixed	(1) Any improvement to the junction would be welcome (2) This section of Staithe Road is classified by the Highways Authority as "unsuitable for HGV" There are no footpaths for pedestrians and it is quite risky walking this stretch especially when the large Agricultural machines are transiting between the farmlands. 12 houses could add another 24 + more cars on this restricted road. It is noted that absence of adequate pedestrian access has already been quoted by the Planning Authority in their rejection of sites SN2005SL, SN4010, SN4014 & SN4004.	(1) No changes proposed (2) Resite close to facilities.	Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds and the detailed information in the supporting text (para 43.29) sets out in greater detail the expectations of the Council for the developer of the site.	1078	No action required.
VC BUR1, 43.30	2592, 2640	Mixed	(1) Waste water is an ongoing problem - anything that improves the situation will be welcome. (2) Existing residents of Staithe Road - South Side have had to install Private Treatment Units at their expense to deal with foul water and the absence of any Public Sewer. Our subsoil is clay and the area is therefore susceptible to flooding in times of excess rainfall. We are worried that building on ground opposite our houses cause a run-off in our direction.	(1) No changes proposed (2) Site new houses nearer to important facilities	The Council has proactively engaged with Anglian Water throughout the production of the VCHAP and this is reflected in Policy VC BUR1 and its supporting text. The developer of the site will be required to liaise with Anglian Water to confirm an appropriate wastewater strategy for the site however AW has not raised a concern about the inclusion of this site within the Plan and it is not considered that this is a soundness matter. Comments relating to concerns about the potential flood risk during excess rainfall events are noted but it is considered that this can be dealt with appropriately via the drainage strategy at the planning application stage. These matters are therefore not considered to raise issues of soundness.	1123	No action required.
VC BUR1, 43.31	2593	Support	Drainage is poor, due to the layer of heavy clay near the surface - any improvement would be welcome.	No changes proposed	The developer of the site will be required to prepare an appropriate drainage strategy for the development, responding to the local ground conditions and not exacerbating the current situation. An appropriate drainage strategy (to be agreed at the planning application stage) could potentially improve the current situation.	1125	No actions required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC BUR1, 43.32	2594	Support	Any improvement or upgrade will be expensive for the developer, which will have a negative effect on the viability to provide some affordable housing within the proposal	No changes proposed	The Council has clearly set out the known constraints in terms of local capacity within the existing sewer network as well as at the existing Water Recycling Centre within the supporting text and the policy includes a requirement for early engagement with Anglian Water. As part of the evidence base for the VCHAP the Council has prepared a Viability Assessment of sites and this has been made available to site promoters who have also been contacted to seek assurances that their sites remain achievable and deliverable within the context of the emerging policy requirements and known constraints and deliver the requisite level of on-site affordable housing. The promoter of the site has provided written assurances that the site can be delivered in accordance with VC BUR1.	1128	No action required
VC BUR1, 43.33	2595	Object	The proposal that there should be a minimum of twelve dwellings is wholly unrealistic, and would destroy the existing character of the village.	I would suggest that the maximum number of dwellings should be limited to eight, in order to give space for each to have a small garden and off road parking.	The Council considers that the proposed density of VC BUR1 is acceptable and would not impact adversely on the character of the village. The streetscene is varied comprising a combination of single storey dwellings, flats, terraced dwellings and larger detached properties. A suitable site layout and design will be required and will be assessed in detail at the planning application stage, having regard to the specific design requirements set out in Policy VC BUR1. This is not a matter of soundness.	1129	No action required
Policy VC HAD1: Land south of Haddiscoe Manor Farm	3219	Support	We consider this form of development that is part of the draft allocation for this village, led by the green credentials of the locality would result in tangible benefits for the community and provide housing in a holistic and sustainable way in order to create a vibrant and resilient community and support the move to a post-carbon economy. Government has recognised the role that residential development can have in achieving sustainability and creating communities, where there is no choice between quality and quantity and green spaces amount to more than token verges and squares.	We are seeking amendments to the policy to ensure the potential number of units on the site is realised. Having undertaken some initial work on the site, we believe that the site is capable of delivering at least 35 units.	The Council welcomes the continued promotion and support from the site promoter for the allocation of VC HAD1 within the VCHAP, including the highways requirements set out in the policy. However the Council does not consider it appropriate to amend the policy text to "at least 35 dwellings" as suggested in this representation. The Council considers that due to the smaller number of services and facilities available in Haddiscoe 35 dwellings in this location is the most that is acceptable, whilst also being a sufficient number to deliver the specific site requirements. The Council notes the submission of a concept plan alongside this representation. Whilst this is clearly indicative in nature the Council does not consider that this layout would be compliant with the requirements of the policy as it fails to provide the significant area of open space along the road frontage, as set out in both the supportive text and the policy requirements.	1063	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC HAD1: Land south of Haddiscoe Manor Farm	3079	Object	Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy VC HAD1 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognise that underlain mineral resource has been included in the supporting text; however, we request inclusion of the text in the policy itself. The policy can be made sound by including the wording below, which was contained in the response by the Mineral Planning Authority, to the Regulation 18 consultation. In addition, for your information: The land north of VC HAD1 (adjacent B1136) is proposed for mineral extraction through the emerging Minerals and Waste Local Plan (site reference MIN25). A planning application was submitted in December 2022 for the extraction of sand and gravel at this site (FUL/2022/0056).	Amend Policy VC HAD1 to add the following wording as a policy requirement: 'The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'	The Council notes the comment of the Mineral Planning Authority but does not consider this to be a soundness matter. The Council has included within the supporting policy text reference to the site being underlain, or partially underlain by safeguarded resources and has highlighted the need for development to comply with the relevant policy within the Minerals and Waste Local Plan. It is not considered necessary to repeat this information within the site-specific text as all development is required to comply with the requirements of the Local Plan, which includes the Minerals and Waste Local Plan. At the time of preparing this response the Council is aware that the planning application for the proposed mineral extraction site north of the site remains undetermined. The Council has considered this proposal as well as the consultee responses submitted to Norfolk County Council within the context of VC HAD1. The Council is aware that the Norfolk County Council Public Health Officer has requested additional data and an expanded monitoring area in order to fully assess the impact of dust particles on sensitive receptors. The Council is of the opinion that should the updated assessment be considered acceptable for the occupiers of dwellings located in closer proximity to the minerals site then the impact on VC HAD1 (which is at a greater distance from the site) would also be acceptable. Conversely, should the impact on the closer receptors be considered unacceptable then this would need to be appropriately addressed in the course of determining the planning application.	1061	The Council does not consider the issues raised within the response of Norfolk County Council Mineral Planning Authority to be soundness matters however should the Inspector be minded to modify Policy VC HAD1 the Council suggests the following addition to the policy wording: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority".

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC HAD1: Land south of Haddiscoe Manor Farm	3193	Object	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. We welcome the preparation of the HIA. We welcome the proposal to locate the development further south, leaving an area of open land at the northern end of the site closest to the A143 to protect the setting of the church. We particularly welcome criterion 6 and 7 of the policy. Bullet point 8 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 8 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	Amend criterion 8 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	The Council welcomes the support of Historic England to the inclusion of the open space to the north of the site, as well as for bullet points 6 and 7 of the site-specific policy. However, the Council considers that the proposed archaeological requirements suggested by Historic England are too onerous and could result in unnecessary and costly field work, prior to the submission of a planning application. The Council has clearly highlighted within both the supportive text and the site-specific policy a requirement for the applicant of the site to liaise with the Historic Environment Service at what it considers to be both a proportionate and justifiable degree.	1060	Whilst the Council does not consider a modification to the policy to be necessary for soundness, should the Inspector be minded to update the policy to reflect the views of Historic England the Council suggests the following wording: "Historic Environment Record (HER) to be consulted at an early stage to determine the need for any archaeological surveys on site. Appropriate archaeological assessments to be undertaken and submitted in support of the planning application, as agreed with HER and the local planning authority".
Policy VC HAD1: Land south of Haddiscoe Manor Farm	3241	Support	Anglian Water suggests that due to the small-scale nature of the site, that the policy requirement regarding the capacity of the WRC and phasing of delivery is unnecessary, however early engagement is welcomed.	Modify policy text to read: Early engagement with Anglian Water regarding connecting to the local water recycling network.	The Council welcomes this positive response to the site-specific policy. Relaxation of the policy wording is not considered to a soundness issue and the Council does not consider that a change to the wording is necessary. However, the Council would accept a minor modification to the policy should the Inspector consider this to be appropriate.	1059	The Council does not consider that a modification to the site-specific policy is necessary to make the Plan sound however if the Inspector is minded to modify the policy to address the comments raised the Council suggests the following wording: "Early engagement with Anglian Water regarding connecting to the local water recycling network".

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Policy VC HAD1: Land south of Haddiscoe Manor Farm	2402, 3041	Mixed	Summary of representations received in response to VC HAD1: - Traffic calming measures should be introduced in the village to aid crossing the A143 - few safe footpaths in the village; - No amenities in the village - provision of safe community space for children required; - Public house closed in 2020; - Sewer / local wastewater treatment capacity insufficient - no mains sewer system in Haddiscoe; - Surface water flooding on The Street is frequent; - Limited views in/out of the site onto A143 - suitable access point required; - Most traffic through the village exceeds the speed limit accordingly to traffic data; and - No street lighting in any local development.	Summary of changes to plan received in response to VC HAD1: - Traffic calming measures should be introduced in the village to aid crossing the A143; - Provision of safe community space for children required;	The Council has engaged extensively with technical consultees and stakeholders throughout the production of the VCHAP, including Norfolk County Council (NCC) Highways team, the Lead Local Flood Authority and Anglian Water. Specific discussions have taken place on a number of sites, including this one, and have led to the criteria in the Policy. No objection has been raised to the allocation at the Regulation 19 stage on highways or flooding grounds. Constraints within the Anglian Water network have been noted in the supporting policy text (paragraph 43.24) and supported in the Regulation-19 representation from Anglian Water who have not raised an objection to this allocation.	1058	No actions required.
Policy VC BUR1: Land north of Staithe Road	3266	Support	We welcome the policy wording for hedgerows/trees in Policy VC ROC. We recommend that similar policy wording is applied to VC BUR1 to ensure this approach is applied consistently across the Local Plan.	Where removal of a tree or any part of a hedgerow is unavoidable, we recommend that policy wording includes reference to mitigation measures, reflecting the updated biodiversity duty required in the 2021 Environment Act to have regard to the enhancement of biodiversity.	The Council considers the policy to be sound in relation to the protection of ecological features. Site assessment identified a hedgerow along the southern boundary of VC BUR1 which is subject to 1997 regulations. The Council does not consider it appropriate to repeat the requirements of existing legislation or policies within the site specific policy text therefore does not consider it necessary to update the policy to reflect the above comments.	1447	None required.
Policy VC BUR1: Land north of Staithe Road	2624	Object	LVA notes that the site is surrounded on three sides by the Broads Authority Area. Significant landscape concern raised due to potential for views out across the valley being adversely affected. Site-specific mitigation measures identified in LVA are supported.	Policy needs to refer to the need for a LVIA given the LVA assessment.	The site-specific policy wording, as well as the supporting text, reflect the potential landscape sensitivities associated with this site given its proximity to the Broads Authority area. However, the site is well contained within the landscape, occupying the frontage of an irregularly shaped parcel of land, and having established woodland screening views into the site from the north west. In addition, existing residential development along Staithe Road and at the junction of Staithe Road/ Pit Road/ Beccles Road/ Mill Road forms the backdrop to the site and development on VC BUR1 will be viewed in the context of these properties. For these reasons the Council does not consider it either appropriate or necessary to include a requirement for an LVIA within the site-specific policy for this site.	1073	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC BUR1: Land north of Staithe Road	2690	Object	Building new houses on first class agricultural land away from all facilities and services is not likely bring any kudos for S.N.C. As already discerned distance to nearest Primary School is over 5 kms with no public transport existing. All other important services, Secondary School, Local Healthcare, Retail services are over 10 kms from this site. Peak time Public Transport does not exist so there would have to be many more car journeys along Staithe Road, a narrow rural road without pedestrian footways much to the detriment of our climate change precautions.	Seek a site nearer to facilities and services.	The Toft Monks village cluster (which includes Burgh St Peter) has a number of services and facilities throughout. The Council has recognised the distance of the primary school from VC BUR1 in the site assessment form but considers there to be reasonable access to other services and facilities within the cluster, including employment opportunities at Aldeby Business Park. With regards to the highway access and network, NCC Highways team have been engaged throughout the VCHAP process and their comments have informed the site specific policy requirements, including localised off-site highway works. The site is classified as Grade 2 agricultural land however the land is not currently in agricultural use, instead being utilised as grazing land.	1072	No action required.
Policy VC BUR1: Land north of Staithe Road	3242	Support	For consistency we recommend that there is a similar approach in requiring early engagement with Anglian Water, as taken with other site allocations where there is a very small WRC serving only a small proportion of properties within a settlement.	Modify policy text to read: Early engagement with Anglian Water regarding connecting to the local water recycling network.	The Council welcomes the response of Anglian Water but does not consider that the proposed modifications to the policy wording is a soundness issue.	1070	The Council does not consider that a modification to the site-specific policy is necessary to make the Plan sound however if the Inspector is minded to modify the policy to address the comments raised the Council suggests the following wording: "Early engagement with Anglian Water regarding connecting to the local water recycling network".
Policy VC BUR1: Land north of Staithe Road	2836	Support	We support this allocation for 12 dwellings in a sustainable rural location. It can be delivered in line with the policy wording below and, subject to viability, will deliver much-needed affordable housing for local people. The village is outside the Nutrient Neutrality catchment, meaning this allocation is deliverable in the short term and could compensate for under-delivery elsewhere in the District, much of which is within the catchment.	No changes proposed.	The Council welcomes the continued promotion and support of the site promoter for the allocation of VC BUR1. The Council expects delivery of affordable housing on the site to be in accordance with emerging Policy 5 in the Greater Norwich Local Plan.	1069	No action required.
Policy VC BUR1: Land north of Staithe Road	2596	Support	A developer will not be able to easily comply with these requirements, due to the plot layout. In order to get a minimum of twelve dwellings, they'd either have to be terraced, or grouped as semi-detached, which is completely at odds with the existing housing layout.	No change proposed.	Whilst the respondent has not raised an objection to the VCHAP on soundness, legal compliance or duty to cooperate grounds the Council recognises this submission as an objection to the density of VC BUR1 (at least 12 dwellings on 0.56ha). The Council considers the proposed density and site layout (frontage development) to be acceptable on this site. Detailed site design and layout will be considered at the planning application stage however the Council considers a suitable scheme is achievable within the varied streetscene.	1066	No action required.

44. Wacton

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Form and Character, 44.1	3007	Object	Wacton is 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. It is well located to the village and nearby school facilities. Whilst the Site was assessed as part of the evidence base, this fails to take into account the technical note produced in relation to transport including potential highways improvements. Furthermore, the Site is well separated from nearby listed buildings and this should not be a reason for failing to allocate the Site. The site should therefore be allocated within the plan.	The proposed site at Stratton Road, Wacton should be allocated within the South Norfolk Village Clusters Housing Allocations Plan as it a suitable and appropriate site for new housing.	The Council does not consider the omission of SN4029SL at Wacton from the VCHAP to be a matter of soundness. The site has previously been assessed in accordance with the agreed criteria and was not considered to be a suitable addition to the VCHAP. The village of Wacton does not have a settlement limit (SL) and as such a new SL would require re-introduction to accommodate development on this site. The Council has considered the merits of this but does not consider it to be an appropriate change for the settlement. The site also falls below the size and scale that would be considered for allocation in the VCHAP, as reiterated within the Regulation-19 representation here. The Council remains of the opinion the site is not suitable for inclusion within the VCHAP.	1511	No action required

45. Wicklewood

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Form and Character, 45.1	2312, 2425, 2625, 2661, 2964	Object	Summary of representations received in response to paragraph 45.1: - concerns about change to text between the Regulation-18 and Regulation-19 documents relating to rural outlook from Hackford Road and Wymondham Road; - loss of views resulting from development; - previous assessments support the open views; - concerns about the local highways network, including school car parking; and - inadequate infrastructure and poor facilities.	Summary of proposed changes received in response to paragraph 45.1: - replace allocations in Wicklewood with smaller, infill and road frontage development only; - reinsert references to views from Hackford Road and Wymondham Road; - remove allocations from the Plan; and - re-consider alternative options.	LANDSCAPE MATTERS Changes between the Regulation-18 and Regulation-19 documents reflect the evolving process which has included public consultation, liaison with technical consultees and the production of an evidence base (including a site specific Landscape and Visual Appraisal). The Council recognises the sensitivities of VC WIC1 and VC WIC2 (to a lesser degree) and considers that this is reflected in the site specific policy text for the respective allocation sites. The Council accepts that there will be a change of outlook from some properties along Hackford Road and Wymondham Road as a result of these allocations however the earlier Regulation-18 wording was considered inaccurate, particularly the references to dwellings along the southern section of Hackford Road. HIGHWAYS Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocations at the Regulation 19 stage on highways grounds. With specific reference to the points raised regarding school parking, Wicklewood Primary School has a large on-site car park and concerns about irresponsible parking associated with the school should be addressed to the school and the appropriate authorities. INFRASTRUCTURE, SERVICES AND FACILITIES The Council has identified a number of services and facilities within the settlement, including a primary school, public house, recreation ground and village hall. The settlement is also located close to the market town of Wymondham which has a wider range of services. Objective 2 of the VCHAP sets out that one of the primary aims of the Plan is to support existing facilities and services within rural settlements where these exist, delivering improvements where these are both appropriate and justified.	1052	The Council does not consider it necessary to alter paragraph 45.1 however should the Inspector be minded to modify the text to reflect these comments the Council suggests the following wording more closely represents the local outlook: "Church Lane and Low St are located on the north-facing slope of a valley, and many dwellings here and on Hackford Road and Wymondham Road benefit from long views of the surrounding countryside."

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Services and Community Facilities, 45.2	2311, 2626, 2662, 2967	Object	Summary of representations received in response to paragraph 45.2: - Regulation-18 document notes the primary school operating at- or near capacity and there is no change in this situation; - Local children unable to attend local primary school; - Lack of facilities and services within the village with the school being irrelevant to many households; - No local employment; and - Increased development at Wicklewood will add pressure to infrastructure in Wymondham.	Summary of changes proposed to the plan received in response to paragraph 45.2: - clarity required regarding capacity of the school; - remove site allocation; - reduced scale would lessen impact on local roads; and - replace with infill housing.	In terms of the capacity at the local primary school, Norfolk County Council Education Services have reiterated their earlier advice that throughout Norfolk there has been a decline in birth rates which is impacting on the entry years and subsequent years in schools; it is anticipated that this will take effect within the next 2-3 years as higher numbers of pupils transition through the primary schools. Increased pupil numbers locally will support the ongoing future of rural schools throughout the village cluster area. In recent years housing growth at Wymondham has increased the number of out-of-catchment pupils attending Wicklewood Primary School however this pressure is expected to ease following the opening of a new primary school at Wymondham College and the planned development of a new primary school at Silfield. For these reasons the Council is satisfied that removal of reference to the capacity of Wicklewood Primary School in the Regulation-19 document is appropriate. The Council notes the comments regarding employment within the village. This relates to the site assessment form rather than the publication document and the Council does not consider that this correction impacts on the soundness of the Plan. (For clarity, the site assessment form refers to local employment being within 1km of the settlement). Finally, Wymondham is a vibrant market town with a range of services and facilities that are accessible to existing and future residents of Wicklewood. The level of growth proposed at Wicklewood will not have a significant impact on the existing infrastructure in Wymondham (assumed to refer to healthcare facilities). Representatives of the Integrated Care System have been engaged with both the Greater Norwich Local Plan and the VCHAP in order to inform their ongoing healthcare strategies and future investment.	1051	No action required.

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Settlement Limit, 45.3	2627, 2965	Mixed	(1) This proposal is quite clearly outside the development boundary which SNDC itself has confirmed is not changing. It has had historic refusals for development, would be detached from other housing in the village and a major intrusion into the landscape. (2) I agree with these objectives, but only in the context of a much broader need to preserve the village's ambience and heritage - so, frankly, 45.3 doesn't go far enough.	(1) Remove this allocation	It is unclear which proposal respondent (1) is referring to although it is assumed that it is VC WIC1. The Council has clearly defined the settlement limit (development boundary) for Wicklewood in paragraph 45.3 and this is shown on the associated policy map for Wicklewood. The description of the Settlement Limit is considered to be appropriate and consistent with the approach elsewhere in the document. The Council has responded to concerns about the allocation of VC WIC1 when responding to more specific representations received elsewhere in the Wicklewood chapter and does not consider it necessary to repeat these responses again.	1050	No action required.
VC WIC1, 45.5	2396, 2628, 2966	Object	Summary of representations received in response to paragraph 45.5: - not an entry site to the village; - not well related to the village proper; - impact on countryside views; - arable fields; - highways impact; - limited services and facilities; and - concerns about increased numbers in the future.	Summary of changes proposed to the plan received in response to paragraph 45.5: - Remove VC WIC1 from the VCHAP; and - Preference for infill development.	These comments repeat many of the representations received in response to other paragraphs within the Wicklewood cluster chapter and as such have been addressed in the Council's responses elsewhere. With regard to the relationship between the site and the village paragraph 45.5 refers to the position of the site, noting its transitional role between the existing village development and the surrounding countryside as well as the main focus of the settlement being to the north of Hackford Road. For these reasons the Council considers the site to provide a gateway/ entrance into the village on approach from the south and south-east and does not consider the text requires modification.	1049	No action required.

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VC WIC1, 45.6	2279, 2629, 2663, 2968	Object	Summary of representations received in response to paragraph 45.6: - detrimental impact to the visual impact on entrance to the village; - concerns about flooding noted but not addressed; - increased traffic movements in the village due to the lack of services and facilities in Wicklewood; - loss of agricultural land; - not in keeping with the character of the village; - beyond the village boundary; and - soft landscaping is not an adequate replacement for the views lost.	Summary of changes to the plan received in response to paragraph 45.6: - Remove VC WIC1 from the Plan; and - Reduced scale development would have less of a landscape impact.	As set out in the supporting text (paragraphs 45.5 and 45.6) the Council recognises the prominent location of the site due to the open landscape and the topography of the site. A Landscape and Visual Appraisal for the site forms part of the evidence base and has informed the site specific policy requirements. As set out in the policy the Council expects a design and layout that integrates the site into the landscape and provides a gateway into the settlement. The Council has sought to avoid development on the most versatile farmland and confirms that VC WIC1 is located on an area identified as being Grade 3 agricultural land (good to moderate land). However the Council also accepts that due to the rural nature of the village clusters area development on some agricultural sites will be necessary. Wider points relating to the highways network and flood matters have been responded to in response to paragraphs 45.7 and 45.8.	1048	No action required.
VC WIC1, 45.7	2630, 2664, 2969	Object	Summary of representations received in response to paragraph 45.7: - The Green is constrained country lane that can not support extra traffic; - The Green is subject to flooding; - Improvements to the local road network risks additional heavy traffic movements through the village; - Adverse impact on Hackford Road; - Concerns about construction traffic and increased commuting from the village; and - Concern about higher numbers than proposed coming forward in time.	Summary of changes to the plan received in response to paragraph 45.7: - Remove the VC WIC1 from the VCHAP; - Reduction in scale of development to reduce stress on local roads; and - Replace with infill housing.	Norfolk County Council (NCC) Highways team and the Lead Local Flood Authority (LLFA) have been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. No objection have been raised to the allocation of VC WIC1 at the Regulation 19 stage for either highway or flooding reasons.	1047	No action required.
VC WIC1, 45.9	2631, 2970	Object	(1) The water supply and sewerage infrastructure is not capable of supporting a development of this size. (2) This paragraph appears to relate to a technical issue, but it does sound worrying. I heard at a Parish Council meeting some time ago that Anglian Water might be struggling already as a result of the extensive housing programme in and around Wymondham, so it appears to demonstrate yet another example of inadequate infrastructure locally.	(1) No to this allocation (2) There's scope for more infill housing. Stick to that as Wicklewood's contribution to the overall plan, as it's within the existing planning boundary (that I understand the proposals aren't). Proposals suggest modest numbers but there's already a published desire for significant extension to whatever is allowed - and that will destroy the ambience and character of Wicklewood as a traditional Norfolk village. My comments elsewhere in this submission are all relevant, and having attended a recent Parish Council meeting I agree with their views.	Paragraph 45.9 relates to Anglian Water infrastructure and recognises the planned growth within the wider area. Anglian Water have engaged with the Council throughout the production of the VCHAP and this supporting textual information recognises that the delivery timing of this development is not known. This is not a matter that is considered to prevent the delivery of the site and Anglian Water have not raised an objection to the allocation of the site in response to the publication of the pre-submission Regulation-19 version of the Plan.	1046	No action required.

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VC WIC1, 45.10	2426, 2632, 2665, 2971	Object	The following is a summary of representations received in response to paragraph 45.10: - estate development will alter the character of the village; - small developments integrate better into the community; - which development provides a precedent?; - increase in site numbers between Regulation-18 and Regulation-19 Plans; - site size exceeds small and medium site definition in the NPPF; - inadequate infrastructure and services; - surrounding highway network not suitable for increased traffic; - need to retain agricultural land; and - landscaping will not protect extensive landscape views.	The following is a summary of proposed changes received in response to paragraph 45.10: - Parish Council would support smaller infill road frontage development; - Remove the site from the VCHAP; and - smaller scale development in a less prominent location.	Allocation VC WIC1 is considered acceptable for up to 30 dwellings. The site density has decreased during the progression of the VCHAP as the Regulation-18 consultation proposed the same number of dwellings within a smaller site area. The enlarged site area reflects the landscape sensitivities of the site, as recognised and addressed within the site-specific policy requirements. The Council considers that an opportunity exists to create an attractive gateway to the settlement. Comments relating to compliance with the NPPF are incorrect. Paragraph 69a of the NPPF requires local authorities to identify sites for at least 10% of their housing requirements on sites no larger than one hectare. Typically the VCHAP allocates a range of sites within the range of 12 to 50 homes, from 0.5ha in site area, meeting the objectives of NPPF paragraph 69. The Council has identified a number of services and facilities within the settlement, including a primary school, public house, recreation ground and village hall. The settlement is also located close to the market town of Wymondham which has a wider range of services. Objective 2 of the VCHAP sets out that one of the primary aims of the Plan is to support existing facilities and services within rural settlements where these exist, delivering improvements where these are both appropriate and justified. Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions have led to the criteria in the Policy. NCC has raised no objection to the allocation at the Regulation 19 stage on highways grounds.	1045	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC WIC2, 45.11	2397, 2972	Object	Representations received in response to paragraph 45.11 have been summarised below: - highways concerns including: poor access into the site, heavy traffic on Hackford Road, single track roads around the area, double bends; - poor drainage of the site; - local knowledge of a Saxon/Roman road crossing the site; - loss of traditional heritage and amenity value to existing villagers and people passing through the village; and - current numbers proposed are modest but more have already been intimated.	Changes proposed in response to paragraph 45.11 have been summarised below: - development should be limited to infill housing; and - remove this site from the Plan.	The Council has consulted widely throughout the VCHAP process including the NCC Highways Authority, the Lead Local Flood Authority, the Historic Environment Service and Historic England. No objections have been received to the allocation of VC WIC2 during the publication period for the pre-submission Regulation-19 version of the VCHAP and the Council does not consider that any of the matters raised in these representations relate to the soundness of the Plan.	1041	No action required.
VC WIC2, 45.12	2973	Object	Sheep/ trees/landscaping are relevant but a side-issue. Hackford Rd's already threatened by increasingly dangerous/busy traffic (heavier and driving faster) including heavy lorries, supermarket/other deliveries, and increasing and irresponsible parking outside the school car park. Infrastructure inadequate - single-track for miles around including Milestone Lane, except Hackford Road. Double bends including at the church are unsighted. Traditional heritage and amenity value to all villagers and those passing through is bound to be damaged by the anticipated development. Numbers of might appear modest but more already intimated – thin edge of the wedge to damage/destroy Wicklewood further as a traditional Norfolk village.	There's scope for more infill housing. Stick to that as Wicklewood's contribution to the overall plan, as it's within the existing planning boundary (that I understand the proposals aren't). There's already a published desire for significant extension to whatever is allowed in the proposed plan - and that will destroy the ambience and character of Wicklewood as a traditional Norfolk village, irrespective of any landscaping and creating gaps to see the church (that is closed because it is unsafe and presumably might be at more serious risk). My comments elsewhere in this submission are all relevant, and having attended a recent Parish Council meeting I agree with their views.	Technical consultations and discussions with NCC Highways Authority throughout the production of the VCHAP have considered both the immediate site access and the wider highways network, with identified requirements reflected in the site specific policy. The highways authority has not raised an objection to the allocation of the site during the Regulation-19 consultation. Heritage, amenity and landscape matters have also been addressed within the policy requirements.	1040	No actions required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC WIC2, 45.13	2636, 2975	Object	Objections submitted in response to para 45.13 have been summarised below: - highways concerns, including: access into the site, heavy traffic using Hackford Road, dangerous bends near the school; - school at capacity and temporary accommodation would be unsightly; - inadequate and irresponsible school parking despite new car park on-site; and - development outside the village boundaries.	Proposed changes submitted in response to para 45.13 have been summarised below: - change location of the access; - reduce numbers to infill housing in the village only; - don't add pressure to the school; - don't add more traffic to Hackford Road; - remove the requirement for a frontage footpath by removing these sites.	The Council has engaged extensively with technical consultees throughout the production of the VCHAP, including Norfolk County Council in its capacity as both Highways Authority and Education Authority. The Highways Authority considers VC WIC2 to be acceptable for allocation in highway safety terms. Detailed design matters have not been agreed as part of the allocation process and therefore the precise access arrangements into the site have not yet been agreed. The policy requirement for a footpath connecting the site to Wicklewood Primary School, as well as the crossing point at Hackford Road, are considered to be reasonable and appropriate for ongoing highway safety. In terms of the capacity at the local primary school, Norfolk County Council Education Services have reiterated their earlier advice that throughout Norfolk there has been a decline in birth rates which is impacting on the entry years and subsequent years in schools; it is anticipated that this will take effect within the next 2-3 years as higher numbers of pupils transition through the primary schools. In recent years housing growth at Wymondham has increased the number of out-of-catchment pupils attending Wicklewood Primary School however this pressure is expected to ease following the opening of a new primary school at Wymondham College and the planned development of a new primary school at Silfield.	1039	No action required.
VC WIC2, 45.14	2976	Object	This paragraph appears to relate to a technical issue, but it does sound worrying. I heard at a Parish Council meeting some time ago that Anglian Water might be struggling already as a result of the extensive housing programme in and around Wymondham, so it appears to demonstrate yet another example of inadequate infrastructure locally.	There's scope for more infill housing. Stick to that as Wicklewood's contribution to the overall plan, as it's within the existing planning boundary (that I understand the proposals aren't). Proposals suggest modest numbers but there's already a published desire for significant extension to whatever is allowed - and that will destroy the ambience and character of Wicklewood as a traditional Norfolk village. My comments elsewhere in this submission are all relevant, and having attended a recent Parish Council meeting I agree with their views.	Paragraph 45.14 refers to Wymondham Wastewater Recycling Centre and acknowledges that the cumulative impact of local development combined with planned growth at Wymondham may require a phased approach to development to ensure adequate capacity for all sites coming forward. This statement reflects that definite timing of site delivery and connection to the existing infrastructure is unknown at this time. Anglian Water has engaged with the VCHAP process and has supported the inclusion of this information for developer's within the supporting text. The Council remains confident that an appropriate wastewater strategy can be achieved and it is not considered necessary to reduce the number of dwellings proposed within this sustainable settlement.	1038	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC WIC3, 45.16	2899	Object	The requirement for social housing appears to have been removed.	The requirement for developments to include social housing should be enforced.	Sites allocated in the VCHAP will be expected to deliver affordable housing in accordance with the requirements of emerging GNLP Policy 5 (33% affordable housing on sites of 10 dwellings or more). Changes to the requirements for the delivery of affordable housing in the NPPF superseded the earlier requirements set out in Policy 4 of the Joint Core Strategy for affordable housing to be delivered on sites of 5 or more dwellings, or sites exceeding a size threshold of 0.2 hectares. The site is carried forward for 6 dwellings, the same number of units originally proposed in the 2015 Local Plan.	1033	No action required.
Policy VC WIC1: Land to the south of Wicklewood Primary School	3217	Support	The proposed development would make a positive contribution to the provision of market and affordable housing in the area. The proposal would also add to the range of housing sites available in the locality, providing flexibility and a wider choice of development opportunities to the market, and thus strengthening the local supply of housing land. By providing sufficient land of the right type in the right place to support growth, the development would address the economic dimension of sustainable development, as defined in the NPPF. We consider this form of development should be considered as part of the draft allocation for this village, led by the green credentials of the locality, given its close proximity to the school. It would result in tangible benefits for the community and provide housing in a holistic and sustainable way in order to create a vibrant and resilient community.	We agree with the allocation of the site. However, we believe an additional policy element should be added to allow for an extension to the proposed boundary to allow for a more comprehensive area of tree belt and open space to the south and west of the site.	The Council welcomes the ongoing support for- and promotion of VC WIC1 within the VCHAP by the site promoters and notes the suggested amendments to the policy wording. The Council considers the area of land allocated to be sufficient to include both the preferred number of dwellings on site ("up to 30 dwellings") and the landscaping required, as illustrated in the illustrative site layout included with the representation. Should an additional area of tree belt associated with the site and/or open space be considered appropriate the Council is likely to support this planting outside the allocation boundaries however the Council does not consider there to be a compelling reason to extend the preferred site boundaries further. The Council's Open Space policies (set out in the Open Space SPD) also support, where appropriate, the provision of off-site open space.	1044	No action required.
Policy VC WIC1: Land to the south of Wicklewood Primary School	3246	Support	Anglian Water agrees with the approach taken regarding the site allocation policies for Wicklewood where matters regarding cumulative/in-combination effects with the development identified in the GNLP may require the phasing of development beyond the early years of the plan, are addressed in the supporting text and therefore a policy requirement is not considered necessary.	No changes proposed.	The Council welcomes the support from Anglian Water to the wording included in the supporting text for Policy VC WIC1.	1043	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC WIC1: Land to the south of Wicklewood Primary School	2584, 2633, 2666	Object	The following is a summary of representations submitted in response to Policy VC WIC1: - too many dwellings for the village; - loss of views from Hackford Road; - lack of services and facilities within the village; - change in character of the village; and - inaccuracies in the document and change in chapter text between Regulation 18 and Regulation 19 versions of the document.	The following is a summary of changes proposed in response to Policy VC WIC1: - remove VC WIC1 from the VCHAP; - focus on smaller infill allocations; and - include previous wording "loss of extensive views of the surrounding countryside".	The Council considers the scale of development proposed on VC WIC1 to be appropriate for the site, as well as the settlement. Wicklewood benefits from a primary school, public house, village hall and recreation ground as well as being within a reasonable distance to the market town of Wymondham. Paragraphs 45.5 and 45.6 of the text supporting VC WIC1 specifically refer to the plateau location of the site and recognise the landscape and visual impacts that will arise from the development of the site. The site-specific policy text has been informed by the findings of the Landscape and Visual Appraisal undertaken as part of the evidence base for the VCHAP. Alterations to the text throughout the document reflect the evolving process and the Council does not consider the changes to the text to be a soundness matter.	1042	The Council does not consider changes to the text to be required however should the Inspector be minded to recommend a minor modification to the wording to reflect these comments the Council would suggest the following wording is reinstated at paragraph 45.1, "Church Lane and Low St are located on the north-facing slope of a valley, and many dwellings here and on Hackford Road and Wymondham Road benefit from long views of the surrounding countryside."
Policy VC WIC2: Land off Hackford Road	3194	Object	Whilst there are no designated heritage assets on this site, the grade I listed church of All Saints and the grade II listed war memorial lie to the north of the site. However, the intervening trees provide an effective screen to the site. We suggest that additional planting along the northern boundary of the site would help to safeguard the setting of the church. We welcome the preparation of the HIA. We welcome bullet points 1 and 2 of the policy. We suggest the addition of and words, 'and enhance' after conserve in the first bullet point to read: 'to conserve and enhance the immediate setting...' to more closely reflect the NPPF.	In first bullet point add, 'to conserve and enhance the immediate setting...'	The Council considers VC WIC2 to be sound however should the Inspector be minded to modify the policy text in accordance with the comments of Historic England the Council agrees with the wording proposed.	1037	The Council considers Policy VC WIC2 to be sound however should the Inspector be minded to modify the policy in response to these comments the Council suggests the following wording: "Site layout and design to maximise wider views of St Andrews and All Saints Church, whilst also seeking to conserve and enhance the immediate setting of the heritage asset".
Policy VC WIC2: Land off Hackford Road	2585	Object	The village of Wicklewood cannot sustain the building of 12 houses on the proposed site next to the school. Such a number of new houses would dramatically change the dynamics of the village where we have one pub and no other services. Equally drainage issues are a serious problem in Wicklewood where high clay content is a real concern when it comes to building on this scale.	WIC2 proposal should be dropped from the plan.	The Council considers that VC WIC2 is a sustainable site of an appropriate size and density that relates well to the existing settlement and therefore the allocation of VC WIC2 accords with the principles of the National Planning Policy Framework. In terms of services and facilities Wicklewood has a public house, primary school, village hall and recreation ground, as well as being close to the market town of Wymondham which has a wider range of services and facilities available. The Lead Local Flood Authority has engaged with the production of the VCHAP and has not raised an objection to the allocation of sites within Wicklewood. The Council remains of the opinion that an appropriate drainage strategy will be achievable on the site.	1036	No actions required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC WIC2: Land off Hackford Road	3247	Support	Anglian Water agrees with the approach taken regarding the site allocation policies for Wicklewood where matters regarding cumulative/in-combination effects with the development identified in the GNLP may require the phasing of development beyond the early years of the plan, are addressed in the supporting text and therefore a policy requirement is not considered necessary.	The small-scale nature of these allocations is unlikely to require phasing in respect of Whitlingham WRC and therefore the policy requirement can be removed.	The Council welcomes the support from Anglian Water to the wording included in the supporting text for Policy VC WIC2.	1034	No action required.
Policy VC WIC3: Land at Hackford Road	2398, 2455, 2897	Object	(1) Outside the village and therefore inappropriate. Combined with very dangerous vehicular access this site is especially unsuitable. (2) This proposal (increased to 9 properties at the last count) was not, to my knowledge, part of the original Wicklewood plan but appears now to have become so despite considerable public objections. My particular objections are based around the handling and dispersal of waste and rain water and no proper solution that would be satisfactory long-term to existing residents (including me) has been proposed. Other facts that concern the village include proposed access onto Hackford Road on a very dangerous bend known to have road accidents history. (3) Wicklewood Parish Council have concerns about drainage at this site. At a presentation given by a developer at a parish council meeting, the parish council and several local residents raised concerns about how the surface drainage of this site would impact on the drainage and septic tanks of nearby properties. We cannot see that anything has been done to mitigate this risk. There are also concerns about the development exiting onto that road on a blind bend where speeding is an issue and which has already seen some accidents.	(1) Outside the village and therefore inappropriate. Combined with very dangerous vehicular access this site is especially unsuitable. (2) WIC3 as a plan needs to be removed from the plan for the village. In particular as Wicklewood village council has already considered the proposal at length and rejected it before passing any decisions on to SNDC. It is my hope that SNDC will ultimately agree with our village council and scrap the proposal. (3) Wicklewood Parish Council does not consider this a suitable site for a housing development	This site is a carried forward allocation, originally allocated in 2015. The site is also subject to a current planning application (pending determination subject to resolution of the nutrient neutrality matter). As part of consideration of the full planning application matters relating to highways have been considered by the highways authority and are considered to be acceptable. A drainage strategy has been submitted by the applicant and is also being considered as part of the planning application. It is considered that an appropriate drainage strategy can be achieved on the site. The Council considers that the site remains deliverable and is appropriate as carried forward allocation VC WIC3.	1031	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC WIC3: Land at Hackford Road	3195	Object	Whilst there are no designated heritage assets on this site, the grade I listed church of All Saints and the grade II listed war memorial lie to the south of the site. The grade II listed Old Mill House lies 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. There is a degree of separation of the site from the church. We do appreciate that this is an existing allocation and it has a planning application pending determination. We welcome the second bullet point relating to the landscaping and the church and its setting and suggest the addition of the words conserve and enhance to more closely reflect the NPPF.	In second bullet point, add "Visual impact on and to conserve and enhance St Andrew and All Saints Church and its setting".	The Council welcomes the comments of Historic England but does not consider that the proposed amendment to the policy text to be a matter of soundness.	1029	The Council considers Policy VC WIC3 to be sound however should the Inspector be minded to modify the policy in response to these comments the Council suggests the following wording: "Appropriate boundary treatments along the north and east boundaries of the site to reflect the rural context and edge of settlement location. Appropriate landscaping to the south of the site to minimise its visual impact and to conserve and enhance St Andrew and All Saints Church and its setting".

46. Winfarthing and Shelfanger

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Winfarthing, 46.5	2830	Object	Although this South Norfolk village clusters plan does not directly involve Shelfanger, the Parish Council has asked me to send their concerns to you. Shelfanger has a history of flooding and in December 2020 was seriously flooded. Therefore with an increase in property development in Winfarthing this can only impact on the surface water that will be discharged and will inevitably flow down from higher ground into the village.	No changes proposed.	The Council acknowledges the concerns of Shelfanger Parish Council regarding surface water flooding. Throughout the production of the VCHAP the Council has engaged extensively with the Lead Local Flood Authority (LLFA) and has undertaken a Stage 2 Strategic Flood Risk Assessment (SFRA) in order to assess the flood risk arising both to- and from promoted sites. Where appropriate these discussions have included areas outside promoted sites that could be impacted by new development. The technical consultees have not raised concerns that development in Winfarthing will impact on residents in Shelfanger and no evidence has been received to support this representation from the Parish Council. A specific Stage 2 SFRA was undertaken to inform the allocation of VC WIN2 and the subsequent site-specific Flood Risk Assessment must have regard to this document in accordance with the site-specific policy requirements. The Council remains satisfied that the inclusion of allocation sites in Winfarthing is acceptable.	1028	No action required.
Policy VC WIN1 – Land west of Hall Road	3267	Support	We welcome the policy wording for hedgerows/trees in Policy VC ROC. We recommend that similar policy wording is applied to VC WIN1 to ensure this approach is applied consistently across the Local Plan.	Where removal of a tree or any part of a hedgerow is unavoidable, we recommend that policy wording includes reference to mitigation measures, reflecting the updated biodiversity duty required in the 2021 Environment Act to have regard to the enhancement of biodiversity.	The Council considers the policy to be sound in relation to the protection of ecological features. The Council does not consider it appropriate to repeat the requirements of existing legislation or policies within the site specific policy text therefore does not consider it necessary to update the policy to reflect the above comments.	1445	None required.
Policy VC WIN1 – Land west of Hall Road	3244	Support	For consistency we recommend that there is a similar approach in both Winfarthing policies requiring early engagement with Anglian Water, as taken with other site allocations where there is a very small WRC serving only a small proportion of properties within a settlement.	Modify policy text to include the following criterion: Early engagement with Anglian Water regarding connecting to the local water recycling network.	The supporting text for site specific policy VC WIN1 includes reference at paragraph 46.11 to the scale of the Wastewater Recycling Centre (WRC) and encourages developers to enter into early engagement with Anglian Water (AW). The Council considers that the inclusion of this reference within the supporting site allocation text is sufficient and that the policy is sound in its current form.	1025	The Council does not consider that a modification to the site-specific policy is necessary to make the Plan sound however if the Inspector is minded to modify the policy to address the comments raised the Council suggests the following wording: "Early engagement with Anglian Water regarding connecting to the local water recycling network".

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC WIN2: Land off Mill Road	3196	Object	Whilst there are no designated heritage assets on this site, the Winfarthing Conservation Area and grade II listed School house lie approximately 50metres to the north of the site. 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 welcome the preparation of the HIA. The HIA makes a number of helpful recommendations, some of which are incorporated into bullet point 1 of the Policy. We suggest the addition of a bullet point to capture the second recommendation of the HIA to read: 'Consideration of the local vernacular and distinctiveness especially materials, with reference to the CA Appraisal.'	Add bullet point to read, 'Consideration of the local vernacular and distinctiveness especially materials, with reference to the CA Appraisal.'	The Council is of the opinion that the separation of the site from the Conservation Area, as well as the form of the intervening development and the dwellings directly opposite the site, means that a requirement for specific materials on this site is not reasonable. The gateway position of the site is noted in both the supporting text and the site-specific policy requirements and developers of the site are required to have appropriate regard to this, particularly in relation to the Conservation Area. For these reasons the Council does not consider that an amendment to Policy VC WIN2 is required.	1027	The Council considers Policy VC WIN2 to be sound in its current form however if the Inspector is minded to modify the policy wording to reflect the comments of Historic England the Council suggests the addition of the following wording to the policy: "Site design to have consideration to the local vernacular and distinctiveness especially materials, with reference to the Conservation Area Appraisal".
Policy VC WIN2: Land off Mill Road	3245	Support	For consistency we recommend that there is a similar approach in both Winfarthing policies requiring early engagement with Anglian Water, as taken with other site allocations where there is a very small WRC serving only a small proportion of properties within a settlement.	Modify policy text to include the following criterion: Early engagement with Anglian Water regarding connecting to the local water recycling network.	The supporting text for site specific policy VC WIN2 includes reference at paragraph 46.17 to the scale of the Wastewater Recycling Centre (WRC) and encourages developers to enter into early engagement with Anglian Water (AW). The Council considers that the inclusion of this reference within the supporting site allocation text is sufficient and that the policy is sound in its current form.	1026	The Council does not consider that a modification to the site-specific policy is necessary to make the Plan sound however if the Inspector is minded to modify the policy to address the comments raised the Council suggests the following wording: "Early engagement with Anglian Water regarding connecting to the local water recycling network".

47. Woodton and Bedingham

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC WOO1: Land south of Church Road	3216	Support	The VCHAP is basically sound. The proposed development would make a positive contribution to the provision of market and affordable housing in the area. The proposal would also add to the range of housing sites available in the locality, providing flexibility and a wider choice of development opportunities to the market, and thus strengthening the local supply of housing land. By providing sufficient land of the right type in the right place to support growth, the development would address the economic dimension of sustainable development, as defined in the NPPF. In order to be justified, growth in the VCHAP need to enhance local services. Development on this site would be able to assist with a modal shift away from car reliance, taking advantage of Woodton's local services. The site is within single ownership and a full planning application is being prepared addressing various planning issues. There are no obstacles that are considered to inhibit making it viable for development, therefore development on this site makes the VCHAP effective.	We agree with the allocation of the site. However we believe the wording should be 'at least 50 dwellings'.	The Council welcomes the support for Policy VC WOO1. Paragraph A.1 sets out the reasons for preparing the VCHAP. Namely, the VCHAP seeks to allocate generally smaller sites across the village clusters of South Norfolk in order to promote sustainable development in rural areas in accordance with paragraph 79 of the NPPF. Therefore the size of the sites being allocated ranges between 12 and 50 dwellings. Changing the policy as suggested would therefore conflict with the overall purpose of the VCHAP. The Council considers the policy as it is currently written to be sound and consistent with the aims of the VCHAP.	1472	No action required.

Policy VC WOO1: Land south of Church Road	2308	Object	Under the terms of soundness we do not believe the evidence supplied by the promoter is proportionate regarding the scale and provision of adequate benefits, not meeting objective 3. The amended plan is not justified as there were 2 reasonable alternatives which have been disregarded. The 'new evidence' supplied by the promoter is no longer relevant and additional community space was not requested or required, not meeting objective 2. The legal process was not followed correctly, with WPC not being fully consulted of the amendments. In conclusion the plan is not in accordance with SC1 in relation to site VCW001.	WPC would like the plan to be changed to revert back to the Reg 18 plan, which stated that the preferred sites of SN0278, SN02062 and SN0268 had been accepted and adopted (VCH Plan of mid-2021). We believe that site SN0268SL was turned down as was not in an appropriate position for development due to its separation from the main area of development. WPC would therefore request plan reverts back to the two agreed sites SN0278 and SN02062 as per Reg 18. With regards to facilities the village has lost its shop in 2022 and the nursery will close in July 2023. Therefore, it is a shop that this village desperately needs above anything else.	The Council acknowledges the objections raised by the Parish Council to the amendment of the preferred allocation at Woodton, as well as the concerns raised about the procedures followed by the Council in preparation of the VCHAP. Both matters are responded to in full below. As set out in the site assessment form, discussions with the site promoter identified additional community benefits that could be delivered through the allocation of VC WOO1 that would not be achievable if the earlier combination of smaller sites (previously preferred at the Regulation-18 stage) was allocated. The pedestrian link between the school and The Street via the recreation ground, the site and The Woodyard Square to the south will improve connectivity within the settlement. In particular, children attending Woodton Primary School and/or visiting the recreation ground will have a safer and more direct route to these facilities, avoiding the footway along the B1332. In addition, the safeguarded land within VC WOO1 is available for educational use and provides an opportunity for a pre-school operator to (re)establish a much needed and well supported facility within the village should the existing nursery provider choose to cease operation. Opportunities for the creation of additional landscaping and open space within the site are intended to aid the assimilation of the site into the wider landscape and create a buffer between the development site and existing residents to the south and south-east of the site. The Council remains of the opinion that the existing services and facilities within the village will benefit from this development, and that the community will also benefit from the improved connectivity and opportunities created for additional educational facilities. The scale of development proposed is considered to be reasonable and appropriate, reflecting the constraints, infrastructure and community benefits identified, as well as the size of the site relative to the size of the settlement. The Council recognises that there are other developments currently under construction within the village. These comprise the earlier 2015 allocation site (2020/1506) and a smaller windfall site considered to be acceptable at Planning Appeal (2021/1447). The Council does not consider it to be reasonable for the delivery timing of these sites to prevent the allocation of an appropriate site within the VCHAP. The Parish Council has stated that the correct	1023	No action required.

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					procedures have not been followed by the Council during the preparation of the VCHAP, most specifically between the Regulation 18 consultation stage and the publication of the Regulation-19 pre-submission version of the Plan. The Council disputes this. The Council invited comments from all interested parties, including statutory and non-statutory consultees, during the Regulation 18 consultation and where appropriate liaised further with technical consultees when reviewing the comments received in order to seek further advice on matters raised or clarification on the submitted comments. Alongside the evidence gathered (including representations made during the Regulation-18 consultation) this information helped to inform the final selection of sites and the site-specific policies contained within the Regulation-19 pre-submission Plan. The publication of the Regulation-19 version of the Plan provided an opportunity for all interested parties to review and comment on the soundness of the Council's preferred version of the Plan, including any amendments made since the earlier stages. The updated site assessments published alongside the Regulation-19 Plan clearly set out the Council's reasons for alterations made to the VCHAP and include amongst other reasons, the submission of preferable or amended sites during the Call for Sites at the Regulation-18 stage, additional evidence of constraints or opportunities and/or ongoing landowner interest in the promotion of a site through the process. The Council has been transparent throughout the process and has sought to make the Plan and the supporting body of evidence available to all parties simultaneously. The Council has acted in accordance with the requirements of the Statement of Community Involvement (2022), most specifically those requirements set out at paras 48-52 and therefore considers the comments of the Parish Council to be incorrect.		

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC WOO1: Land south of Church Road	3076	Object	Norfolk County Council, in its capacity as the Mineral Planning Authority, considers that Policy VC WOO1 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognises that underlain mineral resource has been included in the supporting text; however, we request inclusion of the text in the policy itself. The policy can be made sound by including the wording below, which was contained in the response by the Mineral Planning Authority, to the Regulation 18 consultation.	Amend policy VC WOO1 to add the following wording as a policy requirement: 'The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'	The Council notes the comments of the Minerals Planning Authority but considers that the relevant planning policies relating to the safeguarding of minerals and waste are contained within the Minerals and Waste Local Plan. The Mineral and Waste Local is currently under review and will contain the most-up-to-date planning policy context. The supporting text for VC WOO1 refers to the safeguarded sand and gravel resources underlying the site and provides an appropriate reference point for site developers.	1022	The Council considers Policy VC WOO1 to be sound. However, should the Inspector be minded to modify the policy to address the comments of the Minerals and Waste Authority the Council suggests the following wording: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority and the Local Planning Authority".
Policy VC WOO1: Land south of Church Road	3243	Support	Anglian Water suggests that due to the relatively small-scale nature of the sites, that the policy requirement regarding the capacity of the WRC is unnecessary. The draft DWMP has identified growth for the WRC catchment area to 2050 and has not included any medium or long-term strategies over this period. The policy requirement should be amended as suggested.	Modify policy text to read: Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the local water recycling network	The Council welcomes the positive response received from Anglian Water and notes that it is suggested the site-specific policy is relaxed to remove reference to the capacity of the local Water Recycling Centre (WRC). The Council does not consider that the policy requires modification to address this comment.	1021	The Council considers the policy to be sound in its current form however should the Inspector be minded to modify Policy VC WOO1 to address the comments made the Council agrees to the proposed wording that has been suggested by Anglian Water (as follows): "Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the local water recycling network".
Policy VC WOO1: Land south of Church Road	3197	Support	Whilst there are no designated heritage assets on this site, the 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. 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 appreciate that the allocation has been moved away from these heritage assets which is welcomed.	No changes proposed.	The Council notes these comments of support from Historic England regarding the relocation of the allocation at Woodton.	1019	No action required.

Policy VC WOO1: Land south of Church Road	2278, 2934, 2939	Object	Concerns raised about this preferred allocation have been summarised below: - Lack of local facilities and services to support new development - Local primary school is operating at capacity - Landscape and character impact of VC WOO1 - Loss of agricultural land - Scale of development proposed	(1) Move the housing to an infrastructure town already set up to cope and facilitate. (2) Woodton should be removed from the Plan, but if not the smaller identified sites would be more suitable. Site numbers should be limited to 5 to 10 houses maximum. (3) The sites originally proposed in the Reg. 18 consultation should be adopted and only the original, northern part, of this site considered.	As a larger allocation site (up to 50 dwellings) VC WOO1 will deliver benefits to the local community which would not otherwise be realised, including the provision of a pedestrian footpath to connect Woodton Primary School with The Street to the south via the recreation ground and an area of land safeguarded for the development of either educational or recreational uses to support the continued and future pre-school provision in the village. A combined allocation of the three sites originally preferred for at the Regulation 18 stage would not be able to deliver equivalent community benefits. VC WOO1 is of sufficient scale to accommodate the number of dwellings proposed in the policy, alongside the additional infrastructure requirements and community benefits identified. On this basis the Council maintains that the number of dwellings proposed on VC WOO1 is reasonable and justified. The Council recognises that since the time the site assessment was undertaken the village stores have ceased trading however the settlement continues to benefit from a number of facilities considered to be important assets when determining the suitability of a site for development. These services include a peak-travel time bus service (serving Bungay-Norwich), a village hall, a primary school and two separate recreation grounds. The Council notes local concerns about the potential closure of the local pre-school facility and the public house within the village. Objective 2 of the VCHAP sets out that the distribution of housing is intended to support local facilities and services, as well as delivering appropriate improvements where these can be justified. Within VC WOO1 provision has been made for an area of land to be safeguarded for either education or recreational facilities. This policy requirement provides a future opportunity for a pre-school to operate in close proximity to the existing educational and recreational facilities within the village whilst enabling Woodton Primary School to utilise its full site. During discussions the Children's Services team at Norfolk County Council has expressed concern about the loss of pre-schools, noting the importance of these facilities, and the Council has therefore sought to ensure that when required a site remains available for pre-school facilities within Woodton. The Council acknowledges that there will be some landscape impact arising from the development of VC WOO1 and has sought to address this within the site-specific policy	1018	No actions required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
					requirements. These policy requirements include retention of the existing boundary treatment along the east of the site, new boundary treatments that reflect the rural context of the site and a site layout and design that responds to the current views across the site. The Council encouraged the promotion of brownfield sites for consideration as part of the Call for Sites, in accordance with national planning policy and guidance, and where appropriate has allocated development on brownfield sites within the VCHAP. However, due to the rural nature of the South Norfolk area it is recognised that development will be necessary on greenfield sites. Where these sites are in agricultural use the Council has assessed the grade of the agricultural land and has sought to avoid grades 1 and 2. This site is classified as being within grade 3 and is therefore considered to be of good-moderate quality.		

48. Wreningham, Ashwellthorpe and Fundenhall

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Wreningham, 48.1	2683	Support	Any development here must reflect the scale and character of the village and not extend beyond the existing settlement limit other than suitable infill. All roads serving the village are extremely narrow, 2.7mtrs to 3mtrs in width, with poor visibility at road junctions. Passing is only possible by using private driveway entrances on most of the roads.	No changes proposed.	The Council notes these comments however at this time there are no sites preferred for allocation at Wreningham.	1016	No action required.
Wreningham, 48.2	2684	Support	Any development here must reflect the scale and character of the village and not extend beyond the existing settlement limit other than suitable infill. All roads serving the village are extremely narrow, 2.7mtrs to 3mtrs in width, with poor visibility at road junctions. Passing is only possible by using private driveway entrances on most of the roads.	No changes proposed.	The Council notes these comments. The VCHAP does not include any allocations in Wreningham.	1017	No action required.
Wreningham, 48.5	2590, 2685	Support	(1) We support the existing settlement limit and therefore are very opposed to the site assessment SN2183, development south of Wymondham Road up to 52 houses. Such a development is totally disproportionate to the village. Most importantly the assessment ignores the fact that all four access roads from this site are single track in places, especially Wymondham Road, the main route from the site into Wymondham. The significant increase in the number of houses in the village in recent years has already made these roads very dangerous. Further houses with the inevitable two cars per house would make this far worse. (2) I wish to continue my objection to the proposed site REF: SN2183 and consider the site should be REJECTED and not continue as a shortlisted site. The proposed development is totally out of scale and character, and would mean extending beyond the existing settlement limit. Local road network is unsuitable, due to narrowness and blind bends. Wreningham only suitable for infill and small scale development within the settlement boundaries. There is no village shop and the school is already over-subscribed. Would also query whether existing sewerage system could cope with development on this scale.	No changes proposed.	Continued objections to site SN2183 are noted, but are not considered by the Council to relate to the soundness of the plan. The Council had previously considered SN2183 as a preferred site at the Regulation 18 stage of the Plan production however following a review of the site post the the Regulation-18 consultation period, as well as ongoing discussions with technical consultees, the Council subsequently determined that the site should be re-categorised as a shortlisted site rather than a preferred site. This reflects the identification of constraints on- and off-site and the impact that these could have on the viability and deliverability of the sit. The Council remains of the opinion this is the correct site classification.	1015	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC ASH1, 48.7	2296, 2376, 2405	Object	(1) Numbers and density too high. (2) Flooding in this area is a real issue and must not be discounted. (3) New Road is particularly narrow, there is no pedestrian footpath and there is a blind bend and an issue with speeding traffic. Unless the houses are in a row it wouldn't be in keeping with the linear nature of New Road . The junction into The Street is dangerous, with visibility and cars cutting the corner. (4) There are mature trees down the centre of the site. The site provides habitat for hares, owls and deer.	(1) Lower the density of the housing as their needs to be better parking allowance (2) There must be a footpath installed (3) The road needs to be made wider. A pedestrian footpath needs to be installed on both sides of the road. Better policing of the speed limit needs to be carried out. The New Road/The Street junction needs to be widened and visibility needs to be improved.	These comments have been noted. However, the Council does not consider that they relate to the soundness of the plan. With regards to comments (1) and (3) these issues are considered in more detail in response to representations submitted against policy VC ASH1. Off-site highway mitigation works identified in conjunction with Norfolk County Council Highways throughout the site assessment process will include improvements to the New Road/The Street junction to improve visibility as well as a pedestrian crossing to access the existing footpath along The Street. Paragraph 48.7 refers to the existing footpath along The Street and notes that this connects New Road (and not the site) with the village hall and preschool facilities. The Council recognises that New Road does not currently have footpath provision connecting it to The Street and has included a requirement for a footpath to be installed along the site frontage as part of the development. Whilst this will not extend to The Street there are existing verges and stepping off areas along this stretch of New Road that allow pedestrians to avoid oncoming vehicles.	1005	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC ASH1, 48.8	2377, 2409	Object	(1) There is no footpath so this is not correct (2) The two parcels of land are currently divided by mature oak trees , Are these trees protected? Should they be regarded as priority Habitat. I believe that we live in a conservation area should this not be considered in the planning inclusion? We also have great crested Newts inhabiting the local ponds in this area what protection would be given to such rare species?	(1) Requirement for a footpath to be included. (2) Measures to protect current habitats and rare species should be provided before granting inclusion into the plan.	The Council confirms that there is not currently a footpath along New Road and requires a site frontage footpath to be installed as part of the development. Existing verges and passing places provide stepping off points between the site and The Street. As identified in paragraph 48.7, the existing footpath is at The Street. The trees within the centre of the site have not included in the site-specific policy. The Council considers that the existing planning policy framework addresses the retention of trees within and site design and development (Development Management Policies DM 4.8 and DM4.9) and it is therefore unnecessary to repeat this within the site specific policy. The Council does not consider that the omission of a requirement to protect the trees within the site affects the soundness of the Plan however the Council would accept a modification to Policy VC ASH1 should the Inspector be minded to amend the Policy. As part of a planning application the applicant will be required to submit appropriate ecological assessments and mitigation measures for assessment, as well as ensuring the delivery of 10% biodiversity net gain (bng) with a preference for the retention and protection of existing on-site habitats.	1006	The Council does not consider that a modification is required to make the Plan sound however if the Inspector is minded to modify VC ASH1 to address these concerns the Council would suggest the following wording: "Retention and protection of the Priority Habitats, protected trees within the site and mature trees along the west and south site boundaries to minimise the visual impact of the development and the enhancement of the existing vegetation along the north boundary to protect the amenities of future and existing residents. The site layout and design should also retain and protect the existing established trees present within the site.
VC ASH1, 48.9	2389	Object	In addition to the hedgerows and mature trees on the south and east boundaries a line of mature oak trees currently forms a boundary between the adjoining sites. These should be protected - they provide important habitat and irreplaceable components in a climate change strategy. Planting new trees cannot come close to recovering the carbon mitigation provided by mature trees.	The mature trees between the sites should be under a protection order.	The Council considers that the existing planning policy framework and legislation provides adequate protection for the trees within the site. In particular existing Development Management policy DM4.8 protects existing trees both on and off-site. The Council does not consider that a modification is required to make the Plan sound however the Council has suggested wording should the Inspector be minded to modify this aspect of the Policy. The Council's Arboricultural Officer considered the inclusion of VC ASH1 within the VCHAP and did not consider it necessary to apply Tree Preservation Orders to these trees.	1008	The Council does not consider that a modification is required to make the Plan sound however if the Inspector is minded to modify VC ASH1 to address these concerns the Council would suggest the following wording: "Retention and protection of the Priority Habitats and mature trees along the west and south site boundaries to minimise the visual impact of the development and the enhancement of the existing vegetation along the north boundary to protect the amenities of future and existing residents. The site layout and design should also retain and protect the existing established trees present within the site.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC ASH1, 48.10	2378, 2408, 2442	Object	(1) Footpath does not extend the whole length of New Road and narrow verges are not suitable for a footpath. (2) Proposed entry point to the site is a concern. It would be too close to the blind bend at the current 30MPH limits up New Road. Traffic regularly speeds along New Road within the 30 MPH Limit and this would present a further danger to the inhabitants. (3) This area floods every year and this must be dealt with before any new dwellings are built, along with the pumping station being upgraded also before any further building takes place.	(2) Remove this from the Clusters proposal (3) Deal with the flooding of the area and upgrades to the pumping station	The Council recognises that the proposed footpath does not extend the from the site to The Street however it is not considered to be either reasonable/ proportionate to require the developer of the site to install an extended footpath along the entire length. However, there is a wide verge alongside the road that extends between the site and The Street and this has been considered acceptable by NCC Highways Authority who have not requested the delivery of an extended footpath in this location as part of their Regulation-19 response. With regards to the site access and egress this will be determined at the time of the planning application and, as set out in the policy text, will be informed by the site-specific Flood Risk Assessment (FRA). The provision of a safe access is considered to be achievable. The Council has engaged with both the Lead Local Flood Authority (LLFA) and Anglian Water (AW) throughout preparation of the VCHAP, including raising the specific concerns expressed locally about the perceived flood risk associated with development and infrastructure constraints of this site. The LLFA does not consider that previous issues of localised flooding significantly impact this site and that furthermore with an appropriate design development of the site could result in betterment locally. The comments relating to upgrades to the existing Anglian Water infrastructure have been responded to in full as part of the Council's response to representations received in relation to VC ASH1. The Council has worked closely with technical consultees throughout the production of the VCHAP and the site selections and policy measures reflect these discussions. The issues raised in response to paragraph 48.10 are not considered to relate to the soundness of the plan.	1009	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC ASH1, 48.11	2297, 2379, 2410	Object	(1) The flooding is an issues and needs looking at asap (2) Concerns about the capacity of the existing infrastructure, in particular the ability of the pumping station to cope with the extra load. Anglian Water (AW) are aware of sewerage leaks caused by a high level sewer and the natural flow of water in the gulleys along New Road. (3) Sewerage issues occur during medium to heavy rainfall affecting gardens and houses. Houses have non-return valves (NRVs) fitted. AW engineers also state that the pumping station flow rate cannot be increased any more with out increasing the capacity of the receiving sewer through the whole Village to the treatment works at Wreningham end of the village.	(1) Flooding needs looking at. (2) The sewage handling throughout the village should be guaranteed significant improvement before any further development of sites in the New Road area are given.	The Council has engaged the Lead Local Flood Authority (LLFA), who are satisfied that with an appropriate site design and mitigation the site can be developed and potentially improve surface water flood risks locally. Surface water maps show the main areas at risk to be at the northern and southern fringes of the site and the required Flood Risk Assessment (FRA) will inform the detailed site design and layout. The Council has proactively engaged with Anglian Water (AW) as part of the Water Cycle Study evidence gathering and specifically raised the concerns of residents regarding the adequacy of the AW infrastructure locally. In response AW has set out the key proposed investment schemes for Ashwellthorpe including the installation of Event Duration Monitoring (EDM) equipment on both the storm tank at Ashwellthorpe Water Recycling Centre (WRC) and the storm overflow inlet, as well as planned enhancements to the storm tank (by March 2027). The EDMs record storm overflow events and this information provides evidence to support future investment by AW into the local infrastructure. More generally AW has advised that sewer systems can become overwhelmed in extreme weather incidents, including due to rising river levels preventing sewer outflows working correctly and blocked ditches and unauthorised connections to the network, causing flood water to enter the sewers and leading to water surges pushing sewage back up the pipes. It recognises that joined-up working between a number of parties (including landowners) is necessary to improve this. In response to the Regulation-19 publication of the VCHAP has maintained that water supply and connections to the WRCs will be assessed in detail at the time the site comes forward to ensure that the most up-to-date information relating to both cumulative development and changes in non-household flows can be considered. Further to these discussions Anglian Water has not raised an objection to the inclusion of VC ASH1 within the VCHAP within their response to the Regulation-19 consultation.	1010	The Council does not consider that this issue relates to the soundness of the Plan however the Council will reiterate local concerns about the local sewerage infrastructure capacity to Anglian Water.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC ASH1, 48.12	2300, 2411	Object	(1) There have been problems with flooding in the area and this has been caused by issues with the nearby pumping station and how the sewage is pumped up through the village. There is a potential problem with the extra dwellings causing more issues with flooding. (2) The NRV's fitted to the houses regularly close and It has happened during what I would consider normal weather events, of just a few days of Normal British weather.	(1) Consideration must be given to the huge sewage lorries and the junction not being big enough to use this road (2) A full review of the sewerage system throughout the WHOLE VILLAGE should be made before granting more planning in this area.	The Council has proactively engaged with Anglian Water (AW) as part of the Water Cycle Study evidence gathering and specifically raised the concerns of residents regarding the adequacy of the AW infrastructure locally. In response AW has set out the key proposed investment schemes for Ashwellthorpe including the installation of Event Duration Monitoring (EDM) equipment on both the storm tank at Ashwellthorpe Water Recycling Centre (WRC) and the storm overflow inlet, as well as enhancements to the storm tank (by March 2027). The EDMs record storm overflow events and this information provides evidence to support future investment by AW into the local infrastructure. More generally AW has advised that sewer systems can become overwhelmed in extreme weather incidents, including due to rising river levels preventing sewer outflows working correctly, blocked ditches and unauthorised connections to the sewer network, causing flood water to enter the sewers and leading to water surges pushing sewage back up the pipes. It recognises that joined-up working between a number of parties is necessary to improve this. In response to the Regulation-19 publication of the VCHAP has maintained that water supply and connections to the WRCs will be assessed in detail at the time the site comes forward to ensure that the most up-to-date information relating to both cumulative development and changes in non-household flows can be considered. Further to these discussions Anglian Water has not raised an objection to the inclusion of VC ASH1 within their response to the Regulation-19 consultation.	1011	The Council does not consider that this issue relates to the soundness of the Plan however the Council has continued to reiterate local concerns about the local sewerage infrastructure capacity to Anglian Water.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC ASH1, 48.13	2380	Object	The concern with the environment agency being consulted is that they have previously declined to discuss the issue with any parishioners moving forward.	We would request a full environment survey is undertaken and parishioners are consulted on such issues as the great crested newts are looked at too.	The Environment Agency (EA) has a responsibility to protect defined Groundwater Protection Zones in accordance with government policy and developers of the site will be required to liaise with the EA to ensure that new development does not adversely impact on SPZ3. The site developer will be required to undertake and submit an appropriate ecological survey which will inform both the site layout and design and the on-site mitigation measures and this will be assessed at the planning application stage. In accordance with legislation the developer of the site will be required to deliver biodiversity net gain (BNG) which will protect and enhance wildlife habitats. These are not matters that relate to the soundness of the plan.	1012	No actions required.
VC ASH1, 48.14	2298, 2299, 2381, 2388, 2536	Object	The comments submitted in response to para 48.14 have been summarised below: (1) the proposed numbers on the site are too high (2) concerns about on-site car parking (3) impact on the character of the village and relationship with existing development at New Road (4) concerns about sewage, speeding, additional road traffic movements and impact on local wildlife and the environment	(1) Reduction in numbers on the site (8-10 dwellings preferred in this location) (2) The development at Wood Farm provides more residential potential than can reasonable be expected of a village of this size. Further development is very detrimental to quality of life and spirit of place. (3) The pumping station needs upgrading Safer areas to walk Limit larger lorries from using the road. making a weight limit Make the number of dwellings lower.	The Council considers that the density of the development preferred on VC ASH1 is appropriate for the location and reflects both the edge of settlement location of the site and the identified constraints. The density is considered to make efficient use of the land whilst reflecting the context of the site, in accordance with the requirements of the NPPF. With regards to the highways matters, the Council has engaged with Norfolk County Council highways and have reflected their comments in the policy as appropriate. Ongoing discussion have continued with NCC highways following Reg-19 and the Council proposes a modification to the proposed policy wording to reflect these discussion. On-site car parking this will be required to be in accordance with the appropriate Norfolk County Council car parking standards. As a guide, currently 2 spaces would be required for a 2 or 3 bedroom dwelling. The detailed design matters, including an assessment of car parking provision, will be determined at the planning application stage. NCC Highways Authority have provided comments at the Regulation 19 stage relating to the proposed site-specific policy wording. Matters specifically relating to sewage/ Anglian Water and the ecological impact of development have been set out within the Council's response to VC ASH1.	1014	A modification to the proposed policy wording will be proposed by the Council to reflect discussions with the Highway Authority.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC ASH1: Land west of New Road	2325	Support	As long as the stipulations are adhered to I support the project.	No changes proposed	The Council welcomes the support for allocation VC ASH1. Developers will be expected to reflect the requirements set out in the site-specific policies when preparing schemes for allocated sites.	1002	No actions required
Policy VC ASH1: Land west of New Road	3072	Object	The junction of New Road with Wymondham Road and the Street requires improvement to visibility to enable development traffic to be safely accommodated. This would need to be conditioned as off-site highway works and be delivered by the development. A proportional contribution to the required improvement would not be acceptable to the Highway Authority. The off-site highway works should also include improvement to the nearest bus stops to the site, along with access to them. The stops are located at The Street.	The Highway Authority would request that Policy VC ASH1 is revised to remove reference to proportionate contribution to an upgrade of the existing New Road / The Street junction. The policy should be amended to require off-site highway works as follows: A) Improve visibility from New Road to Wymondham Road and The Street. B) Improve the nearest bus stops to the site, along with access to them. The stops are located at The Street.	The Council considers that a proportionate contribution to the off-site mitigation works is appropriate but following receipt of these comments has requested engagement between the Highways Authority and the landowner to seek assurances that (a) the land required to implement these junction upgrades is available to the developer and(b) the site remains viable. Further discussion with NCC Highways post Reg-19 concluded that improvements to the New Road/The Street junction as required, and this will be reflected in the Statement of Common Ground. The Council proposes a modification but does not believe this relates to the soundness of the plan.	1004	The Council remains of the opinion Policy VC ASH1 is sound in its current form however should the Inspector be minded to modify the policy the Council suggests the following wording: "On- and off-site highway works to include safe access into the site from New Road, a pedestrian footpath along the site frontage which is to be of suitable appearance for the location, a crossing point to facilitate safe pedestrian access from New Road to the existing footpath north of The Street, an upgrade to the existing New Road/ Wymondham Road/ The Street junction to improve visibility (details to be agreed with the Highways Authority and the Local Planning Authority) and improvements to the nearest bus stops to the site (situated along The Street) and access to them (details to be agreed with the Highways Authority and the Local Planning Authority)".

Policy VC ASH1: Land west of New Road	2284, 2375, 2382, 2390, 2441, 2446, 2456, 2457, 2507, 2512, 2516, 2521, 2523, 2527, 2529, 2531, 2534, 2635, 2651	Object	A number of objections have been received in relation to preferred site VC ASH1. Many of these responses raised multiple concerns therefore in order to address all matters these objections have been summarised as follows (nb: the order of summary does not denote the level of concern in the responses received): - Surface water flooding at New Road and affecting existing properties - Inadequate sewerage infrastructure connecting to the existing pumping station - Highways concerns along New Road- this includes speeding vehicles, levels of farm traffic, lack of footpaths along New Road, parked cars along New Road - Impact on the local wildlife and biodiversity, as well as the local landscape - Increased noise and light pollution resulting from the development - Local school operating at capacity - Too many dwellings proposed resulting in a poor relationship with the existing character of the settlement - VC ASH1 is located outside the existing Settlement Limits for Ashwellthorpe - Phase 2 of the Wood Farm development in the village is still to commence and Phase 1 has impacted adversely on the existing infrastructure - Ashwellthorpe has already contributed to the local housing requirements via Wood Farm and windfall development - Poorly advertised consultation means many residents were unaware of the opportunity to comment	SCALE OF DEVELOPMENT - Avoid any further development within Ashwellthorpe - Do not develop this site - Reduce the numbers of dwellings on this site - Limit the site area to the enclosed field and retain all trees along the boundaries - No blocks of flats in this location LOCAL INFRASTRUCTURE - Improve local infrastructure (e.g., GP, dentist, shops and bus service) FLOODING AND ANGLIAN WATER INFRASTRUCTURE - Corrective action to be taken to resolve existing flooding hazard - Upgrade to the AW pumping station required, as well as installation of sewerage pipes with a wider dimension between (a) the site and the pumping station; and then (b) the pumping station to the treatment site - Installation of a secondary sewer to bypass the existing sewer BIODIVERSITY - Retention of the existing oak trees on the site - Retention of trees and habitat - Increased weight to be given to the importance of wildlife habitats, the environment and climate change mitigation requirements HIGHWAYS - Highways improvements to New Road to improve highway safety, including improved road signage, footpaths and gritting in adverse weather - Do not install an unnecessary footpath and crossing point - Installation of traffic calming measures - Sufficient car parking facilities required within the site	The Council has sought to respond to the matters by topic but does not consider that any issues relate to the overall soundness of the plan. SCALE OF DEVELOPMENT The numbers proposed for the site are considered to be sustainable and development at the scale proposed allows for optimal use of the site. To ensure an efficient use of land, in accordance with the requirements of the NPPF, the Council's initial starting point for development allocated within the VCHAP was 25dph however in recognition of the edge of settlement location the number of dwellings proposed on VC ASH1 was reduced to 16dph. Notwithstanding this point, the site is preferred for "up to 15 dwellings" thereby setting an upper limit for numbers on the site. As such, at the site planning stage the developer of the scheme may consider fewer properties to be appropriate. The 2015 Local Plan site allocation reflected an existing commitment site and has subsequently been developed (2011/0506), alongside some small-scale windfall development within the village. A new village hall and play area formed part of the 2011/0506 development and improved the local facilities. Two applications for housing development within Ashwellthorpe (referred to as 'Phase 2 Wood Farm' locally) remain undetermined at the time of responding to the Regulation-19 representations (2019/2252 and 2019/2253). These applications are for linked affordable housing Exception Sites (with cross subsidy market housing on one of the sites) and as such are being considered outside of the VCHAP. Overall, the Council considers that Ashwellthorpe has experienced a sustainable level of growth. INFRASTRUCTURE As stated within the Objectives of the VCHAP, the Council has sought to allocate sites within a range of settlements to meet the needs of existing and future residents. Concerns relating to the existing services and facilities available within the village are again noted, including the capacity of the local primary school. It is recognised that the scale of development proposed on VC ASH1 will not result in the provision of new services and facilities (e.g., a village shop) however it will support the existing facilities within the Wreningham, Ashwellthorpe and Fundenhall	1003	Reiterate local concerns about the local sewerage infrastructure capacity to Anglian Water

				LANDSCAPE AND VISUAL IMPACT - The field opposite the proposed allocation site is a better location for development as the land is higher and there would be less impact on views locally	village cluster. At the time of preparing this response (Summer 2023) the Council is aware that a consultation by the bus provider 'Coach Services' proposes changes to the existing bus route through Ashwellthorpe (37A). These alterations would result in the replacement of the route to Norwich with a more frequent service to the nearby market town of Wymondham (proposed route 37A North). The services and facilities available within Wymondham would be more accessible by public transport as a result, as well as onward buses and train services to Norwich if required. In terms of the capacity at the local primary school, Norfolk County Council Education Services have reiterated their earlier advice that throughout Norfolk there has been a decline in birth rates which is impacting on the entry years and subsequent years in schools; it is anticipated that this will take effect within the next 2-3 years as higher numbers of pupils transition through the primary schools. Increased pupil numbers locally will support the ongoing future of rural schools throughout the village cluster area. Furthermore, as previously noted throughout the VCHAP, children within the catchment area of the local school generally have priority for school places in accordance with the published admission rules for the school. SURFACE WATER FLOODING AND ANGLIAN WATER INFRASTRUCTURE The Council is aware of the continued concerns relating to (a) localised surface water flooding and (b) the limitations of the existing sewerage infrastructure and the impact of further development on this. With regards to the matter of surface water flooding a Stage 2 Strategic Flood Risk Assessment has been undertaken to support the allocation of the site. Developers of the site will be required to complete their own Flood Risk Assessment to inform the site layout and design, as required by the site-specific policy. The Lead Local Flood Authority remains satisfied that development of the site with appropriate on-site mitigation measures is achievable and as such has not raised an objection to the allocation of VC ASH1. Whilst it will not be the responsibility of the developer to improve the existing surface water flooding situation for local residents, an appropriately designed mitigation strategy could result in betterment locally. Surface water maps show the main areas at risk to be at the northern and southern fringes of the site and the required Flood Risk Assessment (FRA) will inform the		

					detailed site design and layout. The Council has proactively engaged with Anglian Water (AW) as part of the Water Cycle Study evidence gathering and specifically raised the concerns of residents regarding the adequacy of the AW infrastructure locally. In response AW has set out the key proposed investment schemes for Ashwellthorpe including the installation of Event Duration Monitoring (EDM) equipment on both the storm tank at Ashwellthorpe Water Recycling Centre (WRC) and the storm overflow inlet, as well as enhancements to the storm tank (by March 2027). The EDMs record storm overflow events and this information provides evidence to support future investment by AW into the local infrastructure. More generally AW has advised that sewer systems can become overwhelmed in extreme weather incidents, including due to rising river levels preventing sewer outflows working correctly, blocked drains and unauthorised connections to the network, causing flood water to enter the sewers and leading to water surges pushing sewage back up the pipes. It recognises that joined-up working between a number of parties is necessary to improve this. In response to the Regulation-19 publication of the VCHAP has maintained that water supply and connections to the WRCs will be assessed in detail at the time the site comes forward to ensure that the most up-to-date information relating to both cumulative development and changes in non-household flows can be considered. Further to these discussions Anglian Water has not raised an objection to the inclusion of VC ASH1 within the VCHAP within their response to the Regulation-19 consultation. HIGHWAYS Local residents have repeated earlier concerns about the highways impact of VC ASH1. Engagement with NCC Highways Authority has continued and comments have been received relating to the site-specific off-site highway mitigation measures during the Regulation-19 consultation. The Council has responded separately to the comments made by the Highways Authority in response to this policy. Detailed matters relating to the appearance of the public footpath as well as the quantum of on-site car parking will be assessed during the planning application stage. LOCAL CHARACTER		

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
					The design and relationship between the proposed development and both the existing properties along New Road and the character of the wider settlement will be assessed at the planning application stage once the detailed design of the site is known. However, the site-specific policy requires variably the retention, protection and enhancement of the existing Priority Habitats (hedgerows) and mature trees along all of the site boundaries. The existing vegetation clearly defines the boundaries of the site and will enclose the development within the wider landscape, lessening the visual impact resulting from the development of this site and providing on-site opportunities for biodiversity net gain. With regards to the ecological impact arising from the development of the biodiversity net gain (BNG) will apply from late 2023 and is intended to ensure that wildlife habitats are improved as a result of development (i.e. land / habitats will be in a better state than it was before development). The preference for BNG will be the avoidance (and improvement of-) existing habitats within the site boundaries. In accordance with national guidance the Council will need to be satisfied with the biodiversity net gain plan prior to the commencement of any development work on the site. LOCAL ENGAGEMENT Finally, it is noted that comments relating to publicity of the Regulation- 19 consultation have been submitted. As set out in the statement of consultation the Council sought to widely publicise the publication period via various methods and actively engaged with town and parish councils, as well as local residents throughout the preparation of the VCHAP.		

Monitoring Framework

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Monitoring Framework	3198	Object	We continue to recommend including an indicator for the historic environment included in the framework.	Include an indicator for the historic environment in the framework.	The Council has continued to proactively engage with Historic England following the close of the Regulation-19 publication period, including via site visits and an in-person meeting. As part of these discussions this matter was explored further between both parties and Historic England subsequently advised that monitoring indicators for this Plan could include the following: (1) Net loss/gain of designated heritage assets; (2) Net loss/gain of non-designated heritage assets; (3) Net loss/gain of entries on Heritage at Risk Register; (4) No. of Conservation Area Appraisals completed; and/or (5) Number of permissions where heritage requirements identified in HIA/policy criteria were adhered to. The Council has reviewed these indicators and in addition to the above has also explored whether any additional or alternative monitoring indicators could be established in the VCHAP. Of the above indicators nos. (3) and (4) are not considered to be directly relevant to the content of the VCHAP and are also already subject to monitoring within the existing Local Plan. As the Council already has heritage monitoring indicators within the Local Plan the omission of the same from the VCHAP is not considered to be a soundness matter however should the Inspector be minded to modify the Plan to respond to the comments of Historic England the Council would suggest the following indicators would be appropriate: (A) The number of planning permissions approved where heritage requirements identified in either the Heritage Impact Assessment or the policy criteria were adhered to; and (B) The net gain/loss of designated heritage assets and non-designated heritage assets identified in either the Heritage Impact Assessment or the policy criteria.	1449	The Council does not consider this to be a matter of soundness for the Plan however should the Inspector be minded to modify the Plan to respond to the comments of Historic England the Council would suggest the following indicators would be appropriate: (A) The number of planning permissions approved where heritage requirements identified in either the Heritage Impact Assessment or the policy criteria were adhered to; and (B) The net gain/loss of designated heritage assets and non-designated heritage assets identified in either the Heritage Impact Assessment or the policy criteria.