

**IN THE MATTER OF THE EXAMINATION OF THE SOUTH NORFOLK VILLAGE
CLUSTERS HOUSING ALLOCATIONS PLAN AND POLICY VC ROC1**

SPEAKING NOTES ON BEHALF OF

DR AND DR GODLEY

AND MRS CHURCH

15TH JANUARY 2026

Introduction

The primary submission is that the policy/allocation is not sound and cannot be made sound.

The secondary submission is that if the Inspector disagrees and finds that it can be made sound, there are further modifications that must be made to achieve that.

Heritage impacts

The site, the background to this allocation, how the Council failed to properly assess the impacts and why the modifications proposed are insufficient.

The site

The site forms the agricultural setting to a cluster of former agricultural buildings with a shared historic functional relationship. The site is part of the setting of the listed buildings as its agricultural setting, it contributes to the setting of the grade 2 listed buildings. Dr and Dr

Godley submitted a heritage appraisal from JB Heritage consulting limited dated March 2023 the Reg 18 stage and also made submissions at reg 19 stage.

The appraisal identified that the agricultural and open character of this land permits views outwards from and towards the assets across a rural landscape that aids an understanding of their former function and appreciation of the significance as a historic farmstead (§ 4.13).

In terms of views from that is from both Old Hall and from 134B The Street.

Views are publicly available and also from further long views even from I'm instructed the river yare.

It also noted that Historic England guidance in GPA3 guides that settings of heritage assets which closely resemble the setting at the time of construction or formation are likely to contribute particularly strongly and she concluded this did – (§ 4.14).

Built form, infrastructure, increased activity, noise, light spill on land that makes an important contribution to the significance of the historic listed former agricultural buildings is harmful.

The assessment undertaken on behalf of the promoter states that the setting is not the only thing contributing to the significance of this cluster of buildings (this was repeated orally by Ms Evans). That is trite and it is not the test.

The setting of the listed buildings has been eroded over time. Harm has already been caused and should not be exacerbated.

The site being promoted for a suburban housing estate erodes the last remaining link to agriculture within the setting. Without the site, there is no agricultural setting.

Background to the allocation

This site made it through the Reg 18 consultation without a heritage impact assessment.

Historic England did make suggestions at Reg 18 stage suggesting a Heritage impact assessment was undertaken.

That assessment was criticised by JB heritage consulting limited on behalf of Dr and Dr Godley. It noted various failures including a misunderstanding of the location of the barn and hayloft completely and not understanding that there was an open relationship to the site.

At Reg 19 stage not only did my clients put in detailed comments but so did Historic England.

They suggested a degree of set back from the cluster of heritage assets and open space would be required at the western part of the site to reduce (note they did not say avoid) the impact on the listed buildings. It made recommendations regarding the sensitivity of the proposed footpath running adjacent to the listed barn.

That led to a further assessment undertaken by the Council.

In terms of the process of allocation it therefore appears to have been undertaken back to front with the impact assessments now attempting to justify the allocation rather than informing the allocation.

Assessment of Harm

The Council's updated HIA upgraded the significance of the listed buildings and increased the impact.

Looking at the Council's document B.4.1, *the Reg 19 Pre submission addendum*, I count that there are over 30 sites assessed.

Out of those 17 have at least one listed building affected.

Out of those 17, 14 sites have 1 asset affected, 1 site has 2 assets affected and 2 sites have 3 assets affected.

VC ROC 1 is one of only 2 sites being considered for allocation with 3 Grade II listed assets affected.

Unlike many of the other assessments in that document, the level of harm is not said to be at the lower end of less than substantial for any of the affected assets by virtue of this proposed allocation. Indeed there is no attempt to categorise where on the spectrum the harm lies and there has been no assessment of the cumulative harm to 3 assets. That is significant.

On the case of my clients, on the case of Historic England and on the case of the Council, there is residual harm to the significance of 3 listed buildings even with the mitigation proposed.

There are still shortcomings. For example, in relation to listing 1050428, the Council now adds that the 2 barns face inwards towards each other. They do not. 134B faces away from the hayloft and the barn and all of its aspects face towards the site. All but one window faces the

site. Moreover, there is no appreciation of that building being single storey. It is also not clear if this was noticed by Historic England.

There is also no assessment of cumulative harm to this related cluster of listed assets.

The site promoter has also included a heritage impact assessment (Charlotte Evans) for this hearing and it noteworthy cannot conclude that there is no harm. Rather the assessment does something unusual for a heritage expert which is to make planning judgments to justify allocation (see §1.4 and §4.20).

*It is anticipated that various mitigation measures might offset some of this perceived harm, and that it should be viewed on balance, alongside **benefits that the allocation will provide, including delivering much-needed housing.***

*here is an important and pragmatic balancing act required between low level harm to the setting of the heritage assets with other benefits, **such as delivering much needed housing in the area.***

The soundness of the policy

In terms of s.66 and the statutory duty to protect listed buildings, this is not self contained at planning applications by virtue of the fact that the purpose of allocation will lead to a planning application so there has to be some consideration of that duty at this stage otherwise the plan is not positively prepared.

This site allocation does not protect- that is agreed by all parties - and that harm is a matter to which considerable weight must be attributed.

Para 203 NPPF states that the local plan should set out a positive strategy for the conservation and enjoyment of the historic environment in which the desirability of sustaining and enhancing the significance of heritage assets should be considered.

Where harm is caused that is in direct conflict.

Of further concern in relation to the mitigation and modifications is that it is not clear how or why the mitigation is introduced in the way it is and how it is justified and how any meaningful conclusions can be drawn.

It seems that a line has been drawn on a plan forming part of the evidence for the site allocation which has informed the policy. There is no evidence to underpin that line. It is not understood

how drawing that line on the site plan reduces the impact at all when there is no assessment to support the extent of open space shown. It is completely arbitrary. Without evidence for the line and the mitigation, the policy is not justified and fails the test of soundness.

The PPG sets out (para 2 in the plan making chapter) that where sites are proposed for allocation, sufficient detail should be given to provide clarity to, inter alia, local communities and other interested parties about the nature and scale of development.

This plan does not do that. My clients do not understand why the line is where it is. How are views protected by virtue of that minimal and arbitrary area not being developed.

The enjoyment and appreciation of this historic environment will be impacted. The footpath at the edge of the site is currently very well used. There is appreciation of the listed buildings in their setting in mid range views from that public footpath. Even with the mitigation proposed, those views will be severely impacted for the majority of the experience adjacent to the site. Indeed it is not understood how a small section of undeveloped land at the west of the buildings will assist in views. Whilst there will be glimpses of the Old Hall as it is 2 storey after development, there will be virtually no view of the associated single storey barn at 134B the street which is a significant element in the cluster of the buildings of the farmstead and which appears to be ignored in the assessments.

Para 213 NPPF sets out that any harm to the significance of a designated heritage asset should require clear and convincing justification.

Para 208 NPPF sets out that part of the consideration should be to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Great weight should be given to an asset's conservation. Here there are 3 assets affected and there is cumulative harm.

Local plans must be prepared with the objective of contributing to the achievement of sustainable development. As such, adverse impacts on the environment should be avoided. Any proposals that would result in harm to heritage assets need to be fully justified and evidenced to ensure they are appropriate.

The mitigation will not avoid adverse heritage impact and that is common ground.

Conclusions

This is a particularly sensitive site compared to other sites proposed for allocation. It is one of only 2 sites for which 3 listed assets are affected. It appears to have been proposed without information relating to heritage impact and is now being justified after the event.

In conclusion:

- 1) Other sites must be preferable to a site on which it is agreed that development will result in harm to 3 listed buildings which are protected by statute, it is not in accordance with NPPF and so the policy is not sound;
- 2) Mitigation to inform this policy should be underpinned by evidence to demonstrate reduction/avoidance of harm. It is not and so it is not justified and so the policy is not sound.
- 3) If this site is to be allocated, development should be reduced and the open space should be greater and the policy should be strengthened.

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