

# South Norfolk Village Clusters Plan (VCHAP)

## Duty to Cooperate Statement, July 2025

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## Introduction

Councils have a duty to cooperate as set out in the 'Maintaining effective cooperation' section of the National Planning Policy Framework (NPPF, December 2024, paras 24 to 28), focusing on strategic, cross boundary matters. The Village Clusters Plan deals specifically with relatively small-scale housing development, circa 12-50 units. Whilst a number of these are located close to the boundary with adjoining authorities, their scale means that strategic issues are most likely to be due to the cumulative impact of development.

## Greater Norwich Local Plan (GNLP)

The obligations for the VCHAP derive from the GNLP, which sets out the requirement for at least 1,200 homes to be allocated on sites within the South Norfolk Village Clusters. The GNLP has itself been through an extensive Duty to Cooperate process, detailed in 'GNLP Statement of Compliance with the Duty to Cooperate, 29/10/2021'. This Statement deals with how cooperation on the distribution of development in the GNLP (which includes the requirement for 1,200 dwellings noted above) was undertaken. In summary, this included:

- the multi-district Strategic Housing Market Assessment and the Greater Norwich Housing Needs Assessment; and
- the Norfolk Housing and Economic Land Availability Assessments (HELAAAs), the methodology for which was agreed by the Norfolk planning authorities in 2016.

The latter sets out an approach which has also underpinned the Site Assessment approach in the VCHAP (see VCHAP Consultations below). The HELAAAs completed across Norfolk demonstrate that each of the authorities can accommodate the required growth within their own Development Plan areas, which includes the 1,200 dwellings in the South Norfolk Village Clusters, as part of the GNLP area. Meeting these needs also fulfils the requirements of the Norfolk Strategic Planning Framework (NSPF)<sup>1</sup>.

This Duty to Cooperate Statement, prepared for the VCHAP, should be read in conjunction with the GNLP Statement of Compliance with the Duty to Cooperate, 29/10/2021 which is available within the GNLP evidence base library (document A9.1) or via the following weblink: [GNLP Duty to Cooperate](#).

## Norfolk Strategic Planning Framework (NSPF): Statement of Common Ground

The NSPF has been developed and subsequently updated under the Norfolk Strategic Member Forum, since a formal agreement to work on cross-boundary issues in 2015. It is used by Local Planning Authorities to address the duty to cooperate and statement of common ground requirements set out in the NPPF. This work is supported by the Norfolk Strategic Planning Officers Group which meets formally every month.

The first version of the NSPF was endorsed by the Norfolk authorities (including the Broads Authority) in 2018, with further updates ratified by partners in 2019 and 2021. At the time of preparing this statement (June 2025), the third version of the NSPF (2021) remains the current document however it is anticipated that an updated NSPF will have been endorsed by all parties by

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<sup>1</sup> Agreement 11 within the 2021 version of the NSPF, updating to Agreement 9 in the 2025 version of the NSPF.

autumn 2025 (version 4). A review of the 2021 NSPF commenced in early 2024 and the 2025 document includes revisions that reflect the following:

- changes made to the National Planning Policy Framework and other legislation;
- the introduction of new strategic planning issues such as nutrient neutrality;
- updated statistical information and economic data;
- updates to the infrastructure section to take into account new information; and
- changes within the structure of signatory bodies such as the abolition of New Anglia Local Enterprise Partnership.

The NSPF sets out a series of Agreements between the signatories, including on matters such as the preparation of Local Plans, meeting housing needs, addressing climate change and the delivery of infrastructure. It looks to set a coordinated approach to cross boundary issues including strategic infrastructure, housing and jobs numbers and developing common policy approaches. The NSPF has also led on developing joint evidence bases and a coordinated response to higher level documents, such as the Green Infrastructure and Recreation Mitigation Strategy and the Health Protocol. Particular areas addressed by this joint approach that relate directly to the VCHAP include:

- the Norfolk-wide Green Infrastructure and Recreational Avoidance Mitigation Strategy (GIRAMS), which seeks to mitigate the impacts of growth on Natura 2000 sites through the establishment of a Norfolk-wide tariff and is a key measure identified in the VCHAP Habitats Regulation Assessment; and
- the Strategic Housing Market Assessment for Central Norfolk (which comprises Broadland District Council, Norwich City Council and South Norfolk Council).

### Norfolk/Suffolk Cross-Border meetings

In addition to the Norfolk Strategic Planning Officers Group, there are officer meetings between the County and District authorities which adjoin the Norfolk/Suffolk boarder to address issues, including those arising from the preparation of Development Plans and major planning applications, as well as infrastructure projects. These meetings typically occur every six months.

### Planning in Health Protocol

The Planning in Health Protocol sets out how NHS organisations, public health and local planning authorities will collaborate in the production of local plans and the determination of planning applications. Having been established several years ago, this reflects the part that the built environment plays within the health and wellbeing of our communities, including the role it can take in addressing health inequalities.

The updated Planning in Health Protocol improves the metrics of information gathered and better informs the understanding of demand and capacity within NHS services. It was endorsed by South Norfolk Cabinet in January 2025. The Planning in Health Protocol is an ongoing collaboration between Norfolk and East Suffolk Local Planning Authorities (LPAs), Norfolk County Council (NCC) and Suffolk County Council (SCC) Public Health and the Norfolk and Waveney Integrated Care Systems (ICS) that covers the eight districts of Norfolk and the former Waveney district in East Suffolk.

Regular meetings also take place relating to planning policy matters. NHS colleagues also contributed to the production of the Greater Norwich Local Plan and have commented during the preparation of the VCHAP.

### Norfolk County Council Local Plan & Major Sites meetings

Officers convene every 6 months with colleagues from Norfolk County Council to provide updates on matters relating to the production of Local Plan documents, as well as major planning applications within South Norfolk. The meeting is facilitated by Norfolk County Council and includes officers representing the minerals and waste team, highways department, the Lead Local Flood Authority, Children's Services (education provision), public health and the fire service.

### Joint Working Arrangements

A number of joint working arrangements exist across the Greater Norwich area involving both officers and Members from each of the local authorities, as well as Norfolk County Council. These opportunities demonstrate the ongoing commitment of the Council to work positively and collaboratively with neighbouring authorities and partnership agencies in order to support the delivery of housing growth and infrastructure throughout the Greater Norwich area.

Examples of joint working arrangements include:

- the establishment of the Greater Norwich Growth Board (GNGB) in 2014 to deliver strategic infrastructure within the partnership area via the use of pooled Community Infrastructure Levy (CIL) funds;
- the Five Year Investment Plan identifies the projects from the Greater Norwich Infrastructure Plan – these are considered as priorities for achieving economic growth targets;
- a programme of projects and schemes to improve accessibility by all forms of transport around the city of Norwich, including improving sustainable transport options and increasing the road network capacity, delivered by the Transport for Norwich (TfN) group. It also covers the full extent of the Strategic Growth Area (as set out in the GNLP), and longer distance trips through the county and beyond;
- the adoption of a Green Infrastructure and Recreational impact Avoidance Mitigation Strategy (GIRAMS) at a county level to provide green infrastructure (GI) on development sites and provide strategic mitigation to avoid adverse effects on protected habitat sites through the establishment of the Recreational impact Avoidance Mitigation Strategy (RAMS);
- preparation of a Green Infrastructure Strategy for Greater Norwich which aims to support the protection, enhancement and creation of GI habitat across the area. The updated strategy was adopted by the greater Norwich Growth Board in March 2025; and
- involvement in the preparation of the Greater Norwich Physical Activity and Sport Strategy (PASS) 2022-2027 which seeks to work with a number of partners to support and encourage opportunities for active lifestyles for all residents.

In addition, during the process of producing the VCHAP the Council, along with other Norfolk authorities, received notification from Natural England concerning nutrient pollution in the protected habitats of the River Wensum Special Area of Conservation and the Broads Special Area of

Conservation and Ramsar site. This advised that new development within the catchment of these habitats comprising overnight accommodation has the potential to cause adverse impacts regarding nutrient pollution. The Norfolk authorities continue to work together to ensure consistency of approach on Nutrient Neutrality. A group of Norfolk authorities, including South Norfolk, have formed a Joint Venture (Norfolk Environmental Credits) sourcing the mitigation that is required to sell credits to developers to enable them to demonstrate housing schemes are nutrient neutral.

### VCHAP Consultations

The preparation of both the Regulation 18 and Regulation 19 versions of the VCHAP have included the involvement of a range of stakeholder bodies, several of whom have had regard to the in-combination impacts of the VCHAP sites with other proposals. Various stakeholders were proactively engaged with during Technical Consultations as part of the HELAA/site assessment process, and both these stakeholders as well as a wider group of bodies were formally invited to comment at each stage of the Plan preparation. In response to the Regulation 18 consultation, comments were received from Suffolk County Council and the Broads Authority, amongst others, specifically addressing cross-boundary issues. Both the Technical and Regulation 18 Consultations led to series of meetings with key stakeholders, including:

- Norfolk County Council Highways (re. highways capacity and safety);
- Norfolk County Council Children's Services (re. school capacity and access);
- Norfolk County Council Lead Local Flood Authority (re. flood risk);
- NHS Integrated Care Systems (re. health care capacity and provision);
- Anglian Water (re. water supply and disposal);
- The Environment Agency (re flood risk) and
- Historic England (re. heritage impacts).

Full details can be found in the Statement of Consultation that is included within the main Evidence Base. Following the initial Regulation 19 publication, when it became apparent that one of the proposed allocations could no longer be considered deliverable, dialogue continued with several of the above stakeholders in order to prepare a further Regulation 18 consultation on Alternative Sites and Focused Changes. The Council also participated in an on-site meeting with Historic England, leading to a reduction in numbers on a second proposed allocation. Meetings with Historic England, Norfolk County Council Highways, the Lead Local Flood Authority, and the Environment Agency, amongst others, helped to shape the second Regulation 18 consultation and also led to updates to key elements of the evidence base.

The preparation of the Regulation 19 Addendum allowed the Council to address some of the issues raised by some of the Duty to Cooperate stakeholders during the initial Regulation 19, including with Suffolk County Council, who subsequently considered their earlier soundness objection to have been suitably addressed.

Appendix 1 of this document provides a record of the meetings that have taken place during the preparation of the VCHAP where these have been specifically in response to the overall objectives of the Plan. The Council has also engaged with consultees on identified site-specific matters as necessary however, due to the quantum of correspondence associated with these detailed discussions, it has not been considered appropriate to include the records of these within the Duty to Cooperate Statement however, should the Inspector consider these documents to be of relevance to the Examination, the Council is able to supply these records.

## Duty to Cooperate requests, August 2020 and January 2025

Following the Regulation 18 consultation a specific email regarding the Duty to Cooperate was sent to bodies set out in the Town and Country Planning (Local Planning) England Regulations 2012, which stated:

*“You, or your organisation, will already have been contacted by the team producing the GNLP about the Duty to Cooperate for that Plan, and either confirmed that there are no outstanding issues, or have developed a Statement of Common Ground. We are now seeking your views on whether you consider there are any strategic and cross boundary issues where you feel a Statement of Common Ground on the VCHAP would be useful?”*

Those responses received expressed a wish to be kept engaged in the process and the potential to draw up a bespoke Statement of Common Ground prior to formal submission.

Due to the passage of time and the identification of key issues through the process, it was considered appropriate to seek further engagement with the prescribed bodies following the close of the Regulation-19 Addendum publication period to confirm that the original position remained valid. A further email was sent out in January 2025. This email stated:

*“Following the opportunities to comment on the VCHAP during the formal publication periods in 2023 and 2024, under Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012, we are now contacting you again to determine whether there are any outstanding matters that you wish to discuss with the Council as the VCHAP approaches submission and examination. At this stage we would ask that you respond to this email by Friday, 31st January 2025 confirming whether there are any ongoing matters you wish to raise or, alternatively, that you have no outstanding matters to address and that you consider that the requirements of the Duty to Cooperate have been met. Should your response indicate that matters remain which you feel require further consideration the Council will contact you again to discuss these, as well as the production of a Statement of Common Ground. The Statement of Common Ground would be submitted to the Planning Inspectorate for examination alongside the VCHAP.”*

The responses received to the above emails are set out in Appendix 2 of this document.

## VCHAP Evidence Base

The VCHAP is supported by a number of evidence studies. The Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA) both address the relationship with other plans, most notably the GNLP, and potential cumulative impacts which extend beyond the immediate plan boundary and allocated sites. In addition, other studies produced include a Stage 2 Strategic Flood Risk Assessment (SFRA) and Water Cycle Study (WCS) addendum, both of which built on the baseline studies for the GNLP and which include consideration of cross-boundary issues and engagement with appropriate stakeholders.

Updating relevant parts of the evidence base to support the Regulation-19 Addendum provided an opportunity to respond to some of the representations made by the Duty to Cooperate stakeholders during the initial Regulation 19 publication period. Key amongst these has been the preparation of a new Stage 1 SFRA, and subsequently updated Stage 2, seeking to address concerns raised by the LLFA in particular. Other elements of work have included updated Heritage Impact Assessments, building on the responses of the on-site meeting and wider discussions with Historic England.

In addition, the publication of the Addendum pre-submission version of the VCHAP highlighted the need for some further engagement on a small number of site-specific requirements raised through the representations by the Duty to Cooperate bodies. The Council has liaised with these stakeholders and prepared Statements of Common Ground to provide clarity on the outstanding issues raised for the Examination, and to provide resolutions where possible (as set out in Appendix 3 of this document). Statements of Common Ground have been prepared with the Broads Authority, Norfolk County Council, Historic England and Anglian Water.

### Conclusion

Based on the above, the Council considers that it continues to meet the requirements, as set out in the National Planning Policy Framework.

**Updated July 2025**

## Appendix 1 – Record of Meeting Notes with Prescribed Bodies

In addition to the other forms of engagement set out in the main text of this document, the following table provides a record of key discussions that have taken place with specific bodies prescribed under the Duty to Cooperate, regarding the preparation of the VCHAP. This table does not include site-specific meetings that have taken place as issues have been identified.

The meetings are grouped by subject matter, with the table setting out the timeline of meetings, participants and a summary of the meeting. These meetings along with other established groups will continue as required through the implementation of the Local Plan.



Table 1 Appendix A- Summary table of meetings with Prescribed Bodies

Meeting Participants	Date of Meeting	Key Issues Raised	Outcome
<i>Heritage</i>			
South Norfolk Council, Historic England (HE)	07/09/2021	To discuss the Duty to Cooperate and to agree an approach to heritage within the VCHAP assessment process	Agreeing the general approach to the assessment of heritage assets on- and close to sites being assessed, including the purpose of the Heritage Impact Assessments (HIAs)
South Norfolk Council, Historic England	28/06/23	Select number of in-person site visits and subsequent discussions regarding both site-specific and general issues raised by HE through the Regulation-19 period	Agreement reached on a number of site-specific matters to inform subsequent policy wording;  Areas of update for HIAs identified and agreed; and  Statement of Common Ground to be entered into as the VCHAP proceeds to submission
<i>Infrastructure: health</i>			
South Norfolk Council, ICS	07/12/21	Implications for the ICS of the VCHAP approach and how this will be taken forward	ICS to review their comments on the VCHAP and consider how best to deal with the implications internally, including flagging up potential allocations with relevant GP groups
<i>Infrastructure: highways</i>			
South Norfolk Council, Norfolk County Council Highways	18/11/20, 15/12/20, 06/01/21, 27/01/21, 12/02/21	Review of potential allocation sites by cluster prior to Regulation-18 consultation, grouped in 5 separate meetings	Potential highways constraints and opportunities identified to inform discussions about appropriate sites to include in the Regulation-18 consultation

South Norfolk Council, Norfolk County Council Highways	06/05/22 09/06/23	Review of consultation responses with site-specific queries arising	Ongoing identification and discussion of highways constraints and opportunities in the context of emerging preferred site allocations
South Norfolk Council, Suffolk County Council	01/05/23	To discuss response to Reg-18 FC to determine whether any cross-boundary transport issues exist	Confirmation that no outstanding issues exist
<i>Infrastructure: education</i>			
South Norfolk Council, Norfolk County Council Children's Services	14/09/21	General discussion regarding school intake, current numbers on school roles and population trends within Norfolk, as well as a number of site-specific queries	General trend for declining pupil numbers in the rural areas due to lower birth rates and parental choice; modest growth can benefit rural schools; new primary schools at Hethersett, Trowse and Wymondham College have eased some existing pressures on local schools
<i>Infrastructure: water management</i>			
South Norfolk Council, Norfolk County Council Lead Local Flood Authority	16/09/21, 20/10/21	To discuss general roles and responsibilities, as well as explanation of Reg-18 consultation responses submitted by the LLFA and a review of a number of site-specific queries	Understanding and agreement reached on comments submitted in response to the consultation, as well as identification of potential constraints and opportunities on specific sites
South Norfolk Council, Norfolk County Council Lead Local Flood Authority Environment Agency JBA (SFRA)	11/09/23	To discuss the modelling approach for the Strategic Flood Risk Assessment	Clarification sought regarding the EAs position and the LLFA position towards modelling – concluded (in subsequent email correspondence) that that EA consider the 40% climate change allowance may be sufficiently precautionary whilst the LLFA maintain their objection to this modelling approach

## Appendix 2 –Duty to Cooperate requests and responses (August 2021 and January 2025)

The following organisations were contacted directly in both 2021 and 2025 in accordance with the Duty to Cooperate:

Anglian Water, Babergh & Mid Suffolk Councils, Breckland District Council, Broadland District Council, Broads Authority, Civil Aviation Authority, East Suffolk Council, Environment Agency, Great Yarmouth Borough Council, Historic England, Homes England, Marine Management, Natural England, New Anglia, NHS, Norfolk County Council, Norwich City Council, Office of Rail and Road, Suffolk County Council and Transport East.

The formal written responses received in response to these emails are set out below.

RE: South Norfolk Village Clusters Housing Allocations Plan (VCHAP) - Duty to Cooperate



Page Mark <Mark.Page@nchc.nhs.uk>

To: Simon Marjoram  
Cc: Boyles Craig

Reply Reply All Forward

Wed 11/08/2021 10:55

Securityoff

Simon

To advise, our reply from the health perspective was made recently through my colleague Craig Boyles (copied in).

Kind Regards,

Mark Page MSc MDTFPM

Assistant Director – Estates & Facilities  
Norfolk Community Health and Care NHS Trust

Lead – for Estates - Norfolk & Waveney STP

Tel: 01603 697433

Mobile: 07827 257047

Fax: 01603 697487

Email: [m.page@nhs.net](mailto:m.page@nhs.net) or [mark.page@nchc.nhs.uk](mailto:mark.page@nchc.nhs.uk)



*NCH&C Estates & Facilities department operate a single point of contact helpdesk function.*

*To log a call or query regarding any of the services we provide, click the below QR code or scan on your smart phone. We would also love to hear your feedback after using our service, so do please take our short survey and let us know how we're doing by clicking on the icon below!*

RE: South Norfolk Village Clusters Housing Allocations Plan (VCHAP) - Duty to Cooperate



Faulkner, Stephen <stephen.faulkner@norfolk.gov.uk>

To: Local Plan; Doleman, Richard; CES Developer Services  
Cc: Simon Marjoram

Reply Reply All Forward

Fri 13/08/2021 08:28

Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

RE: South Norfolk Village Clusters Housing Allocations Plan - Regulation 18 Consultation  
Outlook item

Simon,

Thank you for your email below.

I'm happy to discuss with you the merits as to whether a SoCG is indeed necessary or appropriate at this time.

I've attached the County Council's response to the Reg 18 SNVC Local Plan for your information.

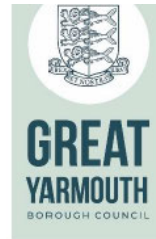
I'll shortly be on leave but will be back in the office on 23/8/21

Kind regards

Stephen

Stephen Faulkner MRTPI  
Principal Planner  
Community and Environmental Services  
Telephone: 01603 222752

FAO: Greater Norwich Local Plan Team



8<sup>th</sup> September 2021

Dear Greater Norwich Local Plan Team,

Thank you for consulting Great Yarmouth Borough Council. Please accept the below as an officer level response on behalf of Great Yarmouth Borough Council for your Regulation 18 'South Norfolk Village Clusters Housing Allocation Plan' (VCHAP).

The Borough Council has no specific cross-boundary issues relating to the policies contained within this plan. As such, it is the Borough Council's view that a specific Statement of Common Ground between the authorities is not necessary. At a broader strategic level, the Norfolk Strategic Planning Framework (NSPF) and the agreements contained within it still apply. Based on this, the Borough Council is content that the strategy document complies with the duty to cooperate in respect of addressing cross boundary strategic matters of particular relevance to Great Yarmouth.

The Borough Council looks forward to continuing to work with Greater Norwich and other neighbouring authorities to bring forwards our shared strategic vision for Norfolk.

If you have any queries based on these comments please do not hesitate to contact me.

Yours Sincerely,  
*N. Fountain*

Nick Fountain  
Senior Strategic Planner  
01493 846626  
[nick.fountain@great-yarmouth.gov.uk](mailto:nick.fountain@great-yarmouth.gov.uk)

RE: South Norfolk Council Village Clusters Housing Allocations Plan (VCHAP) - Duty to Cooperate



Nick Enge <Nick.Eng@homesengland.gov.uk>

To ● Kate Fisher; ○ Homes England Enquiries

Cc ○ Local Plan (SNC)

This sender Nick.Eng@homesengland.gov.uk is from outside your organization.

Summarize

Reply

Reply All

Forward



Tue 21/01/2025 08:27

Dear Kate

Thank you for contacting me. I am pleased to confirm that I have no outstanding matters to address and that I consider that the requirements of the Duty to Cooperate have been met in respect of my previous correspondence.

Kind regards

**Nick Enge MRICS**

Senior Growth Manager

Tel: 01223 374011

Please note my working days are Tuesday morning to Friday lunchtime.



Homes  
England

Homes England  
Northstowe House  
Rampton Road  
Longstanton  
Cambridge  
CB24 3EN

**The Housing and Regeneration Agency**

We believe that affordable, quality homes in well-designed places are key to improving people's lives. We make this happen by using our powers, expertise, land, capital, and influence to bring both investment to communities and to get more quality homes built.

Please forward any Freedom of Information Requests to: [info.gov@homesengland.gov.uk](mailto:info.gov@homesengland.gov.uk)



Sent: Tuesday, January 21, 2025 3:08 PM  
To: Adam Banham <[Adam.Banham@southnorfolkandbroadland.gov.uk](mailto:Adam.Banham@southnorfolkandbroadland.gov.uk)>  
Subject: Re: Broadland District Council Duty to Cooperate for the South Norfolk Council Village Clusters Housing Allocations Plan (VCHAP)

Hello Adam,

I was aware that the Village Clusters aspect was being dealt with separately from the GNLP. I don't see any issue with this in terms of Broadland but thank you for including me in this context on behalf of the residents of our district.

Sue  
07488 323702  
-----

Cllr Susan Holland  
Leader of Broadland District Council  
Member for Spixworth and St Faiths Ward

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**From:** Adam Banham <[Adam.Banham@southnorfolkandbroadland.gov.uk](mailto:Adam.Banham@southnorfolkandbroadland.gov.uk)>  
**Sent:** 21 January 2025 13:54  
**To:** Sue Holland <[cllr.sue.holland@southnorfolkandbroadland.gov.uk](mailto:cllr.sue.holland@southnorfolkandbroadland.gov.uk)>  
**Subject:** Broadland District Council Duty to Cooperate for the South Norfolk Council Village Clusters Housing Allocations Plan (VCHAP)

Hi Sue,

One of our pieces of work on the South Norfolk side of the One Team is preparing an allocation plan for 1,200 new homes in South Norfolk villages. Does this plan pose any questions or concerns to you?

It might sound like I'm asking a peculiar question, but in representing Broadland I want to make sure I am being equitable, and want to double-check that as the Leader of a neighbouring authority you are content with what South Norfolk Council are proposing?

As context, the South Norfolk Council Village Clusters Housing Allocations Plan (VCHAP) is a subsidiary plan to the Greater Norwich Local Plan (GNLP). The 1,200 homes it will allocate are already counted in the strategic policies of the GNLP.

Broadland residents are not being disadvantaged by the proposals in the VCHAP and I do not believe that Broadland District Council needs to raise any objections when the independent inspector examines the plan. However, as a courtesy I wanted to let you know.

For information, the email that has gone to other councils and statutory bodies that we consult is below. Such an approach is common practice, and sometimes councils do object to the land-use plans that their neighbours write.

By emailing I'm being even-handed.

Kind regards,

**Adam Banham CIHM MRTPI**  
Place Shaping Manager

RE: South Norfolk Council Village Clusters Housing Allocations Plan (VCHAP) - Duty to Cooperate



Nick Fountain <nicholas.fountain@great-yarmouth.gov.uk>

To: Kate Fisher; Local Plan (SNC)

Cc: Local Plan

This sender nicholas.fountain@great-yarmouth.gov.uk is from outside your organization.

Summarize

Reply Reply All Forward

Thu 30/01/2025 15:17

Dear Kate,

Thank you for consulting Great Yarmouth Borough Council on the South Norfolk Council Village Clusters Housing Allocations Plan (VCHAP).

I note that the Borough Council made no comments to previous iterations of the plan. The Borough Council has no specific cross-boundary issues relating to the policies contained within this plan. As such, it is the Borough Council's view that a specific Statement of Common Ground between the authorities is not necessary. At a broader strategic level, the Norfolk Strategic Planning Framework (NSPF) and the agreements contained within it still apply. Based on this, the Borough Council is content that the strategy document complies with the duty to cooperate in respect of addressing cross boundary strategic matters of particular relevance to Great Yarmouth.

The Borough Council looks forward to continuing to work with South Norfolk and Broadland to bring forwards our shared strategic vision for Norfolk.

If you have any further queries, please do not hesitate to contact me.

Kind regards,

Nick

**Nick Fountain MRTPI**

Strategic Planning Manager

Strategic Planning

Planning and Growth

Great Yarmouth Borough Council

Email: [nick.fountain@great-yarmouth.gov.uk](mailto:nick.fountain@great-yarmouth.gov.uk)

[www.great-yarmouth.gov.uk](http://www.great-yarmouth.gov.uk)

Telephone: 01493846626

RE: South Norfolk Council Village Clusters Housing Allocations Plan (VCHAP) - Duty to Cooperate



EastAnglia, Planning <Planning.EastAnglia@environment-agency.gov.uk>

To: Kate Fisher

Cc: Local Plan (SNC)

This sender Planning.EastAnglia@environment-agency.gov.uk is from outside your organization.

Summarize

Reply Reply All Forward

Thu 30/01/2025 16:03

Dear Kate,

We are satisfied that our formal consultation responses to the Plan have adequately highlighted potential issues regarding wastewater capacity. We therefore have no outstanding matters to address and consider that the requirements of the Duty to Cooperate have been met.

However, we recommend you consult with Anglian Water for confirmation on their position, particularly in light of their recent communications regarding "Delivering Sustainable Growth Across Eastern England".

Kind Regards

**Alasdair Hain-Cole**

Sustainable Places Planning Advisor – East Anglia Area

Environment Agency | Iceni House, Cobham Road, Ipswich, Suffolk, IP3 9JD

Mob: 0203 0258022

[alsadair.hain-cole@environment-agency.gov.uk](mailto:alsadair.hain-cole@environment-agency.gov.uk)





RE: South Norfolk Council Village Clusters Housing Allocations Plan (VCHAP) - Duty to Cooperate


 Summarize




Robert Hobbs <Robert.Hobbs@babberghmidsuffolk.gov.uk>

To  Kate Fisher

Cc  Local Plan (SNC);  BMSDC Local Plan

 This sender Robert.Hobbs@babberghmidsuffolk.gov.uk is from outside your organization.

 Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

 Reply  Reply All  Forward  

Fri 31/01/2025 19:04

Dear Kate

Thank you for your e-mail.

Having reviewed the Plan, we consider there are no outstanding matters we wish to address and consider that the requirements of the Duty to Cooperate have been met.

Kind regards

Rob

**Robert Hobbs**

Head of Strategic Planning (Planning Policy and Infrastructure)

**Babergh District Council & Mid Suffolk District Council – Working Together**

Tel: 0300 1234 000 (Option 5, then Option 4 for Strategic Planning team)


Direct Dial: 01449 724812

Mob: 07850 882663

Email: [robert.hobbs@babberghmidsuffolk.gov.uk](mailto:robert.hobbs@babberghmidsuffolk.gov.uk)


[www.babergh.gov.uk](http://www.babergh.gov.uk) & [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

Our ref: 499560 South Norfolk Council Village Clusters Housing Allocations Plan (VCHAP) - Duty to Cooperate

 Summarize



Oliver, Louise <Louise.Oliver@naturalengland.org.uk>

To  Kate Fisher

 This sender Louise.Oliver@naturalengland.org.uk is from outside your organization.

 You forwarded this message on 13/02/2025 10:31.

 Reply  Reply All  Forward  

Thu 13/02/2025 09:54

Hi Kate

Please accept my apologies for the delay in replying.

I confirm that Natural England does not consider that there are any outstanding matters regarding the above Plan that would require a Statement of Common Ground to be produced between your Authority and ourselves.

Regards

Lou Oliver

Louise Oliver | Higher Officer - Sustainable Development | Norfolk & Suffolk | Natural England

Dragonfly House | 2 Gilders Way | Norwich | NR1 3UB

M: 07920 086653 [www.gov.uk/natural-england](http://www.gov.uk/natural-england)

**Usual working pattern Mon - Fri 09.00 – 14.00**

**Please send any consultations to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)**



## Appendix 3 – Statements of Common Ground

Statements of Common Ground have been prepared with the following organisations:

Anglian Water

The Broads Authority

Historic England

Norfolk County Council

South Norfolk Village Clusters Housing Allocations Plan

**Statement of Common Ground with Anglian Water**

Comments made under Duty to Cooperate

Date: 17 July 2025

## Purpose of Statement

1. This document has been prepared to inform the Inspector of the agreed position between South Norfolk District Council and in respect of comments made by Anglian Water (AW) during the formal stages of VCHAP preparation, in order to demonstrate that the Council has been fulfilling the “Duty to Cooperate”. It is intended to address certain specific points that have been made by Anglian Water and, as such, should be read in conjunction with the South Norfolk Council Duty to Cooperate.
2. This bespoke Statement of Common Ground (SoCG) is between South Norfolk Council, the council responsible for preparing the Village Clusters Housing Allocations Plan, and Anglian Water.

## Introduction

3. Anglian Water is the statutory water and sewerage undertaker for the Greater Norwich area, including the South Norfolk administrative area. AW is a statutory consultee for Local Plans under the Town and Country Planning (Local Planning) (England) Regulations 2012.
4. Anglian Water has been consulted during the production of the Village Clusters Housing Allocations Plan. AW submitted formal representations at each stage of the process and has engaged in subsequent discussions with South Norfolk Council throughout the production of the Plan.
5. South Norfolk Council appointed AECOM to undertake a Water Cycle Study (WCS) to support the production of the VCHAP. The Water Cycle Study specifically relates to wastewater services infrastructure required to enable the growth proposed, and to the protection of the water environment. The WCS was prepared using data provided by key stakeholders, including Anglian Water and the Environment Agency. Reflecting the evolution of the VCHAP, the Water Cycle Study was undertaken in two parts (Regulation-19 and Regulation-19 Addendum) and these are available within the evidence base that supports the VCHAP.

## Governance arrangements and timetable for review

6. This statement has been prepared by South Norfolk Council and agreed with Anglian Water. The statement will be published online within the Examination Library for the VCHAP, alongside the Publication version of the Plan when it is submitted to the Planning Inspectorate for independent examination.
7. It should be noted that signing this Statement of Common Ground does not prejudice the ability of any such signatory making detailed representations (in support or objection) to the content of the emerging Local Plan.

## Key areas of agreement

8. The key points of agreement noted as existing between both parties are as follows:
  - The VCHAP complies with the Duty to Cooperate.
  - Strategic matters have been addressed via the Greater Norwich Local Plan (GNLP) and the VCHAP is a non-strategic policy making Plan.

- The VCHAP is a subsidiary Plan that will, once adopted, be part of the Local Plan for South Norfolk.
- Anglian Water recognises that the purpose of the VCHAP is small-scale sustainable growth in rural communities across the Plan area, and that the majority of growth under the GNLP is focussed in the main urban areas within Greater Norwich.
- The Council has prepared Water Cycle Study as part of the evidence base to support the VCHAP and has actively engaged with Anglian Water in the preparation of this document.
- Information provided by Anglian Water is a snapshot of the current position at the time it is provided. Information pertaining to the capacity of Water Recycling Centres will vary from year to year, based on a variety of reasons including weather patterns/climatic factors, population growth/new connections, changes in domestic and business flows as a result of changing work patterns, and improved accuracy in data collection as new flow monitors are installed.
- The Objectives set out in the VCHAP are sound and are reflected in the site allocations.
- Anglian Water considers that those site allocations not specifically referenced in this Statement of Common Ground (SoCG) are sound in principle.
- The rural context of the settlements and village clusters within the Plan area means that for some sites connection to the Anglian Water sewerage system may not be feasible and alternative options will need to be identified in those locations.
- Due to the scale of development proposed on sites in the VCHAP, Anglian Water does not consider it necessary to include site-specific policy requirements for the phasing of delivery or headroom/ capacity at the Water Recycling Centres (WRCs), however early engagement with Anglian Water is recommended to ensure there is capacity in the network and/or at the receiving water recycling centre.
- The signatories agree that the matters set out below in Appendix 1 are not soundness issues but do, nonetheless, remain as areas of disagreement.
- The parties to this SoCG would be willing to agree minor modifications to the VCHAP during the examination process.
- Both parties will continue to work proactively on outstanding matters throughout the examination.

## Conclusion

9. The response of South Norfolk Council to points raised by Anglian Water in its role under the Duty to Cooperate is set out in the appended tables. The Inspector is asked to consider these in assessing the soundness of the Plan and in determining whether any modifications might be necessary to improve the clarity of the Plan, or to make the VCHAP sound.

Table 1: Outstanding matter raised by Anglian Water under Duty to Cooperate and the response of South Norfolk Council

Outstanding matter 1: Overarching policy for the management of surface water

<b>REPRESENTATION NO.</b>	3252 (Regulation-19 representation)
<b>MAIN ISSUE RAISED</b>	At Regulation 19, Anglian Water requested an overarching policy approach to managing surface water flows on site. Anglian Water's representation states: <i>"For some sites, the clear intention is to ensure that a drainage strategy for the site will need to demonstrate that there will be no increase in surface water flood risk as a consequence of the development of the site. We would recommend that such measures are included within the policy or within an overarching policy, given the clear preference for managing surface water through the use of sustainable drainage systems (SuDS) in national policy and planning practice guidance....until Schedule 3 [of The Flood and Water Management Act 2010] is implemented we would request that there is an appropriate policy requirement for managing surface water flows on site utilising sustainable drainage systems to provide a consistent approach"</i> . (Original emphasis).
<b>SNC RESPONSE</b>	The Council considers that the existing provisions set out in both Chapter 14 of the National Planning Policy Framework and Policy 2 of the Greater Norwich Local Plan adequately address the requirement for sustainable drainage systems to be incorporated into site design and layout from the outset of the development management process. The Council does not consider it necessary to repeat this overarching policy requirement within the Village Clusters Housing Allocations Plan as we consider that it is appropriately addressed within existing policy requirements.
<b>POTENTIAL CHANGE TO THE PLAN</b>	No modification proposed.
<b>ANGLIAN WATER RESPONSE</b>	Agreed. Anglian Water is satisfied that the overarching policy in the Greater Norwich Local Plan provides suitable measures for managing surface water flood risk.  However, the updates to the National Flood Risk Assessment mapping (NaFRA2) may result in changes to the flood risk presented for sites in the VCHAP.
<b>RESOLVED MATTER (Y/N)</b>	Yes – following confirmation to AW that the SFRA will be updated to reflect NaFRA2.

## Outstanding matter 2: Water Cycle Study

<b><u>REPRESENTATION NO.</u></b>	4186 (Regulation-19 Addendum representation)
<b><u>MAIN ISSUE RAISED</u></b>	<p>Anglian Water note within the Water Cycle Study (WCS) a general a parameter of whether allocated growth would result in a population exceedance of 250 was used. Whilst AW agree that this is generally a correct assumption, they highlight the following:</p> <p><i>“when looking in detail at the parameters of the permits many of the descriptive works are based on different prescriptive standards that can apply to a much smaller population or cubic metres per day of flow that can restrict the capacity available”.</i></p> <p>In particular, the descriptive permits for the following Water Recycling Centres (WRCs) have a specification for a discharge rate significantly lower than 250 which limits the options for connection in these locations:</p> <p>School Lane Spooner Row WRC – 17.65 cubic metres per day  Haddiscoe-Mock Mile Terr WRC – 14.9 cubic metres per day  Winfarthing – Chapel Close WRC – 10 cubic metres per day</p>
<b><u>SNC RESPONSE</u></b>	<p>The methodology for the Water Cycle Study (use of 250 PE for viability relating to descriptive permits) was previously agreed with Anglian Water through the Regulation 18 consultation as well as during the preparation of the GNLP. It was not previously raised that the three WRCs had restricted descriptive standards and therefore the 250 PE was used.</p> <p>In Winfarthing, the amount of growth allocated in the VCHAP is less than assumed thorough the GNLP WCS, which used a worst-case scenario. No objections were raised as part of the GNLP. In Haddiscoe, it is estimated that there would still be capacity even with the quoted PE. In Spooner Row, there is the potential that the proposed development would exceed capacity, however the potential for a change in the permit has not been discounted and could be investigated.</p> <p>The Council does not consider the issues raised in relation to these smaller WRCs to affect the Soundness of the relevant allocations. However, should the Inspector be minded, the Council would not object to a criterion being included in the site-specific policies requiring early engagement with Anglian Water.</p>
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Amended policy wording to be agreed with SNC should the Inspector agree an additional site-specific policy is necessary, either for clarity or soundness. The relevant site-specific policies are: VC SPO1, VC SPO2, VC SPO3, VC SPO4, VC HAD1, VC WIN1 and VC WIN2.

<b><u>REPRESENTATION NO.</u></b>	4186 (Regulation-19 Addendum representation)
<b><u>ANGLIAN WATER RESPONSE</u></b>	<p>Following more detailed analysis of our WRCs with descriptive permits, Anglian Water has amended its position in responding to planning proposals for developments that seek to connect to these small water recycling centres – referred to as ‘descriptive works’. As a result of the limited, and sometimes very constrained, parameters for descriptive permits, there is a risk that incremental housing growth within or close to the WRC catchment could exceed the capacity of these small WRCs and potentially cause environmental harm. This growth could arise through a number of different pathways including housing targets in Local Plans, site allocations in Local/Neighbourhood Plans, windfall development, and speculative applications. Very often these descriptive works are only serving one housing development and likely to have been adopted by Anglian Water from a local authority. Developers must therefore undertake pre-planning engagement with Anglian Water prior to submitting a planning application, if a connection to these small networks and WRCs is sought, to understand the options available.</p>
<b><u>RESOLVED MATTER (Y/N)</u></b>	<p>No – Anglian Water has recently published a position statement on development proposals seeking to connect to water recycling centres with descriptive permits, resulting in a late change in position regarding their comments on the VCHAP. These are dealt with on an individual allocation basis in Table 2. The Council would support modifications to reflect Anglian Water’s updated position, requiring early engagement, and noting that alternatives to disposal to the local WWRC may be necessary, should the Inspector consider these are required to make the plan sound.</p>



Table 2: Site-specific matters raised by Anglian Water under Duty to Cooperate and the responses of South Norfolk Council via Regulation-19 and Regulation-19 Addendum representations

<b><u>SITE REFERENCE</u></b>	VC ASL1
<b><u>REPRESENTATION NO.</u></b>	3227 (Regulation-19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	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 the wording in the GNLP.
<b><u>SNC RESPONSE</u></b>	Whilst this is not considered a soundness issue, the Council would not object to a modification which brings the wording into line with the GNLP.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	If the Inspector is minded to modify the policy to address the comments raised, the Council suggests the following wording: <i>"Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network"</i> .
<b><u>ANGLIAN WATER RESPONSE</u></b>	Anglian considers the change to the policy to be necessary and agrees that the above wording would be appropriate.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No

<b><u>SITE REFERENCE</u></b>	VC BB1
<b><u>REPRESENTATION NO.</u></b>	3228 (Regulation-19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	Due to the relatively small-scale nature of the site, the policy requirement regarding the capacity of the WRC is unnecessary. The draft Drainage and Wastewater Management Plan (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.

<b><u>SITE REFERENCE</u></b>	VC BB1
<b><u>SNC RESPONSE</u></b>	Whilst this is not considered a soundness issue, the Council would not object to a modification in line with Anglian Water's suggestion.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	If the Inspector is minded to modify the policy to address the comments raised, the Council suggests the following wording: <i>"Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network"</i> .
<b><u>ANGLIAN WATER RESPONSE</u></b>	Anglian considers the change to the policy to be necessary and agrees that the above wording would be appropriate.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No

<b><u>SITE REFERENCE</u></b>	VC BUN1, VC BUN2
<b><u>REPRESENTATION NO.</u></b>	3229, 3230 (Regulation-19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	We support the policy requirement to engage with us 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. We suggest the clause for both policies is amended as follows: <i>"Early engagement with Anglian Water to identify possible infrastructure crossing the site, and the capacity to connect to the current vacuum sewer system, as well as the need to determine the capacity of the receiving Water Recycling Centre (WRC), and the consequent potential need to phase the site until capacity is available"</i> .
<b><u>SNC RESPONSE</u></b>	As part of the Regulation-19 Addendum and in response to these comments, the Council took the opportunity to update criterion 3 of the policy for VC BUN1 to read: <i>"Early engagement with Anglian Water to identify possible infrastructure crossing the site, and the capacity to connect to the current vacuum sewer system"</i> .  Policy criterion 4 of VC BUN2 was also updated at the same time. The policy requirement was amended to read: <i>"Early engagement with Anglian Water (AW) to identify possible infrastructure crossing the site, and the capacity to connect to the current vacuum sewer system"</i> .
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No further modification necessary to make the plan Sound.

<b><u>SITE REFERENCE</u></b>	VC BUN1, VC BUN2
<b><u>ANGLIAN WATER RESPONSE</u></b>	<p>Agreed. However, Anglian Water would recommend a further Additional Modification to the supporting text, highlighting the specific issues around the vacuum sewer system in Bunwell, based on the following paragraph (note this level of detail was not sought at either of the Regulation 19 stages).</p> <p>It is worth noting our updated position on vacuum sewer systems which present challenges for delivering sites and in some circumstances could result in the site being unviable, as each vacuum sewerage system is bespoke and designed only for the dwellings it was built to serve. Due to the very nature of the system, there may be mitigation required to ensure there is enough pressure to accommodate the development and to ensure there is no detriment to the existing network and the properties connected. In addition, if there is insufficient capacity downstream of the development site's sustainable point of connection, upgrade works may be required to the vacuum network. It is important to note that these works could take up to 24 months to complete. It is therefore vital that applicants notify us of their development proposal as early as possible. At the application stage we may request a condition which prevents connection until any required improvements are completed, to ensure there is not a risk of flooding or detrimental impact on existing customers.</p>
<b><u>RESOLVED MATTER (Y/N)</u></b>	No. The Council understands that there would be some benefit to a detailed explanation of the situation regarding the vacuum sewer in Bunwell. However, it does not consider this to be a matter of soundness for the Plan, as early engagement with Anglian Water to establish capacity is promoted in both allocation policies, which would be applied through the Development Management process.

<b><u>SITE REFERENCE</u></b>	VC DIT1
<b><u>REPRESENTATION NO.</u></b>	3231 (Regulation 19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	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.
<b><u>SNC RESPONSE</u></b>	The Council did not consider this to be a soundness issue but in response to these comments took the opportunity to amend the wording of policy criterion 3 of VC DIT1REV (the amended site) via the Regulation-19 Addendum. The amended policy criterion now reads as follows: <i>"Early engagement with Anglian Water (AW) to identify infrastructure crossing the site and connection to the local water recycling network"</i> .

<b><u>SITE REFERENCE</u></b>	VC DIT1
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No further modification necessary.
<b><u>ANGLIAN WATER RESPONSE</u></b>	Agreed.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes

<b><u>SITE REFERENCE</u></b>	VC SWA2
<b><u>REPRESENTATION NO.</u></b>	3232 (Regulation 19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	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.
<b><u>SNC RESPONSE</u></b>	In response to these comments, the Council took the opportunity to update the policy criterion for VC SWA2 via the Regulation-19 Addendum and removed this reference from the site-specific requirements.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No further modification necessary.
<b><u>ANGLIAN WATER RESPONSE</u></b>	Agreed.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes

<b><u>SITE REFERENCE</u></b>	VC NEE1
<b><u>REPRESENTATION NO.</u></b>	3233 (Regulation 19 representation)

<b><u>SITE REFERENCE</u></b>	VC NEE1
<b><u>MAIN ISSUE RAISED</u></b>	We suggest that the supporting text and the policy is 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.
<b><u>SNC RESPONSE</u></b>	Whilst the Council does not consider this to be a soundness issue, the Council would not object to a modification in line with Anglian Water's suggestion.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	<p>Update to paragraph 26.18 of the supporting text to read: <i>"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 <u>the developer to consider alternative on-site treatment subject to the necessary permits</u>".</i></p> <p>Amendment to policy criterion 6 of VC NEE1 to read: <i>"Early engagement with Anglian Water regarding the requisitioning of new sewer connection or <u>the developer to consider alternative on-site treatment</u>".</i></p>
<b><u>ANGLIAN WATER RESPONSE</u></b>	None of the properties in Needham are connected to our foul drainage network, as the nearest network is almost a kilometre from the proposed site allocation and located in Harleston. Therefore, it is unlikely this is a reasonable distance to connect to our network (at the developer's expense) and therefore this is the reason we raised the matter that an alternative wastewater treatment option is likely to be the most appropriate solution given the small-scale nature of the development. As such we would suggest a further modification recommending the submission of a foul drainage strategy, which would then facilitate early engagement with the Environment Agency and Anglian Water on this issue.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No – Whilst it does not consider this to be a soundness issue, the Council would not object to a modification in line with Anglian Water's suggestion, which gives added clarity to any future applicant.

<b><u>SITE REFERENCE</u></b>	VC NEW1
<b><u>REPRESENTATION NO.</u></b>	3234 (Regulation 19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	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.

<b><u>SITE REFERENCE</u></b>	VC NEW1
<b><u>SNC RESPONSE</u></b>	Whilst this is not considered a soundness issue, the Council would not object to a modification in line with Anglian Water's suggestion.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Potential replacement of policy criterion 4 of VC NEW1 with the alternative wording suggested by Anglian Water. The new policy wording would read as follows: <i>"Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network"</i> .
<b><u>ANGLIAN WATER RESPONSE</u></b>	Anglian Water considers that the Policy wording is necessary, and agrees that the above wording would be appropriate.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No

<b><u>SITE REFERENCE</u></b>	VC NEW2
<b><u>REPRESENTATION NO.</u></b>	3235 (Regulation 19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	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 for Policy VC NEW1, and as the application has been through the relevant consultation process, we suggest that the following clause can be removed: <i>"Liaison with Anglian Water regarding foul water capacity and the potential need to phase the site to later in the plan period"</i> .
<b><u>SNC RESPONSE</u></b>	The Council has included the policy requirement for engagement with Anglian Water to ensure that in the event of potential changes to the proposals for the site and the submission of further/alternative planning applications, this requirement is clearly set out in the site-specific policy text.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification proposed.
<b><u>ANGLIAN WATER RESPONSE</u></b>	Agreed.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes

<b><u>SITE REFERENCE</u></b>	VC SEE1
<b><u>REPRESENTATION NO.</u></b>	3236 (Regulation 19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	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.
<b><u>SNC RESPONSE</u></b>	The Council considers this to be a matter of clarity and not a matter of soundness. However, the Council would support an update to the existing policy wording to reflect the comments of Anglian Water, should the Inspector be minded to agree with AWS that a modification is required for soundness purposes.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	The following amended wording to policy criterion 4 of VC SEE1 is suggested: Early engagement with Anglian Water regarding their infrastructure on and adjoining the site, <u>asset encroachment, and connecting to the local water recycling network and</u> capacity of the Water Recycling Centre”
<b><u>ANGLIAN WATER RESPONSE</u></b>	<p>Seething-Mill Lane WRC is a descriptive works located adjacent to the site and has a maximum permitted flow of 20 m3/d. This is a site that Anglian Water adopted from South Norfolk Council in 2013 and was designed to accommodate the flows from a small number of houses on Mill Lane. As mentioned previously, there is a sewer crossing the site to the WRC and the outflow pipe from the sewer to a soakaway system on land to the west of the proposed site allocation. As the WRC is adjacent to the site there will be a requirement to address asset encroachment to avoid any odour impacts on sensitive receptors such as residential occupiers. The developer will need to engage with us to discuss a suitable distance to locate homes/private gardens from the site.</p> <p>Following more detailed analysis of our WRCs with descriptive permits, Anglian Water has amended its position in responding to planning proposals for developments that seek to connect to these small water recycling centres – referred to as ‘descriptive works’. As a result of the limited, and sometimes very constrained, parameters for descriptive permits, there is a risk that incremental housing growth connecting to the WRC could exceed the capacity of these small WRCs and potentially cause environmental harm. Developers must undertake pre-planning engagement with Anglian Water prior to submitting a planning application, if a connection to these small networks and WRCs is sought, to understand the options available.</p> <p>Anglian Water is supportive of the suggested potential change to the Plan.</p>

<b><u>SITE REFERENCE</u></b>	VC SEE1
<b><u>RESOLVED MATTER (Y/N)</u></b>	No. Whilst the Council does not consider Anglian Water's proposed change to the Plan to be a matter of soundness, as policy VC SEE1 requires early engagement with Anglian Water 'regarding their infrastructure on and adjoining the site and capacity of the Water Recycling Centre' which would be applied through the Development Management process, it would not object to the proposed wording changes, which could add further clarity.

<b><u>SITE REFERENCE</u></b>	VC SPO1, VC SPO2
<b><u>REPRESENTATION NO.</u></b>	3237, 3238 (Regulation 19 representations)
<b><u>MAIN ISSUE RAISED</u></b>	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.
<b><u>SNC RESPONSE</u></b>	The Council had acknowledged the limited capacity at Spooner Row WRC in the supporting text, as well as the need for upgrades to this to support the allocations in Spooner Row. The Council did not consider the comments of Anglian Water to be a matter of soundness as the issue was already highlighted; however, as the opportunity arose via the Regulation-19 Addendum to update these policies the Council opted to amend the supporting text and site-specific policies accordingly.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No further modification necessary.
<b><u>ANGLIAN WATER RESPONSE</u></b>	<p>There are no planned upgrades to the Spooner Row WRC in our PR24 Business Plan. As previously stated, this is a descriptive works that was constructed to serve a small number of houses off Mill Lane, and was adopted from South Norfolk Council in 2013. Most of the settlement is not served by a public sewer network and is reliant on private wastewater treatment including septic tanks and package treatment plants.</p> <p>Following more detailed analysis of our WRCs with descriptive permits, Anglian Water has amended its position in responding to planning proposals for developments that seek to connect to these small water recycling centres – referred to as 'descriptive works'. As a result of the limited, and sometimes very constrained, parameters for descriptive permits (such as the 17.65m3/day here), there is a risk that incremental housing growth connecting to the WRC could exceed the capacity of these small WRCs and potentially cause environmental harm. Developers must undertake pre-planning engagement with Anglian</p>



<b><u>SITE REFERENCE</u></b>	VC SPO1, VC SPO2
	<p>Water prior to submitting a planning application, if a connection to these small networks and WRCs is sought, to understand the options available.</p> <p>A minor amendment to the supporting text would address the essential need to engage with Anglian Water:</p> <p>Spooner Row Water Recycling Centre (WRC) is small and serves a small number of properties in the settlement. Consequently development of VC SPO2 may have a disproportionate impact on the WRC, requiring upgrades, therefore early engagement with Anglian Water is <del>recommended</del> <b>essential</b>.</p> <p>It is considered unlikely that VC SPO1 would be within a reasonable distance to connect to the public sewer network and alternative wastewater treatment options would need to be considered, given the constrained location of the WRC for any upgrades and located the opposite side of the railway to the site.</p>
<b><u>RESOLVED MATTER (Y/N)</u></b>	No. Whilst the Council does not consider Anglian Water's proposed change to the Plan to be a matter of soundness, as policies VC SPO1REV and VC SPO2 include a requirement for early engagement with Anglian Water which would be applied through the Development Management process, it would not object to the replacement of 'recommended' with 'essential', to emphasise the importance of this.

<b><u>SITE REFERENCE</u></b>	VC SPO4
<b><u>REPRESENTATION NO.</u></b>	3239 (Regulation 19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	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.
<b><u>SNC RESPONSE</u></b>	The Council does not consider this to be an issue of soundness, but would not object to this minor modification to improve the clarity of criterion 3 of the policy for VC SPO4.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Update policy test to read: <i>"Advice is sought from <del>the appropriate water authority</del> Anglian Water regarding the need for relocation of the existing nearby sewage pumping station, to facilitate maintenance"</i> .
<b><u>ANGLIAN WATER RESPONSE</u></b>	Anglian Water has no pumping station within this site, so this potential change can be removed. If such a pumping station exists, it is not operated by Anglian Water as we do not have a foul drainage network in this location. The reference to water authority

<b><u>SITE REFERENCE</u></b>	VC SPO4
	automatically triggered a reflection that it was Anglian Water, but we only have water supply mains network serving this area of the settlement.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes – no change necessary.

<b><u>SITE REFERENCE</u></b>	VC TAC1, VC TAC2
<b><u>REPRESENTATION NO.</u></b>	3240, 3241 (Regulation 19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	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.
<b><u>SNC RESPONSE</u></b>	Whilst the Council did not consider this to be a matter of soundness, it took the opportunity to update the site-specific policy criterion for VC TAC1 and VC TAC1 via the Regulation-19 Addendum to reflect the comments made by Anglian Water in their Regulation-19 representation.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No further modification necessary.
<b><u>ANGLIAN WATER RESPONSE</u></b>	<p>Agreed. It is noted that planning applications have been submitted for both sites and they are pending determination. Anglian Water has indicated in our planning application consultation responses that capacity is available for the proposed developments linked to the site allocations.</p> <p>For reference, Forncett End WRC is programmed to have P and N removal schemes delivered by 2030 to technically achievable limits. Alongside the impact of growth, tightened permit limits driven by nutrient neutrality drivers will bring the reduction of permitted nitrogen and phosphorus levels at some sites down to technical achievable limits (TAL), reducing headroom at a number of WRCs and in some cases removing the option for free or low-cost solutions. Where a WRC has a permit at TAL the Environment Agency is unlikely to be able to allow a permit for an increase in DWF to address the increased risk from growth. Whilst we're pleased to support the environmental needs, these factors make ensuring WRC compliance increasingly challenging when combined with expected levels of population growth in the future. We are working with the Environment Agency to</p>

<b><u>SITE REFERENCE</u></b>	VC TAC1, VC TAC2
	identify alternative solutions within these catchments as a collaborative approach will be the only way to achieve both environmental protection and housing growth.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes

<b><u>SITE REFERENCE</u></b>	VC HAD1
<b><u>REPRESENTATION NO.</u></b>	3241 (Regulation 19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	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.
<b><u>SNC RESPONSE</u></b>	The Council did not consider this to be a matter of soundness but took the opportunity to update the site-specific policy criterion for VC HAD1 via the Regulation-19 Addendum.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No further modification necessary.
<b><u>ANGLIAN WATER RESPONSE</u></b>	<p>Agreed, that the policy requirement is necessary for early engagement with Anglian Water regarding the capacity of the receiving WRC and the requisitioning to new sewers and any consequent need to phase the delivery of the site. This is because Haddiscoe-Mock Mile Terrace WRC is a descriptive works. As a result of the very constrained descriptive parameters for this descriptive permit, there is a risk that additional housing growth that seeks to connect to the WRC could exceed its capacity and potentially cause environmental harm.</p> <p>Following more detailed analysis of our WRCs with descriptive permits, Anglian Water has amended its position in responding to planning proposals for developments that seek to connect to these small water recycling centres – referred to as ‘descriptive works’. As a result of the limited, and sometimes very constrained, parameters for descriptive permits, there is a risk that incremental housing growth connecting to the WRC could exceed the capacity of these small WRCs and potentially cause environmental harm. Developers must undertake pre-planning engagement with Anglian Water prior to submitting a planning application, if a connection to these small networks and WRCs is sought, to understand the options available.</p> <p>A minor amendment to the supporting text would address the essential need to engage with Anglian Water:</p>

<b><u>SITE REFERENCE</u></b>	VC HAD1
	The receiving Water Recycling Centre (Haddiscoe Mock Mile-Terr) is small and consequently development of VC HAD1 may have a disproportionate impact on the WRC, requiring upgrades. The site itself is also not directly connected to the sewer system and will require the requisitioning of a connection. Early engagement with Anglian Water is <del>recommended</del> <b>essential</b> on these issues.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No. Whilst the Council does not consider Anglian Water's proposed change to the Plan to be a matter of soundness, as policy VC HAD1 includes a requirement for early engagement with Anglian Water, which would be applied through the Development Management process, it would not object to the replacement of 'recommended' with 'essential' in the supporting text, to emphasise the importance of this.

<b><u>SITE REFERENCE</u></b>	VC BUR1
<b><u>REPRESENTATION NO.</u></b>	3242 (Regulation 19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	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.
<b><u>SNC RESPONSE</u></b>	The Council does not consider this to be a matter of soundness, but should the Inspector be minded to modify site-specific policy criterion 4 of VC BUR1 to improve consistency throughout the Plan the Council would not object.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Modification of policy criterion 4 to read: " <i>Early engagement with Anglian Water regarding <u>connecting to the local water recycling network</u> <del>the capacity of the Wheatacre Water Recycling Centre and the local sewer network</del></i> ".
<b><u>ANGLIAN WATER RESPONSE</u></b>	<p>Wheatacre Church Lane WRC is a descriptive works is adjacent to the site and has a maximum discharge of 16.2 m3/d. This is a site that Anglian Water adopted from South Norfolk Council in 2013 and was designed to accommodate the flows from a small number of houses at Crossways and Whiteways – with the remainder of the settlement on private wastewater treatment systems. There is a sewer pumping station adjacent to the site there will be a requirement to address asset encroachment to avoid any odour or noise impacts on sensitive receptors such as residential occupiers – this a generally a distance of 15m radius.</p> <p>Following more detailed analysis of our WRCs with descriptive permits, Anglian Water has amended its position in responding to planning proposals for developments that seek to connect to these small water recycling centres – referred to as 'descriptive works'. As a result of the limited, and sometimes very constrained, parameters for descriptive permits, there is a risk that incremental housing growth connecting to the WRC could exceed the capacity of these small WRCs and potentially cause</p>

<b><u>SITE REFERENCE</u></b>	VC BUR1
	<p>environmental harm. Developers must undertake pre-planning engagement with Anglian Water prior to submitting a planning application, if a connection to these small networks and WRCs is sought, to understand the options available.</p> <p>A minor amendment to the supporting text would address the essential need to engage with Anglian Water:</p> <p>Wheatacre Church Lane Water Recycling Centre (WRC) is small and consequently development of VC BUR1 may have a disproportionate impact on the WRC, requiring upgrades. The site <b><u>is adjacent to a sewer pumping station and</u></b> also discharges upstream of the WRC where there are capacity constraints and <del>sewer</del> upgrades are likely to be necessary, therefore early engagement with Anglian Water is <del>recommended</del> <b><u>essential</u></b>.</p>
<b><u>RESOLVED MATTER (Y/N)</u></b>	No – AWS is seeking a further change in relation to the proximity of the pumping station, which was not previously raised in Regulation 19 representations. Whilst the Council does not consider the proposed change to be a soundness issue, as engagement with Anglian Water is a requirement of Policy VC BUR1 to be picked up during the Development Management process (albeit in relation to network capacity), the Council would not object to the proposed wording change, which adds clarity, should the Inspector consider it appropriate.

<b><u>SITE REFERENCE</u></b>	VC WOO1
<b><u>REPRESENTATION NO.</u></b>	3243 (Regulation 19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	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.
<b><u>SNC RESPONSE</u></b>	The Council does not consider this to be a matter of soundness, but should the Inspector be minded to modify site-specific policy criterion 7 of VC WOO1 to improve consistency throughout the Plan the Council would not object.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Potential update to site-specific policy criterion to read: <i>“Early engagement with Anglian Water <u>to ensure that there is adequate capacity, or capacity can be made available, in the local water recycling network</u> <del>regarding the need to phase the site to address capacity issues with both the Water Recycling Centre and the local sewer network</del>”</i> .
<b><u>ANGLIAN WATER RESPONSE</u></b>	AWS considers that the change is necessary and that the proposed wording is appropriate.

<b><u>SITE REFERENCE</u></b>	VC WOO1
<b><u>RESOLVED MATTER (Y/N)</u></b>	No

<b><u>SITE REFERENCE</u></b>	VC BAW1, VC LM1, VC ROC1, VC ROC2
<b><u>REPRESENTATION NO.</u></b>	3248, 3249, 3250, 3251 (Regulation 19 representations)
<b><u>MAIN ISSUE RAISED</u></b>	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. However, 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.
<b><u>SNC RESPONSE</u></b>	The Council did not consider this to be a matter of soundness for the Plan, however the Council took the opportunity to modify these policies via the Regulation-19 Addendum. VC ROC2 was removed from the Regulation-19 Addendum.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No further modification necessary.
<b><u>ANGLIAN WATER RESPONSE</u></b>	Whitlingham WRC recent dry weather flow data and the quantum of already consented development schemes coming forward in the catchment, means the WRC does not currently have capacity for additional growth. However, we have an identified growth scheme for Whitlingham coming forward in AMP8 (2025-2030). The policy requirement for early engagement with Anglian Water is therefore supported.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No - AWS is committed to improvements within the current AMP period (to 31 March 2030), which would accommodate the VCHAP growth. As the VCHAP allocations cover the period to 31 March 2038, it is considered that these sites could, if necessary, be phased to the later part of the plan-period. As such, reinstating the wording from the original 2023 Regulation 19 policies is considered appropriate by both parties. However, the Council does not consider this to be a soundness issue, given that the reference is still contained in the supporting text.

<b><u>SITE REFERENCE</u></b>	VC WIN1, VC WIN2
<b><u>REPRESENTATION NO.</u></b>	3244, 3245 (Regulation 19 representation)

<b><u>SITE REFERENCE</u></b>	VC WIN1, VC WIN2
<b><u>MAIN ISSUE RAISED</u></b>	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.
<b><u>SNC RESPONSE</u></b>	The Council did not consider this to be a matter of soundness but took the opportunity to update the site-specific policy criterion for VC WIN1 and VC WIN2 via the Regulation 19 Addendum to reflect the comments of Anglian Water.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No further modification necessary.
<b><u>ANGLIAN WATER RESPONSE</u></b>	<p>Winfarthing-Chapel Close WRC is a descriptive works and has a maximum discharge of 10m<sup>3</sup>/day. This is a site that Anglian Water adopted from South Norfolk Council in 2002 and was designed to accommodate the flows from a small number of houses in Chapel Close – with the remainder of the settlement on private wastewater treatment systems. The WRC is on a small, constrained site surrounded by existing residential gardens.</p> <p>Due to the distance of the WRC from VC WIN2 it is very unlikely it is within a reasonable or feasible distance to connect a small housing site and therefore alternative/private wastewater treatment option is likely to be a consideration.</p> <p>A minor amendment to the supporting text for both policies would address the essential need to engage with Anglian Water:</p> <p>Winfarthing Water Recycling Centre (WRC) is small and consequently development of VC WIN1/VC WIN2 may have a disproportionate impact on the WRC, requiring upgrades, therefore early engagement with Anglian Water is <del>recommended</del> <b><u>essential</u></b>.</p>
<b><u>RESOLVED MATTER (Y/N)</u></b>	No. Whilst the Council does not consider Anglian Water's proposed change to the Plan to be a matter of soundness, as policies VC WIN1 and VC WIN2 include a requirement for early engagement with Anglian Water, which would be applied through the Development Management process, it would not object to the replacement of 'recommended' with 'essential', to emphasise the importance of this.

<b><u>SITE REFERENCE</u></b>	VC BAR2
<b><u>REPRESENTATION NO.</u></b>	4171 (Regulation 19 Addendum representation)
<b><u>MAIN ISSUE RAISED</u></b>	The proposed additional site for 40 dwellings is within the catchment for Barford-Chapel Street Water Recycling Centre (WRC). Based on current data, whilst there is limited headroom based on dry weather flow at the WRC for future growth, there is

<b><u>SITE REFERENCE</u></b>	VC BAR2
	<p>currently capacity for the proposed growth (VC BAR1/BAR2). To take account of cumulative growth in the catchment, including additional dwellings that might arise through windfall developments, we would welcome the supporting text to encourage the developer to undertake early pre-planning engagement with Anglian Water to discuss network connections and network/WRC capacity.</p> <p>Anglian Water supports the requirement to alleviate flood risk given the site is identified at the head of a significant surface water flow path. The opportunities for providing overall betterment for the existing community should not be underestimated given the more frequent storms and intense rainfall experienced over the autumn and winter months (2023-24). Reducing surface water run-off can also help prevent ingress to our sewer networks and reduce the probability of surcharge events. Our experience over the winter of 2023-24 leading to the period between October 2022 and March 2024 was the wettest 18 months since records began - causing us to revise our expectations of the pace and scale at which climate change will impact our networks.</p>
<b><u>SNC RESPONSE</u></b>	The Council notes the concerns regarding the potential cumulative impact of (windfall) development within the catchment of the WRC, although the need for relevant supporting text or a criterion in the proposed policy for the site was not previously raised at the Regulation 18 Focused Changes stage. The Council does not consider this to be a soundness issue but would support an Inspector's modification to the site-specific policy to require a flood and drainage strategy, supported by a recent pre-planning engagement assessment from Anglian Water, to be submitted for the site.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Potential new site-specific criterion to be added to policy VC BAR2: <i>"Submission of a flood and drainage strategy for the site, which is to be supported by a recent pre-planning engagement assessment from Anglian Water"</i> .
<b><u>ANGLIAN WATER RESPONSE</u></b>	Anglian Water considers the change to the policy to be necessary and agrees that the above wording would be appropriate.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No

<b><u>SITE REFERENCE</u></b>	VC BAW1REV
<b><u>REPRESENTATION NO.</u></b>	4172 (Regulation 19 Addendum representation)



<b><u>SITE REFERENCE</u></b>	VC BAW1REV
<b><u>MAIN ISSUE RAISED</u></b>	Anglian Water support the requirement for a drainage strategy in the policy. AW advise that this should clarify that the assessment should include details of both surface water and foul drainage and that the details are to be agreed with Anglian Water in addition to the Lead Local Flood Authority.
<b><u>SNC RESPONSE</u></b>	The Council does not consider this to be a matter of soundness, however should the Inspector be minded to amend the policy to reflect these comments the Council would not object.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Potential update to site-specific policy criterion 5 to read: <i>"The drainage strategy for the site <del>to</del> must have regard to both surface water and foul drainage, as well as the off-site surface water flowpath located to the south of the site. Details of the drainage strategy are to be agreed with Anglian Water and the Lead Local Flood Authority"</i> .
<b><u>ANGLIAN WATER RESPONSE</u></b>	Anglian Water considers the change to the policy to be necessary and agrees that the above wording would be appropriate.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No

<b><u>SITE REFERENCE</u></b>	VC DIT1REV
<b><u>REPRESENTATION NO.</u></b>	4173 (Regulation 19 Addendum representation)
<b><u>MAIN ISSUE RAISED</u></b>	<p>There is limited dry weather flow permit headroom at the WRC to accommodate future growth in the catchment. As a result, the increase in the number of dwellings on the site, together with VC BRM1 and any additional windfall development coming forward, may cumulatively result in insufficient headroom being available at the WRC. Ditchingham WRC does not have an identified growth scheme for AMP8 (2025-2030) in our PR24 Business Plan. Therefore, should a growth scheme be required it would not be delivered until beyond 2030, and development would need to be phased accordingly.</p> <p>The additional area identified to increase capacity of the site, impacts on another sewer (surface water) crossing the site, in addition to the foul sewer and water main. The policy requirement is therefore essential to ensure the protection of our assets and that they are appropriately accommodated within the development layout design.</p>
<b><u>SNC RESPONSE</u></b>	The Council notes that no changes are requested as part of this representation, and that the comments of Anglian Water are already reflected in paragraph 3.18 of the supporting text.

<b><u>SITE REFERENCE</u></b>	VC DIT1REV
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification proposed.
<b><u>ANGLIAN WATER RESPONSE</u></b>	Agreed.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes.

<b><u>SITE REFERENCE</u></b>	VC BRM1
<b><u>REPRESENTATION NO.</u></b>	4174 (Regulation 19 Addendum representation)
<b><u>MAIN ISSUE RAISED</u></b>	There is limited dry weather flow permit headroom at the WRC to accommodate future growth in the catchment. As a result, this additional site, together with VC DIT1REV and any additional windfall development coming forward, may cumulatively result in insufficient headroom being available at the WRC. Ditchingham WRC does not have an identified growth scheme for AMP8 (2025-2030) in our PR24 Business Plan. Therefore, should a growth scheme be required it would not be delivered until beyond 2030, and development would need to be phased accordingly.
<b><u>SNC RESPONSE</u></b>	The Council notes that no changes are requested as part of this representation, and that the comments of Anglian Water are already reflected in paragraph 3.27 of the supporting text.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification proposed.
<b><u>ANGLIAN WATER RESPONSE</u></b>	Agreed.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes.

<b><u>SITE REFERENCE</u></b>	VC EAR2
<b><u>REPRESENTATION NO.</u></b>	4175 (Regulation 19 Addendum representation)

<b><u>SITE REFERENCE</u></b>	VC EAR2
<b><u>MAIN ISSUE RAISED</u></b>	<p>The site is on the edge of the Earsham-Bungay Road WRC. There is capacity for the proposed level of growth as there is sufficient dry weather flow headroom available at the WRC. The developer would need to engage with Anglian Water regarding connections for water supply and wastewater in the usual way.</p> <p>We support the need for a site-specific flood risk assessment because of the identified groundwater flood risk. Groundwater flooding and elevated water table levels can inundate our underground infrastructure and result in sewer flooding and loss of service for some properties/communities in periods of prolonged/intensive rainfall. Unfortunately, there is a lack of legislation that governs this type of scenario (where high groundwater levels impact sewerage assets, but do not cause an 'above ground' flood), and so we have held multiple workshops and discussions with Norfolk Strategic Flood Alliance partner organisations, in particular the Environment Agency, about managing groundwater differently in the future. Ensuring that new development is resilient to all forms of flood risk is therefore critical, and flood risk is managed appropriately to minimise cumulative impacts including on our existing and new infrastructure networks.</p>
<b><u>SNC RESPONSE</u></b>	Paragraph 4.17 of the supporting text for policy VC EAR2 highlights the identification of groundwater flooding on the site within the Stage 2 Strategic Flood Risk Assessment. The Council therefore recognises the comments and concerns of Anglian Water but does not consider this to be a matter of soundness for the Plan, and also notes that an objection to the site has not been raised by AW.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification proposed.
<b><u>ANGLIAN WATER RESPONSE</u></b>	Agreed. We support the requirement for a site-specific flood risk assessment to be undertaken.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes

<b><u>SITE REFERENCE</u></b>	VC GIL1REV
<b><u>REPRESENTATION NO.</u></b>	4176 (Regulation 19 Addendum representation)
<b><u>MAIN ISSUE RAISED</u></b>	Anglian Water welcomes reference to the limited capacity of the Beccles-Marsh Lane WRC and the need for early engagement to determine whether there is sufficient capacity in the network and receiving WRC. Beccles-Marsh Lane WRC has been

<b><u>SITE REFERENCE</u></b>	VC GIL1REV
	identified for investment in a growth scheme to increase dry weather flow capacity in the PR24 Business Plan for AMP8 (2025-2030). Our Business Plan is subject to final determination by our regulator, Ofwat – this is expected in December 2024.
<b><u>SNC RESPONSE</u></b>	The Council notes these comments and that OFWAT subsequently agreed the PR24 Business Plan in December 2024. No change to the existing text for this policy is required.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification proposed.
<b><u>ANGLIAN WATER RESPONSE</u></b>	It would be helpful if the policy reflected the following wording in the supporting text regarding capacity to accommodate growth at our WRC consistent with other sites such as VC WOO1.  <i><u>‘ Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the local water recycling network’.</u></i>
<b><u>RESOLVED MATTER (Y/N)</u></b>	No. The Council does not consider a change is necessary to make the plan sound, but would not object to the above wording, should the Inspector consider a Modification necessary.

<b><u>SITE REFERENCE</u></b>	VC SWA2REV
<b><u>REPRESENTATION NO.</u></b>	4177 (Regulation 19 Addendum representation)
<b><u>MAIN ISSUE RAISED</u></b>	The site is on the edge of the Swardeston Common WRC catchment. There is capacity for the proposed level of growth as there is sufficient dry weather flow headroom available at the WRC. The developer would need to engage with Anglian Water regarding connections for water supply and wastewater in the usual way. We have no objection to the removal of the policy requirement relating to wastewater capacity due to current capacity availability.  Swardeston Common WRC has been identified as a nutrient significant plant and will require phosphate and nitrogen removal upgrades to technically achievable levels by 1st April 2030. This will reduce the amount of nutrient mitigation required for developments occupied after this date.
<b><u>SNC RESPONSE</u></b>	The Council notes these comments, which reflect changes made in response to Anglian Water’s representations to the initial Regulation 19 publication. No change to the existing text for this policy is required.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification proposed.

<b><u>SITE REFERENCE</u></b>	VC SWA2REV
<b><u>ANGLIAN WATER RESPONSE</u></b>	Agreed.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes

<b><u>SITE REFERENCE</u></b>	VC ROC1
<b><u>REPRESENTATION NO.</u></b>	4178 (Regulation 19 Addendum representation)
<b><u>MAIN ISSUE RAISED</u></b>	<p>Anglian Water notes the statement regarding potential phasing of this site beyond the early years of the Plan given that it is located within the catchment of Whitlingham WRC. Anglian Water has a proposed growth scheme to increase dry weather flow capacity at Whitlingham WRC within our PR24 Business Plan for delivery in AMP8 (2025-2030). However, this is subject to final determination our Business Plan by Ofwat, which is due in December 2024. Whitlingham WRC has been identified as a nutrient significant plant and will require phosphate and nitrogen removal upgrades to technically achievable levels (TAL) by 1st April 2030. An accelerated infrastructure delivery scheme will deliver the phosphate upgrade to TAL by 31st March 2027. This will reduce the amount of nutrient mitigation required for developments occupied after these dates.</p> <p>It is noted that the policy requirement for early engagement with Anglian Water has been removed from the policy and is only referred to in the text. We have no objection to the removal of this clause.</p>
<b><u>SNC RESPONSE</u></b>	The Council notes these comments, which reflect changes made in response to Anglian Water's earlier representations to the initial Regulation 19 publication, and that OFWAT subsequently agreed the PR24 Business Plan in December 2024. No change to the existing text for this policy is required.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification proposed.
<b><u>ANGLIAN WATER RESPONSE</u></b>	Whitlingham WRC recent dry weather flow data and the quantum of already consented development schemes coming forward in the catchment, means the WRC does not currently have capacity for additional growth. However, we have an identified growth scheme for Whitlingham coming forward in AMP8 (2025-2030). The policy requirement for early engagement with Anglian Water is therefore supported.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No. AWS is committed to improvements within the current AMP period (to 31 March 2030), which would accommodate the VCHAP growth. As the VCHAP allocations cover the period to 31 March 2038, it is considered that this site could, if necessary, be phased to the later part of the plan-period. As such, reinstating the wording from the original 2023 Regulation 19 policy is

<b><u>SITE REFERENCE</u></b>	VC ROC1
	considered appropriate by both parties. However, the Council does not consider this to be a soundness issue, given that a relevant reference is still contained in the supporting text.

<b><u>SITE REFERENCE</u></b>	VC SPO1REV, VC SPO2
<b><u>REPRESENTATION NO.</u></b>	4179, 4180 (Regulation 19 Addendum representations)
<b><u>MAIN ISSUE RAISED</u></b>	The WRC at School Lane Spooner Row is subject to a descriptive permit and has limited capacity to accommodate significant growth. Anglian Water agree with the need for early engagement to assess the feasibility of a wastewater connection.
<b><u>SNC RESPONSE</u></b>	No modification proposed.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification proposed.
<b><u>ANGLIAN WATER RESPONSE</u></b>	<p>There are no planned upgrades to the Spooner Row WRC in our PR24 Business Plan. As previously stated, this is a descriptive works with a requirement for the discharge not to exceed 17.65 m3/day. This was constructed to serve a small number of houses off Mill Lane, and a WRC that Anglian Water adopted from South Norfolk Council in 2013. Most of the settlement is not served by a public sewer network and is reliant on private wastewater treatment including septic tanks and package treatment plants.</p> <p>Following more detailed analysis of our WRCs with descriptive permits, Anglian Water has amended its position in responding to planning proposals for developments that seek to connect to these small water recycling centres – referred to as ‘descriptive works’. As a result of the limited, and sometimes very constrained, parameters for descriptive permits, there is a risk that incremental housing growth connecting to the WRC could exceed the capacity of these small WRCs and potentially cause environmental harm. Developers must undertake pre-planning engagement with Anglian Water prior to submitting a planning application, if a connection to these small networks and WRCs is sought, to understand the options available.</p> <p>A minor amendment to the supporting text for VC SPO2 would address the essential need to engage with Anglian Water:</p> <p>Spooner Row Water Recycling Centre (WRC) is small and serves a small number of properties in the settlement. Consequently development of VC SPO2 may have a disproportionate impact on the WRC, requiring upgrades, therefore early engagement with Anglian Water is <del>recommended</del> <b>essential</b>.</p>

<b><u>SITE REFERENCE</u></b>	VC SPO1REV, VC SPO2
	Supporting text in Para 34.18 of the plan can be removed.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No. Whilst the Council does not consider Anglian Water's proposed change to the Plan to be a matter of soundness, as policies VC SPO1REV and VC SPO2 include a requirement for early engagement with Anglian Water, which would be applied through the Development Management process, it would not object to the replacement of 'recommended' with 'essential', to emphasise the importance of this, and the consequent removal of para 34.18.

<b><u>SITE REFERENCE</u></b>	VC TAC1, VC TAC2
<b><u>REPRESENTATION NO.</u></b>	4179, 4180 (Regulation 19 Addendum representations)
<b><u>MAIN ISSUE RAISED</u></b>	Anglian Water state their support for early engagement by the developers of these sites.
<b><u>SNC RESPONSE</u></b>	No modification proposed.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification proposed.
<b><u>ANGLIAN WATER RESPONSE</u></b>	<p>Agreed. It is noted that planning applications have been submitted for both sites and they are pending determination. Anglian Water has indicated in our planning application consultation responses that capacity is available for the proposed developments linked to the site allocations.</p> <p>For reference, Forncett End WRC is programmed to have P and N removal schemes delivered by 2030 to technically achievable limits. Alongside the impact of growth, tightened permit limits driven by nutrient neutrality drivers will bring the reduction of permitted nitrogen and phosphorus levels at some sites down to technical achievable limits (TAL), reducing headroom at a number of WRCs and in some cases removing the option for free or low-cost solutions. Where a WRC has a permit at TAL the Environment Agency is unlikely to be able to allow a permit for an increase in DWF to address the increased risk from growth. Whilst we're pleased to support the environmental needs, these factors make ensuring WRC compliance increasingly challenging when combined with expected levels of population growth in the future. We are working with the Environment Agency to identify alternative solutions within these catchments as a collaborative approach will be the only way to achieve both environmental protection and housing growth.</p>
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes

<u>SITE REFERENCE</u>	VC TAC1, VC TAC2



On behalf of South Norfolk Council:

*Adam Banham*

Place Shaping Manager

On behalf of Anglian Water:

*Phil Jones*

Growth Strategy Manager

South Norfolk Village Clusters Housing Allocations Plan

**Statement of Common Ground with the Broads Authority**

Comments made under Duty to Cooperate

Date: 22 May 2025

## Purpose of Statement

1. This document has been prepared to inform the Inspector of the agreed position between South Norfolk District Council and the Broads Authority in respect of comments made by the Broads Authority (BA) during the formal stages of VCHAP preparation, in order to demonstrate that the Council has been fulfilling the “Duty to Cooperate”. It is intended to address certain specific points that have been made by the Broads Authority and, as such, should be read in conjunction with the Submission version of the South Norfolk Council Duty to Cooperate Statement.

## Introduction

2. The Broads Authority was set up in 1989 as a statutory body with a duty to manage the Norfolk and Suffolk Broads. The Broads Authority has a status equivalent to a National Park and, as a local planning authority, has responsibility for determining planning applications within the Broads Executive Area. The Broads Authority Executive Area extends into South Norfolk in the southern and eastern parts of the district, including several parishes containing Village Cluster settlements.
3. The Local Plan for the Broads was adopted in 2019 and sets out the policy context for decision making within the Broads. The Local Plan for the Broads is currently under review.
4. The Village Clusters Housing Allocations Plan (VCHAP) allocates sites for a minimum of 1,200 homes, in accordance with the requirements of Policy 1 of the Greater Norwich Local Plan (GNLP) (adopted 2024). The VCHAP does not include any strategic planning policies.
5. The Broads Authority has been consulted during the production of the Village Clusters Housing Allocations Plan. The Broads Authority has submitted formal representations at each stage of the process.
6. This Statement of Common Ground sets out the key areas of agreement between South Norfolk Council and the Broads Authority, as well as outstanding matters raised by the Broads Authority either during the 2023 Regulation-19 Pre-submission period or at the later 2024 Regulation-19 Addendum period.

## Geography

7. The Broads Authority Executive Area is shown in Figure 1 below and includes the floodplains and lower reaches of the main rivers (Bure, Waveney and Yare) and their tributaries (Ant, Chet, Thurne and Wensum) in Norfolk.
8. The parishes identified for housing allocations within the VCHAP and within proximity to the Broads Authority Executive Area are: Broome (VC BRM1), Burgh St Peter (VC BUR1), Ditchingham (VC DIT1REV), Earsham (VC EAR1 and VC EAR2), Ellingham (VC ELL1 and VC ELL2), Geldeston (VC GEL1), Gillingham (VC GIL1REV), Haddiscoe (VC HAD1), Hales (VC HAL1 and VC HAL2), Rockland St Mary (VC ROC1) and Thurlton (VC THU1 and VC THU2). Figure 2 illustrates the South Norfolk parishes within the Broads Authority area.

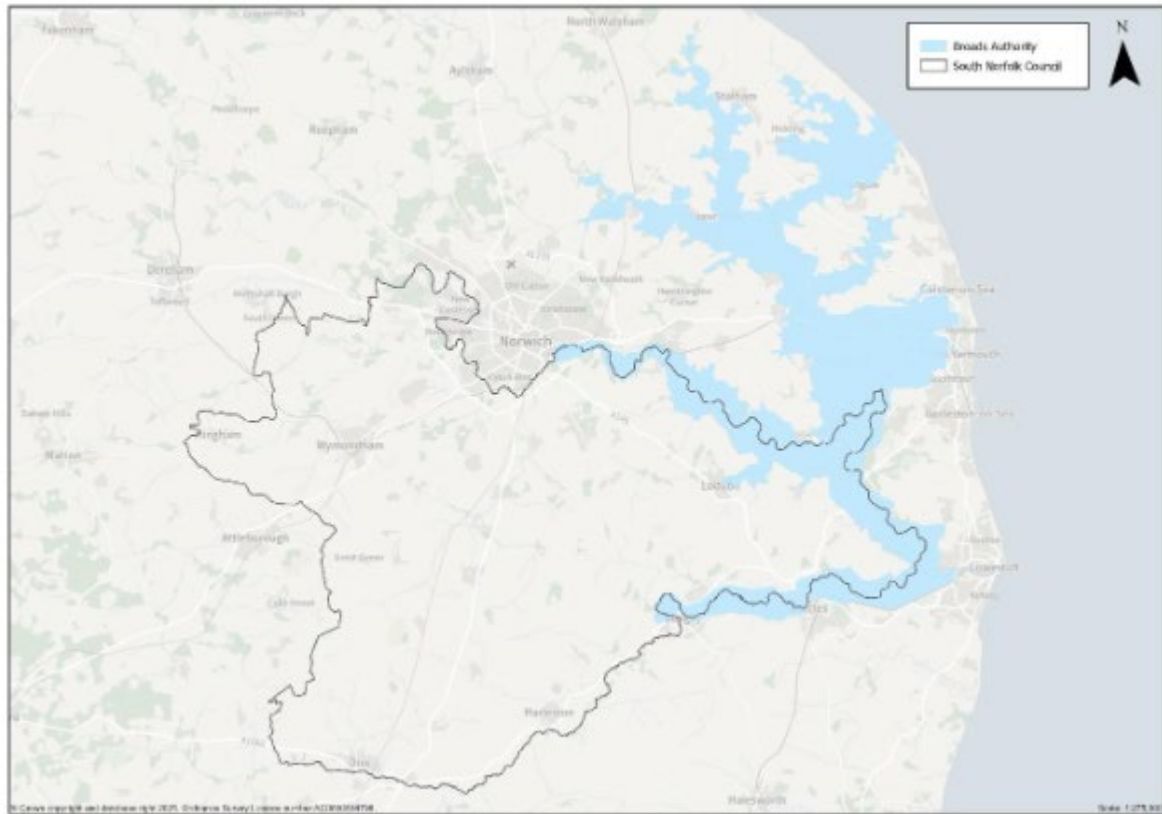


Figure 1: The Broads Authority Executive Area

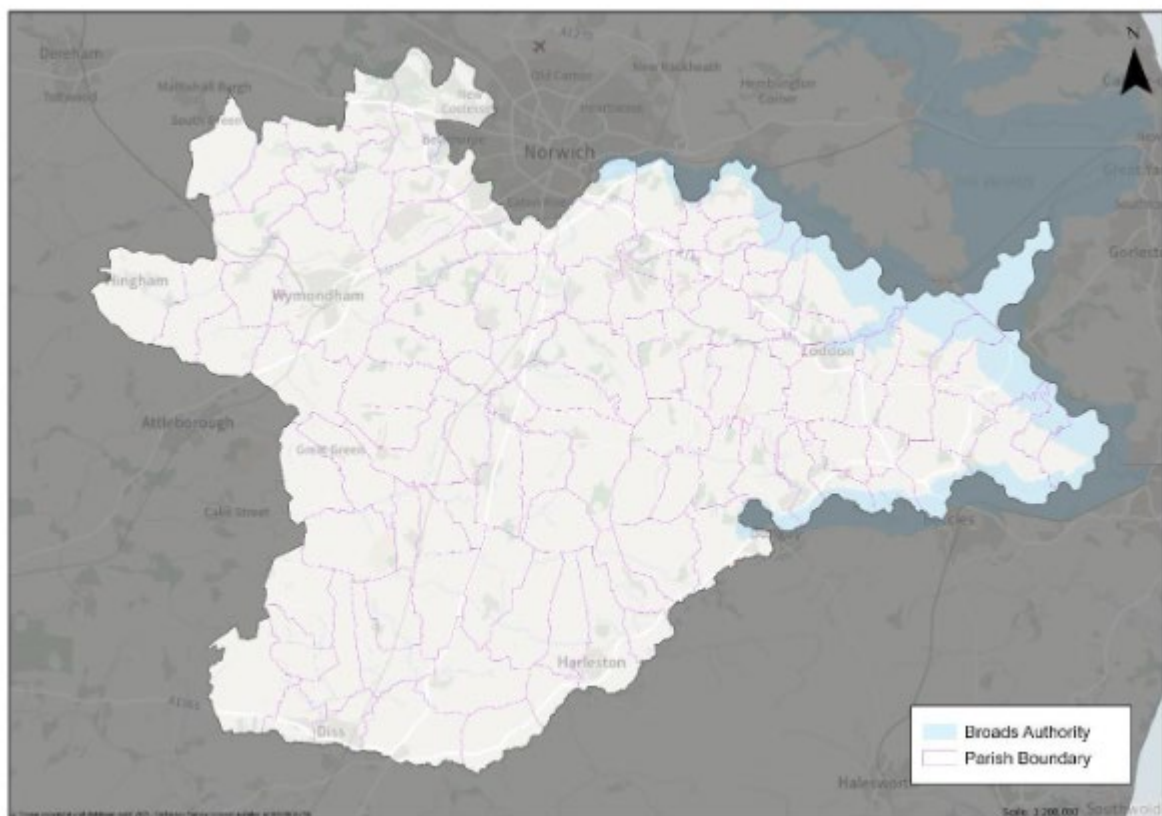


Figure 2: The Broads Authority Executive Area and South Norfolk parish boundaries

### List of Parties Involved

9. This bespoke Statement of Common Ground is between South Norfolk Council, the council responsible for preparing the Village Clusters Housing Allocations Plan, and the Broads Authority, a 'relevant authority', as defined in the Town and Country Planning (Local Planning) (England) Regulations 2012.

### Governance Arrangements and Timetable for Reviews

10. This statement has been prepared by South Norfolk Council and agreed with the Broads Authority. The statement will be published online within the Examination Library for the South Norfolk Council Village Clusters Housing Allocations Plan, alongside the submission of the South Norfolk VCHAP for examination. It can be reviewed and updated during the examination process if required.
11. It should be noted that signing this Statement of Common Ground does not prejudice the ability of any such signatory making detailed representations (in support or objection) to the content of the emerging Local Plan.

### Key areas of agreement

12. The key points of agreement noted as existing between both parties are as follows:
- The VCHAP has been prepared in line with the Council's requirements under the Duty to Cooperate.
  - The Broads are recognised as an area of particular sensitivities, including landscape, habitats and heritage, and this has been taken into account in the preparation of the VCHAP.
  - Strategic matters have been addressed via the GNLP and the VCHAP is a non-strategic policy making Plan.
  - The VCHAP is a subsidiary Plan that will, once adopted, be part of the Local Plan for South Norfolk.
  - The Objectives set out in the VCHAP are sound and are reflected in the site allocations.
  - The BA considers that those site allocations not specifically referenced in this Statement of Common Ground (SoCG) are sound in principle.
  - Both parties note that the Levelling Up and Regeneration Act, which received Royal Assent on 26 October 2023, amended Section 17A of the Norfolk and Suffolk Broads Act 1988. Section 17A creates a general duty of public bodies and this was amended to replace 'shall have regard to' with 'must seek to further' the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads, promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and protecting the interests of navigation.

### Areas of disagreement

13. The signatories agree that the matters set out below in Table 1 are not soundness issues but where they have not been resolved, remain as areas of disagreement.
14. The parties to this SoCG would be willing to agree minor modifications to the VCHAP during the examination process.
15. Both parties will continue to work proactively on outstanding matters throughout the examination.

## Conclusion

16. The response of South Norfolk Council to points raised by the Broads Authority in its role under the Duty to Cooperate is set out in the appended table, Table 1. The Inspector is asked to consider this in assessing the soundness of the Plan and in determining whether any modifications might be necessary to the Village Clusters Housing Allocations Plan, either to improve clarity of the document or to make the Plan sound.

Table 1: Matters raised by the Broads Authority under Duty to Cooperate and the responses of South Norfolk Council

**Site: VC GEL1 (North of Kells Way, Geldeston)**

<b>SITE REF</b>	VC GEL1
<b>REP. NO</b>	2620 (Regulation 19 representation)
<b>MAIN ISSUES RAISED</b>	The second 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?
<b>SNC RESPONSE</b>	<p>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; however, the Council does not consider this to be an issue of soundness. Moreover, 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.</p> <p>Whilst the Council does not consider these to be soundness issues, should the Inspector be minded to agree with the proposed modification the Council would support this update to the policy.</p>
<b>POTENTIAL CHANGE TO THE PLAN</b>	Possible amendment to criterion 2 of the policy to read: "A Topographical Survey and full Landscape Visual Impact Assessment to inform the scale and density of the development which should: reflect the existing housing within the Conservation Area; address the change in levels of the site, including minimising the visual impact of the development on the Broads Authority area and its setting; and protect the residential amenity of adjoining houses;..."
<b>BROADS AUTHORITY RESPONSE</b>	The Broads Authority considers that the potential amendment to the policy relating to requiring a Landscape Visual Impact Assessment and the inclusion of reference to the Broads Authority area remains necessary. There are industry standard definitions of different levels of assessments/appraisals; an applicant will not clearly know which level of assessment is required based on the current wording.
<b>RESOLVED MATTER (Y/N)</b>	No - the proposed amendment is included in the schedule of potential changes to be discussed through the examination.

**Site: VC GIL1REV (South of Geldeston Road and Daisy Way, Gillingham)**

<b>SITE REF</b>	VC GIL1
<b>REP. NO</b>	2621 (Regulation 19 representation)
<b>MAIN ISSUES RAISED</b>	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 full Landscape Assessment, is that a LVIA? Does it need to mention the term LVIA to make it clear what is required?
<b>SNC RESPONSE</b>	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 and therefore it is not an issue of soundness of the Plan. 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 support this update to the text.
<b>POTENTIAL CHANGE TO THE PLAN</b>	Possible amendment to criterion 5 of the policy to read: "A full Landscape Visual Impact Assessment to inform the scale, form and density of the development, as well as the extent of the protection and enhancement of the existing vegetated boundaries, having particular regard to the views to- and from the site from the Broads Authority area to the south;..."
<b>BROADS AUTHORITY RESPONSE</b>	The Broads Authority considers that the potential amendment to the policy relating to requiring a Landscape Visual Impact Assessment and the inclusion of reference to the Broads Authority area remains necessary. There are industry standard definitions of different levels of assessments/appraisals; an applicant will not clearly know which level of assessment is required based on the current wording.
<b>RESOLVED MATTER (Y/N)</b>	No - the proposed amendment is included in the schedule of potential changes to be discussed through the examination.

<b>SITE REF</b>	VC GIL1REV
<b>REP. NO</b>	3886 (Regulation 19 Addendum representation)
<b>MAIN ISSUES RAISED</b>	Our concern is incremental pressure and expansion of development around Gillingham.
<b>SNC RESPONSE</b>	An LVA has been prepared to support this allocation and any mitigation measures relating to the wider landscape needed to make the policy Sound have been incorporated into the policy. More generally, if these concerns are related to incremental development extending beyond the boundaries of the proposed allocation in future, then this would be a matter to be dealt with through future Local Plan reviews, or via the Development Management process should speculative applications be made to the Council.



<b>POTENTIAL CHANGE TO THE PLAN</b>	Amended policy wording to be agreed with SNC should the Inspector agree a modification to the policy is necessary for soundness.
<b>BROADS AUTHORITY RESPONSE</b>	We note your response to our comment, and we do not wish to take our comment any further.
<b>RESOLVED MATTER (Y/N)</b>	Yes

<b>SITE REF</b>	VC GIL1REV, para 5.12
<b>REP. NO</b>	3894 (Regulation-19 Addendum representation)
<b>MAIN ISSUES RAISED</b>	The policy states: 'The boundary of the site incorporates areas at both surface and fluvial (Zones 2 and 3a) flood risk in the south-western corner and a remaining small area of tidal flooding in the southeast corner, which it is recommended are left undeveloped. Development of the site will require a site-specific Flood Risk Assessment (FRA) and strategy, to inform the layout of the site'. This should be made stronger and state 'which must be left undeveloped' as it is not acceptable to be allocating development in Zones 2 and 3a.
<b>SNC RESPONSE</b>	The site-specific policy states that "A site-specific Flood Risk Assessment (FRA) and strategy that has regard to the issues identified in the Stage 2 VC Strategic Flood Risk Assessment (SFRA), to inform proposals for the site and preparation of a Flood Warning and Evacuation Plan". The Council considers that this appropriately addresses the known flooding issues on the site and will ensure that areas of high flood risk are left undeveloped. However, should the Inspector be minded to, the Council would support an update to the supporting text, as suggested.
<b>POTENTIAL CHANGE TO THE PLAN</b>	Amended policy wording to be agreed with SNC should the Inspector agree a modification to the policy is necessary for clarity or soundness.
<b>BROADS AUTHORITY RESPONSE</b>	We note your response to our comment, and we do not wish to take our comment any further.
<b>RESOLVED MATTER (Y/N)</b>	Yes

<b>SITE REF</b>	VC GIL1REV, para 5.14
<b>REP. NO</b>	3901 (Regulation-19 Addendum representation)
<b>MAIN ISSUES RAISED</b>	It also states; 'The developer of the site is recommended to enter into early engagement with Anglian Water...'. Again, this should be stronger – to say 'must'.

<b>SNC RESPONSE</b>	Anglian Water have been engaged throughout the preparation of the VCHAP. Anglian Water have raised no concerns relating to this policy or the supporting text through the preparation of the VCHAP. The Council does not consider that a modification is necessary.
<b>POTENTIAL CHANGE TO THE PLAN</b>	No modification proposed.
<b>BROADS AUTHORITY RESPONSE</b>	We note your response to our comment, and we do not wish to take our comment any further.
<b>RESOLVED MATTER (Y/N)</b>	Yes

**Site: VC ELL1 (South of Mill Road, Ellingham)**

<b>SITE REF</b>	VC ELL1
<b>REP. NO</b>	2622 (Regulation 19 representation)
<b>MAIN ISSUES RAISED</b>	Site is approximately 300m north of the nearest BA boundary. Unfortunately, the LVA does not fully consider impacts on the Broads. However, it acknowledges that there will be long views to the site from the south (BA area) and identifies a need for substantial planting to contain the site along the southern boundary. This is supported. Bullet point 4 does not really reflect what it is in the LVA – the LVA indicates a need for substantial planting, but the importance is not portrayed in the policy wording and needs improving.
<b>SNC RESPONSE</b>	Bullet point 3 of Policy VC ELL1 outlines the requirement for a Landscape Visual Impact Assessment to be submitted with any planning application to support the design, layout and landscaping of the site. 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. Should the Inspector be minded to modify the policy to reflect the comments of the Broads Authority however, the Council would not object.
<b>POTENTIAL CHANGE TO THE PLAN</b>	Amended policy wording to be agreed with SNC should the Inspector decide that a modification to the policy is necessary for soundness.
<b>BROADS AUTHORITY RESPONSE</b>	We note the Council's response. We note that the policy requires a LVIA, which is supported. But our point remains – the LVA undertaken by the Council identifies a specific requirement – the need for substantial planting. We would recommend similar wording to this be included: <i>'an appropriate boundary treatment to be incorporated along the southern site boundary to minimise the visual impact of the development on the Broads Area'</i> . There seems no harm in stating this, or similar, as well as requiring a LVIA. Indeed, the policy as drafted already says <i>'Layout and boundary treatments to respect the transition to the rural area'</i> which could arguably be something a LVIA also identifies.

<b>RESOLVED MATTER (Y/N)</b>	No
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**Site: VC ELL2 (Land at Florence Way, Ellingham)**

<b>SITE REF</b>	VC ELL2
<b>REP. NO</b>	2623 (Regulation 19 representation)
<b>MAIN ISSUES RAISED</b>	No landscape or visual amenity issues identified in the LVA. However, the LVA does not fully consider impacts on the Broads. 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 Broads (including improvements that are needed as set out in our rep to that policy). And also 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.
<b>SNC RESPONSE</b>	VC ELL2 already has defined field boundaries, whereas VC ELL1 requires the subdivision of a larger field, which extends south towards the Broads Authority boundary. As such, bullet point 1 of VC ELL2, which requires the ' <i>protection, reinforcement and enhancement of the existing vegetation along the south and west boundaries of the site</i> ' was intended to address the issue of landscape impact on the Broads. However, if the Inspector is minded to include specific reference to the landscape impact on the Broads in the supporting text and/or Policy, the Council would not object to this update to the text.
<b>POTENTIAL CHANGE TO THE PLAN</b>	Additional policy criterion to be added to the site-specific policy and additional comment to be added to the supporting text to reflect the comments of the Broads Authority, should a change be considered necessary by the Inspector.
<b>BROADS AUTHORITY RESPONSE</b>	ELL1 and ELL2 are so closely located to one another that it is not easy to understand the rationale behind one requiring an LVIA and the other one no assessment at all. And one referring to impact on the Broads and the other one not. For consistency, we would recommend: <ul style="list-style-type: none"> <li>• Reference to the need for a LVIA, using similar wording to ELL1</li> <li>• Reference to the site-specific mitigation measures identified in the LVA.</li> </ul>
<b>RESOLVED MATTER (Y/N)</b>	No

**Site: VC BUR1 (Land north of Staithe Road, Burgh St Peter)**

<b>SITE REF</b>	VC BUR1
<b>REP. NO</b>	2624 (Regulation 19 representation)

<b>MAIN ISSUES RAISED</b>	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.
<b>SNC RESPONSE</b>	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 still some distance from the Broads Authority boundary, and 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 northwest. 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 considers that the allocation wording is sufficient to cover this issue,
<b>POTENTIAL CHANGE TO THE PLAN</b>	Amended policy wording to be agreed with SNC should the Inspector agree a modification to the policy is necessary for soundness.
<b>BROADS AUTHORITY RESPONSE</b>	We note your response to our comment, and we do not wish to take our comment any further.
<b>RESOLVED MATTER (Y/N)</b>	Yes.

**Site: VC BRM1 (Land west of Old Yarmouth Road, Broome)**

<b>SITE REF</b>	VC BRM1
<b>REP. NO</b>	3900 (Regulation 19 Addendum representation)
<b>MAIN ISSUES RAISED</b>	The text says, 'The developer is therefore encouraged to enter into early engagement with AW regarding this matter'. This should be stronger – to say 'must'.
<b>SNC RESPONSE</b>	The policy criteria referred to has been prepared to reflect the specific issues noted on the site and has been supported by Anglian Water through the preparation of the VCHAP. The Council does not consider that a modification is necessary.
<b>POTENTIAL CHANGE TO THE PLAN</b>	No modification proposed.
<b>BROADS AUTHORITY RESPONSE</b>	We note your response to our comment, and we do not wish to take our comment any further.

<b>RESOLVED MATTER (Y/N)</b>	Yes
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**Site: Various**

<b>SITE REF</b>	VC BRM1, VC GIL1REV, VC EAR2
<b>REP. NO</b>	4194, 3886, 4195 (Regulation-19 Addendum)
<b>MAIN ISSUES RAISED</b>	<p>Most of the proposed sites are on the edge of settlements. Particular care and attention need to be given to any proposals for external lighting as well as any design that has a lot of glazing. Lighting in such edge of settlement areas needs to be fully justified, serve a specific purpose, be of the right design and intensity so as to not affect dark skies, such as the intrinsic dark skies of the Broads. Reference to lighting being only needed if fully justified and well designed needs to be made in relevant policies, especially the following as they are close to, albeit separated from, the Broads. Also, design with lots of glazing need to be avoided unless there is going to be automated shades incorporated into the design.</p> <ul style="list-style-type: none"> <li>• Policy VC BRM1</li> <li>• Policy VC EAR2</li> <li>• Policy VC GIL1REV</li> </ul> <p>We recommend that for sites on the edge of settlement you include wording such as: ‘Given that this site is on the edge of the settlement, particular care and attention will be given to lighting of such schemes. This includes external lighting, as well as mitigation for designs with lots of glazing. Schemes will need to fully justify the need for lighting, provide detail of the design and ensure that lighting is on only when it is needed, and designed to not add to light pollution. Designs with a lot of glazing are required to provide mitigation in the form of automated shades that are shut between dusk and dawn.’</p>
<b>SNC RESPONSE</b>	<p>The Council does not consider this to be a soundness issue for the VCHAP. Matters relating to design, including external lighting, will be considered at the planning application stage through the application of South Norfolk Development Management Policy DM 3.13 Amenity, Noise and Quality of Life. Development proposals will also be expected to accord with paragraph 198(c) of the NPPF (Dec 2024) which seeks to <i>“limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”</i>. A specific requirement relating to lighting is not considered to be appropriate by the Council to this specific group of allocation sites, when the issues is more general.</p>
<b>POTENTIAL CHANGE TO THE PLAN</b>	No modification proposed
<b>BROADS AUTHORITY RESPONSE</b>	<p>The Broads Authority comment relates to some specific sites on which representations were sought during the Regulation 19 Addendum publication period., Although the Broads Authority did not raise this as a concern at the initial Regulation 19 stage, the principle applies to other sites that are on the edge of settlements near to the Broads. The Authority retains its objection on the</p>

	basis that the VCHAP needs to fulfil the LURA requirement to 'further the purpose of the Broads'. A similar policy is contained within the Broads Local Plan (Ref DM22 in the 2019 Local Plan).
<b>RESOLVED MATTER (Y/N)</b>	No – whilst the Broads Authority has referenced a Policy within its own Local Plan, this is a development management policy which appears to apply to all types of development. The Council considers that development management issues are covered sufficiently elsewhere, and that it would be overly prescriptive to apply these detailed criteria to the allocation sites, without specific justification.

On behalf of South Norfolk Council:

*Adam Banham*

Place Shaping Manager

22 May 2025

On behalf of the Broads Authority:

*Marie-Pierre Tighe*

Director of Strategic Services

22 May 2025

South Norfolk Village Clusters Housing Allocations Plan

**Statement of Common Ground with Historic England**

Comments made under Duty to Cooperate

Date: June 2025



## Purpose of Statement

1. This document has been prepared to inform the Inspector of the agreed position between South Norfolk District Council and Historic England in respect of comments made by Historic England (HE) during the formal stages of VCHAP preparation, in order to demonstrate that the Council has been fulfilling the “Duty to Cooperate”. It is intended to address certain specific points that have been made by Historic England and, as such, should be read in conjunction with the South Norfolk Council Duty to Cooperate Statement (June 2025).
2. This bespoke Statement of Common Ground (SoCG) is between South Norfolk Council, the council responsible for preparing the Village Clusters Housing Allocations Plan, and Historic England.

## Introduction

3. Founded in 2015, Historic England is the public body responsible for preserving, protecting and enhancing the historic environment, acting as advisor to the Government. The duty to cooperate in relation to planning for sustainable development (Section 33A of the Planning and Compulsory Purchase Act 2004, as amended) applies to the Historic Buildings and Monuments Commission for England (formerly known as English Heritage).
4. Historic England have been consulted throughout the production of the Village Clusters Housing Allocations Plan. Historic England has submitted formal representations at each stage of the process and has engaged in subsequent discussions with South Norfolk Council throughout the production of the Plan.
5. Early in the process Historic England advised that the preparation of Heritage Impact Assessments (HIAs) to inform the site assessment and selection process was required. Historic England referred the Council to its own advice note, Advice Note 3 ‘The Historic Environment and Site Allocations in Local Plans’ for the preferred approach to HIA methodology. Historic England also provided further guidance in their overarching Regulation-18 response relating to the assessment of sites through an HIA and offered further informal advice as first drafts of the HIAs were prepared. A full list of Heritage Impact Assessments prepared by the Council is included in Appendix 1a.

## Governance arrangements and timetable for review

6. This statement has been prepared by South Norfolk Council and agreed with Historic England. This Statement of Common Ground is being published alongside the submission of the South Norfolk VCHAP for examination. It can be reviewed and updated during the examination process if required
7. It should be noted that signing this Statement of Common Ground does not prejudice the ability of any such signatory making detailed representations (in support or objection) to the content of the emerging Local Plan.

## Key areas of agreement

8. The key points of agreement noted as existing between both parties are as follows:
  - The VCHAP has been prepared in line with the Council’s requirements under the Duty to Cooperate.
  - Strategic matters have been addressed via the GNLP and the VCHAP is a non-strategic policy making Plan.

- The VCHAP is a subsidiary Plan that will, once adopted, be part of the Local Plan for South Norfolk.
- The Objectives set out in the VCHAP are sound and are reflected in the site allocations.
- Historic England considers that those site allocations not specifically referenced in this Statement of Common Ground (SoCG) are sound in principle.
- The parties to this SoCG would be willing to agree additional modifications to the VCHAP during the examination process.
- The signatories note that the matters set out in Tables 1 and 2 include the remaining areas of disagreement; however, both parties will continue to work proactively on outstanding matters throughout the examination.

## Conclusion

9. The response of South Norfolk Council to points raised by Historic England in its role under the Duty to Cooperate is set out in the appended table. The Inspector is asked to consider this in assessing the soundness of the Plan and in determining whether any modifications might be necessary to improve the clarity of the Plan, or to make the VCHAP sound.

Table 1: Outstanding matters raised by Historic England under Duty to Cooperate and the responses of South Norfolk Council

Outstanding matter 1: Archaeology criterion in site-specific policies

<b>SITE REFERENCE</b>	<p><u>Regulation 19 sites</u>: VC BAW1, VC BRE1, VC BRO1, VC EAR1, VC GEL1, VC HAL1, VC HAL2, VC HEM1, VC LM1, VC SWA2, VC BRA1, VC NEE1, VC WOR2, VC ROC1, VC SPO1, VC TAC2, VC THU1, VC HAD1</p> <p><u>Regulation 19 Addendum sites</u>: VC BAR2, VC BAW1REV, VC DIT1REV, VC BRM1, VC EAR2, VC GIL1, VC SWA1, VC SWA2, VC BRA1, VC ROC1, VC SPO1REV, VC TAC2</p>
<b>HE ISSUE RAISED</b>	<p>The main remaining concern of Historic England at the Regulation-19 Addendum stage relates to the archaeology criterion for a number of sites.</p> <p>Historic England state: <i>“We recognise that the policy should be proportionate to the site size and heritage sensitivity. However, as currently worded the criterion is not really clear about who needs to be consulted and what assessment needs doing when. The policy also fails to provide for up-front assessment to inform the design and layout of sites to protect any sensitive archaeology. The principal issues relate to both clarity over consultation and also timing of any assessment (desk-based or field-based). As currently drafted, the criterion could be read that an applicant simply has to look at the Historic Environment Record online and decide if they think it needs any further assessment prior to development.”</i></p> <p>Summary of HE recommendations:</p> <ul style="list-style-type: none"> <li>(1) Archaeology assessments should take place prior to an application so that the assessment can inform the design and layout of any application;</li> <li>(2) Policy criterion should replace the phrase Historic Environment Record with Historic Environment Service; and</li> <li>(3) Use of the word ‘assessments’ rather than ‘survey’ to cover both desk-based assessments and field-based assessments.</li> </ul>
<b>SNC RESPONSE</b>	<p>The Council does not consider a modification to the policy to be necessary for soundness as it is already covered sufficiently by paragraph 207 of the NPPF (Dec 2024).</p> <p>The Council is mindful of the expectation that the <i>“level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance”</i> (NPPF, para 207, Dec 2024). In the Council’s experience the need for assessment prior to an application being determined is not typical and a standard policy requirement to undertake these assessments prior to the submission of a planning application would therefore not be proportionate for the vast majority of allocations. This is especially relevant for outline planning applications which may not include site layouts. Furthermore, the Council has prepared Heritage Impact Assessments for sites where these are appropriate, and these provide initial information to inform early discussions relating to site development. These HIAs are referenced in the supporting text for each relevant site.</p>

	<p>Recognising the increased sensitivity of VC TAS1 in archaeological terms, the Council has included a policy criterion which requires the developer to submit a planning application supported by an archaeological assessment which should include the results of field evaluation. More generally however, the findings of the HIAs are not considered to support this approach for the majority of sites within the VCHAP. But, in the event it is determined further evaluations are considered necessary during the assessment of a planning application, these can be required under the provisions of paragraph 207 of the NPPF.</p> <p>Notwithstanding the above, should the Inspector consider a modification is necessary to make the Plan sound, the Council would support the wording submitted by Historic England.</p>
<b>POTENTIAL CHANGE TO THE PLAN</b>	The suggested amendment to the relevant policy criterion within the site-specific policy for each of the sites noted above is based upon wording proposed by Historic England: <i>"<u>Norfolk's Historic Environment Record Service is to be consulted prior to application to determine both the need for, and the extent of-, any archaeological assessments. surveys prior to development</u>".</i>
<b>HISTORIC ENGLAND RESPONSE</b>	<p>For clarity, we are not requesting field evaluation for most sites up front but we are requesting consideration as to whether some form of assessment is needed (be that desk-based assessment or field-based assessment) is needed. Whilst we agree that field-based assessment is only sometimes needed up front, the fact remains that some form of assessment may be needed to inform the application (and layout etc).</p> <p>It is also about being clear that it is consulting the Historic Environment Service rather than the Historic Environment Record to inform that decision.</p>
<b>RESOLVED MATTER (Y/N)</b>	No, disagreed unless the suggested potential change is made.

#### Outstanding matter 2: Extensions to settlement limits within the VCHAP

<b><u>SITE REFERENCE</u></b>	Regulation 19 sites: SN0020SL (Brooke) SN5045SL (Wortwell), SN0406SL (Seething), SN0587SL (Seething), SN0588SL (Seething)
<b><u>THE ISSUE RAISED</u></b>	<p>Historic England commented: <i>"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 [to] 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.'"</i></p>

<b><u>SNC RESPONSE</u></b>	<p>The Council has included some opportunities for windfall development within the VCHAP, as required by NPPF paragraph 73(d) (Dec 2024). It is noted the PPG reference cited by Historic England is for sites ‘proposed for allocation’, which does not apply in these cases, as the Council is not reliant on these sites being developed to meet the overall plan requirements and is not promoting them for specific housing numbers or forms of development.</p> <p>In common with all infill/ windfall development matters relating to the heritage impact of development in this location will be 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) to ensure development was not being encouraged in locations where it was apparent there would be an unacceptable heritage impact. 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, in accordance with para 207 of the Dec 2024 NPPF and other relevant policies of the Development Plan.</p> <p>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. However, should the Inspector be minded to include an update to the background text that references the extension to the settlement limit, highlighting the preparation of a Heritage Impact Assessment as part of the VCHAP, the Council would support this modification to the wording. The Council does not consider this issue to be a soundness matter.</p>
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	A minor change to the chapter wording to reference the preparation of a Heritage Impact Assessment as part of the evidence base for the update to the settlement limit boundaries. The format of this wording would need to be agreed on a site-by-site basis, as appropriate.
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Historic England would welcome a minor change to reference the preparation of a Heritage Impact Assessment as part of the evidence base for the update to the settlement limit boundaries. We would be happy to work with the Council to agree the format of this wording on a site-by-site basis.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No, disagreed unless the suggested potential change is made.

Table 2: Site-specific matters raised by Historic England under Duty to Cooperate and the responses of South Norfolk Council

<b><u>SITE REFERENCE</u></b>	VC GRE2
<b><u>REPRESENTATION NO.</u></b>	3159 (Regulation 19 representation)
<b><u>THE ISSUE RAISED</u></b>	<p>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).’</p>

<b><u>SNC RESPONSE</u></b>	The Council considers Policy VC GRE2 to be sound and notes that development on the site is underway. At the time of preparing this Statement of Common Ground, the Council noted that 11 of the 14 units on the site had been completed. As such, the Council considers it reasonable to assume that the existing planning permission will be completed.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification necessary.
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	We note that the development is now largely complete and therefore no longer consider that this reference is needed.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes

<b><u>SITE REFERENCE</u></b>	VC BAR1
<b><u>REPRESENTATION NO.</u></b>	3161 (Regulation 19 representation)
<b><u>HE ISSUE RAISED</u></b>	<p>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.</p> <p>We welcome the completion of an HIA to consider the impact of development on this asset and the non-designated Cock Inn.</p> <p>We welcome the reference to Sayers Farm in bullet point 4 and the reference to heritage assets in bullet point 5.</p> <p>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 <i>Sayers Farmhouse</i> and <i>The Cock Inn</i>.’</p>
<b><u>SNC RESPONSE</u></b>	<p>The Council considers Policy VC BAR1 to be sound as the site is screened from Sayers Farmhouse by existing vegetation (which the submission Policy seeks to protect) and is separated by the B1108, Watton Road/Back Lane junction. The location of the Farmhouse is also noted in the supporting text, as is the HIA.</p> <p>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.</p>
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Amend bullet point 5 to read: “.....given to the setting of <i>Sayers Farmhouse</i> and <i>The Cock Inn</i> ”.
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Historic England would welcome a minor change to reference the grade II listed Sayers Farmhouse.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No, disagreed unless the suggested potential change is made.

<b><u>SITE REFERENCE</u></b>	VC BRE1
<b><u>REPRESENTATION NO.</u></b>	3163 (Regulation 19 representation)
<b><u>HE ISSUE RAISED</u></b>	<p>Although there are no designated heritage assets on site, the site lies immediately adjacent to the grade II listed Pine Tree Cottage. Development of this site has the potential to impact upon the significance of this designated heritage asset through development within its setting.</p> <p>We welcome the preparation of an HIA for the site.</p> <p>Whilst 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, we note that this area is also now being proposed as an area of informal car parking. We 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. We suggest that consideration should be given to locating the car park in another area of the site, or even off-site – for example it might be more appropriate to locate the car park on the same side of the road as the school to reduce the number of children crossing the road.</p> <p>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.</p> <p>We welcome criterion 3 and 5 of the policy.</p> <p>Bullet point 4 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 ‘This site would need to be investigated prior to development’. In our view, some assessment is needed to inform any planning application.</p> <p>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.’</p>
<b><u>SNC RESPONSE</u></b>	<p>With regards to the school car park, the Council has recognised local concerns about the existing provision but has not determined that this must be delivered through the site allocation. The Plan does not promote a car park within the setting of the listed building, and if proposed by a site developer, the appropriateness of this option would be assessed at the planning application stage.</p>

	<p>In relation to the requirement for frontage development, this is a highways requirement for the allocation of this site. The Council must carefully consider the different factors raised by stakeholders and determine an appropriate solution. The requirement for open space creates a degree of separation around the listed building.</p> <p>The Council does not consider either issue to be a soundness matter and is not proposing any modifications. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England to be included in criterion 2 of the policy.</p>
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Addition to bullet point 2 to include: " <i>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</i> ".
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Historic England would welcome the inclusion of the suggested potential change to the plan as it would provide greater clarity on the need for any car park design to give appropriate consideration of the setting of the listed building. However, we recognise that a degree of protection is already provided for by criterion 5.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No, disagreed unless the suggested potential change is made.

<b><u>SITE REFERENCE</u></b>	VC BRO1
<b><u>REPRESENTATION NO.</u></b>	3165 (Regulation 19 representation)
<b><u>HE ISSUE RAISED</u></b>	Although there are no designated heritage assets on site, the site lies to the south east of the grade II listed Brooke Lodge, dating from c1835 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.
<b><u>SNC RESPONSE</u></b>	HIA updated.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification necessary.
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	HE welcomes the updated HIA.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes – matter agreed

<b><u>SITE REFERENCE</u></b>	VC BUN2
<b><u>REPRESENTATION NO.</u></b>	3167 (Regulation 19 representation)
<b><u>HE ISSUE RAISED</u></b>	There are no designated heritage assets within the site boundary. However, 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. Any development of the site has the potential to impact on the significance of these designated heritage assets.



	<p>We welcome the preparation of an HIA for the site. The HIA makes a number of helpful recommendations for the site. Some of these have been included in the policy (bullet points 1 and 2) but not all.</p> <p>In bullet point 1 it would be helpful to make clear that the views should link Lilac Farmhouse (grade II) to the open countryside. The HIA also advises development should be set back from the road frontage to retain an open setting. Add criterion to state this.</p> <p>Bullet point 2 would be reworded to also reference Bunwell Manor Hotel.</p>
<b><u>SNC RESPONSE</u></b>	<p>The Heritage Impact Assessment, supporting text and site-specific policy requirements have been updated to reflect the comments of Historic England in relation to the surrounding designated heritage assets.</p> <p>The Council would note, however, 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 this instance the Council does not consider that setting back the development from the road frontage would result in an appropriate site layout/ design in this location. Frontage development would be compatible with the existing streetscene.</p> <p>Furthermore, an area of open space has already been identified to the southeast of the site. This will result in a partially open site frontage, enabling through views between Lilac Farm and the wider countryside setting. Whilst the Council does not consider this to be an issue of soundness and is not proposing an amendment to the text, should the Inspector consider a Modification necessary, then the Council would support an update to the first bullet point of VC BUN2 making specific reference to views to/from Lilac Farm.</p>
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	<p>Potential update to the first bullet point of VC BUN2 to read: <i>"Site layout and design includes an area of open space to the south-east of the site to protect the residential amenities of existing and future occupiers, and to retain some long views across the site to the east to preserve a connection between Lilac Farmhouse and the countryside;..."</i></p>
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	<p>Historic England welcomes the reference to Bunwell Manor Hotel.</p> <p>Historic England would welcome the inclusion of the suggested potential change to the first bullet point as it would provide greater clarity on the need for a connection between the listed farmhouse and the countryside.</p>
<b><u>RESOLVED MATTER (Y/N)</u></b>	<p>No, disagreed unless the suggested potential change is made.</p>

<b><u>SITE REFERENCE</u></b>	VC CAR1
<b><u>REPRESENTATION NO.</u></b>	3168 (Regulation 19 representation)
<b><u>THE ISSUE RAISED</u></b>	<p>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.</p> <p>We appreciate that this site was allocated in the previous local plan and indeed has an existing planning permission.</p>

	We welcome the reference in the policy criteria to Flaxlands Farmhouse, but the policy should also mention the Plough Inn (also grade II listed).
<b><u>SNC RESPONSE</u></b>	The site benefits from an existing planning permission which has demonstrated that development the approved scheme is in appropriate for the setting. The Council remains of the opinion that VC CAR1 is sound in its proposed form and does not propose making a modification to the text. 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.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Amendment to bullet point 2 to read: <i>"A layout and design that has regard to the setting of Flaxlands Farmhouse to the north-east <u>and the Plough Inn to the south-east of the site</u>".</i>
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Historic England would welcome the inclusion of the suggested potential change to the second bullet point to reference the grade II listed Plough Inn.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No, disagreed unless the suggested potential change is made.

<b><u>SITE REFERENCE</u></b>	VC EAR1
<b><u>REPRESENTATION NO.</u></b>	3169 (Regulation 19 representation)
<b><u>THE ISSUE RAISED</u></b>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.'</p>
<b><u>SNC RESPONSE</u></b>	The Council does not consider it necessary to amend bullet point 1 to refer specifically to a lower density on the eastern part of the site as this is already set out in supporting paragraph 14.6 (of the Examination version of the VCHAP) and is covered by the requirements of NPPF

	para 208 (Dec 2024). Neither is the lack of direct mention of views towards the church in the policy considered a soundness matter by the Council, given the direct reference to the HIA in the Policy. The Council has set out its response to commentary regarding bullet point 4 of this policy in Table 1 above
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification proposed.
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Reference to HIA in policy noted and welcomed.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes, agreed.

<b><u>SITE REFERENCE</u></b>	VC HAL1
<b><u>REPRESENTATION NO.</u></b>	3171 (Regulation 19 representation)
<b><u>HE ISSUE RAISED</u></b>	<p>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.</p> <p>We welcome the preparation of the HIA and revised HIA for the enlarged site.</p> <p>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.</p> <p>The policy should be amended to include a new criterion to read, <i>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.</i></p> <p>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.'</p>
<b><u>SNC RESPONSE</u></b>	<p>Following the Council drafting its response to the HE representation, both parties attended a site visit to review the site-specific issues and to agree an acceptable approach to this matter. As set out in the subsequent meeting note (see Appendix 1 of the Duty to Cooperate Statement) it was agreed by HE that single storey development was not necessary, but it was suggested the Regulation-19 wording of the policy should be revisited so that it more closely reflected the wording of the HIA.</p> <p>This site now benefits from planning permission (2023/2742) however the Council remains of the opinion an appropriately worded planning policy remains valid to inform any potential revisions to the approved scheme.</p> <p>However, the Council does not believe the issues raised by Historic England to be matters of soundness and it is not proposing a modification to the text. Notwithstanding this position, should the Inspector consider a modification to be necessary, then the Council would be supportive of wording which seeks to protect views towards Hales Hospital, as well as a proposed layout which respond to site levels as part of a design-led approach that is sympathetic to the former hospital.</p> <p>The Council has set out its response to commentary regarding bullet point 5 of this policy in Table 1 above.</p>

<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Potential additional policy criterion to read: <i>“Protection and enhancement of views of the grade II listed Hales Hospital from Briar Lane through careful layout, design and landscaping, especially in the northeast of the site”.</i>
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Historic England would welcome the inclusion of the suggested potential change to reference views of Hales Hospital in the policy.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No, disagreed unless the suggested potential change is made.

<b><u>SITE REFERENCE</u></b>	VC HAL2
<b><u>REPRESENTATION NO.</u></b>	3172 (Regulation 19 representation)
<b><u>HE ISSUE RAISED</u></b>	<p>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.</p> <p>We welcome the preparation of the HIA and revised HIA for the enlarged site.</p> <p>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.</p> <p>Reference should be made to the nearby listed Hales Hospital with the addition of a criterion to read: <i>‘Protect and enhance the grade II listed Hales Hospital through careful layout, design and landscaping’.</i></p> <p>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, <i>‘Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.’</i></p>
<b><u>SNC RESPONSE</u></b>	Development on the site has been completed and the Council therefore does not consider this additional policy requirement to be necessary.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification necessary.
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Completion of development noted.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes – matter agreed.

<b><u>SITE REFERENCE</u></b>	VC HEM1
<b><u>REPRESENTATION NO.</u></b>	3173 (Regulation 19 representation)

<b><u>HE ISSUE RAISED</u></b>	<p>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.</p> <p>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: <i>‘Careful layout and design to keep views open, retain visual prominence of windmill and incorporate views of windmill from public spaces’.</i></p> <p>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, <i>‘Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.’</i></p>
<b><u>SNC RESPONSE</u></b>	<p>The Council considers that Hempnall Mill has been given due attention through supporting paragraph 18.15. Furthermore, following the Council drafting its response to the HE representation, both parties attended a site visit to review the site-specific issues and to agree an acceptable approach to this matter. As set out in the subsequent meeting note (see Appendix 1 of the Duty to Cooperate Statement) it was agreed by HE that the proposed policy wording is sufficient.</p> <p>The Council has set out its response to commentary regarding bullet point 6 of this policy in Table 1 above.</p>
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification necessary.
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Agreed, no further changes necessary
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes – matter agreed.

<b><u>SITE REFERENCE</u></b>	VC LM1
<b><u>REPRESENTATION NO.</u></b>	3175 (Regulation 19 representation)
<b><u>HE ISSUE RAISED</u></b>	<p>The grade II listed barn at Elm Farm lies within the site. Therefore, any development of this site has the potential to impact upon the significance of this heritage asset.</p> <p>We welcome the preparation of the HIA.</p> <p>The HIA makes a number of helpful recommendations in relation to the barn. We welcome the references in paragraph 23.8 and in bullet points 4, 5 and 6 of the policy which reflect these recommendations. It is clearly important for this land to remain open and we welcome that being reflected in policy.</p>

	<p>We do have some concerns about the possibility of one part of the site being accessed across this 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 to reduce harm to the listed building.</p> <p>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. We therefore advise that bullet point 7 should be amended to read, <i>'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i></p>
<b><u>SNC RESPONSE</u></b>	<p>Specific discussions have been held post Reg-19 with Historic England, concerning this site. The policy already includes a requirement for the southeastern portion of the site to be left undeveloped to protect the setting of the barn. This criterion also includes a requirement for the design and layout of the adjoining areas to consider the setting of the barn. The following policy 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 Historic England of this position accordingly. The access to the south-western part of the site (adjacent to Burnthouse Lane) would be for fewer than 25 dwellings, as such it is likely that the road could be designed to the least intrusive adoptable standards of Norfolk County Council. 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 across 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 with a lack of footway provision. The adjoining development is largely complete and does not offer opportunities to access this site.</p> <p>The Council has set out its response to commentary regarding bullet point 7 of this policy in Table 1 above.</p>
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	<p>If the Inspector is minded to agree with the Historic England, the Council would support amended wording to criterion 5 to read: <i><u>"Access The access road across the southeast section of the site, between the <del>two elements to be developed</del> two areas for development, <del>to</del> must be sympathetic to the setting of the listed barn. The access road must be situated as far as practicable from the barn and be appropriately landscaped to ensure a suitable setting for the listed building is maintained."</u></i></p>
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	<p>We welcome the explanation in relation to why access cannot be provided from Burnthouse Lane. We therefore recommend that criterion 5 be amended to read:</p> <p><i>"The access road across the southeast section of the site, between the two areas for development, must be sympathetic to the setting of the listed barn. The access road must be situated as far as practicable from the barn and be appropriately landscaped to ensure a suitable setting for the listed building is maintained."</i></p>
<b><u>RESOLVED MATTER (Y/N)</u></b>	<p>No, disagreed unless the suggested potential change is made.</p>

<b><u>SITE REFERENCE</u></b>	VC WOR2
<b><u>REPRESENTATION NO.</u></b>	3182 (Regulation 19 representation)
<b><u>HE ISSUE RAISED</u></b>	<p>Whilst there are no designated heritage assets within this site, the grade II listed Bell Inn lies opposite this site. Another grade II listed property, known as Premises of Mr Brown, lies to the north of the site. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets.</p> <p>This is an important rural gap site in the village and consideration should be given to that role in combination with the setting of the heritage assets.</p> <p>We welcome the preparation of the HIA. The HIA includes a number of helpful recommendations. Bullet point 3 of the policy reflects the recommendation in relation to historic grain.</p> <p>The policy should also include a criterion reflecting the HIA recommendation in relation to landscaping to read, <i>'Enhance landscaping along the west boundary, particularly behind the village green'</i></p> <p>Bullet point 2 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 2 should be amended to read, <i>'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i></p>
<b><u>SNC RESPONSE</u></b>	<p>The role of this site in contributing to the character of the area and the setting of heritage assets is acknowledged by the Council in the policy. Bullet point 3 of Policy VC WOR2 has been specifically included to require consideration of the impact of development on the site on the surrounding context. The HIA also identifies that consideration of the layout of the site is needed to protect the setting of the grade II listed Bell Inn. This has been included in Policy VC WOR2 as stated above.</p> <p>The Council does not consider that the matters raised are soundness issues and does not propose any modifications to the policy for this site.</p> <p>The Council has set out its response to commentary regarding bullet point 2 of this policy in Table 1 above.</p>
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification proposed.
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Historic England continues to recommend that the policy should also include a criterion reflecting the HIA recommendation in relation to landscaping to read, <i>'Enhance landscaping along the west boundary, particularly behind the village green'</i>
<b><u>RESOLVED MATTER (Y/N)</u></b>	No, disagreed unless the suggested potential change is made.

<b><u>SITE REFERENCE</u></b>	VC ROC1
<b><u>REPRESENTATION NO.</u></b>	3184 (Regulation 19 representation)
<b><u>HE ISSUE RAISED</u></b>	<p>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.</p>

	<p>We welcome the preparation of the HIA.</p> <p>However, 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.</p> <p>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 <i>'Careful consideration should be given to the relationship of the footpath to the listed barn and appropriate materials used'</i>.</p> <p>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, <i>'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i></p>
<b><u>SNC RESPONSE</u></b>	<p>Post Reg-19 the Council met with Historic England to discuss a small number of specific sites, including VC ROC1. This discussion included a site visit to understand the concerns that had been raised. The HIA has subsequently been updated to better explore the relationship between the listed buildings and the surrounding farmland and, alongside the updated policy and supporting text for VC ROC1, was republished within the Regulation-19 Addendum. These amendments reflected the discussions with Historic England and included an open area within the western section of the site. HE has subsequently not raised any further concerns during the Regulation 19 Addendum publication, about the impact of VC ROC1 on the listed buildings or the significance of their setting.</p>
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification necessary.
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	We welcome the preparation of the updated HIA. We welcome paragraph 7.14 of the supporting text and criterion 5 of the policy which seek to respect the setting of the heritage assets through the provision of open space and preservation of long views. No further changes necessary.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes – matter agreed.
<b><u>SITE REFERENCE</u></b>	VC TAS1
<b><u>REPRESENTATION NO.</u></b>	3190 (Regulation 19 representation)
<b><u>HE ISSUE RAISED</u></b>	<p>While there are no designated heritage assets within the site, the grade II listed Old Hall Farmhouse lies immediately to the north west of the site. In addition, the scheduled monument (a hillfort, known as 'Camp in Village'), lies to the north of the site, which also includes the grade I listed Church of St Mary, and grade II listed war memorial and Rectory.</p> <p>Therefore, any development of this site has the potential to impact upon the significance of these heritage assets. We are particularly concerned about the potential impacts on the Farmhouse, given its proximity.</p>



	<p>We do however appreciate this is seeking to increase the density of an existing allocation.</p> <p>We welcome the preparation of the HIA. However, we disagree with some of the HIA findings. It is our view that the setting of the Old Hall Farmhouse would be affected by development across the whole site.</p> <p>We would like to see approximately one third (the northeast) of the site left as orchard or, potentially a playing field extension for the school, but with no built development. Housing development should be contained within the south eastern two thirds of the site to reduce harm to the significance of the listed building by development within its setting.</p> <p>This may have an impact on the capacity of the site and it may not be possible to accommodate 25 dwellings on the site at a density in keeping with the surrounding character of the village.</p> <p>The policy should be amended to include this area of open space/orchard/playing field in the north eastern third of the site to protect and enhance the setting of Old Hall Farmhouse. The capacity of the site should be reduced accordingly.</p> <p>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, <i>'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i></p>
<b><u>SNC RESPONSE</u></b>	<p>Post Regulation-19 the Council met with Historic England to discuss a small number of specific sites, including VC TAS1. This discussion included a site visit to understand the concerns that had been raised. The Council subsequently reviewed the uplift in numbers proposed for this carried-forward allocation site and considered it appropriate to reduce the number of dwellings to 20 (as per the 2015 allocation for the site). In addition, following an update to the HIA the Council considered it appropriate protect views across the site towards this listed building and this was included in the amended policy criterion 2. In their response to the Regulation-19 Addendum, Historic England noted that whilst the change was not as they had previously suggested, it did signal the importance of protecting the setting of Old Hall Farmhouse. No further amendments were suggested in response to this update.</p> <p>In recognition of the potential archaeological sensitivity of the site (due to its proximity to the hillfort, a scheduled monument situated west of the site) the Council reviewed the archaeological requirements for this site and updated policy criterion 4 accordingly (see below).</p>
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification necessary.
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Agreed.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes – matter agreed.

<b><u>SITE REFERENCE</u></b>	VC WIC2
<b><u>REPRESENTATION NO.</u></b>	3194 (Regulation 19 representation)
<b><u>HE ISSUE RAISED</u></b>	<p>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.</p> <p>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: <i>'to conserve and enhance the immediate setting...'</i> to more closely reflect the NPPF.</p>
<b><u>SNC RESPONSE</u></b>	The Council considers the policy to be sound in its current form and is not proposing a modification. However, should the Inspector consider that a modification is necessary, the Council would support the wording below which has been proposed by Historic England.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Amended policy wording for bullet point 1 to read: <i>"Site layout and design to maximise wider views of St Andrews and All Saints Church, whilst also seeking to conserve <u>and enhance</u> the immediate setting of the heritage asset"</i> .
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Historic England continues to recommend that the policy should be amended to more closely reflect the NPPF.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No, disagreed unless the suggested potential change is made.

<b><u>SITE REFERENCE</u></b>	VC WIC3
<b><u>REPRESENTATION NO.</u></b>	3195 (Regulation 19 representation)
<b><u>HE ISSUE RAISED</u></b>	<p>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.</p> <p>We do appreciate that this is an existing allocation and it has a planning application pending determination.</p> <p>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.</p>
<b><u>SNC RESPONSE</u></b>	The Council considers the policy to be sound in its current form and subsequent to the Regulation 19 Addendum publication period, a planning application for 9 dwellings has a committee resolution to approve. However, should the Inspector consider that a modification is necessary in response to the comments raised by Historic England, the Council would support the wording set out below.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Amended policy wording for bullet point 2 to read: <i>"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 <u>and to conserve and enhance</u> St Andrew and All Saints Church and its setting"</i> .
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Historic England continues to recommend that the policy should be amended to more closely reflect the NPPF.

<b><u>RESOLVED MATTER (Y/N)</u></b>	No, disagreed unless the suggested potential change is made.
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<b><u>SITE REFERENCE</u></b>	VC WIN2
<b><u>REPRESENTATION NO.</u></b>	3196 (Regulation 19 representation)
<b><u>HE ISSUE RAISED</u></b>	<p>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.</p> <p>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: <i>'Consideration of the local vernacular and distinctiveness especially materials, with reference to the CA Appraisal.'</i></p>
<b><u>SNC RESPONSE</u></b>	The Council considers Policy VC WIN2 to be sound in its current form and is not proposing a modification. However, if the Inspector is minded to amend the policy wording to reflect the comments of Historic England, the Council would support the proposed wording set out below.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Additional bullet point to read: <i>"Site design to have consideration to the local vernacular and distinctiveness especially materials, with reference to the Conservation Area Appraisal"</i> .
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Historic England continues to recommend that the policy should be amended to more closely reflect the second recommendation of the HIA.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No, disagreed unless the suggested potential change is made.

<b><u>SITE REFERENCE</u></b>	SN0020SL, SN5045SL, VC WOR1, SN0588SL
<b><u>REPRESENTATION NO.</u></b>	3164, 3180, 3181, 3187 (Regulation 19 representations)
<b><u>HE ISSUE RAISED</u></b>	<p>Part of this land lies within the Seething Conservation Area or adjacent to the Conservation Area. There are two grade II listed buildings opposite. Therefore, any development of these sites has the potential to impact upon the significance of these heritage assets.</p> <p>We note that HIAs have been completed for two of these sites which identified moderate impacts on the historic environment. A number of helpful mitigation measures were proposed in the HIAs but it is not clear how these recommendations will be carried forward into the Plan as there is no policy for the settlement limit amendments. We therefore have concerns that the potential impacts on the historic environment will not be properly addressed.</p> <p>Finally, we suggest that an HIA should be prepared for site SN0588SL.</p> <p>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.</p>

<b><u>SNC RESPONSE</u></b>	The Council has prepared Heritage Impact Assessments to support the site assessment for sites SN0020SL, SN5045SL and VC WOR1. It was not considered necessary to prepare a HIA for SN0588SL as this site has been developed and its inclusion within the settlement limit is simply intended to regularise the current position.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification necessary.
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Historic England welcomes the preparation of Heritage Impact Assessments. However there remains a concern that where these are for settlement limit extension, then there is no reference in the Plan to these HIAs. It will not be clear to potential applicants/decision makers that these HIAs (and their recommendations) exist. We would welcome reference to the HIAs in the supporting text of the plan. Historic England would welcome a minor change to reference the preparation of a Heritage Impact Assessment as part of the evidence base for the update to the settlement limit boundaries. We would be happy to work with the Council to agree the format of this wording on a site-by-site basis. (See outstanding matter 2, page 5 above)
<b><u>RESOLVED MATTER (Y/N)</u></b>	No, disagreed unless the suggested potential change is made.

<b><u>SITE REFERENCE</u></b>	Monitoring Framework
<b><u>REPRESENTATION NO.</u></b>	3198 (Regulation 19 representation)
<b><u>HE ISSUE RAISED</u></b>	We continue to recommend including an indicator for the historic environment included in the framework.
<b><u>SNC RESPONSE</u></b>	The Council considers that the Development Management Policies Document includes monitoring indicators specifically relevant to heritage assets in the District. In addition, the recently adopted GNLP also includes monitoring indicators relating to the historic environment – EPE2 and EPE3. The Council therefore does not consider it necessary to repeat these same indicators within the VCHAP.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Monitoring indicator for the historic environment to be agreed.
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Historic England notes the monitoring indications in the Development Management Policies Document and Greater Norwich Local Plan and accepts that on this occasion, this is considered sufficient.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes, agreed

<b><u>SITE REFERENCE</u></b>	Sustainability Appraisal
<b><u>REPRESENTATION NO.</u></b>	2065 (Regulation 19 representation)
<b><u>HE ISSUE RAISED</u></b>	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.

	<p>We do however welcome the preparation of Heritage Impact Assessments (noted at para 5.3.18).</p> <p>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.</p> <p>In future SA reports, please ensure the correct notation is used for listed buildings e.g. grade1 should be grade I, grade 2 should be grade II.</p> <p>The findings of the Analysis on pages 69-95, further highlights our concern that some of the analysis has been overly focused on distance.</p> <p>We note that Scheduled monuments do not appear in Table A.</p>
<b><u>SNC RESPONSE</u></b>	<p>The Council does not consider that the matters raised above relate to the soundness of the Plan.</p> <p>The Sustainability Appraisal (SA) is an iterative part of the evidence base that has supported the assessment and the selection of sites and it should always 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.</p>
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification necessary.
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Noted
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes, agreed

<b><u>SITE REFERENCE</u></b>	VC BAR2
<b><u>REPRESENTATION NO.</u></b>	3986 (Regulation 19 Addendum representation)
<b><u>HE ISSUE RAISED</u></b>	<p>Whilst there are no designated heritage assets within the site boundary, there is a grade II listed building, School Farmhouse, to the south east of the site. The development has the potential to impact the significance of this heritage asset via a change in its setting.</p> <p>We welcome the preparation of the revised Heritage Impact Assessment for the site. In particular we note that built development will now be limited to the northern part of the site with the southern area being retained as playing field, play area and village hall. This is reflected in the policy wording and supporting text of the Plan. This revised site layout will help to protect the setting of the farmhouse by providing breathing space around the asset.</p> <p>There is still no criterion in relation to archaeology in the policy. As previously advised there should also be a requirement for archaeological desk-based assessment to inform any planning application and investigation prior to commencement of development.</p>

<b><u>SNC RESPONSE</u></b>	The Council does not consider this to be a soundness issue as it is already covered by the NPPF (para 207, Dec 2024) and referenced in the supporting text to the Policy. However, should the Inspector consider that a modification is necessary for clarity, the Council would support the wording proposed below.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Additional policy criterion to be added to VC BAR2: <i>'Historic Environment Record to be consulted to determine the need for any archaeological surveys prior to development'</i> .
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Reference should be made to archaeology for consistency with other site allocation policy wording. Ideally this should be in accordance with the wording suggested in Outstanding Matter 1 on page 4/5 above to read: <i>Norfolk's Historic Environment Record Service is to be consulted prior to application to determine both the need for, and the extent of, any archaeological assessments.</i>
<b><u>RESOLVED MATTER (Y/N)</u></b>	No, disagreed unless the suggested potential change is made.

<b><u>SITE REFERENCE</u></b>	VC SPO1REV
<b><u>REPRESENTATION NO.</u></b>	4000 (Regulation 19 Addendum representation)
<b><u>HE ISSUE RAISED</u></b>	<p>Whilst there are no designated heritage assets within the site, the site lies immediately to the north east of the grade II listed property, The Orchards. Therefore, any development of this site has the potential to impact upon the significance of this heritage asset. We appreciate that the property is well screened by existing landscaping.</p> <p>We welcome the preparation of the HIA. We welcome paragraph 8.9 and the second bullet point of the policy in relation to strengthening boundary vegetation.</p> <p>We suggest a slight amendment to the wording to read <i>'...wider landscape and to protect the significance of the setting of The Orchards to the south of the site'</i> because it's the significance of the asset, not its setting.</p> <p>Amend archaeology criterion to read: <i>'Norfolk's Historic Environment Record Service is to be consulted prior to application to determine the need for any archaeological assessments. surveys prior to development.'</i></p>
<b><u>SNC RESPONSE</u></b>	<p>The Council does not consider the issue raised to relate to the soundness of the policy and is not proposing a modification to the wording. However, should the Inspector be minded to amend the policy and supporting text, the Council would support the wording submitted by Historic England and set out below.</p> <p>The Council has set out its response to commentary regarding the archaeology wording for this policy in Table 1 above.</p>
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Amend bullet point 3 of the policy to read: <i>"...wider landscape and to protect the significance of the setting of The Orchards to the south of the site"</i>
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Historic England would welcome the potential change to the policy criterion for technical accuracy and to more properly reflect the NPPF.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No, disagreed unless the suggested potential change is made.

<b><u>SITE REFERENCE</u></b>	VC TAC1REV
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<b><u>REPRESENTATION NO.</u></b>	4211 (Regulation 19 Addendum representation)
<b><u>HE ISSUE RAISED</u></b>	Whilst criterion 2 refers to boundary treatments to the south of the site, the HIA recommends planting along the eastern boundary of the development as mitigation for the non-designated heritage asset, Weaver's Cottage. We therefore recommend that the policy wording of criterion 2 is amended to read ' <i>Appropriate boundary treatments to the south and east of the site...</i> '
<b><u>SNC RESPONSE</u></b>	The Council does not consider the issues raised to relate to the soundness of the plan. This site is currently subject to a planning application. No concerns have been raised as part of this application relating to the Non-Designated Heritage Asset. This is also the case for the previous permission for 3 self-build dwellings on the south-eastern boundary of the site (2016/2635). While the HIA prepared for the site did identify planting on the eastern boundary as a potential mitigation measure, this needs to be balanced with other needs for the site. This includes concerns raised by NCC Highways relating to visibility splays for the access to the site. It should be noted that the HIA indicates that the potential impact from the development without any mitigation was classed as 'minor'. On balance, the Council therefore takes the view that it is not necessary for the policy to require planting on the eastern boundary.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification necessary.
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Agreed.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes – matter agreed.

<b><u>SITE REFERENCE</u></b>	VC TAS1REV
<b><u>REPRESENTATION NO.</u></b>	3993 (Regulation 19 Addendum representation)
<b><u>HE ISSUE RAISED</u></b>	<p>While there are no designated heritage assets within the site, the grade II listed Old Hall Farmhouse lies immediately to the north west of the site. In addition, the scheduled monument (a hillfort, known as 'Camp in Village'), lies to the north of the site, which also includes the grade I listed Church of St Mary, and grade II listed war memorial and Rectory.</p> <p>Therefore, any development of this site has the potential to impact upon the significance of these heritage assets. We are particularly concerned about the potential impacts on the Farmhouse, given its proximity.</p> <p>We welcome the preparation of the HIA.</p> <p>We note that the capacity of the site has been reduced from 25 to 20 dwellings which is welcomed.</p> <p>We note that criterion 2 refers to protecting views across the north of the site. Whilst this is not exactly what we had previously suggested (we had suggested an area of open space/orchard/playing field in the north eastern third of the site), we welcome this proposed change and recognise that this is helpful in signalling the importance of protecting the setting of the GII listed Old Hall Farmhouse.</p> <p>We broadly welcome criterion 4 which recognises the archaeological sensitivity of the area. We suggest a very slight amendment to read: '<i>The Norfolk Historic Environment Service Record to be engaged at an early stage and planning applications supported by archaeological assessment, including the results of field evaluation where appropriate</i>'</p>

<b><u>SNC RESPONSE</u></b>	The Council does not consider a modification to the policy to be necessary for soundness as it is already covered by the NPPF, and the Council's wording is consistent with that of the NPPF (para 205, Dec 2024). However, should the Inspector consider a modification is necessary, the Council would accept the wording submitted by Historic England.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Amendment to policy 4 criterion to read: <i><del>"The Norfolk Historic Environment Service Record</del> to be engaged at an early stage and planning applications supported by archaeological assessment, including the results of field evaluation where appropriate".</i>
<b><u>HISTORIC ENGLAND RESPONSE</u></b>	Historic England would welcome the inclusion of the very minor potential change to the Plan to clarify that it is the Historic Environment Service, rather than the Record, that needs to be consulted.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes, agreed.




**Appendix 1a: Full list of Heritage Impact Assessments prepared for the VCHAP**

SITE	SITE ADDRESS	PREPARED	PREPARED or UPDATED
SN4033	Land at Wheel Road, Alington		Post-Reg 19
VC BAR1	Land at Cock Street and Watton Road, Barford	Post Reg-18	
VC BAR2	Land north of Chapel Street, Barford		Post Reg-19
SN0552REVC	Land at Watton Road, Barford		Post Reg-19
SN0055	Land east of Spur Road and south of Norwich Road, Barnham Broom		Post Reg-19
VC BAW1REV	Land to the east of Stocks Hill, Bawburgh	Post Reg-18	Post Reg-19
SN3019SL	Land west of School Road, Bressingham	Post Reg-18	
VC BRE1	Land east of School Road, Bressingham	Post Reg-18	
SN4069SL	Land south of Scole Road, Brockdish	Post Reg-18	
VC BRO1	Land at Norwich Road, Brooke	Post Reg-18	Post Reg-19
SN0020SL	Rear of 43 High Green, Brooke		Post Reg-19
SN5058	Brooke Lodge, west of Norwich Road, Brooke	Post Reg-18	
VC BRM1	Land west of Old Yarmouth Road, Broome		Post Reg-19
VC BUN2	Land opposite Lilac Farm, Bunwell Street, Bunwell	Post Reg-18	Post Reg-19
VC DIT1REV	Land at Thwaite's and Tunney's Lane, Ditchingham		Post Reg-19
VC EAR1	Land east of School Road, Earsham	Post Reg-18	
VC EAR2	Land north of The Street, Earsham		Post Reg-19
VC GEL1	Land off Kells Way, Geldeston	Post Reg-18	
VC GIL1REV	South of Geldeston Road and Daisy Way, Gillingham		Post Reg-19
VC HAL1	Land off Briar Lane, Hales	Post Reg-18	
VC HAD1	Land south of Haddiscoe Manor Farm, Haddiscoe	Post Reg-18	
VC HEM1	Land at Millfields, Hempnall	Post Reg-18	
SN1015	Land adjacent to the primary school, The Street, Hempnall	Post Reg-18	
SN4052	Land south of School Lane and east of Manor Farm Barns, Little Melton	Post Reg-18	
VC LM1	Land south of School Lane and east of Burnthouse Lane, Little Melton	Post Reg-18	
VC NEE1	Land north of High Road and east of Harmans Lane, Needham	Post Reg-18	

SN1024	Ladbrookes, Tattlepot Lane, Pulham Market	Post Reg-18	
VC ROC1	Land south of New Inn Hill, Rockland St Mary	Post Reg-18	Post Reg-19
SN5039	Land south of The Street, Rockland St Mary	Post Reg-18	
SN0405	Land to the north and south of Brooke Road, Seething	Post Reg-18	
SN0406SL	Land to the west of Seething Street, Seething	Post Reg-18	
SN0587SL	Land to the west of Seething Street, Seething	Post Reg-18	
VC SPO1REV	Land west of Bunwell Road, Spooner Row	Post Reg-18	Post Reg-19
VC SWA1	Land off Bobbins Way, Swardeston		Post Reg-19
VC SWA2REV	Land on Main Road, Swardeston		Post Reg-19
VC TAC1REV	Land to the west of Norwich Road, Tacolneston		Post Reg-19
VC TAS1REV	Land north of Church Road, Tasburgh	Post Reg-18	Post Reg-19
SN3002SL	Land south of Green Pastures, west of The Street, Tivetshall St Margaret	Post Reg-18	
VC WIC1REV	Land south of Wicklewood Primary School, Wicklewood		Post Reg-19
VC WIC2	Land south of Hackford Road, Wicklewood	Post Reg-18	Post Reg-19
VC WIN2	Land off Mill Road, Winfarthing	Post Reg-18	
SN0262	Land north of Church Road, Woodton	Post Reg-18	
VC WOR1	North and south of High Road, Wortwell		Post Reg-19
SN5045SL	Land northeast of High Street, Wortwell		Post Reg-19
VC WOR2	Land at the junction of High Road and Low Road, Wortwell	Post Reg-18	
SN2183	Land south of Wymondham Road, Wreningham	Post Reg-18	

On behalf of South Norfolk Council:  
Adam Banham  
Place Shaping Manager

A handwritten signature in cursive script that reads "Adam Banham". The signature is written in dark ink and is underlined with a single horizontal stroke.

On behalf of Historic England:



Debbie Mack  
Historic Environment Planning Adviser

South Norfolk Village Clusters Housing Allocations Plan

**Statement of Common Ground with Norfolk County Council**

Comments made under Duty to Cooperate

Date: May 2025

## Purpose of the Statement of Common Ground

1. This document has been prepared to inform the Inspector of the agreed position between South Norfolk District Council and Norfolk County Council (NCC) in respect of comments made by NCC during the formal stages of VCHAP preparation, in order to demonstrate that the Council has been fulfilling the “Duty to Cooperate”. It is intended to address certain specific points that have been made by Norfolk County Council and, as such, should be read in conjunction with the South Norfolk Council Duty to Cooperate Statement.
2. The purpose of this SoCG is to set out the basis on which SNC and NCC have actively and positively worked together in recognition of the benefits which can be achieved through joint working and in order to meet the requirements of the Duty to Cooperate. It also outlines the key outstanding matters each NCC service has raised in relation to the VCHAP.

## List of Parties involved

3. Norfolk County Council has been consulted throughout the production of the Village Clusters Housing Allocations Plan in its role as the service provider for the following functions:

Children’s Services/ Education Authority;  
Highways Authority;  
Lead Local Flood Authority;  
Natural Environment Service;  
Minerals and Waste Planning Authority; and  
Historic Environment Service

## Introduction

4. The Duty to Cooperate in relation to planning for sustainable development (Section 33A of the Planning and Compulsory Purchase Act 2004, as amended) applies to county councils that are not planning authorities.
5. Norfolk County Council is the higher tier authority for Norfolk and has responsibility for strategic matters such as infrastructure, highways, flood and water management and children’s services, as well as being the planning authority for a limited range of issues, including minerals and waste applications. South Norfolk Council is the local planning authority for the area and has responsibility for preparing the Village Clusters Housing Allocations Plan (VCHAP).
6. The VCHAP allocates sites for a minimum of 1,200 homes, in accordance with the requirements of Policy 1 of the Greater Norwich Local Plan (GNLP) (adopted 2024). The VCHAP does not include any strategic planning policies.
7. Norfolk County Council has been consulted during the production of the VCHAP and has submitted formal representations at each stage of the process. Discussions with the departments above have taken place throughout the production of the Plan, as appropriate.
8. The Statement of Common Ground (SoCG) is divided into the following sections:
  - The key common areas of agreement between Norfolk County Council and South Norfolk Council are summarised below within this section (Part 1); and

- Part 2 sets out, by County Council team, (a) the specific areas of agreement relating to that service, and (b) key remaining outstanding matters with that service.

9. Outstanding matters outlined within this Statement of Common Ground have been raised by Norfolk County Council, either via the 2023 Regulation-19 Pre-submission period or at the later 2024 Regulation-19 Addendum period.

### Governance arrangements and timetable for reviews

10. This statement has been prepared by South Norfolk Council and agreed with the County Council. The statement will be published online within the Examination Library for the South Norfolk Council Village Clusters Housing Allocations Plan as part of the submission to the Planning Inspectorate for independent examination. It can be reviewed and updated during the examination process if required.

11. It should be noted that signing this Statement of Common Ground does not prejudice the ability of any such signatory making detailed representations (in support or objection) to the content of the emerging Local Plan.

### Key areas of agreement for all parties

12. The key points of agreement amongst all parties are as follows:

- The VCHAP has been prepared in line with the Council's requirements under the Duty to Cooperate.
- The authorities have collaborated throughout the production of the VCHAP.
- Strategic matters have been addressed via the Greater Norwich Local Plan (GNLP) and the VCHAP is a non-strategic Plan, making allocations in a defined group of settlements.
- The settlement hierarchy, including the function of village clusters, has been established within the GNLP.
- The VCHAP fulfils its role to allocate sufficient housing sites within the South Norfolk village clusters to meet the requirements of Policy 1 of the GNLP.
- The VCHAP is a subsidiary Plan that will, once adopted, be part of the Local Plan for South Norfolk.
- The Objectives set out in the VCHAP are sound and are reflected in the site allocations.
- Those site allocations not specifically referenced in this SoCG are sound in principle.
- The parties to this SoCG would be willing to agree minor modifications to the Local Plan during the examination.
- All parties will continue to work proactively on outstanding matters throughout the examination.

## A: Statement of Common Ground with Children's Services

### Key points of agreement

1. The key points of agreement specifically relating to education provision between South Norfolk Council and Norfolk County Council's Children Services are:
  - Both parties agree that the annual intake at primary schools has dropped. This is a result of falling birth rates.
  - Both parties agree that a modest level of growth would support a number of primary schools throughout the District.
  - Both parties agree that the proximity and accessibility of allocation sites to a local primary school has been a key assessment criterion in the VCHAP.
  - New primary schools at Trowse, Hethersett and Wymondham College have eased pressures on a number of schools in Village Cluster locations, that previously accommodated pupils from these higher tier settlements. Silfield Oak Primary School in South Wymondham is also scheduled to open in September 2025 and the County Council continues to explore opportunities for additional capacity at Poringland.
  - Both parties agree that typically the expansion of an existing school is only viable where significant development is proposed due to the high costs associated with expanding schools, beyond the scale of development proposed in the VCHAP.
  - Both parties agree that SNC has been proactive and committed to identifying and exploring options via the VCHAP for improving existing education facilities.
  - Both parties agree that site-specific policy requirements for matters relating to education facilities included in the VCHAP (for example, land for expansion, direct footpath connectivity or car parking facilities) will need to be agreed with the relevant parties at the time of the planning application.
  - Both parties agree that there is a need for additional land within the VC GIL1 allocation to support the growth of Gillingham St Michaels Primary School.
  - Both parties agree that the requirement in allocation policy VC WOO1 to safeguard land to support early years provision within Woodton and the surrounding area is necessary.
  - Both parties support the site-specific policy requirement in VC TAS1 for land to be safeguarded at Tasburgh for possible future school expansion.
  - Both parties agree that enabling opportunities to support enhanced school car parking arrangements at Bressingham (VC BRE1) and Little Melton (VC LM1) through the site-specific policy requirements is appropriate.
  - Both parties agree that there are no outstanding matters between NCC Children Services and South Norfolk Council in relation to the VCHAP.

## B: Statement of Common Ground with Norfolk County Council Highways

### Key points of agreement

1. The key points of agreement specifically relating to highways matters between South Norfolk Council and Norfolk County Council's Highways team are:
  - Both parties recognise the rurality of the District and the challenges that this presents in terms of accessibility to services and facilities, public transport connectivity and the wider highway network; and
  - Both parties recognise the importance of safe pedestrian routes to local primary schools and, where achievable, other local services and facilities.
2. NCC as Highway Authority raised objections to 6 sites in its representations to the Regulation-19 and Regulation-19 Addendum. A list of these sites the matters raised, and the current position on the Highway Authority is set out in Table B.1 below.

Table B.1: Table of Regulation-19 and Regulation-19 Addendum matters raised by NCC highways and the response of South Norfolk Council

<b><u>SITE REFERENCE</u></b>	VC ELL1
<b><u>REPRESENTATION NO.</u></b>	3071 (Regulation-19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	NCC raised concerns regarding the ability to create acceptable visibility splays. The Highways Authority advised that the site frontage should be extended to cover the length of Mill Lane from number 81 to the recreation ground, to ensure a suitable access can be achieved.
<b><u>SNC RESPONSE</u></b>	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 the Council would not object.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Update to policy map to include the full site frontage between no. 81 Mill Lane and the recreation ground.
<b><u>NCC HIGHWAYS RESPONSE</u></b>	The Highway Authority objects to the allocation until full frontage of the site between 81 Mill Lane and recreation ground is included within policy map to ensure adequate visibility can be achieved.



<b><u>RESOLVED MATTER (Y/N)</u></b>	No
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<b><u>SITE REFERENCE</u></b>	VC ASH1
<b><u>REPRESENTATION NO.</u></b>	3072 (Regulation-19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	The Highways Authority advised that visibility improvements are required to the junction of New Road with Wymondham Road and The Street and that this would need to be conditioned as off-site highway works to be delivered by the development. A proportional contribution to the required improvement was not considered acceptable to the Highway Authority. Improvements to the nearest bus stops to the site (on The Street), along with access to them were also requested. The Highway Authority requested a revision so that Policy VC ASH1 is revised to remove reference to proportionate contribution to an upgrade of the existing New Road / The Street junction. The Highway Authority required amendment to the policy 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.
<b><u>SNC RESPONSE</u></b>	The Council remains of the opinion that a proportionate contribution to the off-site mitigation works is appropriate. Following the close of the Regulation-19 period, SNC and NCC Highways continued discussions about this site and concluded that improvements to the New Road/ Wymondham Road/ The Street junction would be required and that this would be reflected within the Statement of Common Ground.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	The Council does not consider this to be a soundness issue. However, should the Inspector be minded to agree with the Highways Authority the Council suggests the following wording: <i>"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)".</i>
<b><u>NCC HIGHWAYS RESPONSE</u></b>	The Highway Authority maintains its objection to the allocation until the draft wording as written above is included within the policy.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No

<b><u>SITE REFERENCE</u></b>	VC DIT1REV
<b><u>REPRESENTATION NO.</u></b>	3073 (Regulation-19 representation) 3984 (Regulation-19 Addendum representation)
<b><u>MAIN ISSUE RAISED</u></b>	The access from Hamilton Way through the consented development (2019/1925) does not extend to the allocation boundary, potentially resulting in an undeliverable allocation.

<b><u>SNC RESPONSE</u></b>	The Council has contacted the landowner of this site and they have confirmed that they own the land that is being referred to and have provided the title to provide this as part of their Delivery Statement. The Council therefore does not view this as a risk to the delivery of the site. However, should the Inspector be minded to modify the site plan for Policy VC DIT1REV to extend the boundary to the estate road to the south, the Council would not object.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Update to policy map to connect to the boundary of the estate road associated with 2019/1925.
<b><u>NCC HIGHWAYS RESPONSE</u></b>	The Highway Authority maintains its objection until the allocation policy map is updated showing an extension of the boundary up to the estate road associated with 2019/1925.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No

<b><u>SITE REFERENCE</u></b>	VC ROC2
<b><u>REPRESENTATION NO.</u></b>	3134 (Regulation 19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	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 requested the removal of ROC2 from the draft plan.
<b><u>SNC RESPONSE</u></b>	The Council removed site VC ROC2 from the VCHAP at the Regulation-19 Addendum stage.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification necessary
<b><u>NCC HIGHWAYS RESPONSE</u></b>	No further comment
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes – matter resolved

<b><u>SITE REFERENCE</u></b>	VC TAC1
<b><u>REPRESENTATION NO.</u></b>	3074 (Regulation 19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	The Highways Authority raised concerns that the site had not demonstrated that an acceptable means of access could be provided. The Highway Authority requested a revision to the allocation area to include suitable direct access to the highway and frontage at the B1113 Norwich Road to provide the required visibility splays and footway.
<b><u>SNC RESPONSE</u></b>	Discussions between the site promoter and SNC continued post Regulation-19. An amended red line was submitted to reflect an alteration to the proposed highways access and this modification was included within the Regulation-19 Addendum to the VCHAP. Discussions with the Highways Authority have also related to the provision of off-site highway works associated with the development of this site. Updated policy wording (bullet point 1) was included in the Regulation-19 Addendum. No further concerns were raised by NCC Highways in response to these amendments.

<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification necessary
<b><u>NCC HIGHWAYS RESPONSE</u></b>	Policy has been updated as above. The Highway Authority withdraws its objection.
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes – matter resolved

<b><u>SITE REFERENCE</u></b>	VC THU1
<b><u>REPRESENTATION NO.</u></b>	1513 (Regulation 19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	The Highways Authority advised that the existing shared surface road at the end of Blacksmith Gardens had scope for a further 11 dwellings rather than the 12 described in Policy VC THU1. In addition, concerns were raised that the proposed allocation area did not extend to the end of the road at Blacksmith's Gardens. The Highway Authority requested the following modifications: An allocation of 11 dwellings only; a policy requirement to prevent vehicles from VC THU1 accessing the existing public right of way; an update to the Thurlton & Norton Subcourse policy map so that VC THU1 extends to meet the end of the Blacksmith's Gardens carriageway to ensure achievable access.
<b><u>SNC RESPONSE</u></b>	Discussions between SNC and NCC highways continued following the close of the Regulation-19 period and the Highways Authority 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. SNC considers that if the developer can demonstrate a suitable highways solution to the satisfaction of both the Highways Authority and the LPA the site has the potential to deliver additional dwellings, therefore the Council has not modified this policy. However, should the Inspector be minded to agree with the Highways Authority the Council would not object to a modification to the removal of the words “at least” from the policy. Similarly, whilst the Council does not consider that either the policy map or the wording require further modification however, should the Inspector be minded to agree with the Highways Authority the Council would not object to these changes.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	(1) Update to the policy map to connect the VC THU1 to Blacksmiths Gardens.  (2) Removal of the words “at least” from the policy so that the amended wording reads: <i>“0.57ha of land is allocated for 12 dwellings”</i> .  (3) Amendment to para 40.13 to read: <i>“The site is allocated for 12 dwellings...”</i> .
<b><u>NCC HIGHWAYS RESPONSE</u></b>	The Highway Authority objects. A shared surface road is of a suitable width to accommodate a maximum of 25 dwellings. Whilst the Highway Authority may be able to accept 12 dwellings of Blacksmith Way, this is an absolute maximum and must not be exceeded. Policy wording suggests that this quantity can be slightly exceeded which is unacceptable, but this can be overcome if the policy is modified as above.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No

## C: Statement of Common Ground with the Lead Local Flood Authority

### Key points of agreement

1. The key points of agreement specifically relating to flood and drainage matters between South Norfolk Council and Norfolk County Council's Lead Local Flood Authority (LLFA) team are:
  - SNC and the LLFA held virtual meetings for site-specific discussions in 2021, prior to the selection of sites for the Regulation-19 version of the Plan.
  - The initial data review undertaken by the LLFA included consideration of infiltration potential at each proposed site. The LLFA confirmed this is a high-level indication and that a further detailed ground investigation including infiltration testing would be required at each site for the preparation of drainage strategies to support any future planning applications.
  - SNC and the LLFA agree that all sites should be designed following the sustainable drainage systems (SuDS) discharge hierarchy.
  - SNC and the LLFA agree that a significant number of sites are either in close proximity to or are affected by surface water flood flowpaths. It is recognised the significance of these flood flowpaths on potential development is site-specific and subject to a number of variables, including considerations such as the proximity to, as well as the scale and direction of the flood flowpath. SNC and the LLFA agree that development within proximity to a flowpath can have either positive or negative impacts, upstream or downstream, and this can be addressed through appropriate site design. The preferred design solution is to avoid the interruption of the surface water flood flowpaths. SNC have identified and highlighted the presence of surface water flowpaths in the supporting text for site allocations where appropriate.
  - Prior to preparing the site-specific policies, SNC and the LLFA agreed that the policy wording should avoid prescriptive requirements and technical details as these solutions would need to be appropriately identified through the design stage.
  - SNC and the LLFA note that a number of sites fall within Internal Drainage Board (IDB) catchment areas. IDBs operate within a drainage district and have responsibility for agreeing discharge rates, works to watercourses (such as culverting or diversion) etc to the watercourses within their areas. In instances where the site is within an IDB area, it will be necessary for the developer to demonstrate and satisfy both the LLFA and the IDB that the proposed design is in accordance with both authorities' design requirements during the submission of planning applications. SNC and the LLFA agree the site-specific policies do not need to refer to the specific role details of the IDB.
  - SNC and the LLFA agree that the piecemeal development of wider site areas should be avoided as this can result in drainage schemes that are designed for smaller sites rather than the cumulative impact of the larger development areas. Where it is either known or anticipated that adjacent parcels of land will be developed, then it has been identified within the allocation text that developers will need to consider the interaction of the sites and the implications for flood risk and surface water management.

2. Two overarching matters remain outstanding between the LLFA and SNC, as set out below in Table C.1, as well as a single site-specific issue raised by the LLFA in response to the publication of the Regulation-19 Addendum. This matter is set out in Table C.2.

Table C.1: Outstanding key matters between SNC and the LLFA

<b><u>EVIDENCE DOCUMENT</u></b>	Strategic Flood Risk Assessment (SFRA)
<b><u>REPRESENTATION NO.</u></b>	3135 (Regulation 19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	The LLFA raised concerns that a 45% climate change allowance for surface water was not applied to 1% AEP events for the 2050's epoch within the SFRA, as required by the August 2022 NPPF Planning Practice Guidance (PPG). The LLFA requested that the modelling be updated with these climate change allowances and the report be updated.
<b><u>SNC RESPONSE</u></b>	<p>SNC and their consultants have engaged proactively with both the LLFA and the Environment Agency (EA) on this matter. Following a meeting with all parties to discuss this specific issue, the EA advised in their subsequent email:</p> <p><i>"In terms of surface water, we wanted to highlight the attached climate change guidance, and specifically the comments on the last page concerning where the climate change allowances are higher for the 2050's epoch than the 2070's epoch, which applies to South Norfolk. It notes that in reality the percentage allowances are very similar, close to the midpoint of the percentage bands, but that the 2050's epoch rounded up while the 2070's epoch rounded down. It is likely therefore that the percentage climate change allowances for both epochs are around 42.5%, or possibly between 42 % and 43%. It could therefore be considered that this is even more similar to the 40% climate change allowance already modelled so hopefully might provide some reassurance that the 40% climate change allowances may be sufficiently precautionary to assess the climate change surface water flood risk to the site, although this would be for NCC and SNDC to decide."</i></p> <p>The Council's consultant is also of the view that the SFRA is a robust document for the purposes of making allocations in the VCHAP.</p> <p>The Council also has regard to the strategic nature of the SFRA and the clear policy requirement for site-specific flood risk assessments to be undertaken to support subsequent planning applications where these are either: (a) above the threshold size set out in the NPPF; or (b) where specifically noted in the site allocation policy in the VCHAP as a result of the findings of the Stage 1 SFRA and the issues identified in the Stage 2 Assessments.</p> <p>The Council therefore remains of the opinion that the approach it has taken to this issue is both justified and proportionate, especially in consideration of the additional costs that would be associated with the revised modelling.</p>

	<p><b>SNC April 2025 Additional Note</b> - The Council notes the publication of updated March 2025 EA flood mapping (NaFRA2). A high-level review of sites has been undertaken, which indicates that the risk to the proposed allocation sites has reduced. The Council is commissioning JBA to undertake a review of the SFRA, with the intention of providing a covering note or addendum for the current SFRA, to address the changes in EA flood mapping.</p>
<b>POTENTIAL CHANGE TO THE PLAN</b>	No modification proposed.
<b>NCC LLFA RESPONSE</b>	<p>Extract from LLFA response letter referenced FW2023_0455 dated 19<sup>th</sup> June 2023.</p> <p><i>“The Greater Norwich Level 2 SFRA was published in February 2021. The climate change allowances were updated in May 2022. There was time for the LPA to apply the updated climate change allowance to the new hydraulic model for the River Waveney that supports the Level 2 SFRA. As guidance and requirements change and become updated the LPAs are expected to update their evidence base in accordance with the guidance in place at the time. As indicated at the start of the letter, the Environment Agency would consider this as a new hydraulic model that would likely be a challenge to the flood map. Therefore, for the hydraulic model to be accepted the Environment Agency’s Evidence and Risk Team would likely need to undertake a suitable leave of review on the model to determine whether it is suitable for use. The LLFA recommends that either the appropriate amendments to the LPA’s hydraulic model are undertaken to meet the Environment Agency’s and the LLFA’s concerns, alternatively where appropriate the updated Environment Agency 2022 modelling is used rather than the incomplete modelling that requires further work.</i></p> <p><i>The LLFA expects the model to be updated with the correct climate change allowances and appropriate updates are then made throughout the report. Furthermore, the LLFA expects the Addendum report to be updated to provide better clarity on the reporting of the work undertaken and the associated results.”</i></p> <p>Extract from LLFA response letter referenced FW2023_0455 dated 19<sup>th</sup> June 2023.</p> <p><i>“The LLFA notes that the updated NPPF confirms</i></p> <p><i>“the Environment Agency’s Flood Map for Planning (Rivers and Sea) do not take account of the possible impacts of climate change and consequent changes in the future probability of flooding. Reference should therefore also be made to the Strategic Flood Risk Assessment when considering location and potential future flood risks to developments and land uses.”</i></p> <p><i>However, as the SFRA has a confusing and at times what appears to be a contradicting approach to the application of climate change, the LLFA has concerns about whether the SFRA addendum will be able to clearly provide that information as an evidence base to developers and planners.</i></p>

	<p><i>The LLFA has reviewed a selection of the sites identified in Table 5-1 and in the Hydraulic Modelling report. The LLFA is concerned there are a few sites that under the updated PPG would be unlikely as appropriate to consider for development. However, the wording around the site potential for developments appears to either infer doubt on the modelled results or rather optimistic compared to the modelled flood extents for both fluvial and surface water sources, such as at SN0274RevB and SN2183. As there has been no significant changes in the hydraulic modelling for either fluvial, tidal or surface water mapping that the SFRA is based upon, it is not clear to the LLFA based on the information in the addendum whether the previous LLFA site specific advice has been applied. The LLFA notes that it is not clear from the report whether consultation with the Environment Agency was undertaken for the fluvial sites and the outcome of that consultation either.”</i></p> <p>The LLFA is seeking the application of the Exceptions guidance from the primary guidance for this area of 45% allowance for climate change.</p> <p>The Exceptions guidance states “In some locations the allowance for the 2050s epoch is higher than that for the 2070s epoch. If so, and development has a lifetime beyond 2061, use the higher of the two allowances”.</p> <p>While this difference of 5% may seem small, the correct application of the national climate change guidance will enable consistency around the management catchment area of the River Waveney while enabling alignment with national guidance.</p> <p><b>LLFA March 2025 Additional Note</b> – The Environment Agency have completed the National Flood Risk Assessment 2 (NaFRA2) and the updated flood maps for the risk of surface water, flooding from rivers and sea and the flood map for planning are due to be published at the end of March 2025. The SFRA guidance states</p> <p>“You may also need to review your SFRA when there are changes to:</p> <ul style="list-style-type: none"> <li>• the <a href="#">predicted impacts of climate change on flood risk</a></li> <li>• detailed flood modelling from the Environment Agency or your lead local flood authority.....</li> <li>• national planning policy or guidance”</li> </ul> <p>The suggests the SFRA requires further review and possible updates as the SFRA and the supporting modelling is now at least two years old, and updates to the Environment Agency’s flood mapping (March 2025), the climate change guidance (May 2022) and NPPF (Dec 2024) have since occurred.</p>
<b><u>RESOLVED MATTER (Y/N)</u></b>	No
<b><u>EVIDENCE DOCUMENT</u></b>	Strategic Flood Risk Assessment (SFRA)

<b><u>REPRESENTATION NO.</u></b>	3135 (Regulation 19 representation)
<b><u>MAIN ISSUE RAISED</u></b>	The LLFA raised concerns relating to the coarseness of the hydraulic model in relation to the geometry for the tributaries. The LLFA also raised concern in relation to the justification for not using the latest Environment Agency hydraulic model for the River Waveney produced in 2022. The LLFA requested that the modelling be updated with better geometry for the tributaries and even consider the use of the updated Environment Agency Waveney (2022) to support the SFRA.
<b><u>SNC RESPONSE</u></b>	<p>LPA Response to the LLFA Extract –</p> <p>The SFRA models have been created to inform a strategic assessment in the absence of detailed modelling. In liaison with our consultants (JBA) the Council carefully considered the time and budget implications of preparing detailed modelling versus the what is necessary to inform the SFRA, bearing in mind the strategic nature of the document. Similar approaches have been considered proportionate when undertaken to support local plan evidence bases for other local authorities. In response to the initial concerns raised by the LLFA further clarity was added to the relevant section of the SFRA, highlighting that the modelling is strategic in nature and that the developer should use detailed modelling to inform a site-specific Flood Risk Assessment.</p> <p>With specific regard to the capacity of the channel of the River Waveney, this would require a survey which would need to be done for the site-specific FRA by the developer of the site. This recommendation is included in the Level 2 SFRA for the site, which in turn is referenced within the site-specific policy for VC GIL1REV.</p> <p><b>SNC Additional Note April 2025:</b> The Council is currently in receipt of a planning application for VC GIL1REV (2022/1993). In March 2025, the Council received confirmation from the Environment Agency that they have no objection to the updated Flood Risk Assessment submitted in support of the site. This FRA included updated hydraulic modelling to accurately reflect the flood risk at the site.</p>
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	No modification proposed.
<b><u>NCC LLFA RESPONSE</u></b>	<p>Extract from LLFA response letter referenced FW2023_0455 dated 19<sup>th</sup> June 2023.</p> <p>“The LPA state there is an absence of detailed modelling. However, the Environment Agency completed their hydraulic modelling last year (2022) which could have been used for the SFRA to cover much of the area but has not. The new Waveney hydraulic 2022 modelling covers the River Waveney itself and the 2D modelled tributary at Needham. However, the River Waveney model does not cover the tributary areas at Brockdish and Gillingham that JBA modelled in 2D with standard 3.5m wide watercourses. The LPA have indicated that budgetary and financial constraints have limited the quality of model constructed, however they were able to fund the development of a model while aware that the Environment Agency were updating the hydraulic model. The indication of the LPA being willing to carry forward the need for additional surveying to incorporate into the model is seen as an acknowledgement by the LPA that the current hydraulic model is incomplete and not suitable for use at this time and yet they are prepared to use it as an incomplete evidence base for the Village Clusters plan (VCHAP). The LLFA recommends that either the appropriate amendments to</p>



	<p>the LPA's hydraulic model are undertaken to meet the LLFAs concerns or where appropriate the updated Environment Agency modelling is used rather than the incomplete modelling that has been presented."</p> <p><b>Additional Note May 2025:</b> The LLFA notes SNC's comment relating to the capacity of the River Waveney channel and the need for it to be surveyed. However, the LLFA notes the concern raised by the LLFA relates to the lack of survey of the tributaries rather than the main channel. The LLFA continue to request that appropriate amendments are made.</p>
<b><u>RESOLVED MATTER (Y/N)</u></b>	No

Table C.2: Table of site-specific issues remaining between SNC and the LLFA

<b><u>SITE REFERENCE</u></b>	VC SWA2REV
<b><u>REPRESENTATION NO.</u></b>	3985 (Regulation 19 Addendum representation)
<b><u>MAIN ISSUE RAISED</u></b>	There is a lack of reference in both the supporting text and the policy text to surface water and associated flood risks. This is inconsistent with the approach taken to other sites with similar flood risks. The LLFA advised that these comments were not an 'in-principle' objection to development on the site but to the level of information required to support the deliverability of the site.
<b><u>SNC RESPONSE</u></b>	<p>VC SWA2REV was included in the Groundwater Site Assessments report which supported the Alternative Sites and Focused Changes Regulation 18 Consultation. This report did not identify VC SWA2REV as being at risk of groundwater flooding. The site has also never been raised as being at risk as part of preparing the SFRA for the VCHAP, nor in representations from technical consultees at the earlier stages of Plan preparation. As such, as Stage 2 Assessment has not been prepared.</p> <p>The site is of a scale which will require a Site-Specific FRA at the planning application stage, and one has been prepared for the current application for 43 dwellings (Ref. 2023/0908). The Council has only referenced the need for a site-specific FRA in the VCHAP either where there are particular issues to address in the Stage 2 SFRA, or where the site is at potential risk, but falls below the threshold size to need an FRA at the application stage. As such, the Council does not consider that it is necessary to include this as part of the supporting text or the policy in order to make the plan sound. However, if the Inspector is minded to modify either the supporting text or the policy the Council would support an amendment to the site-specific text for this site.</p>
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Supporting text or policy criterion to be agreed.
<b><u>NCC LLFA RESPONSE</u></b>	The LLFA are not objecting on the grounds of the principle of the development on the site, but rather on the level of information within Policy SWA2REV relating to flood risk that is required and the consideration of flood risk management and its supporting text which will guide its future deliverability.

	<p>The absence of references made to the consideration of surface water and flood risks associated with the site and any future development of it, within the Policy SWA2REV and its supporting text. Furthermore, the absence of the consideration of flood risk considered inconsistent with the approach adopted by SNDC as part of the Village Clusters Housing Allocations document for other proposed site allocations and fails to support the principles set out in the NPPF in respect of the consideration of flood risk management.</p> <p>The LLFA is requesting that an assessment within the supporting text of any flood risks associated with the site and the potential impacts upon the surrounding area. In addition, the LLFA requests a requirement within the Policy Text for the submission of a site-specific Flood Risk Assessment (FRA) and strategy, to inform the layout of the site, which has regard to the requirements of the Stage 2 VC Strategic Flood Risk Assessment and the preparation of a Flood Warning and Evacuation Plan.</p>
<b><u>RESOLVED MATTER (Y/N)</u></b>	No

## D: Statement of Common Ground with Natural Environment Service

### Key points of agreement

1. The key points of agreement specifically relating to the natural environment between South Norfolk Council (SNC) and Norfolk County Council's Natural Environment Service (NES) are:
  - The Village Clusters Housing Allocations Plan (VCHAP) site allocations have been supported by Landscape Visual Appraisals (LVAs) and the findings of these are reflected in the site-specific policy allocations as appropriate.
  - The VCHAP evidence base includes a Habitats Regulation Assessment (HRA) which has supported the production of the Plan.
  - Throughout the preparation of the Plan, technical consultations have been undertaken with internal and external consultees on matters specifically relating to the environment, including ecology.
  - The Norfolk Green Infrastructure and Recreational Impact Avoidance Strategy (GIRAMS) is a strategic project to mitigate the recreational effects likely to result from new residential development on sensitive designated sites. It supports growth whilst meeting the green infrastructure and nature need for residents and visitors to the local area and applies across the South Norfolk village cluster area.
  - In collaboration with neighbouring LPAs, SNC is currently drafting a Biodiversity Net Gain (BNG) guidance for developers.
  - SNC and NES agree developers will be required to submit ecological assessments to support planning applications on allocation sites in accordance with national guidance unless otherwise identified in the site-specific policy allocation.
  - Where relevant, SNC has identified through Landscape Visual Appraisals a need for further landscape assessments to be undertaken to inform site layout and design and this has been included in the appropriate site-specific policy requirements.
  - Site assessments and subsequent allocations have taken into considered the impact of development on designated River Valley Landscapes and the South Norfolk Landscape Character Assessment more generally.
  - Wherever possible, SNC and NES agree that the protection, retention and enhancement of existing natural landscape features and planting is important within the design of new developments, and this is reflected in the site-specific policies.
  - Opportunities to connect into the existing Public Right of Way network and enhance public access to the countryside have been identified in supporting text and site-specific policies.
  - Both parties agree that there are no outstanding matters between NCC Natural Environment Service and South Norfolk Council in relation to the VCHAP.

## E: Statement of Common Ground with the Minerals and Waste Planning Authority

### Key points of agreement

1. The key points of agreement specifically relating to minerals and waste between South Norfolk Council (SNC) and Norfolk County Council as the Minerals and Waste (M&W) Planning Authority are:
  - At the time of preparing this Statement of Common Ground the Norfolk County Council is currently in the final stages of review of the Norfolk Minerals and Waste Local Plan (NM&WLP). Once adopted, the updated Minerals and Waste Plan will extend the plan period to 2038.
  - The NM&WLP consolidates the three adopted Minerals and Waste Plans into a single Local Plan document.
  - Norfolk County Council M&W Planning Authority have guidance notes for developers available on their website.
2. The M&W Planning Authority has raised a number of objections to the proposed wording of the VCHAP, relating to the safeguarding of mineral resources on allocation sites within the Plan. These objections have been categorised into three separate groups, as set out below in Table E.1.

Table E.1: Table of outstanding matters between SNC and the Minerals and Waste Planning Authority

<b><u>SITE REFERENCES</u></b>	Regulation 19 representations: VC WOO1, VC SWA2, VC ROC1, VC HAD1, VC EAR1, VC TAS1, VC SWA1, VC HAL1, VC ELL1, VC DIT1 Regulation 19 Addendum representations: VC EAR2
<b><u>REPRESENTATION NOS.</u></b>	3076, 3077, 3078, 3079, 3080, 3081, 3082, 3083, 3084, 3085, 3983
<b><u>MAIN ISSUE RAISED</u></b>	The Minerals Planning Authority (MPA) recognises that reference to underlain minerals has been made in the supporting text to site-specific allocation policies but requests that this is also included in the policy text itself for sites greater than 1ha in area.
<b><u>SNC RESPONSE</u></b>	The Council notes the comments of the MPA but considers that the relevant planning policies relating to the safeguarding of minerals and waste are contained within the Norfolk Minerals and Waste Local Plan. The NM&WLP is currently under review and will contain the most-up-to-date planning policy context, alongside the national guidance set out in the Dec 2024 NPPF. With the exception of the site information for VC EAR1 and VC TAS1, the supporting text for all of these policies refers to the safeguarded sand and gravel resources underlying the site and provide an appropriate reference point for site developers. Whilst not a soundness matter, the Council considers that it would be consistent to update the supporting text for VC EAR1 and VC TAS1 to provide the information relating to minerals beneath the site. However, the Council does not consider it necessary to repeat existing M&W policies within the site-specific policy requirements. Should the Inspector be minded to modify the policy criterion for these sites to reflect the comments of the MPA the Local Planning Authority would not object.

<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	With the exception of VC DIT1REV (which now exceeds 2ha in site area and is therefore listed below) an additional policy criterion for each of the sites listed in column (A) could be added to the allocation. The Minerals & Waste authority proposed the following wording: <i>“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”.</i>
<b><u>NCC MINERALS &amp; WASTE RESPONSE</u></b>	<p>The examination into the Norfolk Minerals and Waste Local Plan (NM&amp;WLP) has now concluded, with the publication of the Inspector’s Report on 24 March 2025. The Inspector’s Report concluded that, with the recommended main modifications, the NM&amp;WLP satisfies the legal requirements of the Planning and Compulsory Purchase Act and meets the criteria for soundness as set out in the NPPF and is therefore capable of adoption. The proposed adoption of the NM&amp;WLP will be considered at a meeting of the Full Council on 20 May 2025.</p> <p>The successor safeguarding policy to replace Norfolk Minerals and Waste Core Strategy Policy CS16 - ‘Safeguarding mineral and waste sites and mineral resources’ is Policy MP11: Mineral Safeguarding Areas and Mineral Consultation Areas. Appendix 4 of the NM&amp;WLP lists the development excluded from safeguarding provisions. One of the types of development excluded from the safeguarding provisions is “extensions to existing settlements of no greater than 2 hectares, unless the extension is within 250 metres of a safeguarded minerals or waste site, or 400 metres of a safeguarded water recycling centre”.</p> <p>Due to the advanced stage of the NM&amp;WLP and the change to the exclusion criteria, from sites below 1 hectare to sites below 2 hectares in size, we are no longer requesting additional policy criteria for sites of less than 2 hectares in size.</p>
<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes – matter resolved

<b><u>SITE REFERENCES</u></b>	Regulation 19 representations: VC THU1, VC THU2, VC ELL2, VC SWA1, VC NEE1, VC SEE1
<b><u>REPRESENTATION NOS.</u></b>	3086, 3087, 3088, 3089, 3090, 3091
<b><u>MAIN ISSUE RAISED</u></b>	For sites with a site area smaller than 1ha, the Minerals Planning Authority advises that reference to mineral safeguarding should be removed from the supporting text where it has been included.
<b><u>SNC RESPONSE</u></b>	The Council does not consider this to be a soundness issue as the supporting text is intended to provide contextual information for the site-specific allocations. The Council considers this information to be relevant however, should the Inspector be minded to agree with the MPA, the Council would not object to the removal of the relevant paragraphs from the Plan. The Council notes the inclusion of VC SWA1 within the group of sites highlighted as being smaller than 1 ha in site area. However, the Council also notes its inclusion in the list of sites referenced by the MPA as being larger than 1ha in site area, and, as the site is 1ha in size, the Council considers that it has been included within this group of smaller sites in error.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	Removal of supporting text from the site-specific allocations. The following paragraphs would be removed from the Plan: 40.12, 40.18, 22.16, 25.19, 26.19 and 33.9.
<b><u>NCC MINERALS &amp; WASTE RESPONSE</u></b>	Noted and potential change to the plan agreed.

<b><u>RESOLVED MATTER (Y/N)</u></b>	Yes – matter resolved.
<b><u>SITE REFERENCES</u></b>	<b><u>Regulation 19 Addendum representations:</u></b> VC SWA2REV, VC DIT1REV
<b><u>REPRESENTATION NOS.</u></b>	3981, 4020
<b><u>MAIN ISSUE RAISED</u></b>	The MPA requested that the policy criterion for those sites in excess of 2ha be updated to include a requirement to avoid the needless sterilisation of mineral resources in accordance with Policy CS16 (or its successor).
<b><u>SNC RESPONSE</u></b>	The Council notes the comments of the MPA but considers that the relevant planning policies relating to the safeguarding of minerals and waste are contained within the Norfolk Minerals and Waste Local Plan, and the national guidance set out in the 2024 NPPF (para 223(d)). The NM&WLP is currently under review and will contain the most-up-to-date planning policy context. However, the Council does not consider it necessary to repeat existing minerals and waste policies within the site-specific policy requirements and is not proposing a modification. However, should the Inspector be minded to modify the policy criterion for these sites to reflect the comments of the MPA, the Local Planning Authority would support the wording proposed below.
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	An additional policy criterion for VC SWA2REV and VC DIT1REV to be added to the site-specific policies. The MPA has proposed the following policy wording: <i>“This site is underlain by a safeguarded mineral resource; therefore investigation and assessment of the mineral will be required, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place”</i> .
<b><u>NCC MINERALS &amp; WASTE RESPONSE</u></b>	We consider that it is appropriate and relevant for the requirements of a strategic policy in the Minerals and Waste Core Strategy (or Minerals and Waste Local Plan on adoption), to be included in a site allocation policy where it sets out how the policy will apply to a specific site at the development management stage. Therefore, we consider that the potential change to the plan to include additional policy wording for sites VCSWA2REV and VC DIT1REV is required.
<b><u>RESOLVED MATTER (Y/N)</u></b>	No

3. In addition, one site-specific matter was raised by the Minerals Planning Authority in response to the Regulation-19 Addendum. This is set out in Table E2 below.

Table E.2: Site specific matter remaining between South Norfolk Council and the Minerals and Waste Planning Authority

<b><u>SITE REFERENCE</u></b>	VC EAR2
<b><u>REPRESENTATION NO.</u></b>	3983 (Regulation 19 Addendum representation)
<b><u>MAIN ISSUE RAISED</u></b>	The MPA has highlighted that the site is located within the consultation area for safeguarded mineral extraction site, Earsham Quarry. The quarry is within 25m of the site at its closest point and has an extraction licence until 2040. This is not referenced in

	either the supporting text or the site-specific policy criterion. The MPA considers the 'agent of change' principle (updated para 200 in Dec 2024 NPPF) to be applicable.
<b><u>SNC RESPONSE</u></b>	<p>The Council notes the comment of the MPA but does not consider this to be a soundness matter. Paragraph 14.10 of the Plan makes reference to the site being within proximity to Earsham Quarry, noting that it is separated from the mineral extraction site by the A143. 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. Para 223c of the 2024 NPPF is of relevance, requiring MPAs to define Mineral Safeguarding Areas and Mineral Consultation Areas and this requirement is reflected in emerging policy MP11 of the NM&amp;WLP. The Council does not consider this to be a soundness issue and is not proposing a modification. However, should the Inspector be minded to update either the supporting text or the site-specific policy to reflect the comments of the MPA, the Council would not object to the wording set out below.</p> <p><b>SNC April 2025 Additional Note</b> – The Council has reviewed the additional wording proposed by the Minerals and Waste Planning Authority in their response to this issue in the Statement of Common Ground. Whilst the Council does not consider this to be a soundness issue (for the same reasons set out above) and is therefore not proposing a modification, should the Inspector be minded to update bullet point 4 of the policy to reflect the comments below the Council would support this update to the text.</p>
<b><u>POTENTIAL CHANGE TO THE PLAN</u></b>	An update to either the supporting text, or the site-specific policy requirements. The MPA has proposed the following wording: <i>"The site is within the consultation area for a safeguarded mineral extraction site. Any future development on this site must not prevent or prejudice the use of the existing mineral extraction site unless suitable alternative provision is made, or the applicant demonstrates that the site no longer meets the needs of the aggregate industry".</i>
<b><u>NCC MINERALS &amp; WASTE RESPONSE</u></b>	<p>We consider that it is appropriate and relevant for the requirements of a strategic policy in the Minerals and Waste Core Strategy (or Minerals and Waste Local Plan on adoption), to be included in a site allocation policy where it sets out how the policy will apply to a specific site at the development management stage. This is of particular relevance to allocation site VC EAR2 which is located 25m from Earsham Quarry at its closest point. Therefore, we consider that the potential change to the plan to include additional policy wording for site VC EAR2 is required in order for the plan to be consistent with national policy (paragraphs 200 and 223 of the NPPF (December 2024)) to ensure that the use of the existing mineral extraction site is not prevented or prejudiced by the proposed housing development.</p> <p>We also consider that the fourth bullet point in policy VC EAR2 should be amended to provide further clarity on this issue, as follows (new text inserted in <b><u>bold and underline</u></b>): "The site layout and landscaping within the site responds to the surrounding development and infrastructure, including the scale of the adjacent development, <b><u>the adjacent operative quarry</u></b>, and the proximity of the site to the A143, in order to minimise the impact on both existing and future residents;"</p>
<b><u>RESOLVED MATTER (Y/N)</u></b>	No

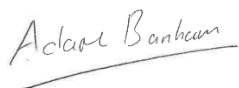
## F: Statement of Common Ground with the Historic Environment Service

### Key points of agreement

1. The key points of agreement specifically relating to the historic environment between South Norfolk Council (SNC) and Norfolk County Council's Historic Environment Service (HES) are:
  - SNC and HES agree that engagement has taken place throughout the production of the VCHAP.
  - The preparation of the VCHAP has been supported by the production of Heritage Impact Assessments which form part of the evidence base for the site assessment and selection processes.
  - The HIAs appropriately consider both designated and non-designated heritage assets, as well as areas of archaeological interest and their format has been arrived at following discussions with Historic England.
  - The purpose of the HIAs is to determine (a) the suitability of a site for allocation; and (b) identify potential mitigation measures and inform draft policy wording.
  - SNC and HES recognise that the identification of mitigation measures within a HIA does not automatically mean that this will have been included within the site-specific policy requirements for that allocation. In some instances, it has been necessary to balance competing considerations within the site-specific policy requirements; however, wherever possible the HIA recommendations have been reflected in the relevant policy criterion.
  - The Historic Environment Service has not raised concerns with SNC regarding the detailed wording of the policy criterion relating to archaeology assessments on allocation sites.
  - Both parties agree that there are no outstanding matters between NCC Historic Environment Service and South Norfolk Council in relation to the VCHAP.



On behalf of South Norfolk Council:  
Adam Banham  
Place Shaping Manager

A handwritten signature in black ink that reads "Adam Banham". The signature is written in a cursive style and is underlined with a single horizontal line.

On behalf of Norfolk County Council:  
Matt Tracey  
Head of Infrastructure & Development

A handwritten signature in black ink. The signature is stylized, starting with a large 'M' and ending with a long, sweeping horizontal stroke that curves upwards at the end. It is positioned above a solid blue horizontal line.