

Cabinet

Agenda

Members of the Cabinet:

Cllr J Fuller (Chairman)	Leader, External Affairs and Policy
Cllr K Mason Billig (Vice Chairman)	Governance and Efficiency
Cllr M Edney	Clean and Safe Environment
Cllr R Elliott	Customer Focus
Cllr L Neal	Stronger Economy
Cllr A Thomas	Better Lives
Cllr J Worley	Finance and Resources

Date & Time:

Tuesday 1 June 2021
9.00 am

Place:

Council Chamber, South Norfolk House, Cygnet Court, Long Stratton, Norwich, NR15 2XE

Contact:

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Email: democracy@s-norfolk.gov.uk
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PUBLIC ATTENDANCE / PUBLIC SPEAKING:

This meeting will be live streamed for public viewing via the following link:

<https://www.youtube.com/channel/UCZciRgwo84-iPyRImsTCIng>

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If you have any special requirements in order to attend this meeting, please let us know in advance.

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All public wishing to attend to observe, or speak at a meeting, are required to register a request by the date / time stipulated on the relevant agenda. Requests should be sent to: democracy@s-norfolk.gov.uk

Public speaking can take place:

- Through a written representation (which will be read out at the meeting)
- In person at the Council offices

Please note that due to the current rules on social distancing, the Council cannot guarantee that you will be permitted to attend the meeting in person. There are limited places in the Council Chamber and the numbers of public speakers permitted in the room will vary for each meeting.

All those attending the meeting in person must, sign in on the QR code for the building and arrive/ leave the venue promptly. The hand sanitiser provided should be used and social distancing must be observed at all times. Further guidance on what to do on arrival will follow once your initial registration has been accepted.

AGENDA

- 1. To report apologies for absence**
- 2. Any items of business which the Chairman decides should be considered as a matter of urgency pursuant to section 100B(4)(b) of the Local Government Act, 1972. Urgent business may only be taken if, “by reason of special circumstances” (which will be recorded in the minutes), the Chairman of the meeting is of the opinion that the item should be considered as a matter of urgency**
- 3. To receive Declarations of interest from Members**
(please see guidance – page 5)
- 4. To confirm the minutes from the meeting of Cabinet held on 19 April 2021**
(attached – page 7)
- 5. South Norfolk Village Clusters Housing Allocations Plan – Regulation 18 Consultation**
(report attached – page 21)
- 6. Update to Local Development Scheme**
(report attached – page 394)
- 7. Strategic Performance, Risk and Finance Report for Quarter 4, 2020/21**
(To Follow)
- 8. Covid-19 Recovery Plan 2021 – 2022**
(report attached – page 413)
- 9. Reopening the High Streets Safely & Welcome Back Funds**
(report attached – page 422)
- 10. Empty Homes Policy**
(report attached – page 536)
- 11. Houses In Multiple Occupation Discretionary Activity Policy**
(report attached – page 562)
- 12. Review of the Councils Temporary Stopping Place for Gypsies and Travellers**
(report attached – page 574)

13. Proposals for additional Environmental Enforcement

(To Follow)

14. Cabinet Core Agenda

(attached – page 583)

DECLARATIONS OF INTEREST AT MEETINGS

When declaring an interest at a meeting Members are asked to indicate whether their interest in the matter is pecuniary, or if the matter relates to, or affects a pecuniary interest they have, or if it is another type of interest. Members are required to identify the nature of the interest and the agenda item to which it relates. In the case of other interests, the member may speak and vote. If it is a pecuniary interest, the member must withdraw from the meeting when it is discussed. If it affects or relates to a pecuniary interest the member has, they have the right to make representations to the meeting as a member of the public but must then withdraw from the meeting. Members are also requested when appropriate to make any declarations under the Code of Practice on Planning and Judicial matters.

<p>Have you declared the interest in the register of interests as a pecuniary interest? If Yes, you will need to withdraw from the room when it is discussed.</p>
<p>Does the interest directly:</p> <ol style="list-style-type: none"> 1. affect yours, or your spouse / partner's financial position? 2. relate to the determining of any approval, consent, licence, permission or registration in relation to you or your spouse / partner? 3. Relate to a contract you, or your spouse / partner have with the Council 4. Affect land you or your spouse / partner own 5. Affect a company that you or your partner own, or have a shareholding in <p>If the answer is "yes" to any of the above, it is likely to be pecuniary.</p> <p>Please refer to the guidance given on declaring pecuniary interests in the register of interest forms. If you have a pecuniary interest, you will need to inform the meeting and then withdraw from the room when it is discussed. If it has not been previously declared, you will also need to notify the Monitoring Officer within 28 days.</p>
<p>Does the interest indirectly affect or relate any pecuniary interest you have already declared, or an interest you have identified at 1-5 above?</p> <p>If yes, you need to inform the meeting. When it is discussed, you will have the right to make representations to the meeting as a member of the public, but you should not partake in general discussion or vote.</p>
<p>Is the interest not related to any of the above? If so, it is likely to be an other interest. You will need to declare the interest, but may participate in discussion and voting on the item.</p>
<p>Have you made any statements or undertaken any actions that would indicate that you have a closed mind on a matter under discussion? If so, you may be predetermined on the issue; you will need to inform the meeting, and when it is discussed, you will have the right to make representations to the meeting as a member of the public, but must then withdraw from the meeting.</p>

**FOR GUIDANCE REFER TO THE FLOWCHART OVERLEAF.
PLEASE REFER ANY QUERIES TO THE MONITORING OFFICER IN THE FIRST
INSTANCE**

DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF



Agenda Item: 4

CABINET

Minutes of a remote meeting of the Cabinet of South Norfolk Council, held on Monday 19 April 2021 at 9.00am.

Committee Members Present: Councillors: J Fuller (Chairman), Y Bendle, M Edney K Mason Billig, L Neal and A Thomas

Apologies for Absence: J Worley

Other Members in Attendance: Councillors: V Clifford-Jackson, R Ellis and T Laidlaw

Officers in Attendance: The Managing Director (T Holden), the Director of Place (P Courtier), the Director of Resources (D Lorimer), the Assistant Director Governance and Business Support (E Hodds), the Assistant Director Individuals and Families (M Pursehouse), the Assistant Director Finance (R Fincham), the Assistant Director Economic Growth (T Armstrong), the Chief of Staff (H Ralph), the Assistant Director Planning (H Mellors), the Senior Community Planning Officer (R Squires) and the Senior Enforcement Officer (K Cubitt)

Also in Attendance: Chairman of Poringland Parish Council (Mr J Joyce) and Local Resident (Mr T Williamson)

2884 DECLARATIONS OF INTEREST

The following members declared 'other' interests in the matters detailed below:

With regard to item 5, the Poringland Neighbourhood Plan, Cllr L Neal declared an interest as a member of Poringland Parish Council, and as a former member of the Parish Council's Neighbourhood Plan Panel.

With regard to item 12, Proposals for Additional Environmental Enforcement, Cllr A Thomas declared an other interest as having been personally impacted by the recent flooding.

2885 MINUTES

The minutes of the meeting of the Cabinet held on 15 March 2021 were agreed as a correct record.

2886 PORINGLAND NEIGHBOURHOOD PLAN – FINAL DECISION STATEMENT

Members considered the report of the Senior Community Planning Officer which summarised the results of a consultation in relation to Policy 2 of the Poringland Neighbourhood Plan.

The Chairman reminded members of the background to the report, explaining that a second period of consultation in relation to Policy 2 had taken place, due to the Council proposing a further minor amendment to the second examiner's proposed modifications to the Policy.

The Senior Community Planning Officer explained that a small number of representations had been received during the recent consultation, and referred in particular to an objection from Gladman Developments Ltd. Members noted that the Council had challenged the points raised and this was outlined in Appendix 1 of the report. In response to a query regarding what weight could be placed on the emerging Greater Norwich Local Plan (GNLP), which was currently at the Regulation 19 stage, the Senior Community Planning Officer explained that all evidence gathering for emerging plans could be taken in to account, which gave the emerging GNLP some material weight.

The Chairman welcomed the Chairman of Poringland Parish Council, Mr J Joyce, to the meeting. Mr Joyce thanked officers for their support during the whole process, which he believed had resulted in a Plan that met the aspirations of the whole community. He stressed that the new Plan did not seek to completely restrict new development, but to contain development to smaller scale sites. The Parish Council supported the Plan and he hoped that Cabinet would agree it so that it could proceed to a local referendum.

As local member, Cllr L Neal expressed her support for the proposals. With regard to the objections received from Gladman Developments Ltd, she pointed out that Poringland had exceeded its minimum housing allocation range, as set out in the Joint Core Strategy, and that the new GNLP did not propose further growth in the village.

In response to a query, the Senior Community Planning Officer explained that once agreed, the Council had 56 working days to conduct a referendum, and that he would be liaising with the elections team to discuss potential dates.

It was unanimously

RESOLVED

To:

1. Amend Policy 2 of the proposed Poringland Neighbourhood Plan in accordance with the Council's proposed minor amendment to the second examiner's recommended modifications.
2. Publish the final Decision Statement (Appendix 2), setting out the Council's decision in respect of each examiner's recommendations and ultimately approving that the Neighbourhood Plan should proceed to a referendum in the neighbourhood area.

The Reason for the Decision

Given the nature of the responses received as part of the consultation, it was felt appropriate to approve the minor amendment to the second examiner's modifications, to allow the Plan to proceed to referendum.

Other Options Considered

To approve the policy wording as submitted to the second examiner or to approve the policy wording as recommended by the second examiner

2887 ENDORSEMENT OF THE NORFOLK STRATEGIC PLANNING FRAMEWORK UPDATE

Members considered the report of the Place Shaping Manager, regarding an update to the Norfolk Strategic Planning Framework (NSPF).

The Chairman explained that in its role as a local planning authority, the Council had a legal responsibility to engage constructively and on an ongoing basis with other public bodies on strategic cross-boundary matters. The NSPF provided a structure for tackling cross boundary matters, and demonstrated how the Council was working with others to fulfil its obligations.

Referring to Appendix A of the report, the Assistant Director Planning advised that the NSPF had been revised to ensure that it remained up to date and effective and she drew attention to paragraphs 3.2 and 3.3 of the report which outlined the key changes that had been made.

Local resident, Mr T Williamson explained that he was speaking as a concerned resident, also advising members that he was a member of the Green Party. He expressed concerns regarding the Greater Norwich Local Plan (GNLP) and its lack of ambition with regard to climate change mitigation. He felt that the Plan failed in its legal duty to address the issues and he questioned whether Cabinet would challenge the Greater Norwich Development Partnership (GNDP) to review the GNLP against the NSPF and research findings on climate change, to ensure legal compliance and prevent possible future delays to the Plan's adoption.

The Chairman explained that the challenges of climate change had been addressed throughout the GNLP, and that any changes to the document could only now be made by the Planning Inspectorate. The decision to be made that day referred only to the NSPF and could not influence the GNLP. However, he stressed that the Council would continue to ensure that the environment was protected, explaining that work on the new Local Plan would commence as soon as the existing Plan was adopted.

The Assistant Director Planning agreed that the soundness of the GNLP would be tested when put before the Planning Inspectorate and explained that the proposed Plan included a detailed chapter on the delivery of growth and addressing climate change. She stressed that the purpose of the NSPF was to ensure that all Norfolk authorities addressed such issues in an objective and consistent way.

During further discussion, the Chairman made reference to the work regarding the GI RAMS study, which related to concerns regarding how the number of new homes would increase visitors to protected habitat sites. He explained that there was some divergence of opinion within the Forum as to how to address such issues, and that his view was that a wider approach involving additional existing groups to help manage the pressures in a more tangible way, was more appropriate than the employment of wardens on site. These issues were due to be discussed at the Forum's next meeting in early May.

Members welcomed the references made to telephone mobile signals and the clearing of footpaths and supported a more robust approach to both issues.

It unanimously

RESOLVED

TO RECOMMEND THAT COUNCIL endorses the update to the Norfolk Strategic Planning Framework and agrees to remain a signatory to the document.

The Reason for the Decision

The revised NSPF will assist the Council in fulfilling its obligations to demonstrate the Duty to Cooperate and to meet the National Planning Policy Framework requirement to have a Statement of Common Ground.

Other Options Considered

None

2888 COVID RECOVERY PLAN

Members considered the report of the Director of People and Communities and the Assistant Director Finance, which provided an update on the ongoing impact of Covid-19 on the District, and the Council's ongoing response.

The Assistant Director (Finance) highlighted the key areas of the report to members. He referred to Appendix A, which outlined the support provided to both residents and businesses, and Appendix B, which outlined the progress made on the six-point Action Plan, agreed back in July.

Members noted that much of the focus of the report was on finance; both ringfenced and un-ringfenced funds. The Assistant Director explained that agreement was sought to release £61,600 of un-ringfenced funds to the Council Tax Recovery Team, where there had been a clear increase in demand, and that a more detailed proposal on how other funds were to be allocated would follow in a further report in June.

The Chairman referred to Appendix A of the report as a superb summary of the Council's response to the pandemic and the actions taken by the Council. He stressed the need for a fair and balanced allocation of funds through a thematic approach and suggested the following areas for consideration:

- Conflict resolution
- Getting back to work and retraining and reskilling
- Working with individual families and communities
- Debt advice
- Business Support
- Healthy recovery

The Managing Director agreed and explained that the main purpose of the report was to secure funding for Council Tax and Recovery, and to seek delegation to allow those elements that needed to move forward, to do so before June. He confirmed that further proposals on the allocation of funds would be presented at the next meeting of the Cabinet.

During discussion, members referred to the excellent work of voluntary support groups and officers explained that although about 20% of the

voluntary groups had dissolved (as was expected as people went back to work), there was still a good number of groups going forward, to provide support for communities, and build resilience, with the support of the Council.

Members also wished to place on record their thanks to officers, praising how quickly they had responded to an increase in demand in some areas, and had adapted to change over the last 12 months.

In response to a query regarding Broadland and South Norfolk Covid Safe Business awards, the Assistant Director Regulatory explained that this referred to the award of covid-safe certificates to instil public confidence in premises and venues, and was not an awards ceremony.

Members expressed their support for the proposals of the report, and it was unanimously

RESOLVED

To:

1. Note the local impact of Covid-19, together with the activities the Council is taking to mitigate those impacts.
2. Note the progress made towards delivering the actions set out in 'Our Plan for Recovery from the Covid-19 Crisis', and to recommend the update of the Recovery Plan to be considered by Cabinet in June.
3. Release the following sums to further support the Covid recovery (from the Un-Ringfenced Covid money)
 - Council Tax and Recovery Team Resource £61,600.
4. Agree a delegation to the relevant director, in consultation with the relevant portfolio holder, to release COMF funds to support activities consistent with the projects listed in this report.

The Reason for the Decision

To ensure that the Council continues to provide appropriate support to residents and businesses.

Other Options Considered

None

2889 THE DEBT RESPITE SCHEME (BREATHING SPACE AND MENTAL HEALTH CRISIS MORATORIUM) REGULATIONS 2020 AND STATUTORY DEBT REPAYMENT PLAN (FINANCIAL SERVICES BILL) – REQUEST FOR ADDITIONAL RESOURCE

Members considered the report of the Senior Enforcement Officer, which sought agreement for a temporary additional resource in the Council's Recovery Team, to deal with the anticipated additional demand, as a result of the introduction of Breathing Space Regulations, and the Statutory Debt Repayment Plan.

The Senior Enforcement Officer presented his report explaining that it was anticipated that the new regulations would result in approximately 15 new cases each day across both South Norfolk and Broadland Councils, and he outlined the proposals for a temporary additional resource.

Cabinet expressed its support for the proposals, noting that debt mitigation was a key part of the Council's role.

Discussion followed during which the Assistant Director Finance explained that the introduction of the regulations had been entirely independent of Covid-19, however, it could be argued that without Covid, the Council may have been able to absorb new workloads. Members therefore supported the recommendations and requested that officers considered further whether the funding required should be sought from reserves, or COMF Covid funds.

It was unanimously

RESOLVED

To increase the Recovery Team capacity by 1 x FTE for a period of 18 months to deal with work arising from the impact of the new Breathing Space and Statutory Debt Repayment Plan regulations in Broadland and South Norfolk. The cost to be shared 45/55 between BDC / SNC in line with the one team agreement.

The Reason for the Decision

To ensure that adequate resources are in place to meet the anticipated demand on the Recovery Team.

Other Options Considered

None

2890 REVIEW OF POLICIES

Members considered the report of the Assistant Directors Finance, and Governance and Business Support, which presented Cabinet with the Counter Fraud, Corruption and Bribery Policy, the Anti-Money Laundering Policy and the Whistleblowing Policy, for recommendation on to Council.

Officers explained that it was good practice to regularly review such policies and members noted they had recently been agreed and reviewed at a recent meeting of the Finance, Resources, Audit and Governance Committee in March.

Cabinet was supportive of the policies, however, queried whether there was a separate policy to consider vexatious complainants. Officers explained that this would be covered in the Council's Complaints Policy, which was due for Cabinet consideration in either June or July.

During discussion the Assistant Director Governance and Business Support advised that the Member Model Code of Conduct would be presented to a future meeting and would address issues such as the use of social media and bullying.

It was unanimously

RESOLVED

- 1. TO RECOMMEND TO COUNCIL** adoption of the:
 - a) Counter Fraud, Corruption and Bribery Policy
 - b) Anti-Money Laundering Policy
 - c) Whistleblowing Policy
- 2.** That the Complaints Policy be presented to members, if possible, at 1 June meeting of the Cabinet

The Reason for the Decision

To ensure that the Council's Policies remain in line with best practice within a sound governance framework.

Other Options Considered

None.

2891 PUBLIC SECTOR EQUALITY DUTY ANNUAL REPORT

Members considered the report of the Governance Manager, which summarised the progress made by Broadland and South Norfolk Councils during 2020, in complying with their duty under the Public Sector Equality Duty, as required by the Equality Act 2010.

The Senior Governance Officer presented the report and referred members to Appendix A, the Council's Public Sector Equality Annual Report. Members noted that this was a statutory requirement and had had been produced jointly with Broadland District Council. It highlighted some of the activities and work which was undertaken by both Councils during 2020, to demonstrate compliance with the Public Sector Equality duty.

The Portfolio Holder, Cllr K Mason Billig commended the report to members, stressing that it was the Council's duty to ensure equality throughout all of its work. She suggested that it might be useful to provide some data, to provide evidence of compliance.

The Chairman agreed that although the report had identified the relevant issues, additional data would strengthen the Report and provide more evidence of compliance. Cabinet agreed that data should be provided in appropriate areas and that final agreement of the Report should be delegated to the Assistant Director Governance and Business support, in consultation with the Portfolio Holder for Governance and Efficiency, before it was published on the Council's website.

It was unanimously

RESOLVED:

To approve the joint Public Sector Equality Duty Annual Report, subject to minor amendment, with final approval being delegated to the Assistant Director of Governance and Business Support, in consultation with the Portfolio Holder for Governance and Efficiency.

The Reason for the Decision

To ensure compliance with the Council's Public Sector Equality Duty and to ensure that the report is fully evidenced.

Other Options Considered

None

2892 IN PERSON MEETINGS

Members considered the report of the Assistant Director Governance and Business Support, which proposed a way forward with in person meetings, following the announcement from the Ministry of Housing, Communities and Local Government, that the Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020 would not apply to meetings on or after 7 May 2021.

The Assistant Director Governance and Business Support reminded members of the background to the report, and outlined its proposals. Members noted that a more detailed report would be considered at the Council's AGM meeting on 26 April 2021.

Members' attention was drawn to paragraph 5.2 of the report, and the need to consider whether the use of dividing screens was an appropriate way forward.

During discussion, the Chairman reminded members that any future hybrid meetings would result in a more complex environment, that would require careful consideration, and he suggested that the need for capacity restrictions and social distancing would continue after 21 June. With this in mind, he felt it would not be appropriate to reconsider the numbers of members on the Development Management Control Committee, until September.

The Assistant Director confirmed that all meetings would take place in the Council Chamber, although the Council would reserve the right to move to an alternative venue, in exceptional circumstances.

In response to queries, the Assistant Director explained that when the current regulations expired on 7 May, there would be no provision to suspend the six-month attendance rule for councillors. The Managing Director stressed that the Council would provide a Covid secure and safe environment for both members and staff at meetings. With regard to the member working group for in-person meetings, the Chairman confirmed that it had and would continue to be a cross-party group.

Attention was drawn to Appendix A of the report and the changes to the standing orders, and the Assistant Director confirmed that both the public and members would need to register to speak two full working days in advance of the meeting, to allow time for Democratic Services to make the necessary arrangements.

It was unanimously

RESOLVED

To:

1. Note the guidelines and protocols for In Person meetings from the 7 May 2021.
2. **RECOMMEND TO FULL COUNCIL** the subsequent amendments to the standing orders as a result of adopting this approach and as outlined in Appendix A.
3. Note the proposal to set up a cross party member working group to manage capacity/priority, and to keep procedures, policies and standing orders under review.
4. **RECOMMEND THAT FULL COUNCIL** delegates to the Monitoring Officer, in consultation with the Committee member working group the ability to amend the standing orders as required in this regard.

The Reason for the Decision

To ensure that in person Committee meetings can return with a Covid secure and safe environment for councillors, staff and the public.

Other Options Considered

To consider mitigating the risks further through the use of dividing screens.

2893 PROPOSALS FOR ADDITIONAL ENVIRONMENTAL ENFORCEMENT

Members considered the report of the Assistant Director Regulatory, regarding proposals for the delivery of additional Environmental Enforcement capacity and a corresponding additional allocation of £50k in the revenue budget.

The Assistant Director Regulatory presented his report to members and referred to the two options identified, outlined at paragraphs 4.2 and 4.3 of the report.

The Portfolio Holder, Cllr M Edney had noted that the current Flood Management Officer was leaving the authority, and he queried whether this would create additional options for the way forward. He stressed that he favoured an option with a Case Support Officer and suggested that the role of the Environmental Enforcement Officer could be redefined, and that riparian rights and other environmental functions further considered.

The Chairman felt that Cabinet was not in a position to make a decision and wanted to see redefined proposals which would cover the breadth of both the natural and built environment. He stressed the need for coordination between

enforcement activities to ensure that “our” environment was protected, maximising the quality of life for residents.

Members agreed to defer the decision to allow officers time to rework the options.

It was unanimously

RESOLVED:

To defer the item for consideration, to allow time for officers to re-work the proposals.

The Reason for the Decision

To ensure a broader approach to enforcement, covering the full breadth of both the built and natural environment.

Other Options Considered

None

2894 SOUTH NORFOLK STRATEGIC FUND

Members noted that this item had been deferred to a future meeting.

2895 CABINET CORE AGENDA

Members noted the latest version of the Cabinet Core Agenda.

2896 EXCLUSION OF THE PUBLIC AND PRESS

It was **RESOLVED** to exclude the public and press from the meeting under Section 100A of the Local Government Act 1972 for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A to the Act (as amended)

2897 MANAGED SERVICE - PAYROLL

Members considered the exempt report of the Assistant Director Governance and Business Support, which provided future options for the management of the payroll service.

The Assistant Director outlined the proposals and referred to the budget implications of each of the options available.

It was unanimously

RESOLVED:

To approve the recommendations of the report, as outlined in paragraphs 6.1 and 6.2.

The Reason for the Decision

To ensure efficiency and value for money for the Council.

Other Options Considered

As outlined in the report

2898 GROWTH OF THE INTERNAL AUDIT CONSORTIUM

Members considered the exempt report of the Assistant Director of Governance and Business Support, regarding the growth of the Internal Audit Consortium.

The Assistant Director outlined the salient points of the report, and members indicated their support for the proposals.

It was unanimously

RESOLVED:

To approve the recommendations of the report, as outlined in paragraphs 8.1 and 8.2.

The Reason for the Decision

To continue to provide a high-quality audit service across Norfolk

Other Options Considered

As outlined in the report.

2899 ELLA MAY BARNES BUILDING

Members considered the exempt report of the Assistant Director Economic Growth and the Senior Economic Development Officer for Funding and Strategy, regarding the Ella May Barnes Building.

Members discussed the proposals and it was unanimously

RESOLVED:

To approve the recommendations of the report, as outlined in paragraphs 8.1 and 8.2

The Reason for the Decision

To maximise the future commercial opportunities provided by the building.

Other Options Considered

None.

(The meeting concluded at 11.31am)

Chairman

South Norfolk Village Clusters Housing Allocations Plan – Regulation 18 Consultation

Report Author(s): Paul Harris
Place Shaping Manager
01603 430444
paul.harris@broadland.gov.uk

Portfolio: External Affairs and Policy and
Stronger Economy

Ward(s) Affected: All

Purpose of the Report:

To agree the Regulation 18 version of the South Norfolk Village Clusters Housing Allocations Plan (VCHAP) for 8 weeks consultation. The VCHAP seeks to allocate sites to accommodate at least 1,200 dwellings in the smaller villages in South Norfolk, in accordance with the requirements of the Greater Norwich Local Plan. The consultation also asks about the plan Objectives and overarching policies, as well as small changes to Settlement Limits to accommodate windfall development, and ask whether there are any further sites which people would like considered.

Recommendations:

Cabinet to agree to :

- 1) publish the draft South Norfolk Village Clusters Housing Allocations Plan (Appendix 1) and the accompanying supporting documents for eight weeks consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012;

and,

- 2) delegate authority to the Assistant Director for Planning, in consultation with the Portfolio Holder for External Affairs and Policy, to make any minor factual amendments to the consultation document (Appendix 1), prior to consultation being begun.

1. Summary

- 1.1 South Norfolk Council is a partner in the production of the Greater Norwich Local Plan (GNLP), which sets out policies to guide development across Broadland, Norwich and South Norfolk up to 2038. The current draft of the GNLP sets out strategic policies along with sites to accommodate most of the identified need for new homes. However, the GNLP is not allocating the sites in the South Norfolk Village Clusters. Instead it makes a requirement for sites to accommodate at least 1,200 new homes in those settlements. The South Norfolk Village Clusters Housing Allocations Plan (VCHAP) seeks to fulfil this requirement.
- 1.2 Approximately 450 sites have been considered for inclusion in the Village Clusters Plan, either as larger 'allocation' sites of 12+ dwellings, to make up the 1,200 units required by the GNLP, or as smaller 'windfall' sites. Following a Site Assessment process, the consultation identifies 66 'Preferred' sites, plus 24 Short listed 'Reasonable Alternatives'; the majority of remaining sites have been rejected (the exceptions being those sites that are being considered through Neighbourhood Plans). The 66 preferred sites, along with the indicative housing requirement for allocations in Neighbourhood Plan areas, are sufficient to accommodate 1,250 dwellings.
- 1.3 As well as the sites, the consultation sets out: draft Objectives for the Plan, suggestions for some overarching policies, which would potentially apply to all new development in the village clusters, and other changes to the Settlement Limits to reflect existing development.
- 1.4 Regulation 18 is the first formal consultation on a draft plan and is part of the evidence gathering for the preparation of a finalised draft, which the Council will consult on prior to submitting the Plan to the Secretary of State for an Examination in Public. As such, we are seeking input on what the overarching policies and the policies for each allocation site should include.

2. Background

- 2.1 Paragraph 67 of the National Planning Policy Framework (NPPF) requires Local Planning authorities to make provision for sufficient, suitable housing sites through their Local Plans, *'planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability'*. South Norfolk Council is a partner in the production of the Greater Norwich Local Plan (GNLP) and recently approved the Regulation 19 version of that Plan for publication between January and March of this year. The GNLP uses the Government's December 2020 'standard method' to calculate how much new housing needs to be planned for across Broadland, Norwich and South Norfolk between 2018 and 2038.

- 2.2 The GNLP sets out a hierarchy for growth, the focus is on the main built up area of Norwich (including those parts within Broadland and South Norfolk), the North East Growth Triangle, and the A11 Tech Corridor. Smaller scales of development are distributed to the Main Towns, Key Service Centres and Village Clusters in Broadland and South Norfolk. Taking into account what has already been built during 2018/19 and 2019/20 and what already has planning permission or is allocated in existing Local Plans, 5.5% of the growth is due to occur in the South Norfolk Village Clusters. This requires the allocation of sites for at least 1,200 new homes in the VCHAP.
- 2.3 Between 2016 and 2019 a number of potential sites within the South Norfolk Village Clusters had already been submitted as part of the GNLP process. The Village Clusters process focusses on delivering development on small sites, distributed across the clusters; therefore, when a further call for Village Cluster sites was included in the January to March 2020 Regulation 18 GNLP consultation, it sought sites of 0.5 to 1.0 hectares, to accommodate 12 to 25 dwellings. In March 2020 the Council also contacted those who had previously submitted sites, to see if they wished to modify them accordingly. The Council continued to accept sites for the Village Clusters process up to 31 May 2020, at which point the Site Assessment process began.
- 2.4 In May 2020 the Regulation and Planning Policy Committee agreed the Site Assessment process. The site assessments incorporate a Housing and Economic Land Availability Assessment (HELAA), using the agreed Norfolk-wide HELAA methodology. The full site assessment also includes looking at the planning history of the site, undertaking a site visit and applying some more detailed criteria. The Site Assessments were also supported by a Technical Consultation with both internal consultees on landscape, heritage and environmental protection issues, as well as a range of external stakeholders, on issues such as highways, utilities, flood risk, ecology and minerals and waste.
- 2.5 The Village Clusters process is also supported by a range of evidence, much of which is shared with the GNLP. Of particular relevance are the following:
- Greater Norwich Water Cycle Study (March 2021), which indicated that sites in some Village Cluster locations may need to be phased in order for infrastructure to be suitably upgraded prior to development (it is likely that a specific supplement to the Water Cycle Study will be needed at the Regulation 19 stage of the Village Clusters Plan);
 - The Level 1 Strategic Flood Risk Assessment (November 2017), which has been used as part of the Village Clusters Site Assessment process; and
 - The GNLP Viability Appraisal (December 2020), which demonstrates that the type of sites being allocated through the Village Clusters Plan can be viably delivered with the relevant supporting infrastructure and affordable housing.
- 2.6 In addition, two specific supporting documents have been prepared to accompany this plan, the Interim Sustainability Appraisal and Habitats Regulation

Assessment. These two documents have been prepared alongside the Regulation 18 Consultation document and helped shape its contents.

- 2.7 The VCHAP will eventually replace the parts of the 2015 South Norfolk Site Specific Allocations and Policies Document that relate to the Village Cluster settlements.

3. Current position/findings

- 3.1 The draft Regulation 18 Consultation Document is attached as Appendix A. The introductory section of the draft consultation document sets out three Objectives for the plan, along with three overarching policies that would potentially apply to all future housing development within the South Norfolk Village Cluster settlements. The consultation is seeking views on the suggested content of the Objectives and policies, and whether there are other issues which also need to be addressed.
- 3.2 450 sites have been through a full site assessment process. As noted above, this process has taken account of a site's planning history and, except where it was unnecessary to do so, site visit observations. This detailed process also includes assessing the sites against the South Norfolk Landscape Character Assessment, Better Broadband for Norfolk coverage and a revised distance to services criteria, which better reflects the rural nature of the Village Clusters. Specifically regarding the latter, the Village Clusters assessment shortlisting criteria widened the number of services to which distances to/from the site have been assessed to include those characteristic of rural villages, e.g. a village/community hall, pub, pre-school provision and formal sports facilities. The maximum accepted distance to services was also increased, to reflect the more dispersed pattern of development across the South Norfolk Village Clusters. Although the range of services and facilities and threshold distances have been increased for the purpose of the site assessment, appropriate consideration has been given to maximising access services and facilities in determining which sites should be preferred.
- 3.3 On the basis of the Site Assessments, the Regulation 18 consultation document identifies 66 preferred sites and 24 shortlisted 'reasonable alternatives'. The remaining sites have been rejected, based on the evidence available at the time of assessment. The exception to this are sites within the Neighbourhood areas of the Diss and District and Dickleburgh Neighbourhood Plans. Sites within these area are being assessed through the Neighbourhood Plan process, with the intention that the Neighbourhood plans will make the necessary allocations in these areas.
- 3.4 In determining preferred and shortlisted sites, consideration has also been given to the Sustainability Appraisal (SA) that has been prepared alongside the plan. It is considered that there is general consistency between the choice of preferred and shortlisted and the finding of the SA at an individual site level. At a strategic level, 3 alternatives were considered: an accessibility-led approach, a dispersal-led approach and a "balanced" approach. The balanced approach is consistent with that taken within the plan.

- 3.5 Across all areas of consideration, taken as a whole, both the accessibility-led and balanced options outperform the dispersal approach. However, the distinction between accessibility-led and balanced approach are more finely balanced. The balanced approach is considered to perform significantly better than an accessibility-led approach in respect of Housing, as it would be better placed address an established issue in respect of rural housing needs. An accessibility-led approach would be preferable in respect of the interrelated issues of Accessibility, Climate change mitigation and Transport. This is because it would focus on those village clusters, and potentially locations within village clusters, where there is the greatest potential to access services and facilities by walking, cycling and public transport, or at least without having to drive long distances, with resultant greenhouse gas emissions, air pollution and traffic. This conclusion is not entirely clear cut however, because a accessibility-led alternative would opportunities missed in respect of supporting local village services and facilities, potentially leading to a risk of closure in the longer term. Issues around climate change mitigation would also to some extent be mitigated by wider changes aimed at decarbonising private transport.
- 3.6 Key numbers in relation to the assessment and conclusions of site assessments are set out in the table below:

Item	Key Figure
Total Number of Village Clusters	48
Total number of Sites Assessed	450
Number of Preferred Sites	66 sites, ranging from 12 to 50 homes in size.
Number of Shortlisted Sites	24
Numbers of Clusters where 1 or more preferred site have been identified	33 clusters with total allocations numbers in a single cluster ranging from 12 to 70 homes.
Number of Clusters where a requirement to allocate has been delegated to a Neighbourhood Plan	4
Number of Clusters where no preferred site could be identified	11
Housing requirement set out in the Greater Norwich Local Plan (GNLP)	1,200
Total Number of homes that could be accommodated on Preferred Sites or through allocations delegated to Neighbourhood Plans	1,250

- 3.7 Maps for the 66 preferred sites are included within the body of the document text. Cluster and Settlement maps will also be published alongside the main document illustrate the all of the preferred, shortlisted and rejected sites, alongside a number of constraints, such as wildlife/ecology designations, flood risk zones and Conservation Areas, which formed part of the site assessment process. The document itself is set out under the 48 clusters and the consultation seeks views on both the choice of sites and also what criteria might be applied to the preferred sites, should they be developed. Again, the exceptions to this are the four

settlements where it is currently proposed that the allocations be made through Neighbourhood Plans: Burston, Roydon and Scole, as part of the Diss and District Neighbourhood Plan; and Dickleburgh.

- 3.8 Whilst 450 sites have already been assessed, this consultation also provides an opportunity for those who have not previously submitted their sites to do so; this may be particularly valuable where the Council has not currently been able to prefer or shortlist a site within a cluster.
- 3.9 As well as the sites that have been assessed, the consultation document also proposes amendments to the current Settlement Limits, based on development which has occurred (or been permitted) since the 2015 Site Specific Allocations and Policies Document was adopted. Additional Settlement Limit changes are also proposed to align with some of the preferred sites. The consultation document seeks views on these changes, which are important because the planning policies which apply inside the Settlement Limit are generally supportive of new development, subject to the usual Planning consideration such as design, landscaping, access, neighbour amenity etc., whereas, outside Settlement Limits, much more restrictive planning policies are applicable.
- 3.10 Lastly the consultation seeks comments on the supporting evidence documents, including the Interim Sustainability Appraisal and Habitats Regulation Assessment, and whether the Monitoring Framework that will be used to assess whether the Plan is effective.

4. Proposed action

- 4.1 It is proposed that the Regulation 18 draft South Norfolk VCHAP is published for consultation. A consultation programme has been devised to seek views in accordance with the Council's Statement of Community Involvement. The consultation would run for eight weeks. It is proposed that the consultation start on 07 June 2021. The consultation has been designed the consultation so that it can be carried out completely remotely and without the need for "in-person" exhibitions.
- 4.2 To enable this the Council has procured an online consultation and mapping system to host the VCHAP consultation and an online "virtual" exhibition room. This approach means that the consultation would not be interrupted should any restrictions be (re)imposed. It also has the benefit of meaning that the public and other stakeholders can access the virtual exhibition at a day and time of their choosing and on any mobile device. This is considered to be particularly beneficial not only because of the wide geographical area effected by the plan, not all of which could be visited by a "live exhibition" but may also help working people engage with the exhibition/consultation or those who may still be reluctant to attend potentially busy "in-person" events. The virtual exhibition will use a similar format to that of a "live" exhibition, with exhibition boards and displays of consultation materials. Officers will still be available to answer questions via phone, meet with people virtually, or where absolutely necessary in person, and at

specified times to answer questions via a webchat as part of the virtual exhibition. The exhibition would also provide direct links to the consultation platform making it easier for people visiting the exhibition to make their comments.

- 4.3 In accordance with GDPR requirements, consultees previously involved in the GNLP process up to the end of March 2020 will be contacted directly about this consultation, as will anyone else who has requested to be kept informed since March 2020. These consultees will be in addition to all of the statutory consultees, including town and parish council. The latter will be asked to publicise the consultation locally. An article previewing the consultation has already appeared in the most recent edition of The Link and generated some interest.

5. Other options

- 5.1 Cabinet could postpone the consultation and request that additional work be undertaken on the site assessments, or changes to the consultation programme.
- 5.2 The work undertaken to date is however considered to be credible and has been overseen by the members of the Regulation and Planning Policy Committee. The consultation programme is in line with the Council's Statement of Community Involvement. Progressing with the consultation in a timely manner would also help support the GNLP by helping to demonstrate that the housing requirement for the South Norfolk Village Clusters is capable of being met.

6. Issues and risks

- 6.1 **Resource Implications** – The production of the VCHAP is being undertaken within the resources of the Place Shaping Team, with relevant input from other members of the wider Planning Service. Additional hours for existing staff, the production of the Sustainability Appraisal and Habitats Regulation Assessment and the procurement of online consultation support is within the dedicated budget for the production of the VCHAP.
- 6.2 **Legal Implications** – The production of the VCHAP and Regulation 18 consultation are being undertaken in accordance with the relevant Planning legislation, in particular The Town and Country Planning (Local Planning) (England) Regulations 2012. As with all Local Plan documents, the process for production allows for public/stakeholder scrutiny, which involves the right to legal challenge. The Council will take appropriate legal advice throughout the process (funded from the identified budget).
- 6.3 **Equality Implications** – Stakeholder engagement, in accordance with the Council's Statement of Community Involvement (SCI). The VCHAP will be subject to EQIA.
- 6.4 **Environmental Impact** – the assessment and selection of sites starts with the agreed Norfolk HELAA methodology and a site assessment process that takes into account the environmental impacts of proposed development. The production of the VCHAP is supported by the evidence base that also underpins the GNLP,

as noted in para 2.5 above, and the parallel production of both a Sustainability Appraisal and Habitats Regulation Assessment. These documents also consider the 'in combination' implications of development and will ensure informed decisions can be made about the environmental impacts of the plan.

- 6.5 **Crime and Disorder** – the production of the VCHAP is not considered to have any specific concerns in terms of Crime and Disorder.

7 Conclusion

- 7.1 For the reasons set out in this report, the consultation draft South Norfolk VCHAP should be published for eight weeks consultation. The responses to that consultation, including any additional sites submitted, will then be assessed and a Regulation 19 version of the VCHAP prepared, along with updates to the supporting evidence.

8 Recommendations

- 8.1 Cabinet to agree to :

- 1) publish the draft South Norfolk Village Clusters Housing Allocations Plan (Appendix A) and the accompanying supporting documents for eight weeks consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012;

and,

- 2) delegate authority to the Assistant Director for Planning, in consultation with the Portfolio Holder for External Affairs and Policy, to make any minor factual amendments to the consultation document (Appendix A), prior to consultation being begun.

Appendices

Appendix 1 – South Norfolk Village Clusters Housing Allocations Plan – Regulation 18 Consultation Document

Appendix 2 – South Norfolk Village Clusters Housing Allocations Plan – Cluster Scale Consultation Maps and Example Map Cluster Map Booklet

Background papers

Interim Sustainability Appraisal for the South Norfolk Village Clusters Housing Allocations Plan

Interim Habitats Regulation Assessment for the South Norfolk Village Clusters Housing Allocations Plan

Greater Norwich Local Plan -Regulation 19 Publication version

South Norfolk Local Plan

South Norfolk Village Clusters Housing Allocation Plan

Draft version

May 2021



South Norfolk Village Clusters Housing Allocations Plan Regulation 18 Consultation

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Introduction and Background

The South Norfolk Village Clusters Housing Allocations Plan (The Village Clusters Plan) aims to deliver sustainable growth within the villages of South Norfolk. The Village Clusters Plan is being developed alongside the Greater Norwich Local Plan (GNLP) and in accordance with Government's national planning policies and guidance. The main aim of the Plan is to allocate a series of smaller sites, typically within the range of 12 to 50 homes, across the 48 Village Clusters in South Norfolk, to accommodate at least 1,200 new homes in total. The Plan also defines the Settlement Limits for the villages within these clusters, making provision for further smaller sites and incorporating revisions to reflect development that has occurred, or has been permitted since the boundaries were last updated.

This consultation draft sets out the proposed Objectives for the Village Clusters Plan as well as a set of Core Policies that would apply to all of the Preferred allocation sites. It is proposed that those Core Policies would cover the issues of standard requirements to deliver sustainable development, housing mix on the Preferred sites, and design standards.

The Council has assessed almost 450 sites for possible inclusion in the Village Clusters Plan and, following that assessment, this consultation categorises them as 'Preferred', Shortlisted (or 'Reasonable Alternative') or Rejected (or 'Unreasonable Alternative'). We are seeking your views on those sites and asks whether there are any sites which we have not yet assessed, which landowners or developers would like to submit for consideration.

The consultation draft Plan has been prepared alongside a draft Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA).

National Policy

Government planning policy is set out in the National Planning Policy Framework (NPPF). In terms of rural housing, paragraph 78 of the NPPF states that:

'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.'

- This underpins the Village Clusters Plan, which looks at settlements both individually, but also, importantly, as part of a cluster of settlements many of which share local facilities and services.

Paragraph 68 of the NPPF notes the importance of small and medium sized sites, up to 1 hectare in size, in contributing to meeting housing needs, particularly in terms of the ability to deliver those sites quickly. This paragraph also encourages Councils to have Local Plan policies which support windfall development on non-allocated sites. The scale of sites sought through the Village Clusters Plan, both the potential allocations and the review of smaller sites as Settlement Limit extensions, helps deliver on these requirements.

The Greater Norwich Local Plan (GNLP)

South Norfolk Council is working with Broadland Council and Norwich City Council to produce the Greater Norwich Local Plan (GNLP). Amongst other things, the GNLP identifies how many homes need to be built between 2018 and 2038,. The basis for calculating the future requirements is the Government's December 2020 'standard method' for identifying local housing need. More details on the GNLP can be found at www.gnlp.org.uk.

The GNLP strategy focuses most of the planned growth in a strategic growth area that covers the Broadland Growth Triangle to the north east of Norwich, Norwich and its wider urban area, and the A11 corridor including Hethersett and Wymondham. This strategic growth area is also referred to as the Cambridge Norwich Tech Corridor. The GNLP does however also allow for further growth in the Main Towns and the larger 'Key Service Centre' villages (such as Hingham, Loddon/Chedgrave and Poringland/Framingham Earl) outside of this strategic growth area. The draft GNLP also requires some development to occur on smaller sites in the Village Clusters, as described in the GNLP such provision is made as it *'has the benefit of supporting small-scale builders, providing choice for the market and helping to ensure the delivery of housing in popular village locations.'*

Overall 5.5% of the GNLP growth is assigned to the Village Clusters in South Norfolk. Half of that growth has either already been built during 2018/19 and 2019/20, or is on sites which already have planning permission, or are allocated in the current South Norfolk Site Specific Allocations and Policies (2015). To meet the remaining requirements of the GNLP, the **South Norfolk Village Clusters Housing Allocations Plan needs to identify sites for at least a further 1,200 new homes.**

Non-housing sites in the South Norfolk Village Clusters, such as employment allocations or stand-alone sites for specific uses, such as sports and recreation facilities, are still dealt with through the GNLP.

Village Clusters

There are 48 Village Clusters in South Norfolk. Some contain a single parish, whilst others contain multiple parishes. In line with the approach set out in the GNLP, each one is centred around the local Primary School. Where that primary school is within a larger settlement outside of a Village Cluster, the remaining rural parishes still form a cluster in

the Village Clusters Plan e.g. Brockdish, Needham, Wortwell and Startson are within the catchment of Harleston Primary School, but those four parishes form a cluster in this Plan. The Primary School catchment has been taken as a proxy for social sustainability. However the Council also recognises that many other facilities are important to local communities and has also undertaken an audit of other facilities and services within the clusters, to inform the Site Assessment process (see details below).

The sites within the Village Clusters are split into two categories

- new Allocations, these are sites typically proposed for between 12 to 50 dwellings, which will go to meeting the 1,200 dwelling requirement in the GNLP, noted above; and
- Settlement Limit Extensions, for sites smaller than 12 dwellings, these will not count towards the 1,200 dwelling requirement, but will help ensure that the 'windfall allowance' in the GNLP is achieved.

The threshold of 12 dwellings is consistent with the GNLP and reflects the fact that sites smaller than this are less likely to achieve the required element of affordable housing. Settlement Limit extensions offer the opportunity for 'self-build' development, as encouraged through Government policy, particularly where those sites have been proposed by the site owner who wishes to build or commission their own home.

This Consultation

The current consultation is under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Comments can be submitted between XXX and XXX.

Regulation 18 is part of the evidence gathering stage of preparing a Local Plan, before the Plan is formally submitted for an Examination in Public, which is currently timetabled to happen in 2022. Therefore, we are seeking your input to help shape the final draft of the Village Clusters Plan. In this consultation we are seeking your views on various aspects of the draft Plan including:

- The **Objectives** of the Village Clusters Plan;
- the **Core Policies**, which would apply to all of the Allocation sites, including whether we need them and, if we do, what you think they should cover

We also need your input on the sites that have been put forward to the Council and our assessment of them:

- The **Preferred Allocation sites**, including the number of houses proposed and what a policy for that site might need to contain to ensure a high standard of development;
- The **Shortlisted (or Reasonable Alternative) and Rejected (or Unreasonable) Allocation sites**, including whether you agree with the Council's assessment of the site, or whether you think these sites should be preferred, and why;
- The **Preferred, Shortlisted (or Reasonable Alternative) and Rejected (Unreasonable) Settlement Limit Extensions**, including whether you agree with the Council's assessment of the site.
- Any **further sites** which we should consider? Whilst we have already assessed around 450 sites, if you have a site that you would like the Council to consider, this is your opportunity to submit it. Please bear in mind that we are primarily looking for smaller sites, typically around 12 to 25 houses, close to the existing Settlement Limits and well related to village services and facilities.

As well as the sites put forward to us, we are seeking views on **the Settlement Limits** themselves. The Settlement Limit is important because the planning policies which apply inside the Settlement Limit are generally supportive of new development, subject to the usual Planning consideration such as design, landscaping, access, neighbour amenity etc., whereas, outside Settlement Limits, much more restrictive planning policies are applicable. We have already suggested amendments to Settlement Limits to reflect development which has happened since they were last defined in the 2015 Local Plan, or where it makes sense to change them to fit with a nearby Preferred Allocation site. However we are asking whether you agree with these proposed changes and/or whether there are further changes we should make?

The sites and Settlement Limit proposals are set out by cluster within this draft Plan. Maps for preferred sites are included within the document.

Maps showing all preferred, shortlisted (Reasonable Alternative), rejected (Unreasonable Alternatives) and the extent of settlement limits, including any proposed changes, have been published alongside of this document.

As part of this consultation you also have the opportunities to make comments on the evidence document that support the plan, including the draft Sustainability Appraisal and Habitat Regulations Assessment.

Existing Planning Policies and Neighbourhood Plans

Whilst we are continuing to prepare the GNLP with our partner authorities, and preparing this separate South Norfolk Village Clusters Housing Allocation Plan, this is in the context of other planning documents which already exist, or are also being prepared.

Currently Local Plan Policies for the village cluster settlements in South Norfolk are set out in variety of documents, these include:

- The Joint Core Strategy for Broadland, Norwich and South Norfolk (2014), which sets out the strategic planning policies covering the three. Districts;
- The South Norfolk Site Specific Allocations and Policies Document (2015), which sets out allocations for housing and other uses
- The South Norfolk Development Management Policies Document (2015) which sets out a number of non-site specific policies applicable many types of development (highways, parking, design, landscaping, neighbour amenity etc.) as well as criteria based policies for various different types of development, and policies applying to particular landscape designations.

When adopted the GNLP will replace the existing Joint Core Strategy (JCS) and will also replace the parts of the South Norfolk Site Specific Allocations and Policies relating to the larger settlements in South Norfolk. The Village Clusters Plan will then replace the remainder of the Site Specific Allocations and Policies document. However, the 2015 Development Management Policies Document will remain in place.

Some Town and Parish Council have, and are continuing to, produce Neighbourhood Plans, which sit alongside the Local Plan and when adopted, are also used to determine planning applications. Most of these Neighbourhood Plans include more detailed Development Management policies, which aim to shape development proposals to better reflect local circumstances. However, currently two Neighbourhood plans, Dickleburgh and Diss and District (covering Burston, Roydon and Scole) are proposing to make their own allocations and our approach to these clusters is set out in the specific chapters below. For more information about Neighbourhood Plans in South Norfolk, please visit www.south-norfolk.gov.uk/residents/planning-and-building/planning-policy/neighbourhood-plans.

The Plan Objectives

The following sets out the three Objectives which the Village Clusters is aiming to achieve through the allocation of appropriate sites, the amendment of Settlement Limits and the Core Policies (below) to guide development.

SNVC Objective 1 - Meet housing needs

Deliver housing in accordance with the Greater Norwich Local Plan housing target for the South Norfolk Village Clusters through the allocation of viable and deliverable development sites for housing. Ensuring that housing sites provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of their life cycle e.g. first time buyers, those seeking family housing and those looking to downsize or move to more suitable accommodation in later life. Provide opportunities for 'self-builds' through the extension or amendment of settlement boundaries to allow 'in-fill' development in appropriate locations.

SNVC Objective 2 - Protecting village communities and support rural services and facilities

Provide opportunities for new housing development in a range of settlements within the village clusters to support local services and facilities, meeting the needs of a range of occupiers with the potential to support different local services and facilities

SNVC Objective 3 - Protect the character of villages and their settings

Ensure that the scale, location and density of housing is well related to the form and character of existing villages and ensure appropriate landscaping measures are delivered as part of new development.

QUESTION 1: Do you agree with the Objectives for the Village Clusters Plan? If you think the Objectives should be changed, please explain how and why.

Core policies

The main element of the Village Cluster Plan is the identification of sites to meet the GNLP requirement of at least 1,200 additional homes in the South Norfolk Village Clusters, which is dealt with in the individual cluster sections. Each allocated site will have an accompanying policy, setting out how many dwellings that site is allocated for and also any specific requirements which development of the site needs to meet e.g. protection of particular features on the site (such as trees, pond, hedgerows etc.), address a particular constraint of the site (such as a change in levels), access from a particular point, protection of particular views or taking account of the impact on a specific heritage asset. In addition, we are also considering having a small number of Core Policies that would apply to all of the sites. These policies need to strike a balance between not repeating what will be in the GNLP Strategic Policies or already contained in the South Norfolk's Development Management Policies and Government's National policy, whilst making it clear what our expectations are of the Village Clusters sites.

Policy SNVC1 - Standard requirements

Whilst each Village Cluster site will be different, all the sites are similar in that they are of a smaller scale, with most being between 12 and 35 dwellings, and they are on the edge of smaller, more rural settlements. To avoid repetition in each of the individual site policies, we are suggesting that the Plan includes a Policy on 'Standard requirements'. In addition, this policy could set out over-arching requirements to ensure specific infrastructure constraints are addressed.

Waste Water Constraints

Anglian Water's Water Recycling Long Term Plan covers the period to 2045 and will address ongoing capacity constraints in the existing wastewater network. However, it is possible that the phasing of development across the village clusters allocation sites will be affected in part by the availability of wastewater capacity within the wastewater network.

Existing capacity constraints have been identified at both the Woodton and Ditchingham Water Recycling Centres (WRC). These constraints may impact upon any additional connections to these WRCs in the short term (until 2025) whilst upgrade works are planned and implemented. Possible longer-term constraints have been identified in a number of WRCs that serve the South Norfolk village cluster area. Specifically, the following WRCs are considered likely to require significant upgrades from 2025 onwards: Long Stratton, Diss, Saxlingham, Whitlingham-Trowse and Woodton.

Specific requirements within this policy could include:

- safe and convenient access to/from the site for vehicles, cyclists and pedestrians;
- proportionate enhancements to pedestrian and cycle connections to local services and facilities;
- minimising the impact on the amenity of existing residents
- relevant supporting surveys and studies, such as ecological surveys or flood risk assessments;
- landscaping consistent with a rural, edge of village location, taking into account the South Norfolk Landscape Character Assessments;
- provision of open space on sites of 15+ dwellings;
- A requirement to ensure that all applicants for major development contact Anglian Water Services prior to engaging with the Local Authority to ensure that there is adequate capacity, or that capacity can be made available, for connection to the wastewater network.

QUESTION 2: Do you agree that the Village Clusters Plan should include a policy on ‘Standard requirements’? If so, do you agree that the criteria suggested are appropriate, or should they be amended and/or should additional criteria be added?

Policy SNVC2 – Design

The Council already has a number of Policies to encourage good quality design, in the Development Management Policies Document, and in the emerging GNLP. In addition, many Neighbourhood Plans also include policies relating to design. However, the many of these Preferred sites, although relatively small, are in edge of village locations, where achieving a high quality of design will be paramount. A Design Policy, could include:

- Development (including vehicle parking and open space provision) to be of an appropriate density, layout and massing for the locality, taking into account:
- relevant Conservation Area Character Appraisals and Management Guidelines;
- the South Norfolk Place-Shaping Guide SPD (2012), or any equivalent replacement;
- the South Norfolk Landscape Character Assessments;
- the design policies of relevant Neighbourhood Plans;

QUESTION 3: Do you agree that the Village Clusters Plan should include a policy on ‘Design’? If so, do you agree that the criteria suggested are appropriate, or should they be amended and/or should additional criteria be added?

There are often assumptions made about the type of new housing that is required, whether that be affordable housing for those who cannot afford open market rents/prices, housing for first time buyers, housing for families, or housing for older people wishing to downsize. These assumptions have changed during the recent COVID-19 pandemic, where suggestions have been made that more people are seeking rural housing locations now that their need to commute is reduced, or that access to outdoor space is an increased priority. However, the policies in a Local Plan need to be based on clear evidence. Currently the 2017 Central Norfolk Strategic Housing Market Assessment (SHMA) gives us some of that evidence. This SHMA is currently in the process of being updated, which will give this Plan a more up-to-date picture. In addition, local communities can identify specific local requirements through a Neighbourhood Plan. A Housing Mix Policy could include:

- Development should meet the affordable housing and housing mix requirements of the most up to date SHMA (or equivalent) available at the time it is permitted. This will include the need for single storey development, or similar, to meet the needs of older occupants.
- Where a relevant Neighbourhood Plan provides more up to date local information, or a greater level of detail, this will be used to modify the housing mix accordingly.

QUESTION 4: Do you agree that the Village Clusters Plan should include a policy on 'Housing Mix'? If so, do you agree that the criteria suggested are appropriate, or should they be amended and/or should additional criteria be added?

The Assessment of Sites

The Council has only assessed sites which have been put forward to us for consideration by (or on behalf of) the landowner or the potential developer of the site. The primary reason for this is to ensure that there is a reasonable prospect that the sites which are eventually allocated will come forward within the lifetime of the Plan. Many of the sites were initially put forward as part of the Greater Norwich Local Plan (GNLP) process, which meant they were considerably larger than what is being sought in the Village Clusters Plan. However, in March 2020 the Council sought to contact all of the site promoters to ask them whether they wished to amend their sites to take into account the requirements of the Village Clusters Plan i.e. for smaller sites which reflect the smaller, rural communities that they will be a part of, and which will contribute to the smaller sites requirement in the NPPF. A further 'call for sites' was included in the GNLP Regulation 18 consultation between January and March 2020. Almost 450 sites have been assessed for this consultation.

The assessment of sites has been undertaken in a consistent manner. The starting point has been the Norfolk-wide Housing and Economic Land Availability Assessment (HELAA) Methodology (2016), which has been agreed as part of the Norfolk Strategic Planning Framework process and is considered to be consistent with Government guidance. The Norfolk HELAA methodology also forms the basis of the GNLP site assessment process.

Whilst the HELAA provides a starting point, the full site assessment is a more detailed process which includes looking at the planning history of the site, undertaking a site visit and applying some more detailed criteria. Most noticeably the site assessment added criteria relating to the local Landscape Character Assessment, Better Broadband for Norfolk and revised the distance to services criteria to better reflect the rural nature of the Village Clusters Plan. Specifically regarding the latter, the Village Clusters assessment has widened the number of services to which distances to/from the site have been assessed, to include some which are characteristic of rural villages, a village/community hall and pub, as well as pre-school provision and formal sports facilities. The maximum distance to services was also increased, to reflect the more dispersed pattern of development across the South Norfolk Village Cluster. However the choice of sites has still been informed by the need for safe and convenient access to those services, as well as by an accompanying Sustainability Appraisal, see below.

The Site Assessments were also supported by a **Technical Consultation** with both internal consultees on landscape, heritage and environmental protection issues, as well as a range of external stakeholders, on issues such as highways, utilities and minerals and waste. The technical consultation also included issues of flood risk and ecology, although

technical comments on these issues are expected to be provided in response to this consultation.

A copy of the HELAA and Site Assessment form for the Village Clusters Plan can be found at Appendix **XX**

Evidence Base

Much of the evidence base to the Village Cluster is shared with the GNLP. Of particular relevance are those listed below, you may make comments on these documents as part of this consultation:

- Greater Norwich Water Cycle Study (March 2021), which indicated that sites in some Village Clusters locations may need to be phased in order for infrastructure to be suitably upgraded prior to development (it is likely that a specific supplement to the Water Cycle Study will be needed at the Regulation 19 stage of Village Clusters Plan)
- The Level 1 Strategic Flood Risk Assessment (November 2017), which has been used as part of the Village Clusters Site Assessment Process; and
- The GNLP Viability Appraisal (December 2020), which demonstrates that the type of sites being allocated through the Village Clusters Plan can be viably delivered with the relevant supporting infrastructure and affordable housing.

In addition, two specific supporting documents have been prepared to accompany this plan, these are listed below and you are able to make comments on these documents as part of this consultation:

- Sustainability Appraisal (SA); and,
- Habitats Regulation Assessment (HRA).

The preparation of the Scoping Report for the SA involved consultation with specified bodies in accordance with legal requirements. This consultation was undertaken in September and October 2020. A number of SA commentaries have been produced for the Council as part of the process of selecting the preferred sites, these have been incorporated into the published sustainability appraisal.

Interim SA and HRA documents have been published as part of the Regulation 18 consultation, the current findings of which indicate that the draft consultation Plan is selecting appropriate Preferred Sites in the context of the likely impacts assessed by these two documents.

Monitoring

All Local Plan documents are monitored on an annual basis in order to assess the effectiveness of the policies and allocations they contain. The outputs of the monitoring of the currently Local Plan documents are published as part of the Joint Core Strategy for Broadland, Norwich and South Norfolk, Annual Monitoring Report. A draft Monitoring Framework is included within this consultation document, which indicates how the effectiveness of the Village Clusters Plan will be measured after adoption.

DRAFT

1. Alburgh and Denton

Form and character

Alburgh

Alburgh is a linear village of mainly single plot frontage development with a mixture of housing types forming a central core along The Street, with a short spur along part of Church Road. A ribbon of scattered farmsteads and dwellings extends northwards towards Mill Road, and an open area containing farmsteads and some isolated dwellings extends southwards towards Piccadilly Corner. The area is characterised by many hedgerows and a number of mature trees, and is generally surrounded by open fields affording distant views. The village is linked to Hempnall and the B1527 to the north via The Street; and is linked to the A143 to the south via Tunbeck Road and Station Road, thereby on to Beccles, Bungay, Harleston and Diss.

Denton

Denton is in two principle parts. The main part extends from part way up Trunch Hill in the south to Skinners' Meadow in the north. A smaller and more scattered part is situated a quarter of a mile to the north and includes Uplands Terrace and some development along Darrow Green Road. Development is generally single plot depth fronting the road, except Skinners' Meadow and Globe Close.

There are many scattered former farm houses and conversions of former agricultural buildings. The attractive valley of the Beck runs through the extreme south of the parish with three tributaries flowing from the north. Trunch Hill runs down into the main valley. There are many trees and hedgerows particularly in the southern part of the parish which give it an attractive rural character

Services and Community Facilities

The cluster contains a village hall at the junction of Low Road and Church Road, and preschool facilities. The village also has some recreation facilities and a limited bus service. Denton shares a Primary and nursery school with Alburgh.

Settlement Limit and Constraints

Alburgh

The Settlement Limit has been drawn to include the main built-up area of the settlement around The Street. The remainder of Alburgh is very dispersed and therefore unsuitable for the creation of a Settlement Limit without leading to significant development which would fundamentally alter the character of the area.

No alterations are proposed to the existing Settlement Limit.

Denton

The Settlement Limit has been drawn to include the main built form of the settlement to allow for limited infill development only, due to the rural nature of the area and limited local facilities. No alterations are proposed to the existing Settlement Limit.

It is noted that Alburgh primary school is operating at or near capacity.

QUESTION 5: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

4 sites have been promoted for consideration, none of which were identified as preferred sites or shortlisted sites.

Rejected Sites

The following site(s) were promoted for development but were rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN00168	<p>Land at north of Upland Terrace Council houses, Norwich Road, Denton.</p> <p>The site as promoted extends to over 3ha, although the site promoter has indicated that a much smaller scheme (circa 4 dwellings) is being sought. Notwithstanding this, the site would extend a small group of former Council Houses in a location which is detached from the main part of the village (which lies to the south) and would erode the rural character of the locality. The site is well beyond 3km from the catchment primary school and connectivity to local services is poor.</p>
SN00193	<p>Land at Upland Farm, Denton.</p> <p>The site as promoted extends to over 5ha; however, even a smaller element of the site would be detached from the main part of the village (which lies to the south) and would effectively be an isolated group of dwellings in the countryside, eroding the rural character of the locality. The site is well beyond 3km from the catchment primary school and connectivity to local services is poor.</p>

Site	Location and Reasons for Rejection
SN4011	<p>Land to South and West of Church Road, Alburgh.</p> <p>The site is relatively well located for access to the school and village hall and creating accesses for frontage accesses (although improvements sought by Highways could urbanise this rural location). Linear, frontage development would also be in keeping with the character of this part of the village; however, this form of development would require the loss of extensive roadside hedging. The site is in the setting of a listed building and also has views across to the Grade 1 listed church, meaning that development at the western end of the site (either side of the Old Hall Farm drive) would have a detrimental impact on the setting of these designated heritage assets.</p>
SN4031SL	<p>Land adjacent to no1 Station Road, Alburgh.</p> <p>The site is promoted for a Settlement Limit extension in a part of the village with no existing Settlement Limit. The character of the area is of mixed development (small scale industry, agriculture and residential), but very much dispersed in pattern. The site is at the edge of the designated River Valley and in the vicinity of four listed properties; whilst these in themselves might not prevent development, creating a Settlement Limit in this location could encourage development that would seriously erode the character of the area. Previous applications on this site for an outstanding county house (under the NPPF) and a sustainable (then Code 6) home have both been dismissed at appeal within the past 6 years.</p>

QUESTION 6: Do you think that any of the rejected sites should be shortlisted or preferred for allocation? If so, please explain your answer.

2. Alington, Yelverton and Bergh Apton

Form and character

Alington and Yelverton

The main built-up areas of Alington and Yelverton form a contiguous settlement. Development is concentrated around Church Road and Wheel Road. There is also a significant area of development at Mill Road, Alington. Small detached clusters of development exist to the west of the main built up area on Burgate Lane and to the south on Church Meadow Lane in Alington, whilst a small number of individual dwellings and farmsteads are dispersed throughout the remainder of both parishes.

The settlement has developed as a ribbon form along Church Road and Wheel Road, though significant post-war estate scale development has taken place in the parish north of Wheel Road and west of Church Road, resulting in a more nucleated settlement form for this part of the settlement.

The settlement is set in generally flat open countryside, although in the south of Alington there is a small area of attractive valley landscape. The village is characterised by good areas of tree and hedge planting especially along Church Road, which together with its setting and views of the surrounding countryside give it an attractive rural character.

The western limit of the village along Wheel Road / Burgate Lane is clearly defined by a significant tree belt on the north side of the road, which together with open fields on both sides of the road maintains the separation between the main village and the small cluster of dwellings to the west. The A146 is 1km (0.6 miles) to the north and provides a good link to Norwich and Loddon whilst the B1332 lies immediately to the west of the parish providing good links to services in Poringland and also to Norwich and Bungay.

Bergh Apton

Development within the parish is relatively small scale and in clusters along Cookes Road and The Street, and a larger concentration of development along Mill Road and Threadneedle Street that has created a linear settlement form characterised by one plot depth development. The main areas of settlement in the village retain a rural character with no estate scale development whilst the remainder of the parish consists of isolated dwellings and farmsteads. The local road network comprises 'C' class and unclassified roads. The A146 is to the north of the settlement and provides a good link to Norwich and Loddon.

Services and Community Facilities

The cluster has a range of social and community facilities including a village hall, shop, primary school and preschool. There is also a limited bus service.

Settlement Limit and Constraints

Alpington and Yelverton

The Settlement Limit has been drawn to include the main built-up area of the settlement around The Street. The remainder of Alburgh is very dispersed and therefore unsuitable for the creation of a Settlement Limit without leading to significant development which would fundamentally alter the character of the area. No alterations are proposed to the existing Settlement Limit other than through the specific preferred sites identified in the preferred and shortlisted sites section.

Bergh Apton

The Settlement Limit has been drawn to include three main areas of settlement within Bergh Apton. These are the linear development along Mill Road and Threadneedle Street; around the junction of Cookes Road and The Street which includes an allocation of seven dwellings and further south on The Street which includes an allocation of five dwellings made within the 2016 Site Allocations Plan. No alterations are proposed to the existing Settlement Limit.

The primary school within Alpington is noted as being full, but in catchment pupil numbers are understood to be lower with the school currently helping with overflow from Poringland.

QUESTION 7: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

18 sites have been promoted for consideration, of which 4 were considered reasonable alternatives.

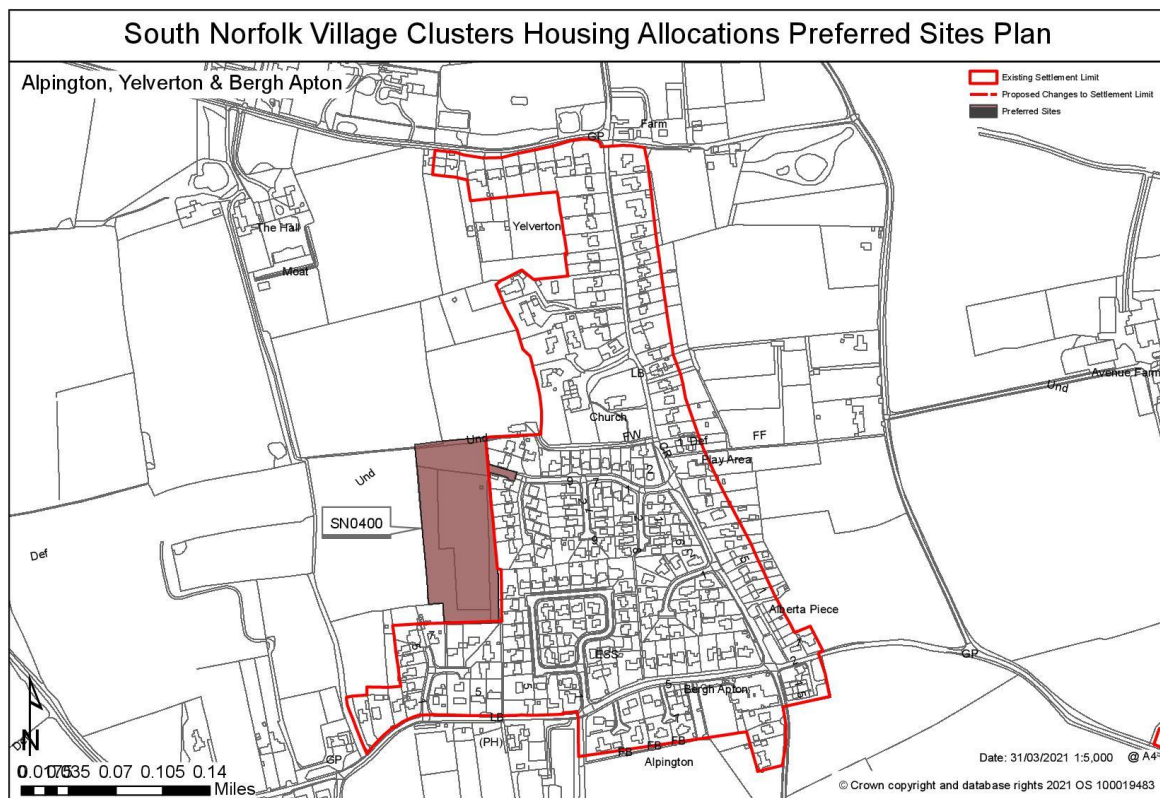
Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Site: SN0400 - Church Meadow, Alington

Preferred for up to 25 dwellings on a site of 1.87 hectares

Reasoned justification: The site is well located in terms of access to local services/facilities, with footway links to those in the village. The site is visually well contained, with no overriding constraints. Suitable for allocation for up to 25 dwellings, reflecting the scale and density of Church Meadow and the constraints of the site shape. There is an opportunity to enhance the setting the veteran tree in the north east corner of the site.

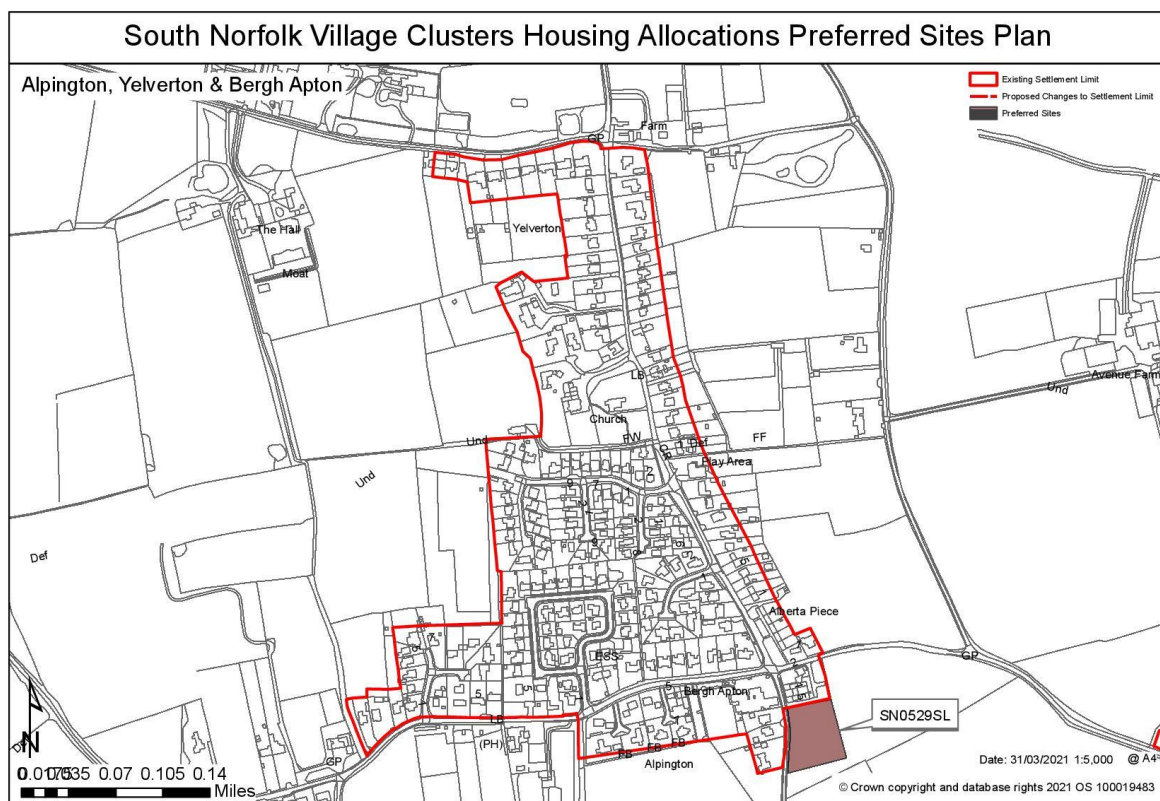


QUESTION 8: Do you support or object to the allocation of the preferred site?
Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Site: SN0529SL - Nichols Road, Alington

Preferred for a Settlement Limit Extension on a site of 0.37 hectares.

Reasoned justification: The site is adjacent to the existing Settlement Limit and within a reasonable distance of local services and facilities. However, development would need to respect the linear pattern of existing development on the western side of Nichols Road and should include appropriate landscaping, particularly to the eastern boundary. Development could potentially enhance the entrance to the village from the south. It has also been noted that a frontage access is preferred, rather than rear driveways like the adjoining scheme and that the footpath provided via the adjacent affordable housing development could be extended to serve this site.

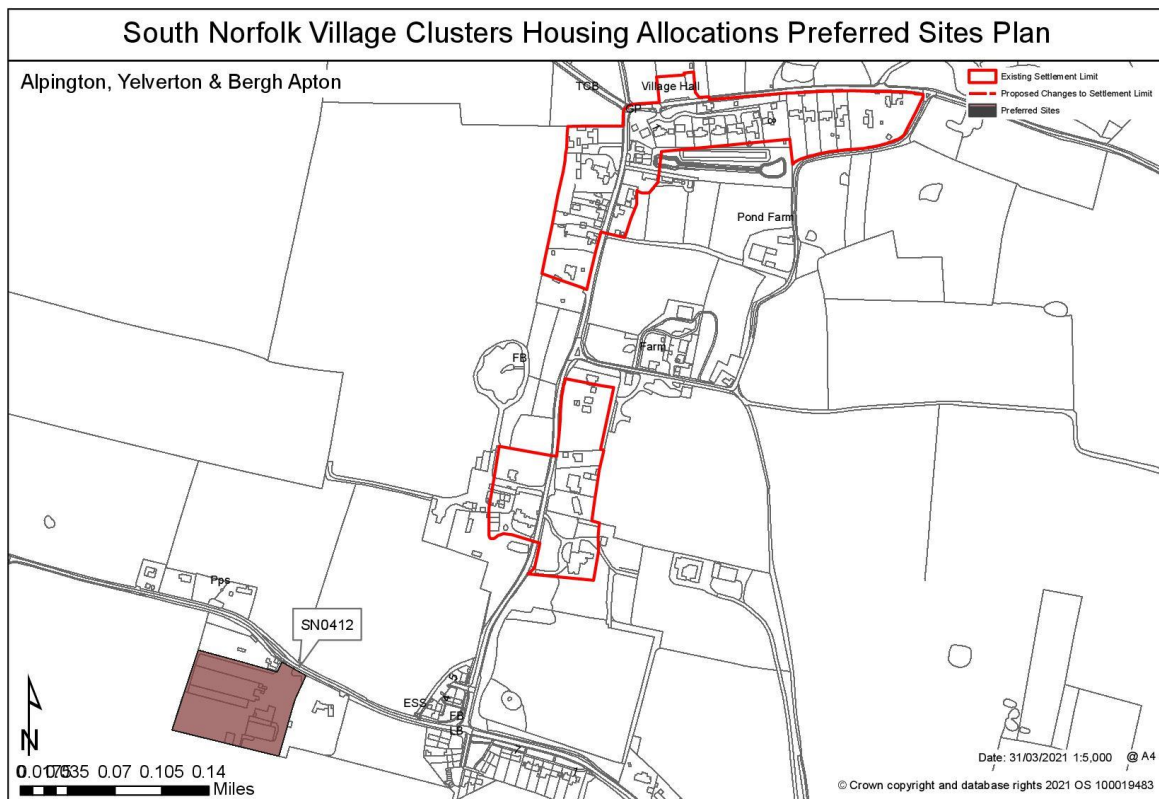


QUESTION 9: Do you support or object to the proposed use of the site? Please explain your reasons

Site: SN0412 - Former concrete works, Church Road, Bergh Apton

Preferred for 25+ dwellings on a site of 1.7 hectares.

Reasoned justification: This is a brownfield site. Whilst the site is not ideal in terms of highways access, the traffic generated by former uses (and potential lawful uses of the site) can be offset against the traffic from any redevelopment. Consideration needs to be given to the level of highways works that would be appropriate in this rural setting. Development of the site would be broadly consistent with the pattern of small clustered groups of dwellings that make up Bergh Apton, and preferable to further infilling between the clusters. The site itself has few constraints other than the clearance and clean-up costs related to the current buildings, hardstanding etc. Existing vegetation is non-native and redevelopment offers an opportunity to enhance the site.



QUESTION 10: Do you support or object to the allocation of the preferred site?

Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Shortlisted Sites

On the basis of the assessment undertaken the following site(s) have been shortlisted:

Site	Location and reasons not preferred for allocation:
SN0433	<p>Land at Wheel Road, Alington</p> <p>Shortlisted as a Reasonable Alternative for up to 25 dwellings on a site of 1 hectare.</p> <p>The site is reasonably located in terms of local services and facilities and has few on-site constraints. The main concerns with the site relate to the removal of the substantial frontage hedge (with trees) to facilitate the necessary highways improvements, across the whole site frontage from the Reeders Lane/Burgate Lane junction (which itself would require improvement) to the Wheel of Fortune. This would significantly change the character of the area and raise concerns in terms of wider landscape character.</p>

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0435	<p>Land at Burgate Lane (Glebe Field), Alington</p> <p>Whilst there an existing site access via Burgate Lane, there are significant trees on the site frontage that would prevent achieving a satisfactory access with sufficient visibility splays. These trees also provide a significant feature in the street scene, where their removal would cause harm to the landscape. Whilst the site is in close proximity to some local services and facilities, there are no footways along this part of Burgate Lane to the main part of the village, where there is also a lack of continuous footways. The adjoining properties are very low density and significantly set back from the road frontage, therefore development of the site would not be in keeping with the form and character of the neighbouring development.</p>

Site	Location and Reasons for Rejection
SN4030	<p>Land at Mill Farm, Mill Road, Bergh Apton</p> <p>Mill Road is separate from the main settlement and the surrounding highway network is substandard with no safe walking route to the school and poor access at each junction end. The site is behind Mill Farm and does not relate well to the existing linear pattern of frontage development, as it would extend development further south. In addition, there is insufficient frontage to provide adequate access into this site.</p>
SN2022	<p>The Dell, Bergh Apton</p> <p>The site is remote location away from any settlement and services. The highway network is inadequate to support development in this location and there is no safe walking route to the school. There would be a loss of trees and habitat to the detriment of the surrounding landscape and environment.</p>
SN2023	<p>Land south of Loddon Road and east Bergh Apton house, Bergh Apton</p> <p>The site is remote location away from any settlement and services. The highway network is inadequate to support development in this location and there is no safe walking route to the school. There would be a loss of trees and habitat to the detriment of the surrounding landscape and environment.</p>
SN0434	<p>Bergh Apton Road, rear of Alberta Piece, Alington</p> <p>Whilst the site is adjacent to the existing Settlement Limit and within a reasonable distance of local services and facilities, actual accessibility is much more limited due to the constraints of the local highway network. The site also provides an attractive rural setting where the site is very visible when approaching from Bergh Apton, where the removal of hedgerows to provide site access would cause harm to the wider landscape. Development of the site would represent an out of character breakout into the open countryside. Few other constraints have been identified.</p>
SN1012	<p>Mill Field, Mill Road</p> <p>Mill Road is separate from the main settlement and the surrounding highway network is substandard with no safe walking route to the school and poor access at each junction end. The site extends behind the existing linear pattern of frontage development and would encroach further north which is out of character. In addition, there are significant</p>

Site	Location and Reasons for Rejection
	existing trees and hedging along the frontage which would be lost with a negative impact on the landscape character
SN2006	<p>South of Loddon Road (A146) and Gull Lane, Yelverton</p> <p>Development of the site would be a significant extension into the countryside that would not reflect the exiting form of the settlement on this side of Yelverton. Highways have also raised issues with the proposed access from the A146 'Corridor of Movement'. There is no possibility of creating suitable access to the site in the vicinity of the existing Gull Lane junction and almost opposite the Gull Inn. The site is also heavily constrained by flood risk where half of the site, including the proposed access point, is Flood Zone 3a and at a higher level of surface water flood. There is also potential impact on the CWS immediately to the south west.</p>
SN2015	<p>Town Farm, Church Road, Bergh Apton</p> <p>The site has a poor relationship to the main areas of settlement within Bergh Apton. Whilst the site is part of a smaller group of dwellings along Church Road , it is separated from the main village (and the local facilities) where there is no current Settlement Limit in this location. The site also provides an attractive rural setting where development would be detrimental to the existing rural form and character. Highway constraints have also been identified, especially regarding the unsuitable local road network.</p>
SN0203	<p>Land to the south of Church Road, Bergh Apton</p> <p>Whilst the site would broadly fit with the 'clustered' nature of Bergh Apton, it is adjacent to a significant grouping of listed Tayler and Green properties. Church Road itself is narrow, with no footways. Whilst the nearby preferred brownfield site can offset the traffic generated by new dwellings against the previous use of the site, the same cannot be said of a greenfield site. Loss of the frontage hedge would also erode the character of the area, and the site would be further constrained by the need to protect the mature oak trees on the boundary of the property to the west.</p>
SN0210	<p>Church Wood, Welbeck Road, Bergh Apton</p> <p>Although the site is opposite a County Council recycling centre, it is not considered that further development in this location would be</p>

Site	Location and Reasons for Rejection
	<p>acceptable. The site is remote from services/facilities in Bergh Apton and other settlements, with a poor highways network the already supports the recycling centre traffic. The site forms and attractive, partially wooded, section of the Well Beck/Chet Valley, bisected by a public right of way. The site is also immediately adjacent to a County Wildlife Site and the Grade II* Listed St Peter & St Paul's Church.</p>
SN0433REV	<p>Land at Wheel Road, Alington</p> <p>This is a larger area of land extending to 3.3 hectares of which site SN0433 is part. The site is reasonably located in terms of local services and facilities and has few on-site constraints. The main concerns with the site relate to the removal of the substantial frontage hedge (with tress) to facilitate the necessary highways improvements, across the whole site frontage from the Reeders Lane/Burgate Lane junction (which itself would require improvement) to the Wheel of Fortune. This would significantly change the character of the area and raise concerns in terms of wider landscape character. Would also unacceptably impact on the rural setting of the listed Stacey Cottage to the south of the site.</p>
SN0533	<p>Land east of The Street, Bergh Apton</p> <p>As with other parts of Bergh Apton, the wider highways network is a concern, although access to this site should be achievable from The Street. However, this access would be likely to require the removal of a significant roadside hedge, the loss of which in itself would be a concern, but which would also increase the impact of any development on the settlement pattern (emphasising the closing up of the currently dispersed pattern) and also on the nearby listed cottage.</p>
SN0122SL	<p>Land to the north of Cooke's Road, Bergh Apton</p> <p>The site is separate from the main part of the settlement and the surrounding highway network is substandard with no safe walking route to the school. A 2019 appeal decision concluded that two dwellings on this site would have an '<i>unacceptably harmful effect on highway safety</i>'. Whilst it is adjacent to the settlement limit there would be an impact on the landscape as it would extend into countryside to the north of Cooke's Road and the character is of limited development; the 2019 appeal decision highlighted this site would '<i>cause material harm to the area's open and rural appearance</i>'. It would also have an impact on</p>

Site	Location and Reasons for Rejection
	the nearby heritage assets including the historic parkland setting of Bergh Apton Manor, and nearby listed properties.
SN2117	<p>Land adjacent to the village hall, Bergh Apton</p> <p>The site is separate from the main part of the settlement where the surrounding highway network is substandard with no safe walking route to the school. Whilst it is adjacent to the settlement limit there would be an impact on the landscape as it would extend into countryside to the north of Cooke's Road and the character is open with limited development. An appeal decision for two dwellings on the adjacent site would '<i>cause material harm to the area's open and rural appearance</i>'. It would also have an impact on the nearby heritage assets including the historic parkland setting of Bergh Apton Manor, and nearby listed properties.</p>

QUESTION 11: Do you think that any of the shortlisted or rejected sites should be allocated instead of, or in addition to, the preferred site? Please explain your response.

QUESTION 12: Do you think that any of the shortlisted sites should be considered unreasonable? Please explain your response.

3. Aslacton, Great Moulton and Tibenham

Form and character

Aslacton and Great Moulton

The main concentrations of development within the parishes of Aslacton and Great Moulton are in three distinct settlements – the historic village cores of Aslacton and Great Moulton, and an area of largely modern development at Sneath Common.

The historic core of Aslacton is concentrated around The Street and Church Road and includes the village school.

Great Moulton is a compact settlement which has developed between a number of traditional farmsteads strung along the south side of High Green and some further farms on the north side of Old Road. The village has seen a considerable amount of modern development, with estate development such as Potters Crescent and Heather Way as well as a large amount of infill development.

The local road network comprises of mainly 'C' and unclassified roads, but the B1134 to the south of Sneath Common provides links to the A140 to the east and the B1077 and New Buckenham to the west.

Tibenham

The parish of Tibenham has a dispersed rural settlement pattern consisting of individual dwellings and farms scattered throughout the parish. The established village of Tibenham is concentrated along The Street and around the site of the old school. Further detached clusters of development exist at Pristow Green and Long Row. The main concentration of development has developed in a linear form characterised by one plot depth. Its setting in a small valley with abundant tree hedge planting along the road frontages and attractive open countryside give it a rural character.

Services and Community Facilities

The cluster has limited facilities including a pub, village hall, recreation area and limited public transport. There is a primary school situated in Aslacton.

Settlement Limit and Constraints

Aslacton & Gt Moulton

The Settlement Limit has been drawn to include the main built form of the three settlements. In addition, the boundary includes a small allocation on High Green made

within the 2016 Site Allocations Plan and the former scrapyard in Aslacton. Small amendments to the Settlement Limit are proposed on Pottergate Street and at Sneath Road/Woodrow Lane to reflect planning permissions for new dwellings that have been allowed on sites adjacent to the existing Settlement Limit. These changes are shown on the policies map.

QUESTION 13: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

14 sites have been promoted for consideration, of which 1 has been preferred and 1 has been shortlisted.

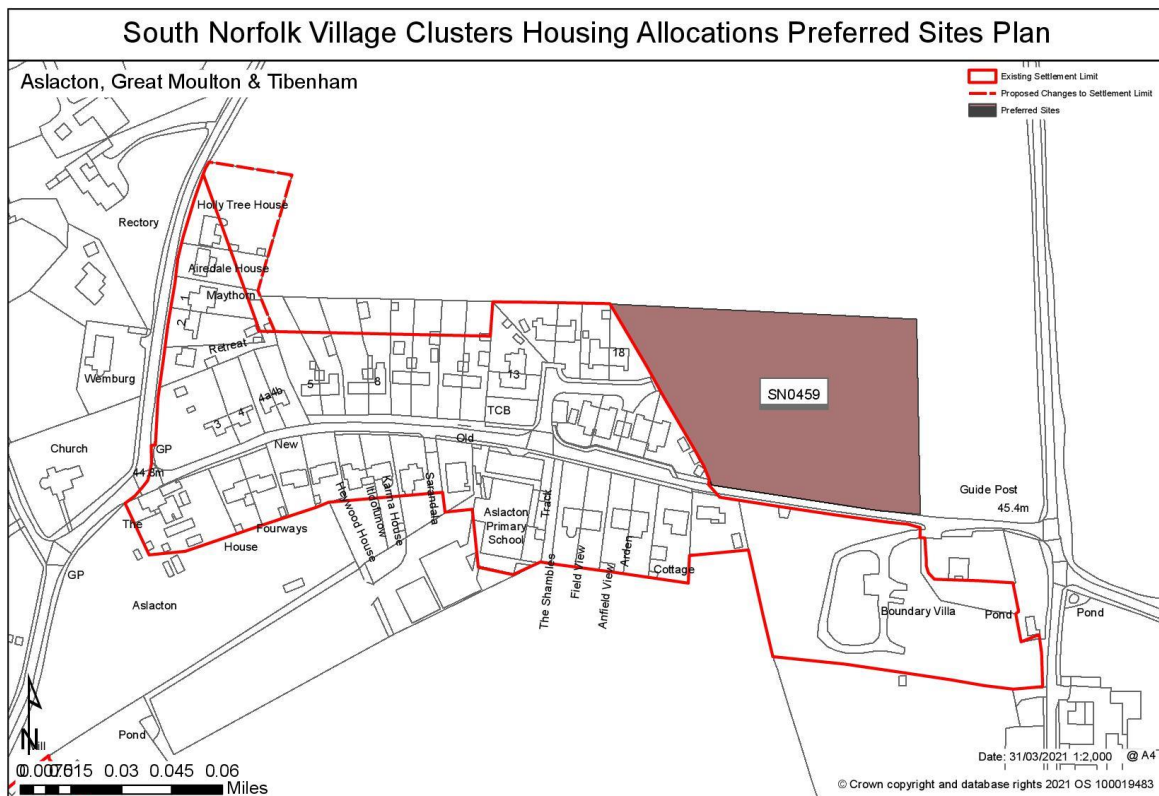
Preferred Site(s)

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Site: SN0459, Land off Church Road, Aslacton

Preferred for up to 25 dwellings on a site of 1 hectare

Reasoned justification: Site is well related to Aslacton Primary School. Whilst highway and landscape concerns have been raised it is considered that these could be mitigated through footpath extensions and appropriate landscaping. In order to be consistent with the aims of the Village Cluster Housing Allocation, it is proposed that only 1 hectare of the promoted site is allocated for development. The proposed allocation would therefore comprise the western half the promoted site immediately adjacent to existing development.



QUESTION 14: Do you support or object to the allocation of the preferred site?

Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Shortlisted Sites

On the basis of the assessment undertaken the following site(s) have been shortlisted:

Site	Location and reasons not preferred for allocation:
SN2118	<p>South of Sneath Road, Aslacton</p> <p>Shortlisted for a Settlement Limit Extension on a site of 0.54 hectares.</p> <p>The site is considered potentially suitable as a limited Settlement Limit extension as there are no significant concerns in terms of townscape, landscape or heritage, although identified flood risk issues would need to be overcome for the site to be developed. However, the site has limited access to services and no safe walking route to school.</p>

Rejected Sites

The following site(s) were promoted for development but have been considered to be unreasonable alternatives on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0365SL	<p>Land east of Cherry Tree Road, Tibenham.</p> <p>The site is remote from existing settlements with very limited access to services. It is also considered that the development may impact detrimentally on nearby heritage assets.</p>
SN0554SL	<p>Land at Hallowing Lane, Great Moulton.</p> <p>The site is subject to a number of constraints, including highways constraints, heritage and trees. There is no safe walking route to the primary school.</p>
SN0555	<p>Land off Old Road (adjacent to Hallowing Lane), Great Moulton.</p> <p>The site is subject to a number of constraints, including highways constraints, heritage and trees. There is no safe walking route to the primary school.</p>
SN0557SL	<p>Sites between Ketts Farm and Orchard Farm, Great Moulton.</p>

Site	Location and Reasons for Rejection
	The site is considered to be unreasonable. The site is subject to a number of constraints, including highways constraints, heritage and flood risk. There is no safe walking route to the primary school.
SN1041	<p>Land at Pottergate, Aslacton.</p> <p>The site is remote from existing settlements with very limited access to services. There is no safe walking route to school. The site is considered to have detrimental impacts in terms of landscape, townscape and heritage and is subject to flood risk constraints.</p>
SN1042	<p>Land at Church Road, Aslacton.</p> <p>The site is remote from existing settlements with very limited access to services. There is no safe walking route to school. The site is considered to have detrimental impacts in terms of landscape, townscape and heritage and is subject to flood risk constraints.</p>
SN2005	<p>West of Woodrow Lane, Aslacton.</p> <p>The site is remote from existing settlements with very limited access to services. There is no safe walking route to school. The site is considered to have detrimental impacts in terms of landscape, townscape and heritage and is subject to flood risk constraints.</p>
SN2008SL	<p>Overwood Lane, Great Moulton.</p> <p>It is remote from existing settlements, with resultant detrimental impacts in terms of landscape and townscape. It has poor connectivity to services and no safe walking route to school. Potential impact on setting of nearby listed buildings.</p>
SN2068	<p>Cherry Tree Farm, Great Moulton.</p> <p>Site is breakout from the existing pattern of built form and would impact on the existing rural approaches to existing settlements. Access to site potentially constrained and would require significant loss of hedgerow. Proximity to railway line would potentially impact on the amenity of future residents. Site has limited access to services and facilities. There is no safe walking route to school. No footpath access from existing settlements to proposed retail provision.</p>
SN2102SL	Long Row, Tibenham.

Site	Location and Reasons for Rejection
	Site is remote with poor access to services. Concern over potential impact on nearby heritage assets
SN2112	<p>Back Barn Road, Tibenham</p> <p>Access to services is limited. Location and form of development considered to have significant impact on landscape and the form and character of settlements. Concerns over impact on capacity of local highway network.</p>
SN3008REV	<p>East of Pristow Green Lane, Tibenham</p> <p>Access to services is limited. Location and form of development considered to have significant impact on landscape and the form and character of settlements. Concerns over impact on capacity of local highway network.</p>

QUESTION 15: Do you think that any of the shortlisted or rejected sites should be allocated instead of, or in addition to, the preferred site(s)? Please add additional comments to explain your response.

QUESTION 16: Do you think that any of the shortlisted sites should be rejected? Please explain your response.

4. Barford, Marlingford, Colton and Wramplingham

Form and character

Barford

Barford is a compact settlement on the north bank of the River Tiffey. Development has extended northwards away from the B1108 along Cock Street and Style Loke, with frontage development to the north of Church Lane and along Chapel Street/Marlingford Road. The historic centre of the village is concentrated on Cock Street and Chapel Street with later estate development situated off Chapel Street at Park Avenue and Clarke Close. The village is set in the attractive valley of the River Tiffey and is characterised by mature tree planting. The most sensitive area of the village is situated on either side of Cock Street where the Hall and its grounds on the west side and the popular plantation on the east side, positively contribute to the form and character of the village.

Barford has a good road link via the B1108 to Norwich 13km to the east and links via mainly unclassified roads to Wymondham 6km to the south.

Marlingford

The main village is located in the bottom of the Yare Valley on the outside of a bend in the river.

Marlingford village has developed along two sides of a triangle formed by Barford Road and Mill Road, which radiate towards the south west from the junction with Marlingford Road. The junction forms the focal point of the village. To the north-east of the junction is the 'Old Hall' which is listed. The area around the Hall has remained undeveloped which contributes to its setting.

The wedge of land between Barford Road and Mill Road occupied previously by allotments and The Common has remained undeveloped and is locally regarded as Marlingford's amenity area used for conservation and recreation. This contributes to the rural character of Marlingford as a village set in open countryside within the river valley.

Colton

Historically, the settlement of Colton developed with a number of large farms and small cottages which have been joined up by frontage development to form a distinct settlement grouping. To the south of Norwich Road the buildings are set in large grounds with trees and hedges along the road frontage. The area to the north of Norwich Road falls within the administrative area of the Broadland District Council. Development along The Street is of higher density.

Wrampingham

Development within the parish has been concentrated along Wymondham Road and The Street with the remainder of the parish displaying a dispersed settlement pattern comprising individual dwellings and farmsteads. The small scale development at Wymondham Road is linear in form and concentrated on the south side of the road.

Services and Community Facilities

Barford has a range of facilities including a village hall, shop and primary school. There are also a number of industrial and commercial concerns located within the centre of the village, which provide local employment opportunities. There is also a regular bus service. The remaining settlements have facilities limited to a village hall and public house, with a limited bus service.

Settlement Limit and Constraints

Barford

A Settlement Limit has been drawn to include the main built form of the settlement. A smaller Settlement Limit has been drawn around the existing properties on Church Lane to the west of the village, which includes the allocation south of Church Lane made within the 2016 Site Allocations Plan.

Much of the central part of Barford forms part of the Barford Flood Alleviation Scheme which helps to control flooding in the village. This has therefore constrained where development could be located in the village, and this area has been excluded from the Settlement Limit.

Marlingford

The Settlement Limit has been drawn to include the main built form of the settlement. Due to its rural character and very limited services the Settlement Limit has been drawn to allow only very limited infill development.

Colton

Due to the very limited facilities available in Colton the Settlement Limit has been drawn around the built form on Norwich Road, to allow for very limited infill development and to avoid further expansion into the surrounding countryside, preserving the rural character of the area.

No alterations are proposed to the existing settlement limits within this cluster.

QUESTION 17: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

8 sites have been promoted for consideration, of which 1 was shortlisted but no sites were identified as preferred allocations

Shortlisted Sites

On the basis of the assessment undertaken the following site has been identified as a reasonable alternative.

Site	Location and reasons not preferred for allocation:
SN0552	<p>Land off Watton Road, Barford.</p> <p>Shortlisted for up to 50 dwellings on a site of approximately 2.4 hectares in connection with the provision of significant public open space.</p> <p>As promoted the site is excessive in scale in the context of the plan and would have a significant adverse impact on the wider landscape. A site of reduced size would be more appropriate, although it wouldn't offset all adverse landscape impacts. Due to the identified flood risk constraints on those parts of the site closest to the existing settlement new development would have a sub-optimal relationship with the main village. However, it may be possible to overcome the identified highways concerns and ensure appropriate access to village services through various highways mitigation measures. The site may also provide an opportunity to secure public open space that could be a benefit to the Village. This could justify a development in excess of the 12-25 homes that are typically being sought through the plan.</p>

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0416	<p>Land south of Barford Church and north of Barnham Broom Road.</p> <p>Development of the site would have a detrimental impact on the setting of the adjacent Grade II listed Church immediately to the north of the site. The inclusion of an area of open space to the south of the Church is not considered sufficient to overcome this impact and would reduce the developable area of the site. The site is removed from the existing settlement limit and has connectivity issues and is therefore also not considered to be suitable as a settlement limit extension.</p>
SN0424	<p>Land south of Marlingford Road, Colton.</p> <p>It is located in a prominent location within the landscape and would have a detrimental impact on the character and setting of Colton, particularly when approaching from the south. The local road network is also noted to have considerable constraints which cannot be overcome.</p>
SN0425	<p>Land at Mill Road and Barford Road, Marlingford.</p> <p>Development of the site would conflict with the linear pattern of development in evidence, eroding the character of the settlement. The site relates poorly to the existing services, including the local school. The site is also within a sensitive River Valley setting and furthermore, access constraints to the site have also been identified.</p>
SN1013REV	<p>Land between Church Lane and Back Lane, Barford</p> <p>Principle access is proposed via the existing allocation, BAR1, which has known access constraints. Furthermore, even at a reduced scale/ site size development in this location would have an adverse impact on the existing loose pattern form of development that characterises this part of the village.</p>
SN0474	<p>Land west of Colton Road, Marlingford</p> <p>Not suitable due to remote location of site and poor access</p>
SN0475REV A	<p>Land east of Highhouse Farm Lane, Colton</p> <p>The benefits of an affordable housing led scheme are outweighed by the poor connectivity of the site, including its distance from the local primary school, as well as the impact development of the site would</p>

Site	Location and Reasons for Rejection
	have on the existing form and character of the settlement. Significant highways network and access constraints have also been identified.
SN0475B	<p>Land east of Highhouse Farm Lane, Colton</p> <p>The site relates poorly to the existing services, including the primary school, and would have a poor relationship with the existing form and character of the settlement. Significant access and highway network constraints have also been identified and are considered to be further barriers to the development of this site.</p>

QUESTION 18: Do you think that any of the shortlisted or rejected site(s) should be allocated instead of, or in addition to, the preferred site(s)? Please add additional comments to explain your response.

QUESTION 19: Do you think that any of the shortlisted site(s) should be rejected? Please add additional comments to explain your response.

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

Form and character

Barnham Broom

The built-up area around Mill Road is set on a west-facing slope of part of the attractive Yare Valley. It is separated from the eastern part of the village by the significant wooded area south of St Michael's Church and open fields south of Norwich Road. The settlement form here is based on the junction of Mill Road and Bell Road, and estate-scale development has occurred between the two roads. To the east, the built-up area of Norwich Road is linear, with small cul-de-sacs at Chapel Close and Lincoln's Field.

Further east of the built-up area at Norwich Road is the detached farm hamlet of Pockthorpe, which is separated from the main part of the village by a significant open gap, with good views of the surrounding open countryside. Good road links exist to Norwich and Watton (B1108) and Wymondham and Dereham (B1135).

Kimberley & Carleton Forehoe

The settlement of Kimberley is located mid-way between Wymondham and Hingham. It is a scattered settlement which has developed adjacent to Kimberley Park although two main groups of development can be identified at Kimberley Street and Kimberley Green. Kimberley Street is an essentially linear development astride the B1108 while that at Kimberley Green is loosely grouped around the green and the parish church. The parish also includes the settlement of Carleton Forehoe to the north. The parish is centred on the junction of the B1108 and B1135 which provides direct links to Norwich, Watton, Wymondham and East Dereham.

Brandon Parva, Coston, Runhall & Welborne

The parish is located in the north west of the district. It has no single consolidation of development with the population located in four groups dispersed within an agricultural area. These are located at Runhall, Welborne Common, Brandon Parva and Coston. In addition there are isolated dwellings and farmsteads situated in the parish.

Services and Community Facilities

The cluster has a good range of facilities including a primary school, preschool facilities, village hall, shop and pub. Outside the village centre, the parish also contains Barnham Broom Golf & Country Club. There is a limited bus service.

Settlement Limit and Constraints

The Settlement Limit has been drawn in two parts to include the main built form of the settlement. There is a significant break in the Settlement Limit where agricultural land and woodland provide a rural setting for the village. The Settlement Limit maintains physical separation between the two built up area.

No alterations are proposed to the existing settlement limits within this cluster other than those specifically identified within the preferred and shortlisted sites section.

QUESTION 20: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

9 sites have been promoted for consideration, of which 3 are identified as preferred allocations and 3 were shortlisted.

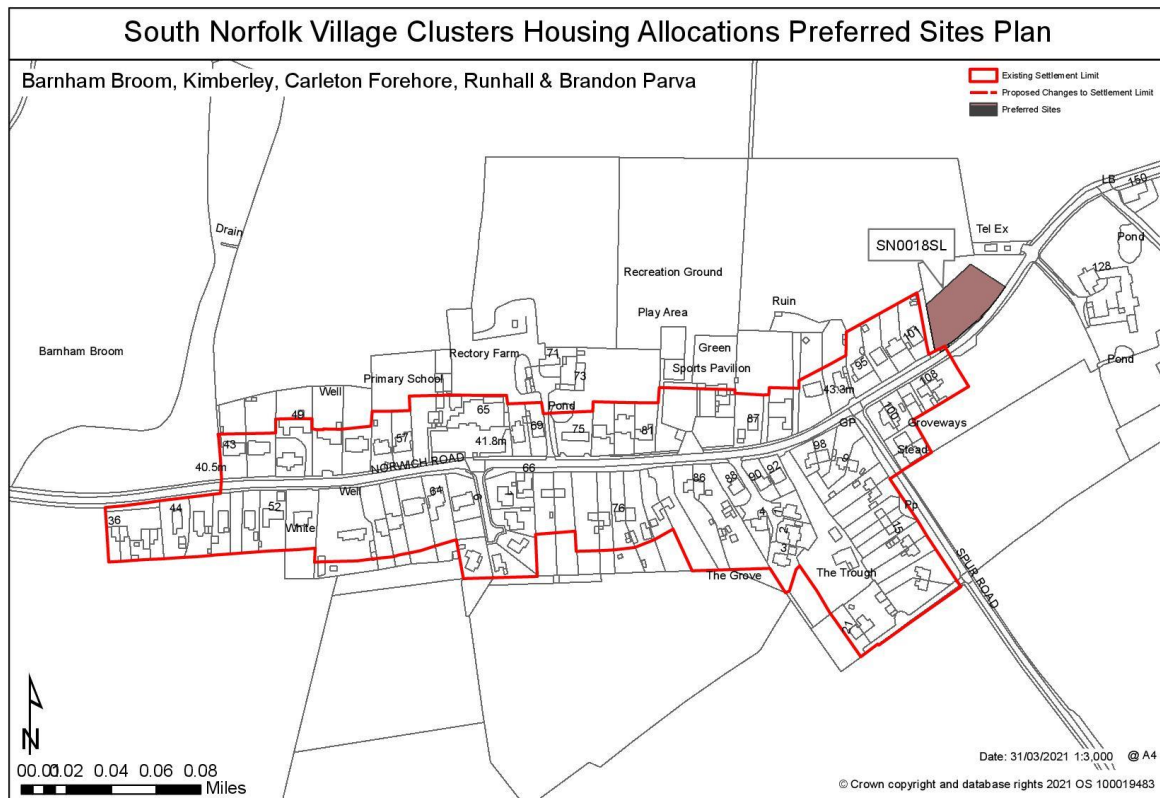
Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Site: SN0018SL, Land north of Norwich Road, adj 101

Preferred for a Settlement Limit Extension on a site of 0.18 hectares

Reasoned justification: Whilst the site is on the rural approach to the east end of Barnham Broom, and close to a non-designated heritage asset, it is also well located for access to local services and facilities with no on-site constraints; as such, a small Settlement Limit extension would be appropriate.

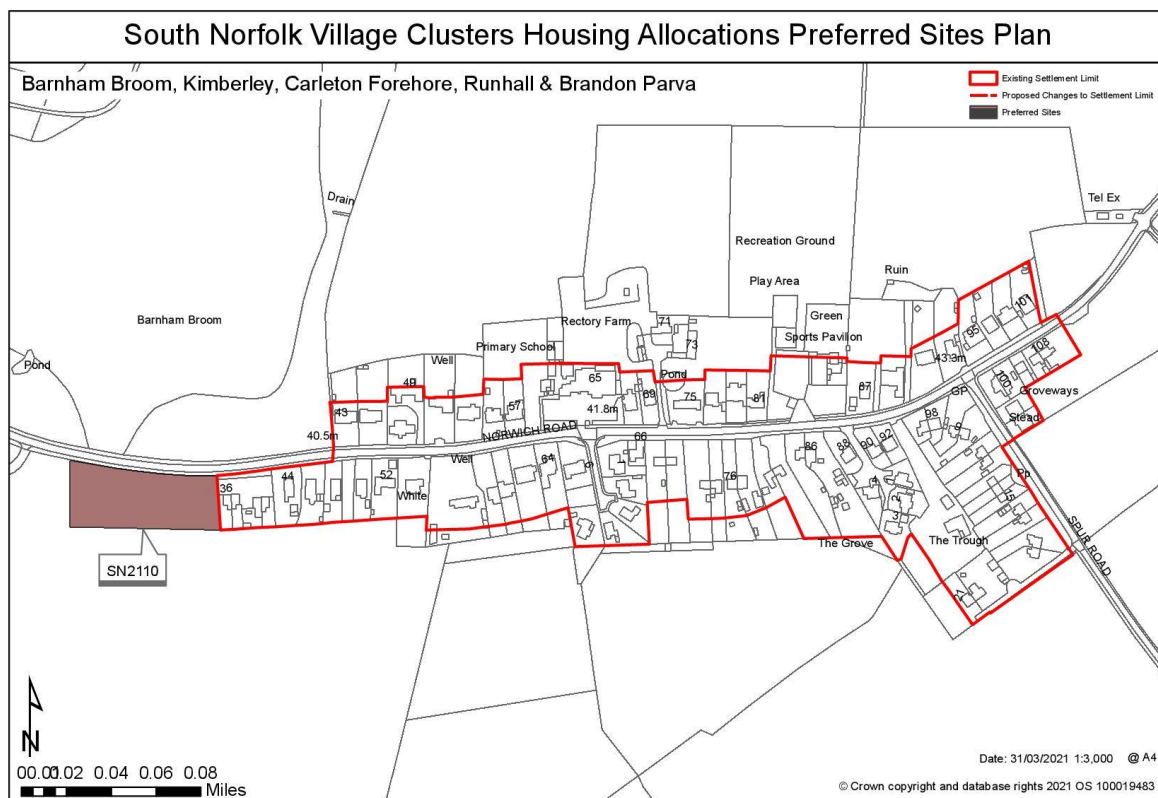


QUESTION 21: Do you support or object to the proposed use of the site? Please explain your reasons

Site: SN2110, Land south of Norwich Road, Barnham Broom

Preferred for a Settlement Limit Extension on a site of 0.4 hectares.

Reasoned justification: The site is a smaller road frontage element of a more substantial field. The site is central to the village and relatively unconstrained. However, frontage development would impact on the character of the area by closing the gap between the eastern and western parts of Barnham Broom and potentially lead to the loss of roadside trees; the gap also contributes to the setting of a non-designated heritage asset. The site would only be suitable for a small-scale scheme that addresses these concerns.



Shortlisted Sites

On the basis of the assessment undertaken the following site(s) have been shortlisted.

Site	Reasons not preferred for allocation:
SN0055	<p>Land east of Spur Road and south of Norwich Road, Barnham Broom</p> <p>Shortlisted for a development of up to 25 dwellings on a site of 1 hectare.</p> <p>The site is well located in terms of access to services and facilities in Barnham Broom, although improvements to footways may be necessary. The site is rural in character, with frontage hedges, providing the setting to non-designated heritage assets; consequently, estate scale development is unlikely to be appropriate. However, the site could be considered suitable for a small-scale allocation of up to 25 units, potentially with some units fronting both Norwich Road and Spur Road.</p>
SN0174	<p>Land off Bell Road, Barnham Broom</p> <p>Shortlisted for a development of up to 25 dwellings on a site of 1 hectare.</p> <p>The site is located with reasonable access to services and facilities and is in itself relatively unconstrained, subject to access from the recently completed Bankside Way development. However, the western part of the site would be more intrusive in the Yare Valley, be more problematic in terms of built form/townscape and encroach more on the nearby listed property. The most significant constraint is the need to improve the junction of Bell Road with Mill Road and Norwich Road, which requires third party land.</p>
SN0196	<p>Land to the west of Mill View, Barnham Broom</p> <p>Shortlisted for a development of up to 25 dwellings on a site of 1 hectare.</p> <p>The site is located with reasonable access to services and facilities and is in itself relatively unconstrained, subject to access through the adjoining submitted site (SN0174) and via the recently completed Bankside Way development. However, the western part of the site would be more intrusive in the Yare Valley, be more problematic in terms of built form/townscape and encroach more on the nearby listed property. Development of this site would also require breaching the hedge between this site and SN0174. The most significant constraint is the need to improve the junction of Bell Road with Mill Road and</p>

Site	Reasons not preferred for allocation:
	Norwich Road, which requires third party land. If this site were allocated it is likely that SN0196 would also need to be developed. It would therefore need to be considered whether a larger development across SN0196 would be more appropriate in isolation than small developments across two adjacent sites.

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN4078	<p>South of Batchawana, Bell Road, Barnham Broom</p> <p>The site is promoted for a Settlement Limit extension on the east side of Bell Road, where there is currently only an individual dwelling outside the Limit. Development would appear incongruous and would have a negative impact on the character of the area and the street scene. The site subdivides two larger fields, with no obvious boundaries to the east or south.</p>
SN0476REV	<p>Land east of Hingham Road and north of Barnham Broom Golf Club (The site lies within the clusters of both Barnham Broom and Barford)</p> <p>The site has a poor relationship to the existing settlements (Barnham Broom/Marlingford/Colton/Barford) and is a considerable distance from the existing services/facilities. Even at a reduced scale, development in this location would have an adverse impact on the landscape, including the River Valley, and highways constraints result in further issues that would hinder the development. Proposals for accommodation specifically tied to the existing commercial use at Barnham Broom Golf Club/Spa (e.g. holiday and/or staff accommodation), plus the expansion of the recreational facilities themselves could be made and assessed under current planning policies.</p>
SN0324	<p>Land south west of Dades Farm, Norwich Road, Barnham Broom</p> <p>Whilst the site itself has few constraints and is within a reasonable distance of local services and facilities, improved access would require</p>

Site	Location and Reasons for Rejection
	<p>footways to link to those further west, along Norwich Road.</p> <p>Development would currently be detached from the main area of the village, and even if the intervening sites (which have been promoted for the Village Cluster Plan) were supported, development of this site would still be harmful to the open character of the area and the rural setting of Barnham Broom.</p>

QUESTION 24: Do you think that any of the shortlisted or rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

QUESTION 25: Do you think that any of the shortlisted sites should be rejected? Please add additional comments to explain your response.

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6. Bawburgh

Form and character

Bawburgh is situated in the bottom of the Yare Valley between the B1108 and A47. Two distinct settlement groups have developed each side of the river. To the south of the river, frontage development extends along Church Street towards the church; more recent estate development is situated on Hockering Lane, with a detached group of dwellings further south beyond the village hall on Stocks Hill. To the north of the river, frontage development follows the line of New Road and Harts Lane, with another nucleus of dwellings to the west of the junction with Marlingford Road.

The central area of the village was designated a Conservation Area in 1973. The floodplain of the River Yare between the two 'sides' of the village has remained undeveloped. This contributes to the valley setting of Bawburgh.

Services and Community Facilities

Bawburgh is situated in the bottom of the Yare Valley between the B1108 and A47. Two distinct settlement groups have developed each side of the river. To the south of the river, frontage development extends along Church Street towards the church; more recent estate development is situated on Hockering Lane, with a detached group of dwellings further south beyond the village hall on Stocks Hill. To the north of the river, frontage development follows the line of New Road and Harts Lane, with another nucleus of dwellings to the west of the junction with Marlingford Road.

The central area of the village was designated a Conservation Area in 1973. The floodplain of the River Yare between the two 'sides' of the village has remained undeveloped. This contributes to the valley setting of Bawburgh.

Settlement Limit and Constraints

The Settlement Limit is separated by the river which runs through the centre of the village. The northern section includes almost all dwellings on New Road and Harts Lane, including the small cluster of development at the junction with Marlingford Road. The southern section includes most buildings on Church Street and Hockering Lane, but excludes the church itself. The cluster of dwellings at Stocks Hill, south of the village hall, is excluded from the Settlement Limit, as this area contributes to the valley setting and rural entrance to the village. No alterations are proposed to the existing Settlement Limit.

QUESTION 26: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

5 sites have been promoted for consideration, of which 1 has been identified as a preferred allocation site. No further sites were shortlisted.

Preferred Site(s)

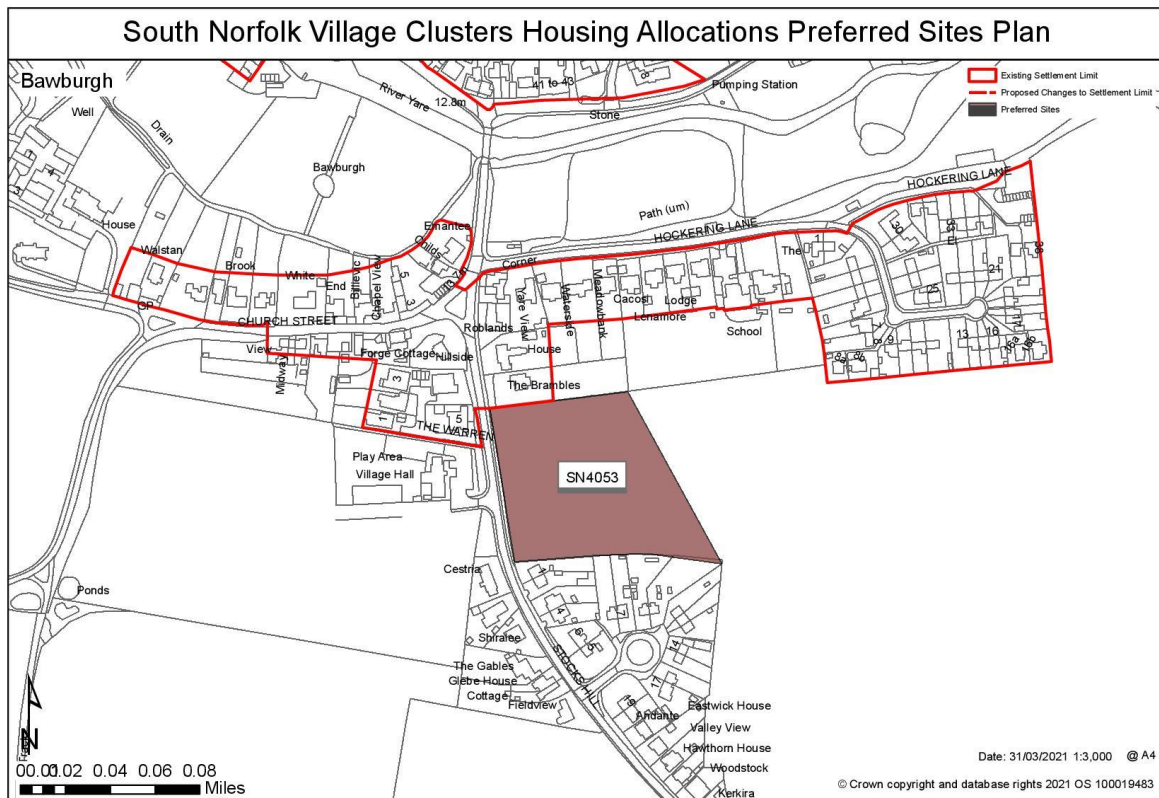
On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

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Site: SN4053, Land to the east of Stocks Hill

Preferred for 35 dwellings on a site of 1.4 hectare.

Reasoned justification: The site is well related to the existing built form of the settlement and would benefit from good connectivity to village services. A landscape assessment would be required to determine the landscape impact of development in this location. There would not be a significant impact on existing vegetation on the site.



QUESTION 27: Do you support or object to the allocation of the preferred site?

Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN4071	<p>Land to the east of Harts Lane and South of Long Lane.</p> <p>Development of the site would have a negative impact upon both the landscape and townscape, particularly having regard to the site's location at a gateway into Bawburgh from the east. Development of the site would also require the removal of a section of hedgerow to facilitate access and footpaths and significant highways concerns have been raised about the connectivity of the site to the facilities within the village due to the narrow form of the bridge in the village. It is not considered that the constraint could be reasonably addressed.</p>
SN3032	<p>Land to the west of Harts Lane.</p> <p>Large portions of the site are within flood zones 2 and 3, restricting the developable area of the site. The site is located within the River Valley and forms a key part of the verdant rural character of the area. Development of the site would impact upon the townscape and landscape. Highways concerns have been raised and development of the site would also require the removal of a significant hedgerow along the front of the site which is a particular feature of the existing streetscene.</p>
SN0015	<p>Land at New Road.</p> <p>The site is located outside of the main built form of the village and has poor connectivity to the services and facilities within the village. A number of highways constraints have been identified and the site lies within a number of landscape protection designations. The separation of the site from the main areas of the settlement would increase the detrimental landscape impact of development in this location.</p>
SN0002SL	<p>Land to the east of the Brambles, Stocks Hill.</p> <p>The site is located to the rear of The Brambles and any development in this location would constitute uncharacteristic backland development. The site also lies within a number of landscape designations, including the Conservation Area.</p>

QUESTION 28: Do you think that any of the rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

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7. Bressingham

Form and character

The parish contains a number of scattered settlements of which the largest are the part of Bressingham located on High Road and Bressingham Common located along Common Road. Both settlements are mainly linear in form and are separated and surrounded by large open fields. Both settlements are distinguished by many trees and hedgerows contributing greatly to their rural character and are afforded views across the Waveney Valley by the downward sloping land to the south.

Services and Community Facilities

The village has a small range of services including a Village hall, shop, limited bus service and a primary school. Bressingham garden centre provides for some employment opportunities locally.

Settlement Limit and Constraints

The Settlement Limit has been drawn to include the two main built forms within Bressingham off Common Road and the Street, and to provide some limited infill within it without affecting the setting of 'The Grange' on High Road or the form and character of the Settlement. The remainder of Bressingham is very dispersed and therefore unsuitable for the creation of a Settlement Limit without leading to significant development which would fundamentally alter the character of the area. No alterations are proposed to the existing Settlement Limit.

QUESTION 29: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

17 sites have been promoted for consideration, of which 2 have been identified as preferred allocation and 1 further site shortlisted.

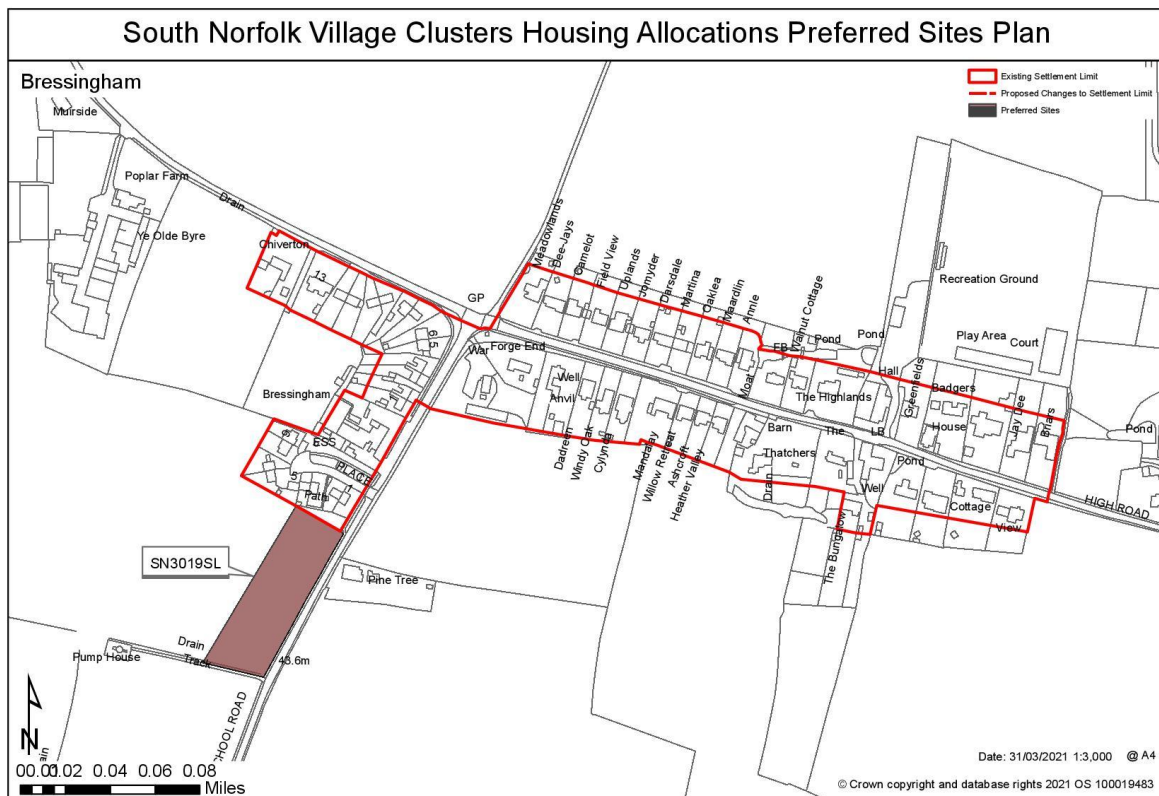
Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Site: SN3019, Land west of School Road

Preferred for up to 12 dwellings on a site of 0.49 hectares.

Reasoned justification: The site was initially promoted as a Settlement Limit extension, however as it is of a scale that is only just below the nominal 0.5ha allocation threshold it has been identified suitable as an allocation. The site is well related and connected to the centre of the settlement where there is an existing footpath provision. Areas within the eastern section of the site are identified as being at risk of surface water flooding, however this forms the site frontage and is not expected to prevent development.



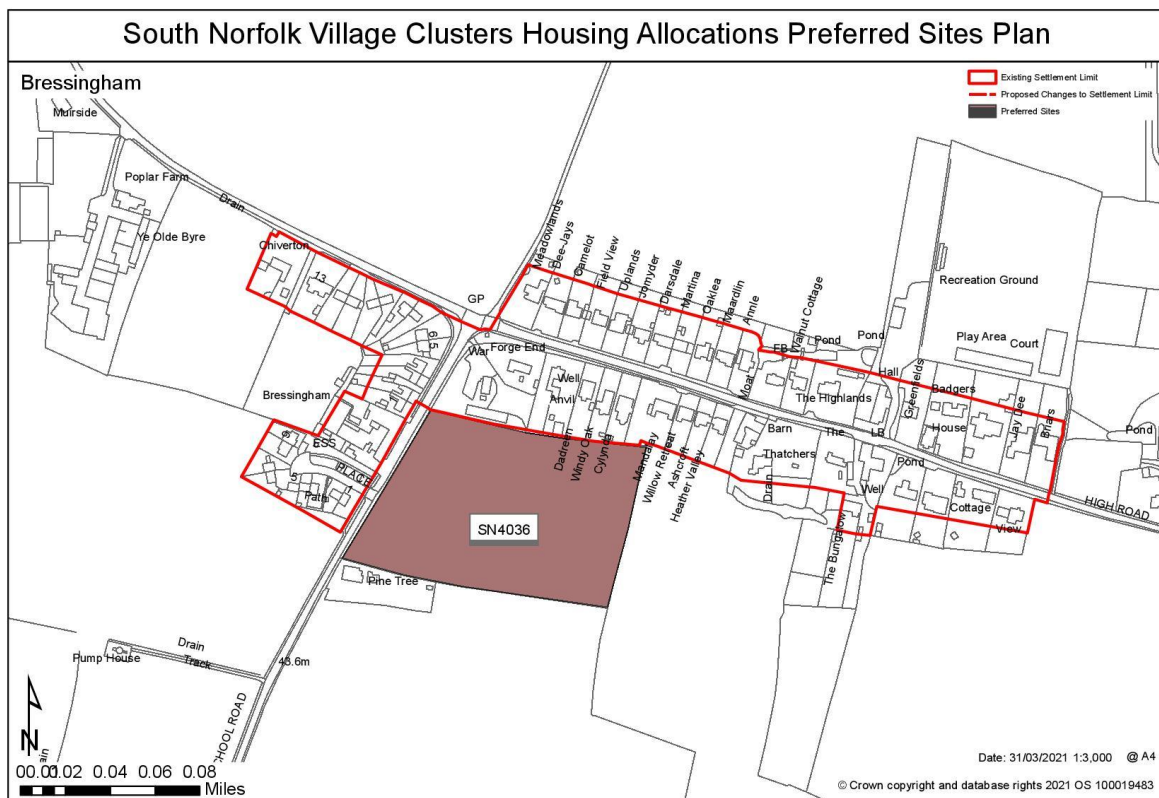
QUESTION 30: Do you support or object to the allocation of the preferred site?

Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Site: SN4036 - Land to the east of School Road

Preferred for up to 40 dwellings on a site of 2.09 hectares.

Reasoned justification: The site is well related and connected to existing services and facilities; it relates well to the settlement and has limited on-site/ off-site constraints identified. A larger site area that needed for the residential development is identified as it is proposed that the site includes proposed parking for the adjacent school and also to allow for the provision of a large area of open space to protect the setting of the adjoining listed building.



QUESTION 32: Do you support or object to the allocation of the preferred site? If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Shortlisted Sites

On the basis of the assessment undertaken the following site(s) have been shortlisted:

Site	Location and reasons not preferred for allocation:
SN4037	<p>Land to the south of Fersfield Road, Bressingham.</p> <p>Shortlisted for up to 25 dwellings on a site of 1.29 hectare.</p> <p>The site relates well to the existing settlement and would not have a detrimental impact on the landscape or townscape. It is anticipated that other constraints identified could be subject to suitable mitigation measures.</p>

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN2052	<p>East of The Street, Bressingham.</p> <p>The site has limited access to services and facilities. Site has significant surface water flood risk issues with flow path running across site. Potential harm to open setting of nearby listed buildings. Concerns over highway impacts.</p>
SN2053	<p>Adjoining Pond Farm, Bressingham.</p> <p>The site has limited access to services and facilities. Site has significant surface water flood risk issues with flow path running across site. Potential harm to open setting of nearby listed buildings. Concerns over highway impacts</p>
SN2054	<p>Land east of School Road, Bressingham.</p> <p>Has a good relationship to services and facilities, but due to its scale and relationship to the existing settlement, the development of the site would have a significant detrimental effect in terms of landscape and the form and character of the area (townscape).</p>

Site	Location and Reasons for Rejection
SN2056	<p>Land at Fersfield Common, Bressingham.</p> <p>The site has limited access to services and facilities. Site is subject to surface water flood risk issues. Development of the site would have an adverse effect on local landscape due to limited built form in the immediate area. Concerns over suitability of local highway network.</p>
SN2057	<p>North of A1066, Bressingham</p> <p>The site is relatively well connected to existing services. However, development will be constrained by the need to protect the setting of nearby listed buildings, potential highways issues and the landscape concerns due to its position in a designated River Valley. Site is unlikely to achieve a level of development that would make it suitable for allocation.</p>
SN2079	<p>Land at Fersfield Road/ Folly Lane, Bressingham</p> <p>Whilst the site is well related to existing services and facilities, it lies within a prominent position in the landscape, with the potential to result in adverse impacts on the local setting.</p>
SN3010	<p>Wyevale Garden Centre, Bressingham</p> <p>The site is poorly related to core services within the settlement and this is reinforced by the separation resulting from the main road. The site would result in a loss of employment. Development of the whole site would be outside the scale proposed by the VCHAP but smaller scale development would result in piecemeal development in an unsustainable location.</p>
SN3020	<p>Land west of School Road, Bressingham.</p> <p>The site is separated from and therefore has poor relationship with the existing settlement. Consequently, development of this site is considered to have an unacceptable impact on the local landscape setting and character and appearance of the area. This impact would be particularly significant if the adjacent site is not considered suitable for development.</p>
SN3023SL	<p>South of Darrow Lane, Bressingham.</p> <p>The site is isolated from, and poorly related/connected to the existing settlement. There are further Identified constraints including highway and amenity issues and landscape (tree) constraints.</p>

Site	Location and Reasons for Rejection
SN3036	<p>South of Low Road, Bressingham.</p> <p>The site is detached from the main settlement and separated from it by the A1066. This results in a poor relationship with resultant detrimental impacts on the landscape and character and appearance of the area and diminished access to services and facilities. The site is potentially constrained by highways issues.</p>
SN3037	<p>North of Low Road, Bressingham.</p> <p>The site is not well connected to the main settlement, nor does the site relate well physically to the main settlement. This results in detrimental impacts on the landscape and character and appearance of the area and diminished access to services. The site is likely to be constrained by highways issues.</p>
SN3038	<p>South of High Road, Bressingham.</p> <p>The site is detached from the main settlement and separated from it by the A1066. This results in a poor relationship with resultant detrimental impacts on the landscape and character and appearance of the area and diminished access to services and facilities. The site is potentially constrained by highways issues</p>
SN4026	<p>Land east of Common Road, Bressingham.</p> <p>The site is detached and poorly connected to the main settlement. This diminishes access to services and facilities. The site is prominent within the landscape and its development would result in a hard edge in what is an otherwise rural setting. This results in detrimental impacts on the landscape. Highway concerns have been identified.</p>
SN4033	<p>Rear of 34 Common Road, Bressingham.</p> <p>Whilst the site is reasonably well located to services in distance terms there is no continuous footpath, which diminishes accessibility. The site is constrained by issues relating to highways, residential amenity and landscaping (trees).</p>

QUESTION 31: Do you think that any of the shortlisted or rejected alternative site(s) should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

**QUESTION 32: Do you think that any of the shortlisted sites should be rejected?
Please add additional comments to explain your response.**

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8. Brooke, Kirstead and Howe

Form and character

Brooke

The village is situated on the B1332 Norwich – Bungay Road with development traditionally located in a linear form running eastwards and westwards from the Norwich Road (B1332) along The Street and High Green. Some modern estate development has occurred off both these roads.

The village is characterised by a mixture of dwellings, especially on The Street and High Green where there are many historic buildings. These combine with trees, hedges, water features and undeveloped spaces to create an attractive area which is encompassed by a conservation area. There is a small but important area of open space at the southern end of Brecon Road. The area immediately to the south of the village is well wooded which creates a visual shield for the village. Elsewhere within the parish development is widely dispersed comprising individual dwellings and farmsteads, although Brooke Industrial Park has been developed in recent years to the north of the village on the B1332. This road provides relatively good access to Norwich some 12km to the north and Bungay to the south. The remainder of the local road network comprises a mixture of 'C' class and unclassified roads.

Kirstead

Kirstead is a sparsely populated parish. It comprises individual dwellings and farms dispersed throughout, together with a concentration of linear development at Kirstead Green and Green Man Lane, set in attractive open countryside.

Howe

Howe is a sparsely populated parish. The development in the parish displays a scattered form and has been concentrated along Howe Green with a small number of individual farmhouses dispersed throughout the remainder of the parish.

Services and Community Facilities

The cluster has a range of social, community and recreational facilities including a pub, farm shop, primary school, a village hall and a limited bus service. There are also employment opportunities at the industrial park.

Settlement Limit and Constraints

The Settlement Limit for Brooke is in three parts. Within the main settlement itself, the boundary is divided into a western section around development along High Green and Norwich Road and an eastern section encompassing development along The Street. Parts

of the centre of the village around the Meres and the Conservation Area around Brooke House have been specifically excluded. The third section of Settlement Limit is to the north of the main settlement and defines the Brooke Industrial Park employment area. No alterations are proposed to the existing Settlement Limit.

QUESTION 33: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

15 sites have been promoted for consideration, of which 2 have been identified as preferred allocations and 1 further site shortlisted. One of the sites promoted for consideration (SN0077SL) obtained planning permission (District Reference: 2018/0868) in September 2018 (SN0077SL).

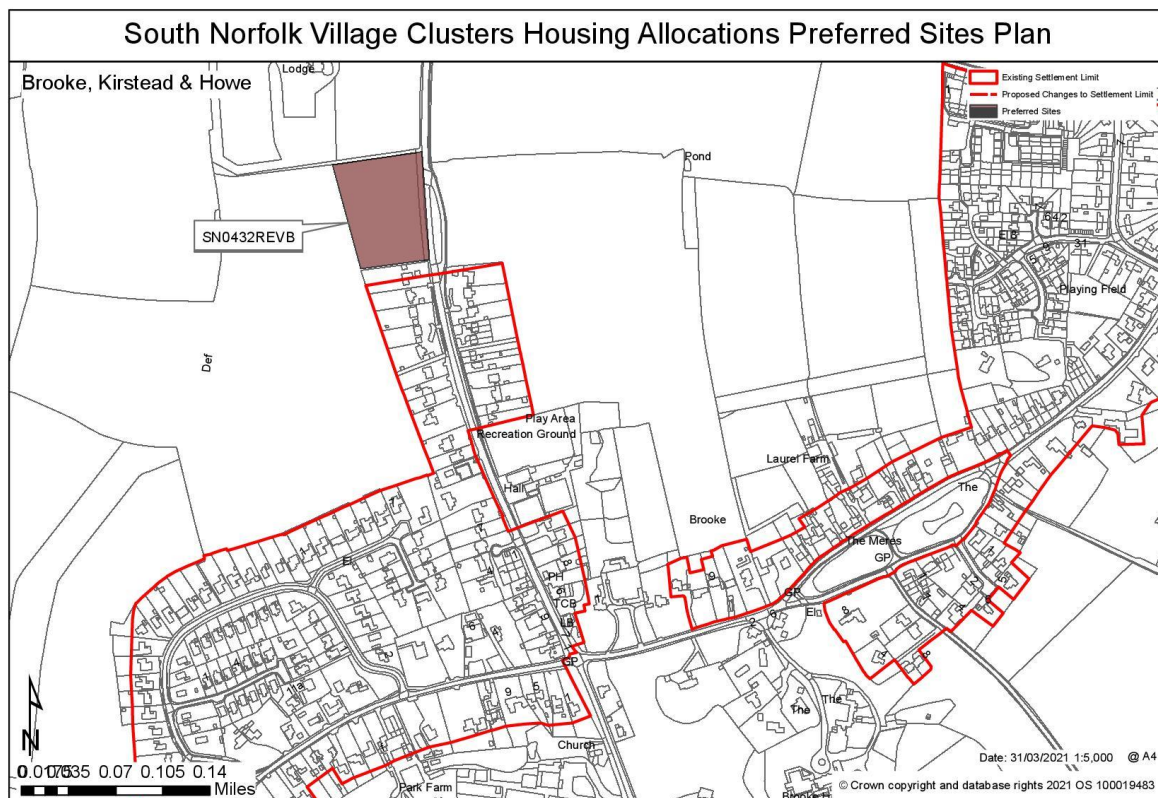
Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Site: SN0432REVB, West of Norwich Road

Preferred for up to 25 dwellings on a site of 1.2 hectares.

Reasoned justification: The site is well located and relatively unconstrained. The site fills a gap between the existing settlement and the grounds of Brooke Lodge; however, it is open to wider countryside to the rear (west) and development in depth to achieve a reasonable density/volume of dwellings would require careful design. There is a need to consider the highways requirements in relation to potential development on the east of Norwich Road in combination with this site.



QUESTION 35: Do you support or object to the allocation of the preferred site?

Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Shortlisted Sites

On the basis of the assessment undertaken the following site(s) have been shortlisted:

Site	Location and Reasons not preferred for allocation:
SN2119	<p>North of High Green/West of Astley Cooper Place.</p> <p>Shortlisted for up to 25 dwellings on a site of 1 hectare.</p> <p>The site is within a reasonable distance of the services and facilities in Brooke. However, there concerns related to: the suitability of High Green in this location and the ability to achieve a safe access; the ability to achieve a footway to link with existing provision and the impact this could have on the Conservation Area; and, the impact on the setting of the Listed dwelling at 66 High Green. The site itself includes areas of surface water flood risk and extensive vegetation. However, adjacent land is in the same ownership which could offer opportunities to revise the site area to minimise impacts in respect of the above constraints.</p> <p>The acceptability/deliverability of this site is subject to demonstrating access via Astley Copper Place.</p>

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0020SL	<p>Rear of 43 High Green, Brooke</p> <p>Whilst the site is well located in terms of access to services and facilities, it falls wholly within the Conservation Area and includes a number of trees, which if lost could affect that character of the area. Trees, plus a potential ransom strip could prevent access from The Mallows Walk, although alternative access via the garden of 43 High Green should be possible.</p>
SN0490	South east of Mereside, Brooke

Site	Location and Reasons for Rejection
	<p>Although centrally located within Brooke, with good access to local services and facilities, the main issues centre around the heritage/townscape/landscape impacts of a site within the Conservation Area, which extends over this site to protect the rural setting of the settlement, and which is visible from Hunstead Lane and the adjoining PRow. A number of issues also remained outstanding at the time the appeal for 17 dwellings was dismissed in 2015, including those related to ecology and surface water drainage.</p>
SN0579SL	<p>North of Waldor Cottage, High Green</p> <p>The site is promoted for 'starter homes' in a location with is highly unlikely to encourage walking and cycling for everyday journeys on an unlit, 60mph road with no footways. The site has a substantial frontage hedge and extensive planting, the removal of which would significantly change the character of the area, particularly in the context of the Ancient Woodland to the rear of the site, the nearby listed building and when existing Brooke along High Green. The ditch and associated surface water flood risk is also concern.</p>
SN0583	<p>Laurel Farm, north of The Street</p> <p>There are a number of concerns with this site. There is a lack of clear access arrangements. There is concern over the impact on the rural setting of the Conservation Area and nearby listed buildings (particularly those on the Laurels Farm access and visible from Brooke Footpath 3, which runs through the site). The site does not relate well to the built form of the village. There is also concern about the landscape impact of a detached development in a relatively unscreened site.</p>
SN0584	<p>West of Burgess Way, Brooke</p> <p>The site is reasonably well connect to the services and facilities in Brooke, with no obvious features on the site itself. However, the scale and form of development would be limited by the shape of the site and the adjoining bungalow development on Burgess Way. The submission indicates access rights need to be acquired and this is based on the site being put forward for 25 dwellings, the feasibility of which has yet to be demonstrated. Therefore there are questions over the achievability of the site. In addition, it is considered that the impacts on the rural setting of the Conservation Area, and a number of listed</p>

Site	Location and Reasons for Rejection
	buildings within it (particularly 57 The Street) would make this site unacceptable.
SN2018	<p>East of Norwich Road</p> <p>Whilst the site is well located and relatively unconstrained, it is too large for the purposes of the VCHAP, with no overriding benefits to justify a larger site. A smaller part of the site is considered as SN0432REVA.</p>
SN2122	<p>East of Wood Farm</p> <p>The site would be out of keeping without development of the adjoining site (SN2119) and in combination they are too large for the purposes of the VCHAP. Issues regarding the integrating a very exposed/open site with development in this part of the village would remain, as would the need take account of the agricultural/commercial buildings on the western boundary, addressing the highways concerns and the need to provide a footway link to local services and facilities.</p>
SN2174	<p>Land east of Kirstead Green/south of St Christopher Close</p> <p>The site itself is constrained primarily by the pumping station on site and the presence of surface water flood risk, otherwise it is a relatively well contained site. The loss of frontage hedgerows and trees would be a concern. Whilst at some distance from services and facilities, and therefore unlikely to encourage walking/cycling, it does have good access to the Bungay/Norwich bus service. Kirstead has not had a Settlement Limit since the 1994 Local Plan and would require one to be reinstated for this site to be included.</p>
SN4004	<p>West of Kirstead Green</p> <p>The site itself is constrained primarily by the presence of surface water flood risk and the ribbon form of development that would result from the site's development and which would extend beyond the current edge of the settlement. Otherwise it is a relatively well contained site. The loss of frontage hedgerow would be a concern, and the vegetation to the B1332 boundary would need to be retained for visual containment and amenity. Whilst at some distance from services and facilities, and therefore unlikely to encourage walking/cycling, it does have good access to the Bungay/Norwich bus service. Kirstead has not had a</p>

Site	Location and Reasons for Rejection
	Settlement Limit since the 1994 Local Plan and would require one to be reinstated for this site to be included.
SN4047	<p>East of Old Hall Gardens/Brooke Flock Farm, Brooke</p> <p>Although within a reasonable distance of most village services/facilities and with few constraints as an arable greenfield site, there are a number of concerns particularly regarding achieving suitable access, heritage impact on the Conservation Area and nearby listed buildings, landscape/townscape impact and ecology re the adjoining TPO'd woodland and wider wooded landscape.</p>
SN4065SL	<p>Adj Oaklands, Honey Pot Lane, Brooke</p> <p>The site is over 1km from the Settlement Limit for Brooke and more than 1.5km from all of the key services and facilities, on an unlit, 60mph road, with no footways. The site is also identified as being at surface water flood risk and is in the immediate vicinity of Brooke Wood Ancient Woodland/County Wildlife Site.</p>

QUESTION 36: Do you think that any of the shortlisted or rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

QUESTION 37: Do you think that any of the shortlisted sites should be rejected? Please add additional comments to explain your response.

9. Bunwell

Form and character

The village is a series of dispersed groups of dwellings. The village at Bunwell Street is set in predominantly flat open countryside. This contrasts with the clusters of development at Low Common and Bunwell Hill, which are set in the Tas Valley. Development has been concentrated at Bunwell Street, in an extensive linear form with small clusters of development at Bunwell Hill and The Turnpike, Bunwell Bottom, Cordwell and Low Common. Development along The Street is interspersed with a number of farms generally set back from the road, providing an open aspect on the street scene. Parts of the built-up area of Bunwell Street lie within the parish of Carleton Rode. For the purposes of a Settlement Limit, these are included within Bunwell. The B1113 runs through the parish, linking it to New Buckenham and Norwich. There are also road links to Attleborough and Wymondham.

Services and Community Facilities

There is a good range of facilities, including a bus services, convenience store and garage along Bunwell Street, although the primary school, village hall and playing field are along (or close to) The Turnpike.

Settlement Limit and Constraints

The Settlement Limit has been drawn to include the main built form of the settlement and includes the two small allocations made within the 2016 Site Allocations Plan; land north of Bunwell Street and land at The Turnpike. The proposed Settlement Limit covers most development in Bunwell Street but is split at Lilac Farm where farm buildings and newly developed affordable housing are excluded. There are additional settlement limits at Old Turnpike (by the school), The Turnpike and Little Green. No alterations are proposed to the existing Settlement Limit.

QUESTION 38: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

7 sites have been promoted for consideration, of which 1 was identified as a preferred allocation site and a further 3 shortlisted.

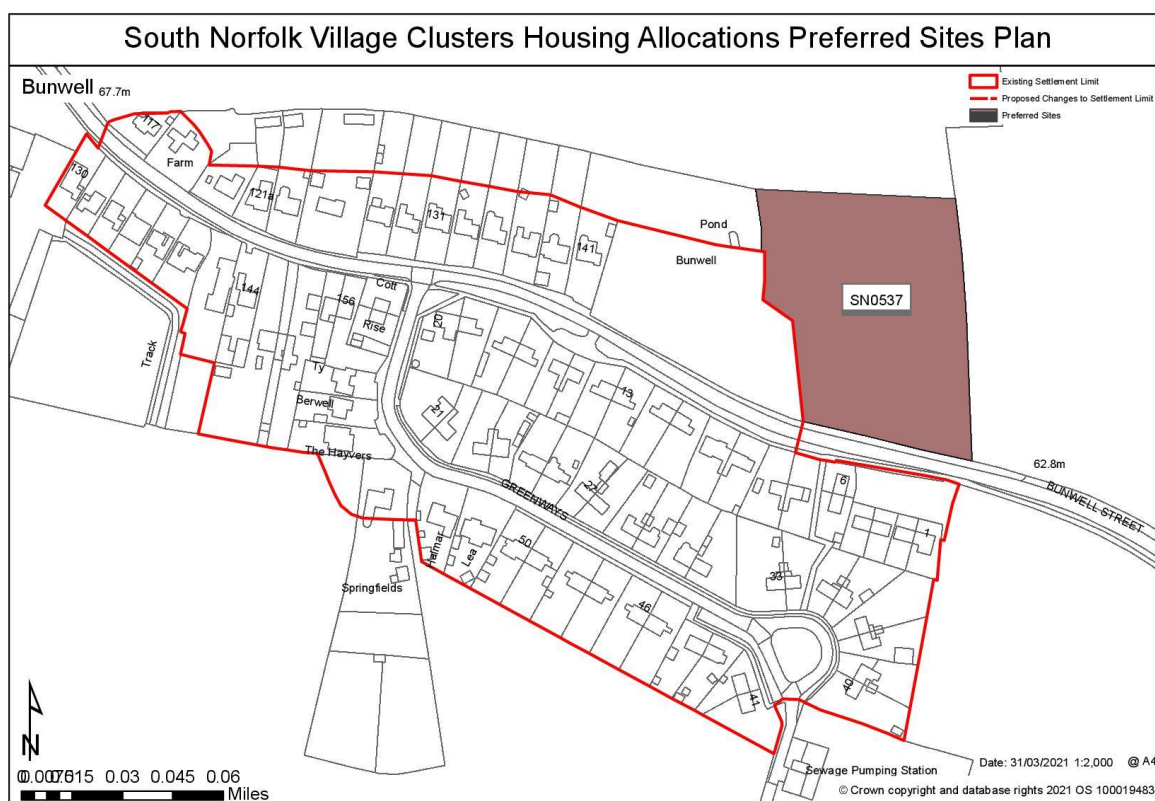
Preferred Sites

On the basis of the assessment undertaken the following site has been identified as a preferred allocation:

Site: SN0537, Land to the north of Bunwell Street

Preferred for up to 25 dwellings on a site of 1.2 hectares.

Reasoned justification: The site relates well to the existing pattern of development and available services and facilities. A suitable access is likely to be able to be achievable. The site is adjacent to a previously allocated site that has planning permission and development of the site would continue existing pattern of development along Bunwell Street. The preferred site is considered to have fewest constraints - although the site is over 1ha, numbers are expected to be restricted to ensure coherence with the lower density scheme permitted on the adjoining BUN1 allocation. The site is well related to existing services and facilities and is within a safe walking distance to Bunwell School.



QUESTION 39: Do you support or object to the allocation of the preferred site?

Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Shortlisted Sites

On the basis of the assessment undertaken the following site(s) have been shortlisted:

Site	Location and Reasons not preferred for allocation:
SN0538REV	<p>Land opposite Lilac Farm, Bunwell Street, Bunwell</p> <p>Shortlisted for up to 25 dwellings on a site of 1 hectare.</p> <p>The site currently agricultural land that forms a gap in the existing pattern of development along north side of Bunwell Street. New development in this location would be relatively well contained. The site has suitable access to a range of services and facilities. Further consideration would need to be given to the importance of the trees along the site frontage and the impact on them resulting from the creation of an access and carriageway widening.</p>
SN0539	<p>Lilac Farm, Bunwell Street, Bunwell</p> <p>Shortlisted for up to 19 dwellings on a site of 0.79 hectare.</p> <p>Development of the site could offer an opportunity to improve the setting of the listed building with removal of existing buildings that detract from it and with the good design of new development.</p> <p>Development of the site as a smaller scale settlement limit extension, could diminish impacts on the heritage asset further. The site is an acceptable walking distance to school.</p>
SN2126	<p>Land adjoining The Laurels, 114 Bunwell Street</p> <p>Shortlisted for up to 16 dwellings on a site of 0.54 hectare.</p> <p>The site is constrained by existing trees. This may limit the number of dwellings that could be accommodated on the site below allocation level. However, part of the site currently lies within the settlement limit and there may be scope for development.</p>

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0009	<p>Land at Church Farm, Church Lane, Bunwell</p> <p>The overall scale of the submitted site, if developed, would result in an excessive and uncharacteristic addition in this location detrimental to the character and appearance of the area. Heritage concerns have also been identified. The site is also considered to be unreasonable for a small scale linear frontage development. However, the further extension of the settlement in this way would result in the coalescence of the two distinct settlement sections. This is also considered detrimental to the character and appearance of the area.</p>
SN2001SL	<p>Land between Colstream and Burnlea, Chapel Road, Bunwell</p> <p>The development of the site would have a detrimental urbanising effect that would adversely affect the character and appearance of Chapel Lane.</p>
SN2004SL	<p>Land south of Church Lane, Bunwell</p> <p>Development of this site would not be characteristic of the existing form of development and would have an adverse impact on the setting of the Church opposite the site.</p>

QUESTION 40: Do you think that any of the shortlisted or rejected site(s) should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

QUESTION 41: Do you think that any of the shortlisted site(s) should be rejected? Please add additional comments to explain your response.

10. Burston, Shimpling and Gissing

Diss and District Neighbourhood Plan

The Diss and District Neighbourhood Plan covers an area that includes the following settlements that are, or form part of, a South Norfolk Village Cluster: Burston, Shimpling, Diss, Roydon and Scole.

The Diss and District Neighbourhood Plan is being prepared by the Diss and District Neighbourhood Plan Steering Group and is expected to be published for consultation in summer 2021. The Diss and District Neighbourhood Plan will include site allocations for residential development, based upon housing requirements for different areas as set out in the Greater Norwich Local Plan (GNLP).

The housing requirement identified for Diss is 250 homes, this is set out in the GNLP. The indicative housing requirements for Burston and Shimpling, Roydon and Scole is a minimum of 25 homes each, a minimum of 75 homes in total.

To ensure transparency, this chapter includes the list of the sites in Burston and Shimpling that have been promoted to the Council for consideration. The assessment and allocation of sites for Burston and Shimpling will be undertaken through the Neighbourhood Plan, relevant details of the site(s) promoted to the Council have been shared with the Neighbourhood Plan steering Group.

Details of the Diss and District Neighbourhood Plan can be found here: www.ddnp.info.

Form and character

Burston & Shimpling

Burston comprises the village and outlying hamlets of Mill Green and Shimpling. A further group of dwellings is located at Audley End.

Burston has developed mainly along Diss Road, Crown Green and Station Road and is centred round two village greens. The western half comprises relatively modern detached dwellings in contrast to the eastern side which is mainly semi-detached ribbon development. Crown green, Church green and the open areas leading into Higdon Close form an attractive centre to Burston. There are several notable old buildings which form part of the designated conservation area extending along Diss Road and Mill Road. The surrounding countryside comprises mainly open fields bordered by low hedges and scattered trees.

Gissing

The parish of Gissing comprises three main settlements at Upper Street, Lower Street and Mill Green. The remainder of the parish is sparsely populated, containing farmsteads and some isolated rows of dwellings.

Services and Community Facilities

The cluster has a range of facilities comprising a preschool, school, village hall, pub and outdoor recreation area. There is also a limited bus service. Within Burston there are also some employment uses in agriculture, hospitality and office sectors.

Settlement Limit and Constraints

The Settlement Limit has been drawn to provide for the consolidation of much of the built form of Burston, allowing for limited infill development within it. The Settlement Limit excludes the areas considered to form attractive features of the village which include Crown Green and Church Green and their respective settings. The boundary also excludes the outlying settlements, although should the Mill cease to operate this could provide a suitable brownfield redevelopment opportunity. No alterations are proposed to the existing Settlement Limit.

QUESTION 42: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred, Shortlisted and Rejected Sites

Burston and Shimpling

For the reasons set out above, the suitability of development sites promoted for consideration in Burston and Shimpling are not set out here. However, for the purposes of transparency a list of sites promoted to the Council for consideration is set out below.

Reference:	Address:
SN0349	Land west of Gissing Road, Burston
SN0386	Land east of Rectory Road, Burston
SN0005SL	South east of Diss Road, Burston
SN0560	Land north of Diss Road, Burston

Reference:	Address:
SN0562SL	Land south of Diss Road, Burston
SN0561	Land north of Diss Road, Burston
SN1028SL	Land east of Mill Road, Crown Farm Barn, Burston

Gissing

Gissing is not included as part of The Diss and District Neighbourhood Plan, therefore any sites promoted in Gissing have been assessed for suitability through the South Norfolk Village Clusters Housing Allocations Plan.

The following site was promoted for development, however, it was rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0208SL	<p>Land at Common Road, Gissing</p> <p>The site has poor connectivity and relationship to services, including the primary school. There would be an associated loss of small-scale employment on the site.</p>

QUESTION 43: Do you think that any of the rejected sites should be preferred for allocation. Please add additional comments to explain your response.

11. Carleton Rode

Form and Character

To the north of the parish dwellings are within the Settlement Limit of, and therefore considered with Bunwell (which is also a Service Village). Elsewhere, the main development of Carleton Rode village is along Flaxlands Road/Rode Lane, resulting in a linear settlement form characterised by one plot depth. There are isolated clusters of development at Hargate on the B1113 and at the junction of the B1113 and Rode Lane.

Development along Rode Lane has been concentrated along the east side of the road, with the exception of a small group of dwellings on the west side. The relatively undeveloped west side of Hall Road and Rode Lane allows views of the surrounding countryside. Development around Church Farm is separated from the main built-up area by large open fields, contributing to the rural setting of the village. The village is surrounded by generally flat countryside, with the Tas Valley in the southern part of the parish. The B1113 runs through the south of the parish, linking it to New Buckenham and Norwich. There is also a road link to Old Buckenham.

Services and Community Facilities

The primary school is located to the south of the village, opposite the church, while the village hall and playing field are to the east of the village on Mill Road.

Settlement Limit and Constraints

The Settlement Limit has been drawn to include the main built form of the settlement and include the allocation made within the 2016 Site Allocations Plan. The proposed Settlement Limit covers most development along Rode Lane/Flaxlands Road and separates the main village from the Church Farm cluster where open countryside is prominent. The road capacity of the village is a limiting factor. No alterations are proposed to the existing Settlement Limit

Preferred and Shortlisted Sites

7 sites have been promoted for consideration, 6 of which none were identified as preferred or shortlisted sites.

The remaining site (reference SN0439SL) has not been formally reassessed either as a potential allocation site, or for an uplift in housing numbers on the site, because it now benefits from outline planning permission and reserved matters consent (District Reference 2017/2092).

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0547REV	<p>Land north of The Turnpike, Carleton Rode</p> <p>The site is separated from the main settlement and its services and is considered to be in an unsustainable location. The site is relatively well contained in the wider landscape however highway concerns have been identified, as has the impact of development on designated heritage assets.</p>
SN2086	<p>Land south of Flaxlands Road, Carleton Rode</p> <p>The site is well contained and relates well to existing development however it is situated within key views of designated heritage assets, including the Grade I listed Church to the north, and development would have a detrimental impact on the setting of these buildings. Surface water flooding within part of the site and highways concerns have also been identified.</p>
SN4009	<p>Land to west of Rode Lane, Carleton Rode</p> <p>Development of the site is constrained by the presence of heritage assets and natural landscape features, as well as the identified surface water flooding.</p>
SN4067	<p>Land west of Greenways Lane, Carleton Rode</p> <p>Development on this site would not reflect the linear development of the settlement and would represent a divergence from the historical character of the village. Highways concerns have also been identified.</p>
SN4068	<p>Land south of Flaxlands Road, Carleton Rode</p> <p>The site appears reasonably well located but has poor connectivity to the main settlement. Development of the site would also result in the coalescence of two distinct areas of the settlement to the detriment to the overall character of Carleton Rode. Potential adverse heritage impacts have also been identified due to its impact on the setting of nearby designated heritage assets.</p>

Site	Location and Reasons for Rejection
SN4080	<p>Land north of The Turnpike, Carleton Rode</p> <p>The site is separated from the main settlement and is considered to have detrimental impact on the form and character of the settlement and character of the overall landscape. Loss of the boundary hedgerow to obtain access to the site has also been identified as a potential landscape issue.</p>

**QUESTION 44: Do you think that any of the rejected sites should be allocated?
Please add additional comments to explain your response.**

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12. Dickleburgh

Dickleburgh Neighbourhood Plan

The Dickleburgh Neighbourhood Plan is being prepared by the Dickleburgh Neighbourhood Plan Steering Group. The Dickleburgh Neighbourhood Plan will include site allocations for residential development, based upon housing requirements for different areas as set out in the Greater Norwich Local Plan (GNLP).

The indicative housing requirements for Dickleburgh is a minimum of 25 homes.

To ensure transparency, the chapter includes the list of the sites in Dickleburgh that have been promoted to the Council for consideration. The assessment and allocation of these sites will be undertaken through the Neighbourhood Plan, relevant details of the site(s) promoted to the Council have been shared with the Neighbourhood Plan steering Group.

The ongoing devolution of responsibility for making allocations to Dickleburgh will be contingent on adequate progress being made with the Neighbourhood Plan.

Details of the Dickleburgh Neighbourhood Plan can be found here: <https://dickleburgh-rushallpc.norfolkparishes.gov.uk/neighbourhood-plan/>

Form and character

Dickleburgh and Rushall

The main concentration of development within the parish is based along the former A140. There are also smaller rural communities at Rushall and Langmere. Individual dwellings and farmsteads are dispersed throughout the remainder of the parish.

The historical centre of the village has developed along The Street and is characterised by buildings close to the road. More recent development has extended the built-up area both north and south along the former A140 with further developments eastwards along Rectory Road and Harvey Lane. Immediately to the north of the main part of the village is an area of development at Dickleburgh Moor, a small detached ribbon of development along the west side of Norwich Road. A number of estate developments have taken place in between Rectory Road and Harvey Lane. The A140 by-passes the village to the west providing links to Norwich to the north and Ipswich to the south, as well as Diss via the A1066.

Services and Community Facilities

The settlement has a range of social, recreational and community facilities including preschool, a primary school, village hall, pub and shop. The village has the benefit of mains sewerage. There is also a limited bus service. There are also several employment uses covering various sectors.

Settlement Limit and Constraints

The Settlement Limit has been drawn to include the main built form of the settlement, but specifically excludes the grounds of All Saints Church and the Rectory, the allotment gardens on Chapel Road and the recreation ground on Harvey Lane because of their contribution to the form and character of the village. In addition, no boundary has been drawn around the detached ribbon development at Dickleburgh Moor as further residential development would be detrimental to the rural character of the area. The Settlement Limit extends around the main settlement which includes the allocated land north of Harvey Lane made within the 2016 Site Allocations Plan. No alterations are proposed to the existing Settlement Limit.

QUESTION 45: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred, Shortlisted and Rejected Sites.

For the reasons set out above, the suitability of development sites promoted for consideration in Dickleburgh are not set out here. However, for the purposes of transparency a list of sites promoted to the Council for consideration is set out below.

Reference:	Address:
SN0350	Land west of Ipswich Road, Dickleburgh
SN0498REV	Land east of Ipswich Road, Dickleburgh
SN0199 SL	Land north of Rectory Road, Dickleburgh
SN0217	Land adjacent to Bridge Farm, Norwich Road, Dickleburgh
SN0258	Land south of Rectory Road and west of Rectory Lane
SN4056SL	Land east of Ipswich Road, Dickleburgh
SN0063	Land to the south of Harvey Lane / Langmere Road, Dickleburgh
SN0063	Land to the side and rear of Kings House, Dickleburgh

Reference:	Address:
SN0230	Land east of Norwich Road, Dickleburgh
SN0256	Land north of 43-81 Rectory Road, Dickleburgh
SN0257	Land north of 81 to 141 Rectory Road, Dickleburgh
SN0259	Land south of Rectory Road and east of Rectory Lane
SN0361	Garage site, Ipswich Road, Dickleburgh
SN0389	Land north of Harvey Lane, Dickleburgh
SN0516	Land off Norwich Road, Dickleburgh
SN2083	Land west of Norwich Road, Dickleburgh (between Moorlands and Moorfield)
SN2084SL	Land west of Norwich Road, Dickleburgh (south of Moorfields)
SN2145	Land to the west of Dickleburgh
SN3017	Land to the west of Dickleburgh
SN4043SL	Allotment Gardens north of Dickleburgh Church (and west of Brandreth Close)
SN4057	Land west of garage site, Ipswich Road, Dickleburgh
SN4070SL	Land to the side and rear of Kings House, Dickleburgh

13. Ditchingham, Broome, Hedenham and Thwaite

Form and character

Ditchingham

Development within the parish has been concentrated along Loddon Road, Norwich Road, Station Road and Thwaite Road to form the established village of Ditchingham. Abutting the village to the east is the village of Broome. To the south of the parish at Ditchingham Dam is a small area of development which is contiguous with the built-up area of Bungay lying largely within the Broads Authority area and includes the large development on the former maltings sites. Development within the remainder of the parish comprises of individual dwellings and farmsteads.

The village has developed a nucleated settlement form largely as a result of substantial post-war development. The majority of this growth has taken the form of estate development between Thwaite Road and Loddon Road. An area of 1950s Tayler and Green housing at Windmill Green and Scudamore Place makes a significant contribution to the character of the village and is now a Conservation Area. The A143 runs across the south of the parish linking with Beccles and the A146 to the east and Harleston, the A140 and Diss to the west. The B1332 provides a link to Norwich, whilst local road and pedestrian facilities provide easy access to Bungay.

A large area of the southern part of the parish lies within the Broads Authority area with the main village also close to the Broads.

Broome

Development within the parish has been along Yarmouth Road and Sun Road in a linear form with an isolated group of development at Broome Street. Elsewhere the parish displays a dispersed settlement pattern comprising individual dwellings and farmsteads. The south-western end of the village merges with development at Ditchingham so that there is no clear distinction between the two settlements at this point.

The village is set in attractive open countryside within the Waveney Valley. Broome Heath lies to the north of Yarmouth Road and the undeveloped nature of this side of Yarmouth Road provides an open aspect which contributes significantly towards the rural character of the village. The A143, which by-passes the village, provides a link to Harleston and Diss to the south-west and Beccles and Great Yarmouth to the north-east, as well as Lowestoft via the A146. Local road and pedestrian links provide easy access to Bungay to the south, whilst the nearby B1332 provides a link to Norwich to the north.

Part of the parish lies within the Broads Authority area.

Hedenham

Hedenham is a sparsely populated parish. It mainly comprises individual dwellings and farms with a small concentration of development on Church Road. The settlement is set in attractive open countryside interspersed with small wooded areas and is partly situated on the south slope of a small valley bounded to the east by Hedenham Park giving a rural character. The settlement is characterised by traditional cottages with some Tayler and Green housing at Smiths Knoll and both Hedenham Hall and Ditchingham Hall with their associated parklands form an attractive area of historic parkland.

Hedenham has had a designated Conservation Area since 1994.

Thwaite

The main concentration of development within the parish has taken place along Bungay Road towards the church. Individual dwellings and farmsteads are sparsely distributed throughout the remainder of the parish. The agricultural nature and the open countryside all emphasise the rural character of the area.

Services and Community Facilities

The cluster has a range of social, recreational and community facilities including preschool, a primary school, village hall, pub and shop. There is also a regular bus service in Ditchingham. The settlement is also home to several employment uses across different sectors.

Settlement Limit and Constraints

Ditchingham

The Settlement Limit has been drawn to include the main built form of the settlement and include the allocated land to the north of Rider Haggard Way.

The existing primary school in Ditchingham is noted as operating at capacity. However, the nearest alternative school in Ellingham has capacity. Further exploration will be needed to ensure primary school needs can be met.

Broome

The Settlement Limit has been drawn to include the existing linear pattern of development in the settlement and to include the existing allocation made within the 2016 Site Allocations Plan, where outline consent has been granted for 25 dwellings which reflects this linear pattern.

Hedenham

The Settlement Limit has been drawn around the area of Smiths Knoll to allow for limited sensitive infill only due to the limited facilities available and character of the conservation area.

No alterations are proposed to the existing settlement limits within this cluster.

QUESTION 46: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

12 sites have been promoted for consideration, of which 2 have been identified as preferred allocation site and a further 2 have been shortlisted.

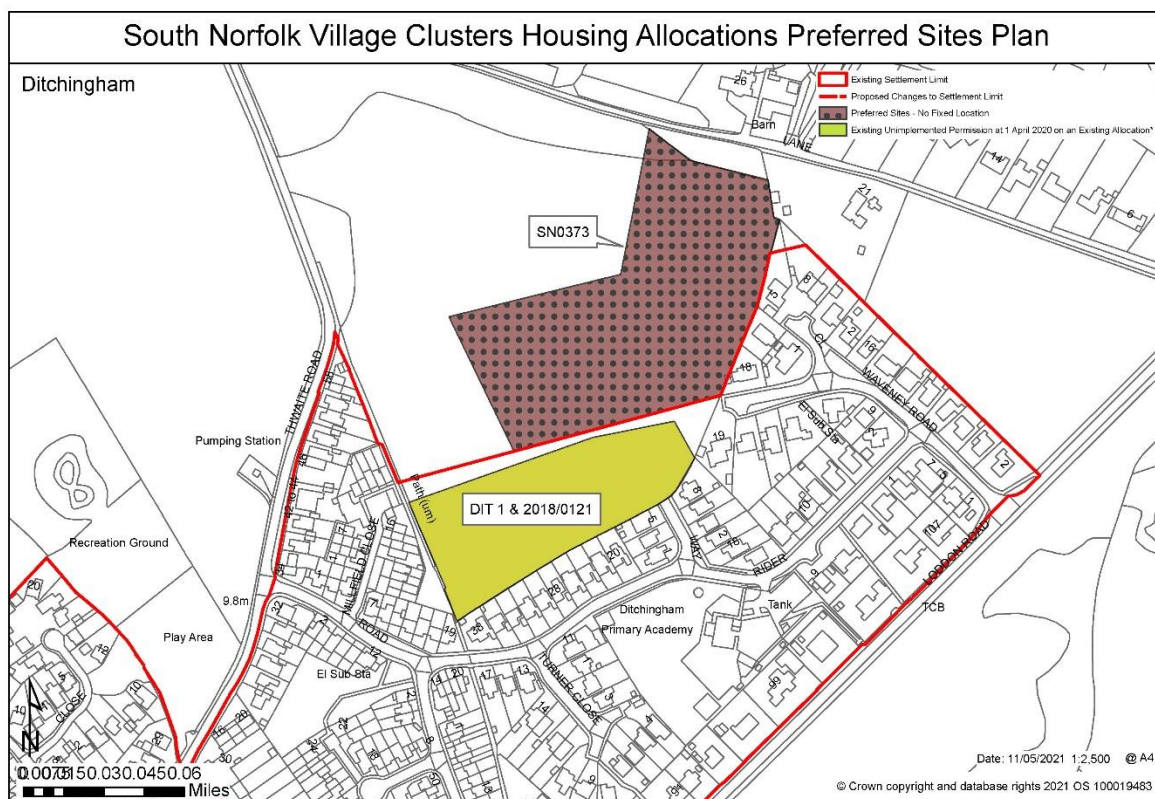
Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Site: SN0373, Land between Thwaite Road and Tunneys Lane

Preferred for up to 35 dwellings on a site of 1.4 hectares.

Reasoned justification: The site as promoted is significantly larger than the preferred site and could potentially accommodate more than 35 dwellings if necessary. The site is well related to the existing services and facilities within Ditchingham. No additional constraints have been identified which would affect its delivery. Although, the development of the site is subject to suitable access via the current DIT1 allocation (which has yet to be started) and Waveney Road, and this may limit the total capacity for the site to expand. The preferred site at approx. 1.4ha reflects the aspirations for the plan and would be located to the south east of the site.



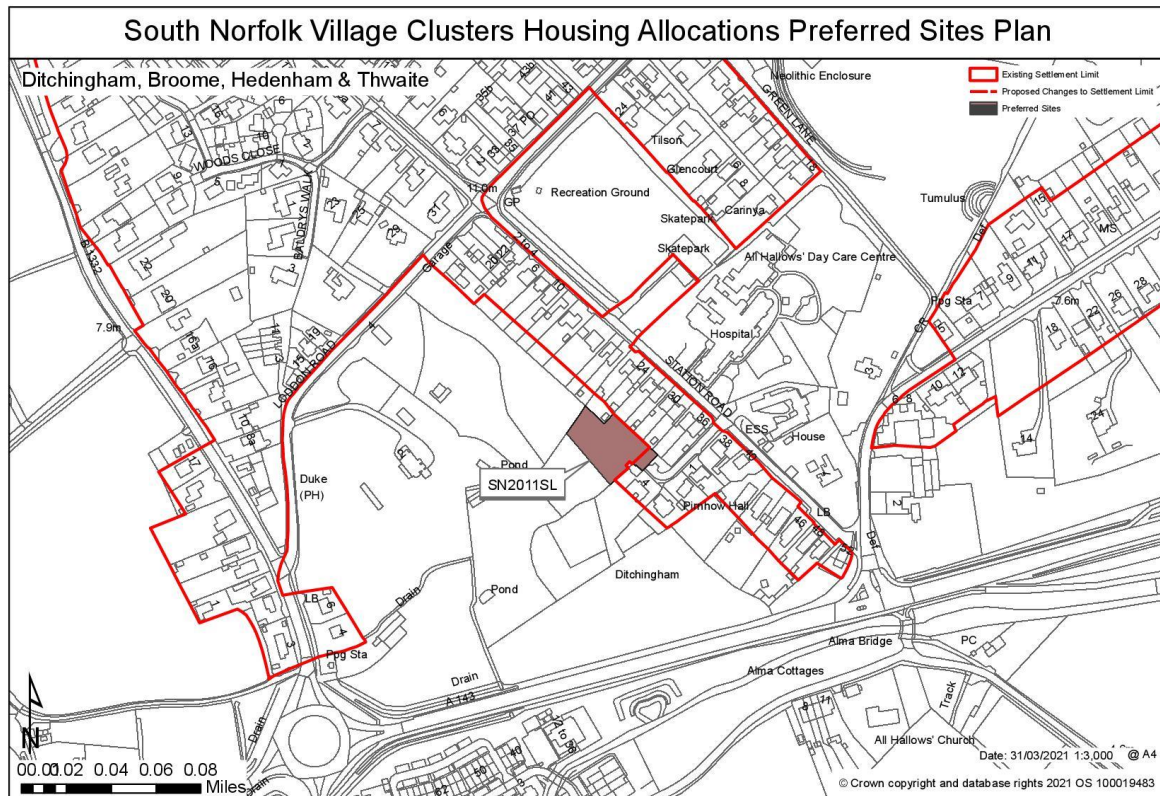
QUESTION 47: Do you support or object to the allocation of the preferred site?

Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Site: SN2011SL, Land off Lamberts Way, Ditchingham

Preferred for a Settlement Limit Extension on a site of 0.4 hectares.

Reasoned justification: The site is suitable for a Settlement Limit extension. The site would be accessible from Lamberts Way and is adjacent to residential development to the south and the east. The promoter has noted that they would wish to build one self-build dwelling on the site although the site is a sufficient size to potentially allow a larger number of properties.



Shortlisted Sites

On the basis of the assessment undertaken the following site(s) have been shortlisted:

Site	Location and Reasons not preferred for allocation:
SN0345	<p>Land to the north of Loddon Road, Ditchingham</p> <p>Shortlisted for up to 25 dwellings on a site of 1.62 hectares.</p> <p>This site is considered to suitable for allocation, subject to confirmation of highway suitability, provision of a footway and confirmation that the development of the site would not have an unacceptable impact on the nearby SSSI. The site relates suitably to existing services and facilities, the existing form and character of the village and there is limited impact on the wider landscape due to existing screening.</p>
SN4020	<p>Land west of Old Yarmouth Road, Broome</p> <p>Shortlisted for up to 15 dwellings on a site of 0.67 hectare.</p> <p><i>(Note: The western part of this site overlaps with SN4049)</i></p> <p>The site is considered a reasonable option for additional road frontage development. Consideration should however be given to the continued linear spread of the village to the east away from the main services and facilities</p>

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0078	<p>Land off Loddon Road, Ditchingham</p> <p>The development of the site would require the removal of a number of trees. Development would impact upon the landscape. Furthermore, the site is in multiple ownership and it is unclear if all the site owners support development.</p>
SN0205SL	Land north west of Scudamore Place, Ditchingham

Site	Location and Reasons for Rejection
	<p>The site is located within the setting of the Taylor and Green properties at Scudamore Place. Development would impact upon the setting of these dwellings which are grade II listed. It would also impact upon the setting of the exception site with the dwellings located directly in front of them. Development of the site would impact upon the amenity of these properties by virtue of their close proximity. For this reason the site was rated red through the HELAA for townscape impacts and has been excluded from the site assessments.</p>
SN0343	<p>Land adjoining Wildflower Way, Ditchingham</p> <p>The development of the site would represent an extension into open countryside with limited screening to reduce impact. This is considered to have a detrimental impact upon the form and character of the settlement and landscape overall.</p>
SN0346	<p>Land to the north of Old Yarmouth Road, Broome</p> <p>Whilst the site is well located within Broome with good access to services and facilities, it is a designated Local Nature Reserve. The site also forms part of the setting of Broome Heath which is a County Wildlife Site, with access to the rear of the site. Development in this location is considered to have an impact upon the landscape and ecology and it is not considered to be a reasonable option</p>
SN3004SL	<p>Land to the south of 130 Yarmouth Rd, Broome</p> <p>The new dwelling would be located directly to the rear of the existing property 130 Yarmouth Road. The proposal is considered to be detrimental to the townscape, furthermore amenity issues have also been identified for 130 and 128 Yarmouth Road as the access will pass directly between the two dwellings the site is not considered a reasonable option for an extension to the Settlement Limit.</p>
SN4021	<p>Land to the south east of Loddon Road, Broome</p> <p>Development of the site is considered to result in a detrimental impact upon the townscape and also the satisfactory functioning of the highway.</p>
SN4044SL	<p>Land to the rear of 126 Yarmouth road, Broome</p> <p>The new dwelling would be located directly to the rear of the existing property 130 Yarmouth Road. The proposal is considered to be</p>

Site	Location and Reasons for Rejection
	detrimental to the townscape, furthermore amenity issues have also been identified for 130 and 128 Yarmouth Road as the access will pass directly between the two dwellings the site is not considered a reasonable option for an extension to the Settlement Limit.
SN0410REV	<p>Land west of Old Yarmouth Road, Broome</p> <p>The site is on edge of village, but key services and facilities are accessible via a footpath connection to the village. Site is in a gateway location and development to the rear of other dwellings would be highly visible within the landscape.</p>

QUESTION 49: Do you think that any of the shortlisted or rejected sites should be allocated instead of, or in addition to, the preferred site(s)? Please add additional comments to explain your response.

QUESTION 50: Do you think that any of the shortlisted site(s) should be rejected? Please add additional comments to explain your response.

14. Earsham

Form and character

Earsham is located within the Waveney Valley approximately 1km south west of Bungay and in close proximity to the Broads. The main area of development in the parish lies to the south of the modern A143 along The Street. Development elsewhere in the parish is of a scattered and sporadic nature.

The main built-up area of Earsham was originally based along the line of The Street with the core of the village centred on the crossroads of The Street and Station Road. Significant post-war development has resulted in a more nucleated settlement form. Earsham has good links, via the A143 with Beccles and Lowestoft to the east, and Harleston and Diss to the west, and to Norwich via the B1332. Part of the parish, to the north of the A143 bypass, lies within the Broads Authority area.

Services and Community Facilities

The settlement has a range of commercial, social and community facilities including a primary school, pub and village hall. There is also a limited bus service. Earsham is in close proximity to Bungay which provides a large range of social and community facilities. The village has the benefit of mains sewerage capacity.

Settlement Limit and Constraints

The Settlement Limit includes the main built form of the settlement and there are no alterations are proposed to the existing Settlement Limit.

QUESTION 51: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

2 sites have been promoted for consideration, of which both have been identified as preferred sites.

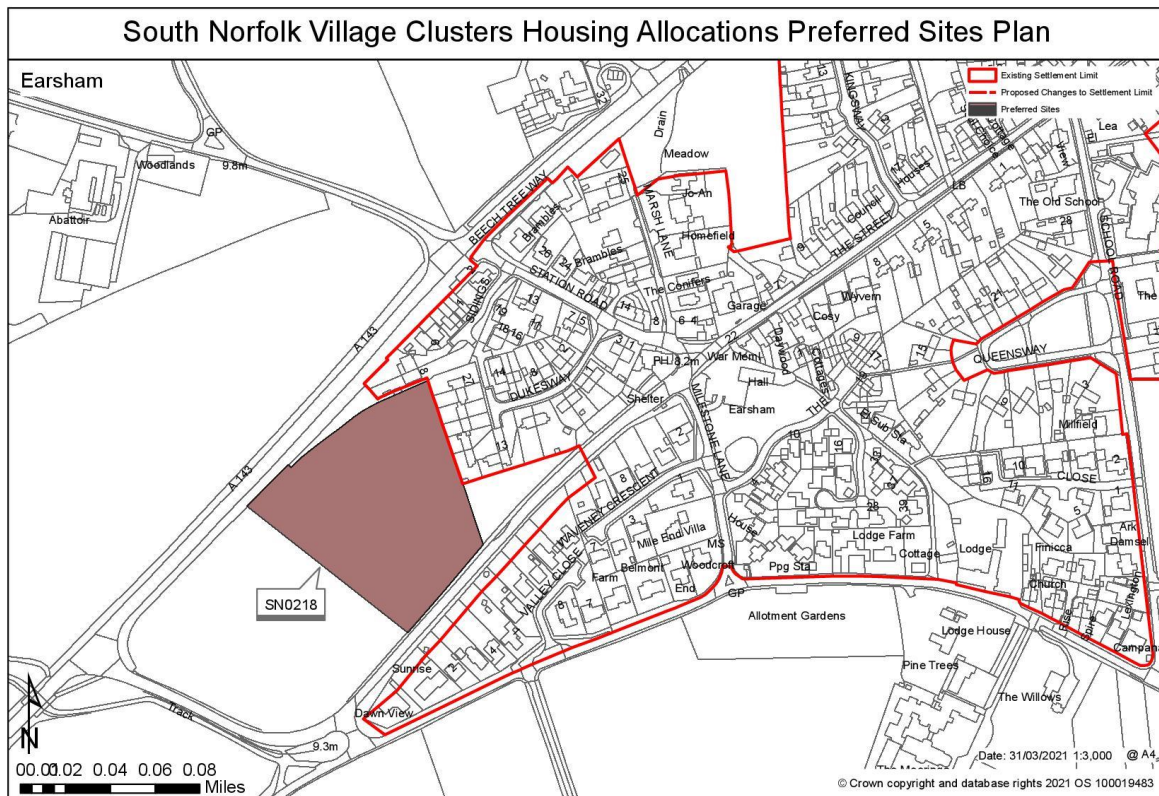
Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Site: SN0218, Land north of The Street

Preferred for 35 dwellings on a site of 1.4 hectares.

Reasoned justification: This site is well related to Earsham village and facilities. Development of the site is subject to achieving a satisfactory access to the south eastern boundary, off The Street. The site benefits from a long site frontage where providing a suitable vehicular access should be sufficient (good visibility/ability to set development back to provide a footway). Whilst development of the site may have impacts upon the landscape and townscape, it has been identified that these could be mitigated. The site is within Flood Zone 1 where a small section to the southern boundary is considered a 'low risk' to surface flooding, given the size of the site it is considered that development is still achievable.



QUESTION 52: Do you support or object to the allocation of the preferred site?

Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

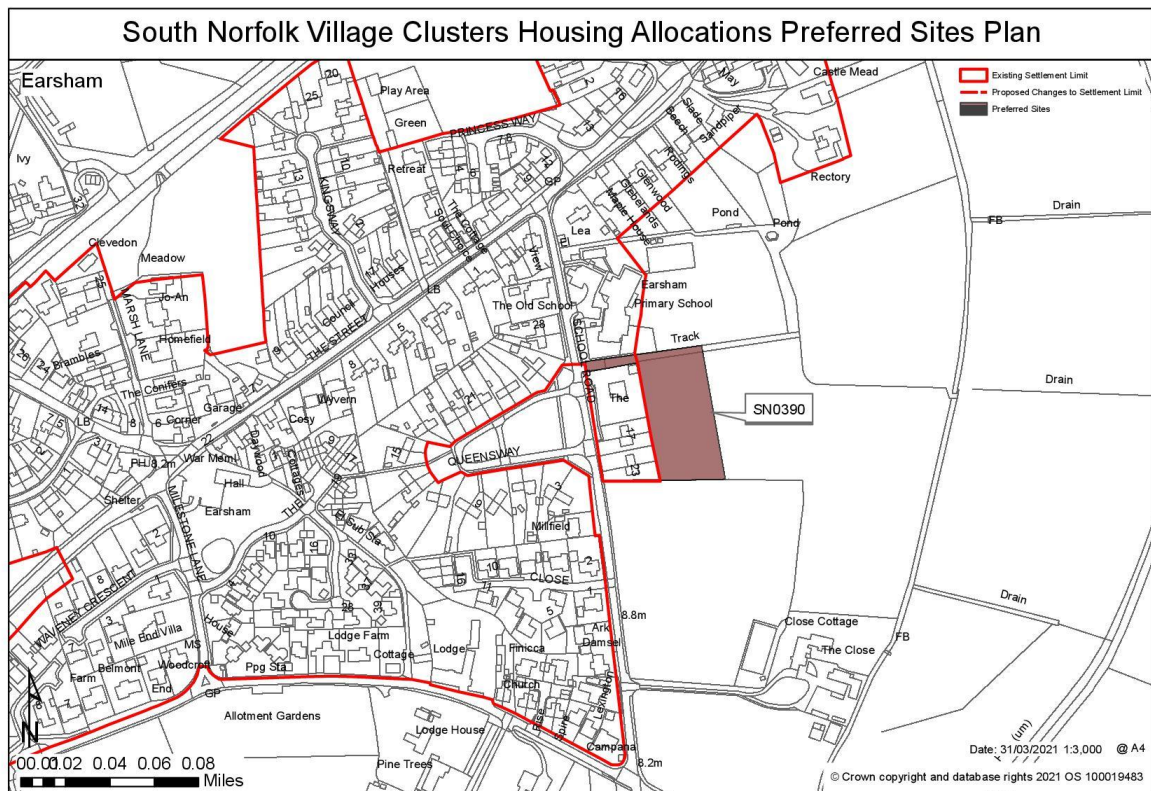
Site: SN0390, Land east of School Road

Preferred for a Settlement Limit Extension on a site of approximately 0.5ha.

Reasoned justification: The site is in a preferable location for an allocation, as it is well related to services and facilities, but is currently constrained by a narrow access, suitable for a private drive only. Therefore, at this stage it is considered as a settlement limit extension.

It is proposed that only the eastern field is developed in order to avoid flood risk areas and mitigate landscape impact. Consideration will need to be given to views along School Road, south towards the Listed Church where there are potential Heritage concerns.

If access issues can be resolved then the site is can be expected to be suitable for allocation for a development in the region of 25 homes on a site of approximately 1ha.



QUESTION 53: Do you support or object to the proposed use of the site? Please explain your reasons

Rejected Sites

No sites have been rejected.

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15. Forncett St Mary and Forncett St Peter

Form and character

Forncett St Mary and Forncett St Peter are both linear in form and have developed along Aslacton Road/ Low Road which follows the line of the Tas Valley. The buildings comprise mainly farms and cottages interspersed with open fields and more recent development. The majority of new development has taken place at Forncett St Peter. A conservation area is drawn around most of the settlements and numerous listed and historic buildings feature within it. The undeveloped flood plain of the River Tas valley is located to the east.

Services and Community Facilities

Forncett St Peter has limited facilities; a school and bus and Forncett St Mary has the village hall. These settlements share these dispersed facilities and others that are located at Forncett End/Tacolneston, although these are much further afield.

Settlement Limit and Constraints

The Settlement Limit has been drawn around the cluster of linear development form at Forncett St Mary leaving its more dispersed outlying areas outside and around the existing built-up area of Forncett St Peter in order to prevent the linear spread of the settlement into the surrounding valley landscape. The Settlement Limit as defined for these settlements allows for limited infill development and takes account of the proximity to services maintains the space between the two villages and conserves the rural character of the area. No alterations are proposed to the existing Settlement Limit.

QUESTION 54: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

7 sites have been promoted for consideration, of which none were identified as preferred or shortlisted sites.

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0429SL	<p>Land at Spicers Lane, Forncett St Mary</p> <p>The site is separated from the main part of the settlement and the existing Settlement Limit for Forncett St Mary. The surrounding and immediate highway network is substandard with no safe walking route to the school. Whilst it is adjacent to existing residential development along Spicers Lane, further development would impact on an otherwise rural area where the character is limited of development. The site is also within close proximity to Grade II Listed Buildings to the south which could cause heritage impacts however it is considered that these impacts could potentially be mitigated.</p>
SN0559	<p>Four Seasons Nursery, Cheney's Lane, Forncett St. Mary</p> <p>Development of the site would constitute backland development and would have an adverse impact on the form and character of the current very rural area. Since the initial GNLP submission, a point of access has been identified to the east via Spicers Lane, where highway evidence has highlighted concerns of the possibility of creating a suitable access to the site. The local road network is considered to be unsuitable in terms of road capacity or lack of footpath provision, where there is limited accessibility to services, other than a bus stop and School. Development of the site would result in the loss of Grade 2 agricultural land which is identified as Very Good Quality Agricultural Land that has minor limitations which affect crop yield, cultivations or harvesting. In addition to this, the site is located near to the River Valley, Forncett Conservation Area and within the curtilage of the Four Seasons Grade II Listed Building.</p>
SN1002	<p>Land to the south of North Field Road & Land to the west and south of Long Stratton Road, Forncetts</p> <p>The site has a poor relationship with the existing village/built up areas (Forncett St Mary/Peter and Forncett End), where development could adversely affect the natural rural landscape setting. The sites provide</p>

Site	Location and Reasons for Rejection
	<p>an important gap between development in Forncett End to the east and Forncett St Mary to the west. Where whilst there is sporadic development surrounding the parcels of land identified, these are minimal groupings of 1 or 2 houses. Highways have raised concerns with the poor highway network surrounding the sites that have limited footpaths. A development of reduced scale would not sufficiently address these concerns.</p>
SN1039SL	<p>Kilamay Farm, Wash Lane</p> <p>The site is largely detached form the existing settlement where there are limited services and facilities. The site is located to the south of a group of Listed Buildings, including the Grade I St Peter Church and associated. The views between these heritage assets and the site are largely uninterrupted where developed could impact on their setting. The site is also within the Tas Rural River Valley which also provides an attractive rural setting, any landscape impact would need to be mitigated. Highway constraints have also been identified; access is via a narrow rural carriageway. The site is located opposite a commercial use (currently used as a mechanic yard) where there are potential concerns regarding amenity issues.</p>
SN1040	<p>Land at mill Road / Overwood Lane / Gilderswood</p> <p>Whilst the site is part of a smaller group of dwellings along Mill Road, the site is detached from the main areas of the settlement and is not adjacent to any existing settlement boundaries. The site is rural in character with site frontage hedges that provide the setting to the monument asset identified, where development in this location would impact upon the heritage setting. Development of this site would result in encroachment into the countryside, beyond the existing boundaries of the settlement and would have a landscape impact as a result.</p>
SN2028	<p>Low Road, Forncett St Mary</p> <p>The site is constrained due to access and highways issues, the impact upon the historic character and the detrimental townscape impact the development would have. Whilst the site is in close proximity to the school and the existing Settlement Limit, it has a poor relationship with existing residential development, both in terms of form and</p>

Site	Location and Reasons for Rejection
	connectivity. Areas of the site are also affected by surface water flood risk. Off-site highway works would also be required.
SN2058	<p>Tawny Farm, Station Road, Forncett St Peter</p> <p>Highway safety concerns have been identified in that the site lies on the north side of Station Road, on the inside of an "S" bend, with the existing access being located approximately 45m to the east of the railway bridge. This part of Station Road is largely a national speed limit road of a relatively narrow width and few opportunities for pedestrians and cyclists to seek refuge on the road verge. The Highways Authority have suggested that substantial highway works, and land dedication would be required to form a safe access, combined with an appropriate treatment of Station Road junction with Wacton Road. It is also note that the existing buildings on site comprise two units of holiday accommodation where it has not been demonstrated that the holiday accommodation is not economically viable as holiday accommodation. This would need further investigation. The site is in the setting of 3 listed buildings, meaning that development to the south end of the site would have an impact on the setting of these designated heritage assets, however development could be reasonably mitigated.</p>

QUESTION 55: Do you think that any of the rejected sites should be shortlisted or preferred for allocation? Please add additional comments to explain your response.

16. Gillingham, Geldeston, and Stockton

Form and Character

Gillingham

The historic core of the village lies along The Street and Loddon Road, with a further cluster of development at west Kings Dam. Estate development has occurred north of The Street, and the majority of the village (contained within the Settlement Limit) is now in a nucleated form. The older part of the village is characterised by substantial tree planting along Loddon Road, in particular the wooded area to the east and the line of trees along Forge Grove which are protected by a Tree Preservation Order.

The village is set in the Waveney Valley and adjacent to the Broads, and open views out from the village make an important contribution to its rural character. The attractive area around Gillingham Hall and its park was designated as a Conservation Area in 1994. The parish is well served by the A146 (providing direct links to Beccles, Lowestoft, Loddon and Norwich) and the A143 (access to Bungay, Gt Yarmouth, and to the A140 and Diss). The former B1140 provides access to Thurlton and Norton Subcourse.

Geldeston

The main concentration of development is around Geldeston Hill and The Street, with a small detached cluster at West End and isolated Dockeney and Dunburgh Hill. The village has developed in a linear form along The Street with a small post-war council housing estate, The Kells, having been developed by Tayler & Green to the west of Geldeston Hill. Some infill development has occurred along The Street. The A143 to the north of the parish provides a direct road link to Bungay, the A140 and Diss to the west and Beccles and Great Yarmouth to the east and to Lowestoft and Norwich via the A146. Much of the parish to the south of the village lies within the Broads Authority area.

Stockton

Stockton is a sparsely populated parish consisting mainly of individual dwellings and farms set in open countryside. There is a small cluster located around the Church. The A146 runs through the parish and provides direct access to Norwich and Beccles. The A143 in the south provides access to Bungay.

Services and Community Facilities

The cluster has a range of social and community facilities comprising a primary school, village hall and a pub. There is also a shop, recreational facilities and a regular bus service. There is a petrol station and fast-food restaurant to the north at the A146/A143 roundabout.

Settlement Limit and Constraints

Gillingham

The Settlement Limit is in two parts. The first includes the main built form of the settlement. The second part is around the school and adjoining housing, which also extends to include the allocation made within the 2016 Site Allocations Plan for new housing in between the two built-up areas.

The extent of the new housing allocation is limited to land that is within Flood Risk Zone 1. It is not appropriate to allocate a larger site due to the surrounding land being at a higher risk of flooding. Within the land allocated, an allocation of approximately 10 dwellings is considered appropriate to reflect the form and character of existing built development to the west of the site.

It is noted that the existing primary school in Gillingham is operating at capacity. There is an open field adjacent to the school however within which the preferred site is located. Further exploration will be needed to ensure primary school needs can be met.

Geldeston

The Settlement Limit has been drawn to include the two main built-up forms of the settlement along The Street and The Kells, including the small allocation west of Kells Way made within the 2016 Site Allocations Plan. The boundary also includes a small cluster of dwellings east of Geldeston, off The Street.

No alterations are proposed to the existing settlement limits within this cluster.

QUESTION 56: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

7 sites have been promoted for consideration, of which 2 have been identified as preferred allocations and 2 have been shortlisted.

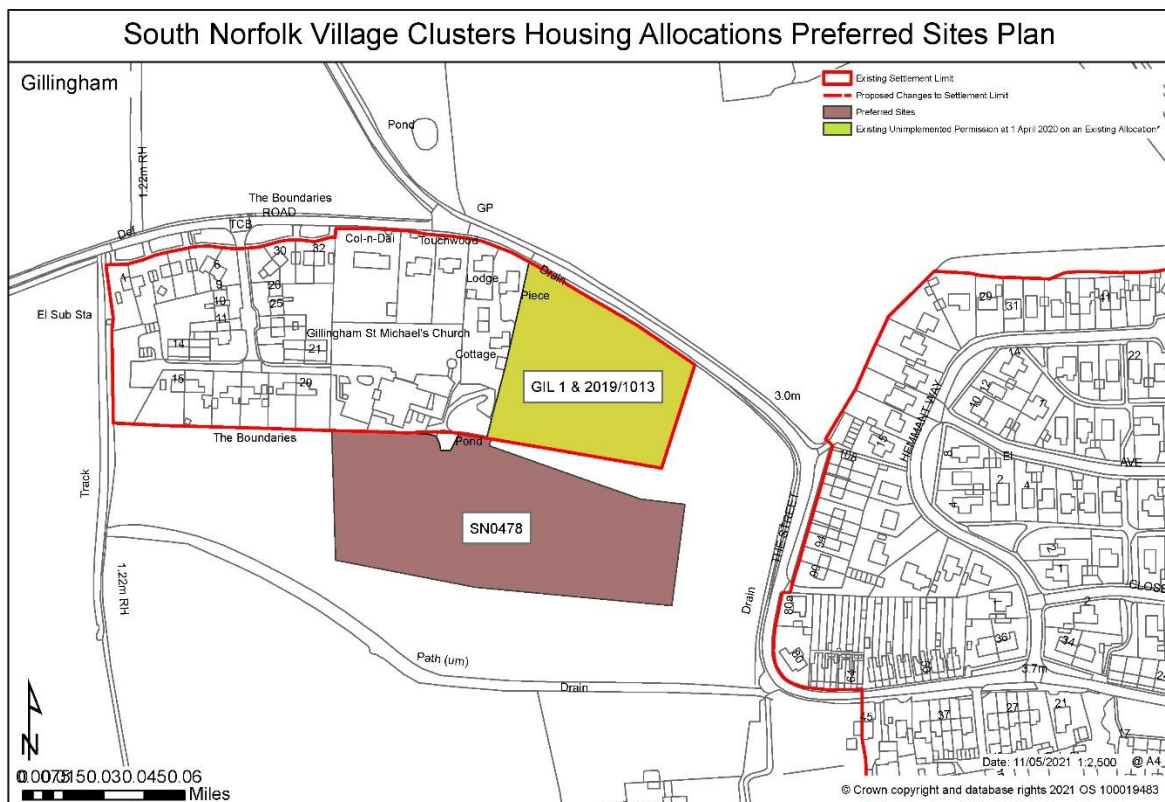
Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Site: SN0478, Land south of GIL 1, Gillingham

Preferred for 35 dwellings on a site of 1.4 hectares

Reasoned Justification: The site would be accessed through the exiting Hopkins Homes development that is currently under construction and which appears to offer a suitable access. Further highway improvements may be required or proposed numbers restricted if highways constraints cannot be resolved. Much of the surrounding area falls within flood zone 2/3, including land immediately to the south of the site. However, the promoter advised that the report produced by Evans Coastal and Rivers in connection with the current development identified the land to be in Zone 1 in relation to Flood. Further investigation (FRA) would be required to confirm this prior to allocation. It is also noted that the boundaries of the site can be adjusted if required as surrounding fields are in the same ownership. Landscape constraints have been identified as site is in close proximity to the Broads (King's Dam) and footpaths run parallel to the south and west of the site. A landscape assessment would need to be undertaken to demonstrate that there would not be unacceptable landscape impacts.



QUESTION 58: Do you support or object to the allocation of the preferred site?

Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Shortlisted Sites

On the basis of the assessment undertaken the following site(s) have been shortlisted:

Site	Reasons not preferred for allocation:
<p>SN0274 REVA or REVB</p>	<p>Land to the south of the A143 and A146 roundabout, Gillingham</p> <p>Shortlisted for up to 25 dwellings on a site of 2 hectares.</p> <p>SN0274 REV A and REV B are immediately adjacent to one another and have therefore been assessed together. Both sites are subject to flood risk constraints. However, the development to the south (application reference: 2019/1013) also falls within Flood Zone 2/3a but the applicant submitted a Flood Risk Assessment (FRA) which identifies the actual 'Residual Risk and Flood Zones' on site and all of the 22 homes proposed were able to be sited within Flood Zone 1.</p> <p>Any allocation of this site would be subject to further investigation to determine the extent of flooding and whether development on one or both of these sites could also be accommodated within Flood Zone 1. The site has few other constraints.</p> <p>The Highways Authority have recognised that the site could provide further highways enhancements with the widening of The Street. In addition, an application to extend the service station to the north of the site has recently been approved where a linkage to the rest of the village has been suggested. It is considered that development of the site could provide this linkage and development in this location could be coherently planned to maximise any opportunities for connections to be created.</p> <p>Due to the sites being adjacent and of the same ownership, it has been identified that the site boundary could extend across REVA and REVB to help mitigate flood risk issues is necessary.</p>

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0091	<p>Land to the north and east of Church Farm, Church Road, Stockton</p> <p>The site is considered to be remote from services and cannot provide a reasonable or safe walking route to the primary school. The site is detached from the main areas of the settlement and is not adjacent to any existing settlement boundaries. Highway safety constraints have been identified; development of the site could lead to an intensification of slowing, stopping and turning movements onto A146 Principal Route. The local road network is limited in width, lacks passing provision and has no footways. It has also been noted that visibility may require third party consent.</p>
SN0207	<p>Land off Old Yarmouth Rd/ Geldeston Hill, Geldeston</p> <p>The site is considered unsuitable due to number of highways constraints that are unresolvable. The site also sits elevated within the landscape where impact upon the landscape protection designations may not be mitigated against. Access to the site via Old Yarmouth Road (to the north) is not a suitable access for development. Therefore, the only other access is off Geldeston Hill, via Ketts Acres to the east. Whilst Kell's Acres is an adopted road, it is very narrow and there are concerns that any improvements would impact on two mature trees in the setting of the Tayler and Green housing. Development of this site would also negatively impact on the landscape character of the valley setting and also the adjoining Conservation Area.</p>
SN0276 and SN021SL	<p>Land to the east of the Village Hall, Gillingham</p> <p>The site is considered unsuitable for allocation or an SL extension, due to highway safety constraints. Access to the site would need to come through the village hall car park which is 3rd party land that has not been presented as an option. In addition to this, if access could be achieved there would be issues with junction visibility to the north and south on Loddon Road (which is a busy route from the A146 into Beccles). It is considered that this would be difficult to resolve with the</p>

Site	Location and Reasons for Rejection
	<p>junction to The Street opposite. The site is also heavily constrained by tree cover and also suffers from some small areas at risk of fluvial or surface water flooding to the eastern boundary. It is also noted that the majority of the site falls within the Broads Authority executive area.</p>
SN1004	<p>Land off Old Yarmouth Rd/ Geldeston Hill, Geldeston</p> <p>It is considered that safe access is not achievable due to visibility constraint caused by adjacent building. Whilst the site is located adjacent to the existing SL limited, the site is backland development, out of keeping with the exiting settlement pattern, with potential amenity concerns for existing residents. It has also been identified that the site is located within the Geldeston Conservation Area and there are a number of listed buildings within close proximity of the site.</p>

QUESTION 59: Do you think that any of the shortlisted or rejected sites should be allocated instead of, or in addition to, the preferred site(s)? Please add additional comments to explain your response.

QUESTION 60: Do you think that any of the shortlisted sites should be rejected? Please add additional comments to explain your response.

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

Form and Character

Hales

Development in Hales has been concentrated around Yarmouth Road east of the A146 Beccles Road. Individual dwellings and farmsteads are sparsely distributed through the remainder of the parish.

The village has developed along the historical road network of Yarmouth Road, School Lane and Briar Lane. There has been significant modern infill development together with some limited estate development which has resulted in a more nucleated settlement form.

The village is set in an attractive valley landscape which contributes to its rural setting. Hales is adjacent to the A146 which provides a good link to Norwich, Beccles and Loddon whilst the B1136 provides relatively good access to Haddiscoe, and then to Great Yarmouth via the A143.

Heckingham

Part of the built up area of Hales lies within the parish of Heckingham, however the remainder of the settlement is sparsely populated comprising a small number of dwellings and farmsteads set in open countryside. The A146 to the south of the settlement provides a good link to Norwich.

Carleton St Peter

Carleton St Peter is a sparsely populated parish consisting of a small number of individual dwellings and farms set in a predominately valley landscape.

Langley with Hardley

Development within the parish has been concentrated into three small groups at Langley Green, Langley Street and Hardley Street with individual dwellings and farmsteads widely dispersed throughout the remainder of the parish. The three groups of development are set on the edge of Langley and Hardley Marshes within the Yare Valley. In the west of the parish is the historic parkland of Langley Park. The character of the developed areas is of a dispersed nature comprising small scattered ribbons of development together with the attractive valley setting combine to give the area an attractive rural character adjacent to the Broads.

Claxton

Development within the parish has been concentrated along The Street with a few isolated dwellings and farmsteads scattered throughout the remainder of the parish. The village, located on the edge of the Broads Area, is set in the attractive Yare Valley with extensive marshlands to the north and a gently sloping valley to the south.

The village has a strong linear settlement form with dwellings generally set back from the road although the older cottages at the east end of The Street are built-up close to the road in a traditional style.

Raveningham

Raveningham displays a dispersed rural settlement pattern consisting of individual dwellings and farms set in open countryside with significant areas of woodland, in particular the historic parkland of Raveningham Park. The parish has good access to Haddiscoe and the A143 to the east and Hales, Loddon and A146 to the west.

Sisland

The parish is sparsely populated consisting of a few individual dwellings and farms set in an attractive valley landscape. Mundham Road which runs immediately south of the parish provides direct access to Loddon and the A146.

Services and Community Facilities

The cluster has a range of social and community facilities including a village hall and shop at the Hales Service Station on the edge of the village. There is outdoor recreation space and public transport links. There is also a public house and some employment opportunities.

Settlement Limit and Constraints

Hales

The Settlement Limit has been drawn to include the main built form of the settlement, development around the former Hales Hospital and land allocated (HAL 1) within the 2016 Allocations Plan for residential development in between.

Claxton

The Settlement Limit has been drawn to include the main built form of the settlement that is within South Norfolk and allows for some limited infill development. Much of the surrounding area falls within the Broads Executive area.

No alterations are proposed to the existing settlement limits within this cluster.

QUESTION 61: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

2 sites have been promoted for consideration, of which 1 has been identified as a preferred allocation.

Preferred Sites

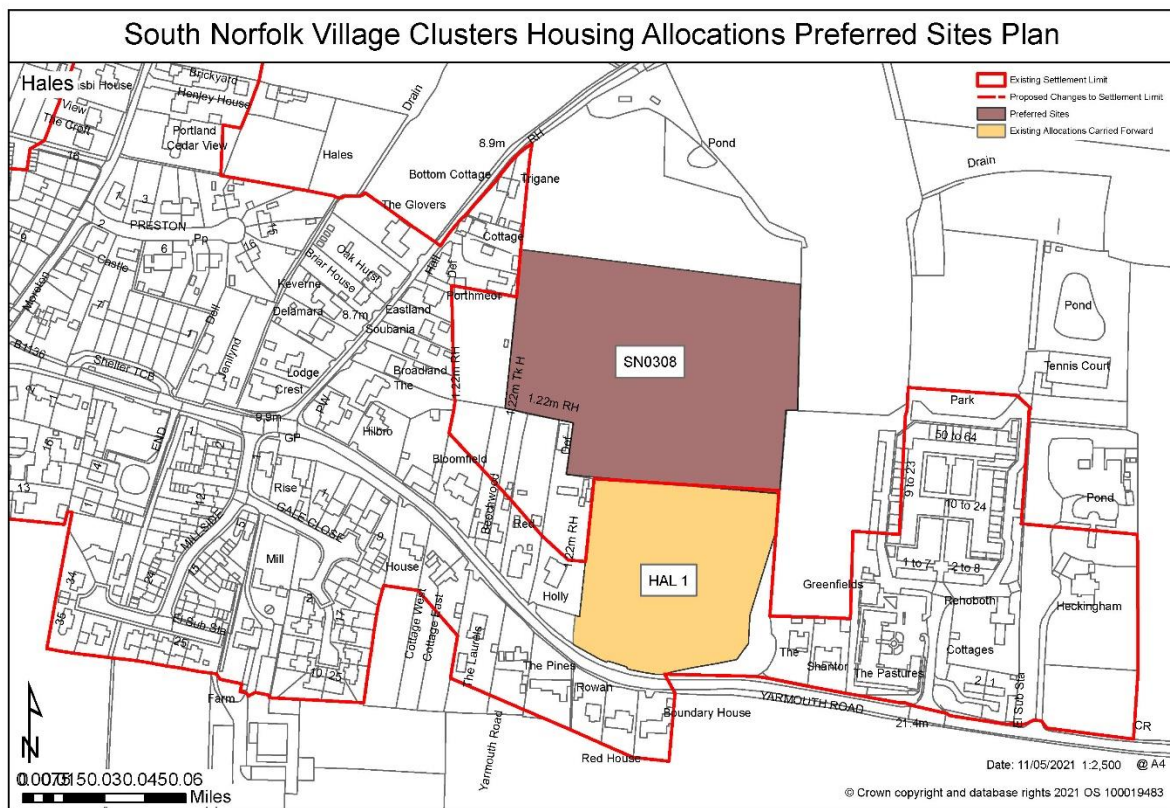
On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

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Site: Part of SN0308, Land off Briar Lane, Hales

Preferred for up to 35 dwellings on a site of 1.4 hectares.

Reasoned justification: The site is well located to access the available local facilities. Hales also benefits from a continuous footway to employment and higher order services in Loddon, as well as being on the main Lowestoft/Beccles/Norwich bus route. The site as promoted is too large, but a more restricted site (approx. 1/3 of the land promoted) would be less intrusive in the landscape and on the setting of the listed former Hales Hospital, as well as allowing for any necessary mitigation of the 1:1000 year surface water flood risk. The site would need to be accessed via the current HAL1 allocation, which has outline consent for 20 dwellings.



QUESTION 62: Do you support or object to the allocation of the preferred site?

Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0530	<p>Land west of Claxton Church Road, Claxton</p> <p>The site is poorly located for access to services either within this Village Cluster, or within the adjoining cluster of Thurton and Ashby St Mary (some of which are closer) and Highways do not consider a suitable access can be achieved to the site from Church Lane. The site is very rural with consequent detrimental impacts on the relatively open landscape (visible from highways and footpaths) and development would effectively be an isolated group of dwellings in the countryside. There are also heritage assets in the vicinity, including the Grade 1 Listed St Andrew's Church, and protected species (brown hare) have been noted on site.</p>

QUESTION 63: Do you think that the rejected site should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

QUESTION 64: Do you think that any of the shortlisted sites should be rejected? Please add additional comments to explain your response.

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

Form and Character

Hempnall

The main settlement of Hempnall comprises of development along the lines of Broaden Lane, The Street, Mill Road / Bungay Road and Field Lane. Originally a linear settlement based on the historic road network, the village has developed a more nucleated settlement form mainly as a result of modern estate development to the east of Broaden Lane and east of Field Lane. The village has also experienced significant infill development. The B1527 runs through the parish providing good access to the A140 and Long Stratton to the west and to the B1332 and Bungay to the east.

Morningthorpe and Fritton

The parish displays a largely dispersed settlement pattern with the exception of two areas of settlement which have developed at Morningthorpe and Fritton. Morningthorpe is a minor settlement grouping comprising a small number of dwellings. Fritton has developed primarily along The Street in a ribbon form and is characterised by dwellings set back from the road. The remainder of the parish is predominately rural.

Topcroft

The main concentration within the parish has taken place along The Street with a cluster of houses located at Church Road away from the main part of the village. Individual dwellings and farmsteads are dispersed throughout the remainder of the parish.

Development along The Street has resulted in a linear settlement form characterised by one plot depth development mainly to the east side of the road, with the west side characterised by more open frontages interspersed with a number of farms set back from the road.

The large open areas, views of the surrounding countryside and good tree and hedge planting along much of The Street, are all important in maintaining the rural character and setting of the village.

Shelton and Hardwick

Development within the parish has been concentrated at Hardwick with a small isolated cluster at Shelton and individual dwellings and farmsteads dispersed throughout the remainder of the parish.

Hardwick has developed a linear settlement form based along Mill Road, Hall Lane and The Street characterised by one plot depth development.

The village comprises three distinct areas. The first is based along Mill Road and comprises generally modern development. To the north-west of this area and separated by a large open field is a limited ribbon of development along Hall Lane. The third main area is the main core of the village along The Street. The three parts of the village give it an attractive rural character set in a flat and open landscape but with an attractive river valley immediately to the north.

Services and Community Facilities

The cluster settlement has a good range of social and community facilities including a primary school, a number of shops, surgery, pub, garage, village hall and recreation space. The village has the benefit of mains sewerage. There is a limited bus service.

Settlement Limit and Constraints

Hempnall

The Settlement Limit has been drawn to include the main built form of the settlement. In addition, the boundary includes land previously allocated within the 2016 Allocation Plan, for residential development to the south-east of the village (HEM 1) Development has occurred in the form of isolated clusters of housing along Field Lane (south of the village), Lundy Green, Road Green, Silver Green and isolated ribbon development at Hempnall Green.

Topcroft

Due to the proximity of the Flood zones, the rural character of the settlement the Settlement Limit has been around the built form of The Street. The open areas to the front of Street Farm and Trees Farm which are recognised for their importance in contributing to the street scene and rural character of this settlement have been excluded from the Settlement Limit.

Shelton & Hardwick

The Settlement Limit has been drawn around two of the more built up areas of ribbon development at Shelton to allow for very limited development within the boundary. Corner Farm has not been included within the Settlement Limit in order to maintain the important open spaces around it and the separation of the two parts which characterises the village.

No alterations are proposed to the existing settlement limits within this cluster.

QUESTION 65: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

14 sites have been promoted for consideration, of which 2 were identified as preferred allocation but no further sites were shortlisted.

Preferred Sites

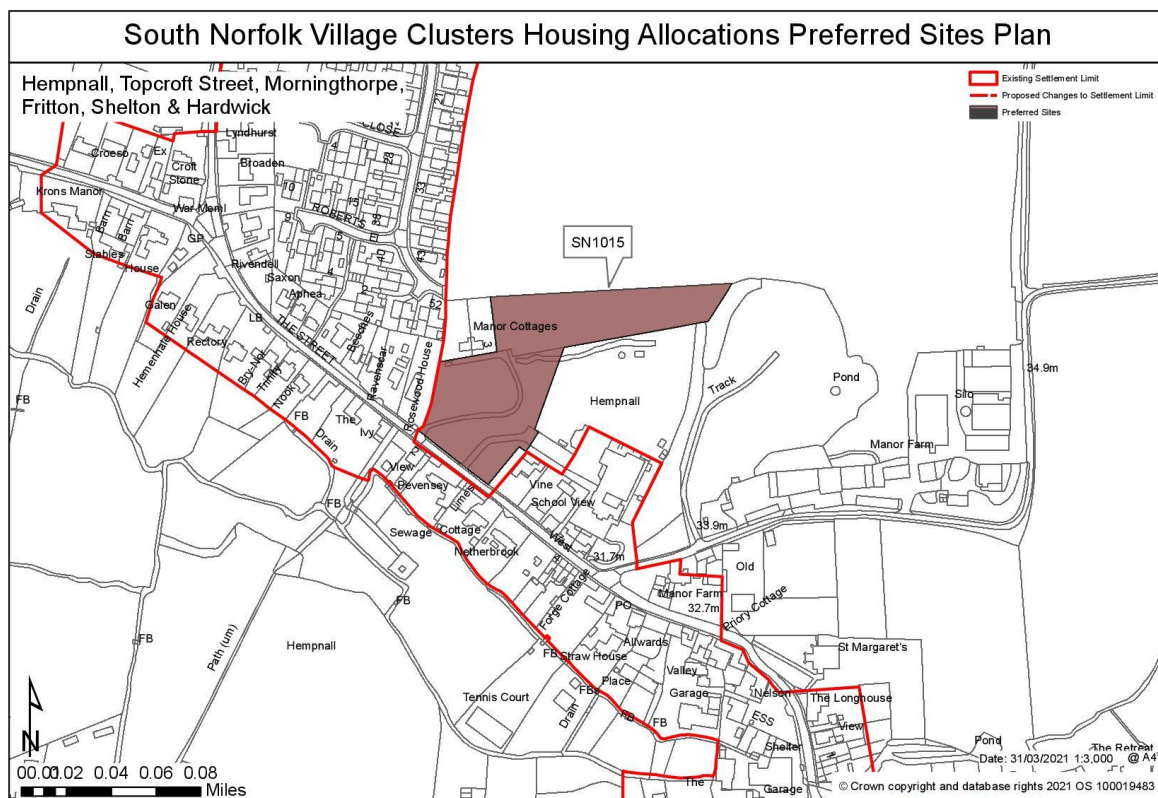
On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

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Site: SN1015, Land adjacent to the primary school, The Street

Preferred for 20 dwellings on a site of 1.6 hectares

Reasoned Justification: The site benefits from good connectivity and relates well to the existing built form of the settlement. The site is relatively open to the north with a PRoW to the north east site boundary, where development should be lower density to maintain some through views and to reduce the impact on the character of the Conservation Area and setting of the Listed Buildings. Off-site highway works have been identified however these are considered to be achievable. Development would also need to address change in levels across the site.



QUESTION 67: Do you support or object to the allocation of the preferred site?
Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0147	<p>Land around Alburgh Road and Silver Green, Sycamore Farm, 17 Alburgh Road, Hempnall Green</p> <p>The site is considered to be remote from services and facilities where highway safety concerns have also been identified. Access is via field access from Silver Green where it is considered not feasible to construct a satisfactory access and there is no safe walking route to the catchment school. Heritage and landscape constraints have also been identified.</p>
SN0178SL	<p>Land adjacent Tween Oaks, Alburgh Road</p> <p>The site is remote from services where there is also no safe walking route to the catchment school. Whilst some residential development is located on the western side of Alburgh Road and development at scale promoted could be mitigated by design and landscaping, it has been noted that development would result in loss of significant hedgerow which would be detrimental of character of the lane. The site is open to larger parcels of farmland to the west where there the site would be prominent in this direction.</p>
SN0580	<p>Land at Home Farm, Alburgh Road, Hempnall Green</p> <p>The site would have unresolvable highway issues and impact on landscape and townscape. The site is considered to be remote from services where access to the site would require the removal of frontage hedge/trees and provision of a 2.0m wide footway as there is no safe walking route to the catchment school.</p>
SN1016	<p>Land at Busseys Loke</p> <p>The site would have a poor relationship with the existing form and character of the settlement. Whilst the site is reasonably close to local services and public transport, it is lacking footpath provision. Significant access and highway network constraints have been identified and are considered to be barriers to the delivery of this site. The site is also</p>

Site	Location and Reasons for Rejection
	heavily constrained by 2 PRow's (PF7 and PF8) which would require diverting as they cross the middle of the site.
SN1017	<p>Land at Broaden Lane</p> <p>The site relates poorly to the existing services, including the primary school, and would have a poor relationship with the existing form and character of the settlement. Development of this site would be harmful in landscape character terms; the site is open in views from the north and west with prominent in views from the highway.</p>
SN1018	<p>Land south of Millfields</p> <p>The site is considered to have significant highway safety issues and constraints resulting from the narrow width of the access off Field Lane with no footway. It has also been considered that visibility is not achievable within highway and site frontage. Even with a reduction in site size, the highway issues are considered to be unresolvable.</p>
SN2029SL	<p>West of Topcroft Street, Toftcroft</p> <p>The site relates poorly to the existing services, including the local school which is over a 3km walk where there is no continuous footpath. It has also been noted that the development would impact on the heritage asset immediately north, where there are also concerns that development here would result in encroachment. The site has also been identified to fall within Flood Zone 2 and 3 which could heavily constrain developable land.</p>
SN2046	<p>Land at Pear Tree Farm, Hemphall</p> <p>The site is considered to have poor connectivity and relationship to services, including the primary school. There is also no safe walking route to the catchment school. The site is heavily constrained by significant tree cover within the southern half of the site and by a pond located within the western section of the site (where is also identified surface water risk). This would reduce the area of developable land.</p>
SN2081	<p>West of Feld Lane</p> <p>The site has unresolvable highway issues. The site is accessed via Field Lane to the west which has banks/hedging and no footway. It is considered that most/all frontage trees/hedge would need to be removed in order to create a satisfactory access where it has been</p>

Site	Location and Reasons for Rejection
	advised that hedgerow along Field Lane should be retained Landscape constraints have identified that development of site would have a significant impact on form and character of settlement.
SN2146SL	West of The Street The site has unresolvable highway constraints. Development of the site would also conflict with the linear pattern of development with potential harm to the character of the settlement. The site relates poorly to the existing services, including the local school which is a 3km walk and has no continuous footpath link. Heritage and surface water flood issues have been identified; however, these could be mitigated.
SN4012	Land west of Low Road The site is considered is to be remote from the services and facilities within the village cluster, exacerbated by the lack of footways. The site is also considered to be out of keeping in terms of form and character, whilst the site is adjacent to residential dwellings, the site is detached from the main part of Topcroft to the south.
SN4083	Land at Bungay Road, Hempnall Frontage development would limit landscape and heritage impacts, however identified flood risk constraints are likely to restrict development on the western part of the site which is closest to the existing settlement. This could result in a poor relationship between new development and existing development along Bungay Road. Whilst the site is reasonably close to local services there is no footpath provision for the first 50m of the site and there appears to be no land available for improvements.

QUESTION 68: Do you think that any of the shortlisted or rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

QUESTION 69: Do you think that any of the shortlisted sites should be rejected? Please add additional comments to explain your response.

19. Heywood

Form and character

Heywood is a sparsely populated parish. It is predominately rural in nature and the majority of dwellings/farmsteads that have developed are along Heywood Road. To the south of the parish lies Diss and Heywood Road provides direct access to the town.

Services and Community Facilities

The settlement has very limited facilities.

Settlement Limit and Constraints

There is currently no Settlement Limit in Heywood and no alterations are proposed.

QUESTION 70: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

No sites have been promoted for consideration, therefore at this stage no site have been assessed.

Form and character

Keswick

Keswick is a very rural parish despite abutting Norwich, with development concentrated on Low Road. To the south of Low Road there is an established frontage between Glebe House and Low Farm. The dwellings on Low Road are located within the Yare Valley but to the east of these there is an important gap which offers views to the crest of the valley side from the south.

To the north of Low Road there are a handful of buildings scattered along its frontage. At the eastern end is Hall Farm occupying a prominent location which helps to give Keswick its rural character.

Detached from the development on Low Road are isolated pockets of dwellings including the Keswick Mill area, an attractive area next to the river and designated as a small Conservation Area. In addition, there are other individual and groups of dwellings, and farms isolated from the main developed ribbon, set in partially wooded countryside. In the south of the parish, the former education college based on Keswick Hall, which is a Grade II listed building, has been converted to residential use which has ensured the continued use of this important building. The parkland setting of the Hall contributes to the overall attractiveness of the landscape in the area.

The parish of Keswick stretches along the B1113 linking with the A140 Ipswich Road into Norwich.

Intwood

The settlement of Intwood lies south of Keswick and the A47. This area is predominately rural with isolated dwellings and farmsteads.

Services and Community Facilities

These are very limited comprising a small community hall and a bus service along the B1113.

Settlement Limit and Constraints

The Settlement Limit has been drawn around the existing built up area at Low Road to prevent further extension into the surrounding countryside and excluding parts that are within Flood Zones 2 and 3.

A Settlement Limit has also been drawn at land between B1113 and A140 roads for a new employment allocation to provide small workshop, light industrial B1 uses and provision of an access road from the B1113 to the A140.

No alterations are proposed to the existing Settlement Limit

QUESTION 71: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

3 sites have been promoted for consideration, of which none were identified as preferred or shortlisted sites.

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0012 SL	<p>Land at Eaton Gate, Low Road, Keswick</p> <p>The site is not suitable for more than the one consented dwelling due to significant site constraints including tree cover, flood issues, landscape and access. A higher density development would have a detrimental impact on landscape which may not be reasonably mitigated and likely to significantly encroach on the river valley. Whilst the site is part of a smaller group of dwellings, it is separated from the main village and the existing Settlement Limit where this part of the village retains its predominantly dispersed rural character. Highways have raised concerns with visibility to either Mill Lane, or Low Road.</p>
SN2014	<p>Land at Intwood Road, Keswick</p> <p>The site has a poor relationship with existing development, both in terms of form and connectivity as well as being located within the Strategic gap and the Norwich Southern Bypass Landscape Protection Zone which seeks to retain the openness of the zone and where</p>

Site	Location and Reasons for Rejection
	<p>possible enhance the landscape setting of the southern bypass. The site is detached from the main part of the village where this part of the village retains its predominantly dispersed rural character.</p> <p>Development would have a detrimental impact on landscape which may not be reasonably mitigated. Highways have also raised concerns with the current road alignment of Intwood Road which challenges for visibility.</p>
SN4081	<p>Land to east of Intwood Road, Keswick</p> <p>The site is located within the Strategic gap and the Norwich Southern Bypass Landscape Protection Zone which seeks to retain the openness of the zone and where possible enhance the landscape setting of the southern bypass. In addition, the site is located adjacent to a County Wildlife site 'Carr Wood' where development would have a detrimental impact on landscape which may not be reasonably mitigated. The site is remote from services where there is no safe walking route to school. Highways have also raised concerns with an access off Intwood Road and achieving visibility.</p>

**QUESTION 72: Do you think that any of the rejected sites should be allocated?
Please add additional comments to explain your response.**

21. Ketteringham

Form and character

Ketteringham is a small village which lies to the south of the new A11 and the Norwich - Ely railway line. The village has developed in a linear form along The Street and Low Road. The council depot and waste-recycling/paper recycling plants in the parish are separated from the residential area. There is a smaller outlier of development to the south of the village around the Church and Ketteringham Hall.

Some infilling has taken place along The Street and Low Road, but the total number of dwellings is still small. The setting of the village within open countryside is made apparent by the significant breaks in the built-up area to the north of The Street around the War Memorial and between 'Cytringa' and 'Thatched Cottage' to the south of Low Road. These afford views over the surrounding countryside. The area around Ketteringham Hall is distinctly separate from the main part of the village. The grounds of Ketteringham Hall are of considerable archaeological importance.

Services and Community Facilities

There are limited services available comprising a village hall, preschool facilities and small garage. Further employment is available at the cluster of industrial units to the north-east. There is also a bus service.

Settlement Limit and Constraints

The Settlement Limit has been drawn to include the main built form of the settlement. Due to the setting of the village in open countryside and limited service and facilities available, the boundary has been defined to allow only very limited infill development.

No alterations are proposed to the existing Settlement Limit

QUESTION 73: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

4 sites have been promoted for consideration, of which none were identified as preferred or shortlisted sites.

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment:

Site	Location and Reasons for Rejection
SN0473	<p>Land at Church Road, Ketteringham</p> <p>The site is an unsuitable option for allocation due to its physical separation from the main settlement, access issues and the detrimental townscape impact its development would have. Development of the site would represent a breakout to the south of the village where views of the site are afforded from the surrounding road network. The site is also located adjacent to Bean and Outer Park Woods – County Wildlife Park where development may impact on protected species, which may not be reasonably mitigated.</p>
SN0513	<p>Land north of High Street, Ketteringham</p> <p>The site is part of a smaller group of dwellings located north off The Street, also separated from the existing Settlement Limit. The site is also constrained by heritage setting (Listed War memorial in front of the adjacent site) and landscape impact. Site is also at the limits of accessibility to services in terms of distance, a problem which is exacerbated by the lack of footways.</p>
SN0528	<p>High street, Ketteringham</p> <p>The site is constrained by heritage impacts, access and landscape. There is a Grade II listed war memorial located to the site's frontage where a Planning Inspector has considered that the development of the site would fail to preserve or enhance the setting, and thereby the significance of, the designated heritage asset. Whilst the site is adjacent to the existing Settlement Limit and within a reasonable distance of local services and facilities, this does not outweigh the limitations of the site in highways terms. The site also provides an attractive rural setting with open views to the north and north east, where development could lead to an uncharacteristic interruption.</p>
SN3031	<p>Land at Cantley Lane, Ketteringham</p> <p>The wider site is significantly too large in the context of the Village Clusters document. No smaller parts of the site are considered suitable</p>

Site	Location and Reasons for Rejection
	<p>due to the poor relationship with existing settlement (i.e. detached by intervening fields), and the consequent townscape/landscape concerns. The site is also heavily constrained by flood zone 2 and 3a, which cover over 50% of the site. Impacts on landscape, highways and Heritage assets could not be reasonably mitigated.</p>

**QUESTION 74: Do you think that any of the rejected sites should be allocated?
Please add additional comments to explain your response.**

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22. Kirby Cane and Ellingham

Form and character

The main development of Kirby Cane and Ellingham is concentrated in what has developed into a nucleated settlement around Mill Road, Mill Lane and Yarmouth Road, with significant estate development south of Yarmouth Road and on a more limited scale to the east of Mill Road and Mill Lane. There has also been a significant amount of infill development. The A143 provides a good link to Bungay, the A140 and Diss in the west and to Beccles, the A146 and Great Yarmouth to the east.

Services and Community Facilities

The settlement has a range of social, recreational and community facilities including a preschool, primary school, shop and village hall. There are several employment opportunities and a limited bus service.

Settlement Limit and Constraints

The Settlement Limit has been drawn to include the main built form of the settlement. No alterations are proposed to the existing Settlement Limit

QUESTION 75: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

12 sites have been promoted for consideration, of which 3 have been preferred for allocation but no further sites have been shortlisted.

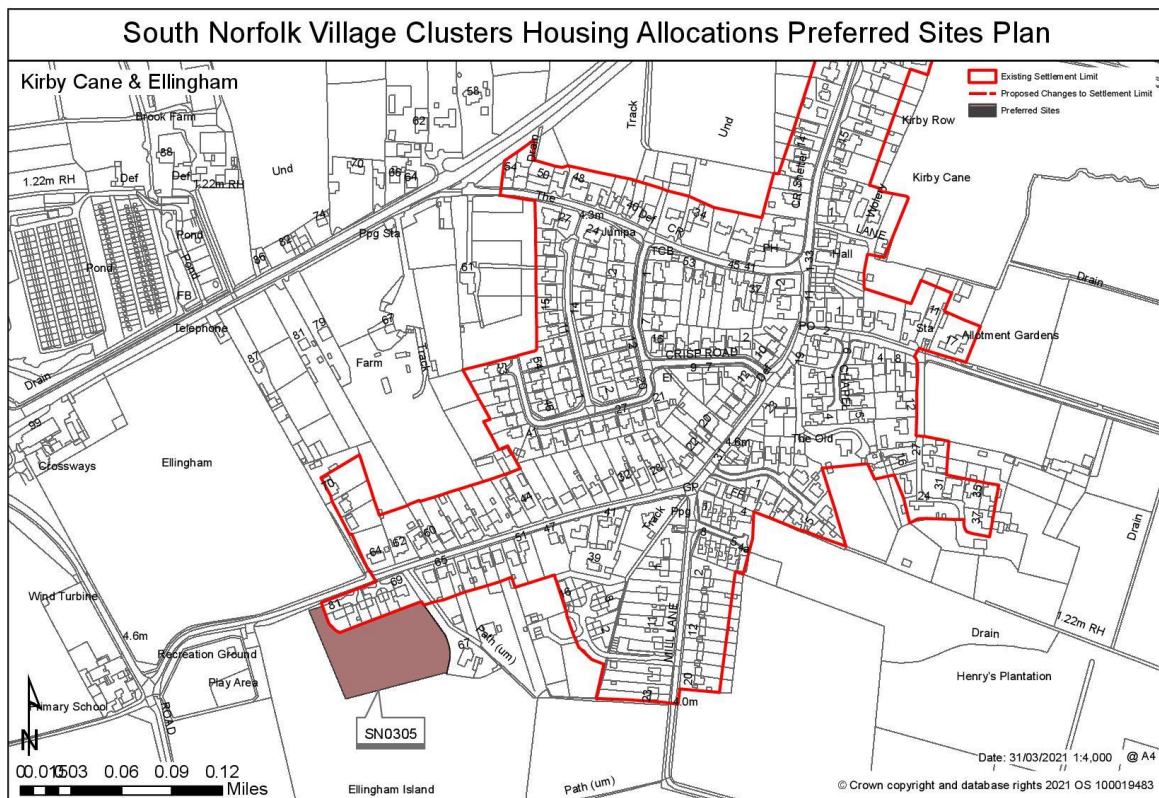
Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Site: SN0305, Land South of Mill Road, Ellingham

Preferred for up to 12 dwellings on a site of 1 hectare.

Reasoned justification: The site is well located for access to local services and facilities in the village. The principal constraint on the site is the high-pressure pipeline running along the western boundary, and the associated easements. It is therefore not proposed to allocate any closer to the pipeline than the existing dwellings on Mill Road. Restricting the extent of the site also has the benefit that it will not obscure views of the church to the south or impact too greatly on the River Valley Landscape. The site otherwise has few constraints.



QUESTION 76: Do you support or object to the allocation of the preferred site?

Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Preferred for up to 25 dwellings on a site of 1 hectares.

South Norfolk Village Clusters Housing Allocations Preferred Sites Plan

Kirby Cane & Ellingham

Legend:

- Existing Settlement Limit
- Proposed Changes to Settlement Limit
- Preferred Sites

Scale: 0.0 0.03 0.06 0.09 0.12 Miles

Date: 31/03/2021 1:4,000 @ A4

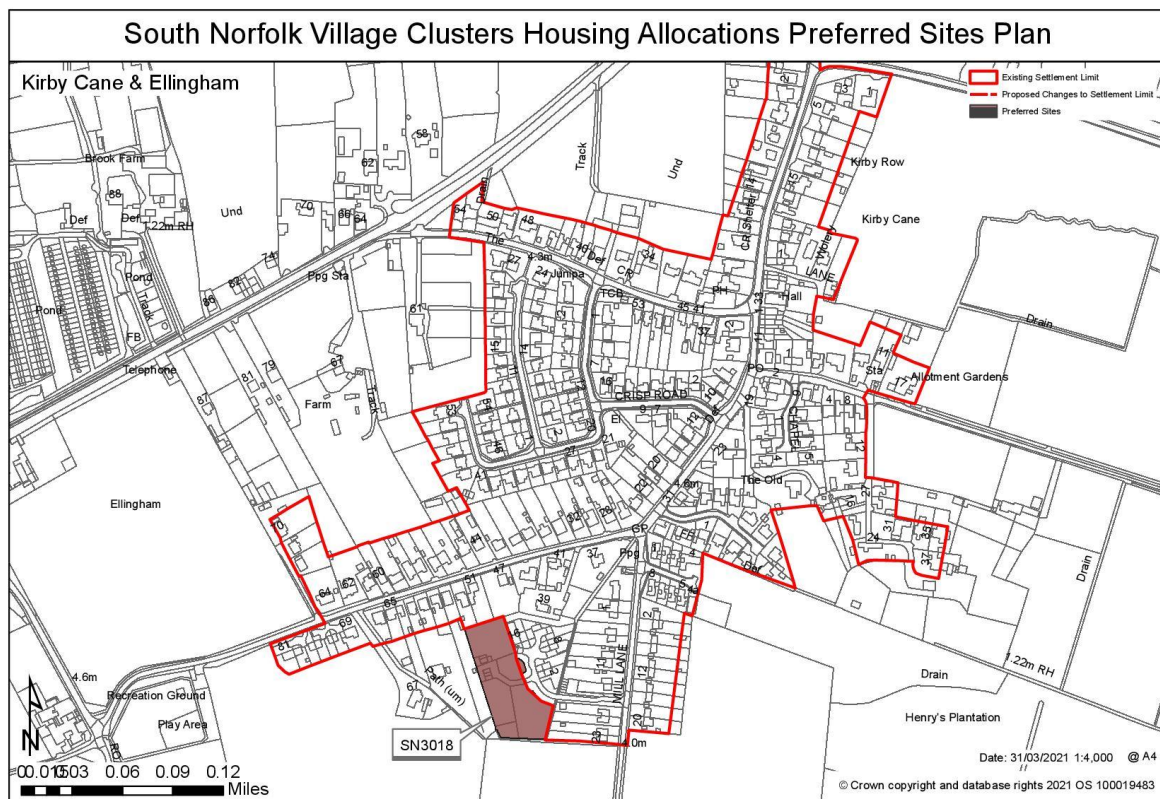
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Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Site: SN3018, Florence Way, Ellingham

Preferred for up to 12 dwellings on a site of 0.5 hectares.

Reasoned justification: The site is well located within the village, there are few on-site constraints and the landscape impact of the site within the River Valley is largely contained/mitigated by the surrounding development. The main constraint would be access. Vehicular traffic would need to use Mill Lane, which has limitations; however, there is a separate footpath to the rear of Florence Way which leads back to the Mill Lane/Mill Road junction. Florence Way does not appear to have been constructed to the County Council's adoptable standards, and negotiation with the owner of road will be required; the promoter of the site states that this has been initiated.



QUESTION 78: Do you support or object to the allocation of the preferred site?

Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0019SL	<p>Land at Old Post Office Land, Kirby Cane</p> <p>The site is well connected and is accessible to local services however significant highways concerns have been identified about access to the site, as well as townscape and residential amenity concerns caused by the backland form of development proposed for the site.</p>
SN0303SL	<p>South west corner of Henry's Field, Mill Lane, Ellingham</p> <p>Whilst the site is adjacent to the existing Settlement Limit and within a reasonable distance of local services and facilities, this does not outweigh the limitations of the site in highways terms. The site also provides an attractive rural setting within the River Valley landscape, when approaching</p>
SN0304	<p>South east corner of Ellingham Island, opposite Henry's Field, Mill Lane, Ellingham</p> <p>Whilst the site is adjacent to the existing Settlement Limit and within a reasonable distance of local services and facilities, this does not outweigh the limitations of the site in highways terms. The site also provides an attractive rural setting within the River Valley landscape, when approaching Ellingham from The Broads to the south, as well as from the public rights of way on and near the site.</p>
SN0306	<p>Land adjacent to South Lodge, Old Yarmouth Road</p> <p>The site is part of a smaller group of dwellings separated from the main village (and the local facilities) by the A143 bypass; as such, there is no current Settlement Limit in this location. The site also lies within the landscaped parkland of Ellingham Hall and forms a long, tree-filled gap on the sparsely developed northern side of the Old Yarmouth Road, and it is considered that the negative landscape and heritage impacts could not be reasonably mitigated.</p>
SN0344	<p>Land to the east of Church Road, Kirby Cane</p> <p>As promoted, it is excessive in size and therefore a smaller site area has also been considered as part of this assessment. Significant</p>

Site	Location and Reasons for Rejection
	<p>highways concerns, in particular creating a safe access into the site, have been identified as well as landscape concerns arising from the detached location of the site. It is not considered that either the highway safety concerns nor the landscape impact could be reasonably overcome.</p>
SN0396	<p>Land at Kirby Row, Newgate Lane, Kirby Cane</p> <p>The site relates reasonably well to the settlement and is adjacent to existing development. Some landscape and flood risk concerns have been identified however significant highways issues have been raised, including difficulties achieving an acceptable access to the site (which is currently accessed via an unadopted track), and visibility concerns at the Newgate Lane/Mill Road junction.</p>
SN4002SL	<p>Otto's Wood, north end of Lockhart Road Ellingham</p> <p>Whilst this site is suitably located within the village, with good access, the site is heavily treed and covered by a group TPO. The loss of trees would be detrimental to the amenity and character of the area, which is within the defined River Valley, with the added potential ecological/biodiversity implications of losing the woodland habitat.</p>
SN4018	<p>Land to the west of Church Road, Ellingham</p> <p>The site is adjacent to the primary school and playing field and a walkable distance to other local facilities and has few on-site constraints. However, the site would clearly be a detached group of houses, 200m+ from the nearest dwellings, with the development potential of the intervening land limited by a high-pressure pipeline. The site is set within a very open River Valley landscape, clearly visible in views from The Broads and the edge of the Conservation Area along Geldeston Road to the south, and numerous other footpaths and highways. The site promoter has suggested the site could deliver an additional play area and parking for the primary school, but it is not evident that there has been engagement with the school/NCC and this would make the developed area further detached.</p>
SN4054	<p>Land adjacent to 123 Old Yarmouth Road, Ellingham</p> <p>Although the site is brownfield, the majority is used for caravan storage, which could relatively easily revert to greenfield. The site has good access to some services (such as the primary school) but is at the</p>

Site	Location and Reasons for Rejection
	<p>limits of reasonable distances for others. The site adjoins a detached part of the settlement which currently has no defined Settlement Limit, separated from the main village by the A143 bypass. Access would require the removal of a substantial road frontage hedge and the site contains a number of trees, the loss of which would alter the character of the area. Development would be largely backland, on land which sits lower than the existing road frontage properties, with potential amenity issues.</p>

QUESTION 79: Do you think that any of the rejected sites should be allocated instead of, or in addition to, the preferred site(s)? Please add additional comments to explain your response.

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23. Little Melton and Great Melton

Form and Character

Little Melton

Little Melton was historically linear in form, but some estate development has taken place at Ringwood Close, Gibbs Close and south of School Lane at Braymeadow and Greenacres. The grounds of Elm Farm, which is centrally located in the village, provides an important break in the street frontage and contributes to the character of the centre of the village. The village is set in open countryside, and is visible from Watton Road to the north, creating a landscape setting when approaching the village from Green Lane. However, hedges and trees to the south of the village mean there are fewer long-range vistas.

The proximity to the A47 (via Green Lane) makes Little Melton accessible from Norwich. There are bus stops (on both sides of the road) at two points in the village, with buses to Wymondham, Hethersett and Norwich.

Great Melton

Great Melton comprises a scattering of farms and cottages with a loose knit group of dwellings at High Green. To the north of High Green there is an area forming Great Melton Park.

Services and Community Facilities

The cluster has a range of services and community facilities including preschool, Little Melton Primary School and the Village Inn, plus a convenience store and MOT garage. There are allotments, accessible from Great Melton Road and Mill Road, which contribute to the rural nature of the village. The village hall and playing field are on Mill Road, outside the Settlement Limit and in a countryside setting. There is a lack of footpaths in the village, which combined with narrow roads, makes pedestrian travel challenging at peak times. There is also a limited bus service.

Settlement Limit and Constraints

The Settlement Limit has been drawn to include the main built form of the settlement and include the land allocated within the 2015 Site Allocations Plan (LIT 1) located south of Ringwood Close. The Settlement Limit maintains to exclude the allotments which run between Great Melton Road and Mill Road. The Settlement Limit has been extended to reflect the recent Reserved Matters application 2015/1697 for 27 residential dwellings. The Settlement Limit will also be amended slightly to reflect recent minor planning permissions

on School Lane (16/1105/F and 17/0251/F) These changes are shown on the policies map.

There are problems with surface water drainage, which could be alleviated through improved maintenance of open and piped water courses.

The South Norfolk Place-making Guide states that key views of historic churches should be protected. All Saints' Church lies to the east of the village along Mill Road, separated from the village by agricultural land. From the village, views of the church are blocked by roadside hedges and field boundary hedges.

QUESTION 80: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

12 sites have been promoted for consideration, of which 2 have been preferred for allocation and 2 have been shortlisted.

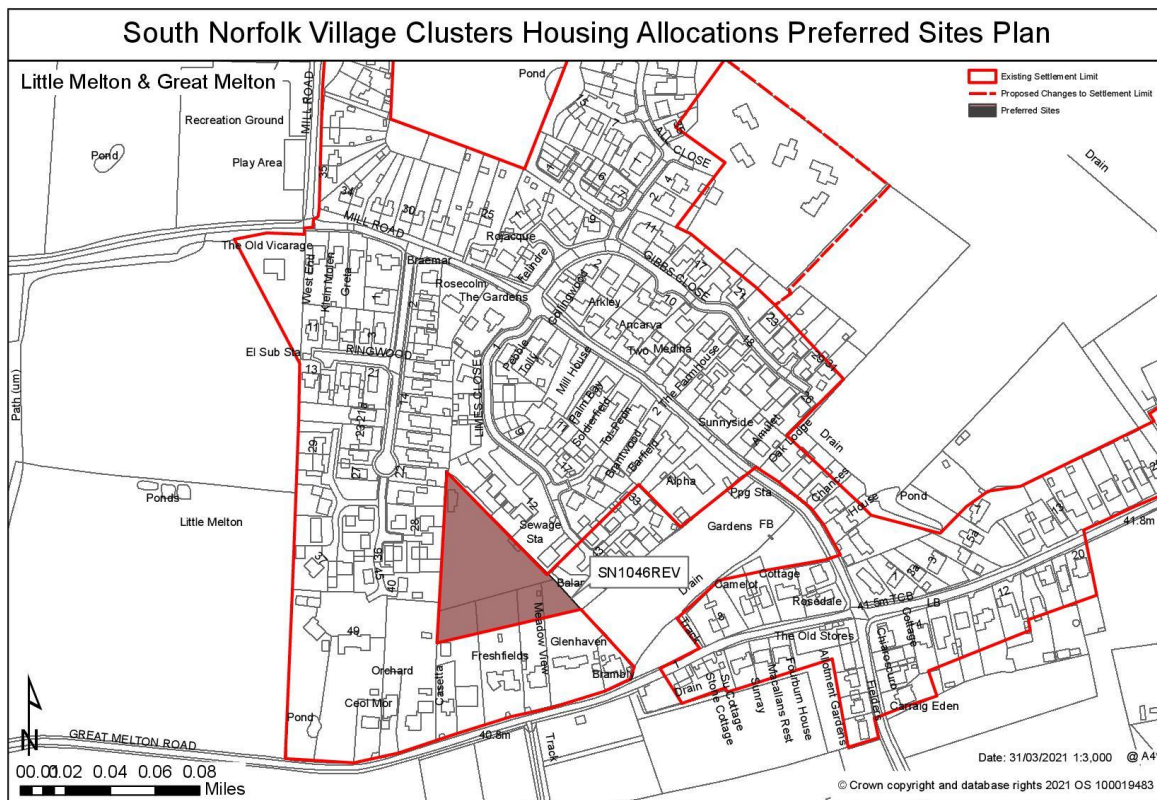
Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Preferred for a Settlement Limit Extension on a site of 0.69 hectares.

Reasoned justification: The site is situated to the rear of residential development on all sides and appears to be landlocked. However, the promoter has advised that the proposal would include the demolition of 'Glenhaven' dwelling to the south to allow access to the site. The Highway Authority have raised concerns with the access and whether a suitable access could be achieved, and the local road network is unsuitable. These concerns would need to be demonstrated prior to development.

Whilst the site is of allocation size, development potential is limited given the backland nature of the site, its awkward layout of the site, and the need to demolish the existing bungalow to gain access. Therefore, it is only proposed to bring the site into the Settlement Limit.

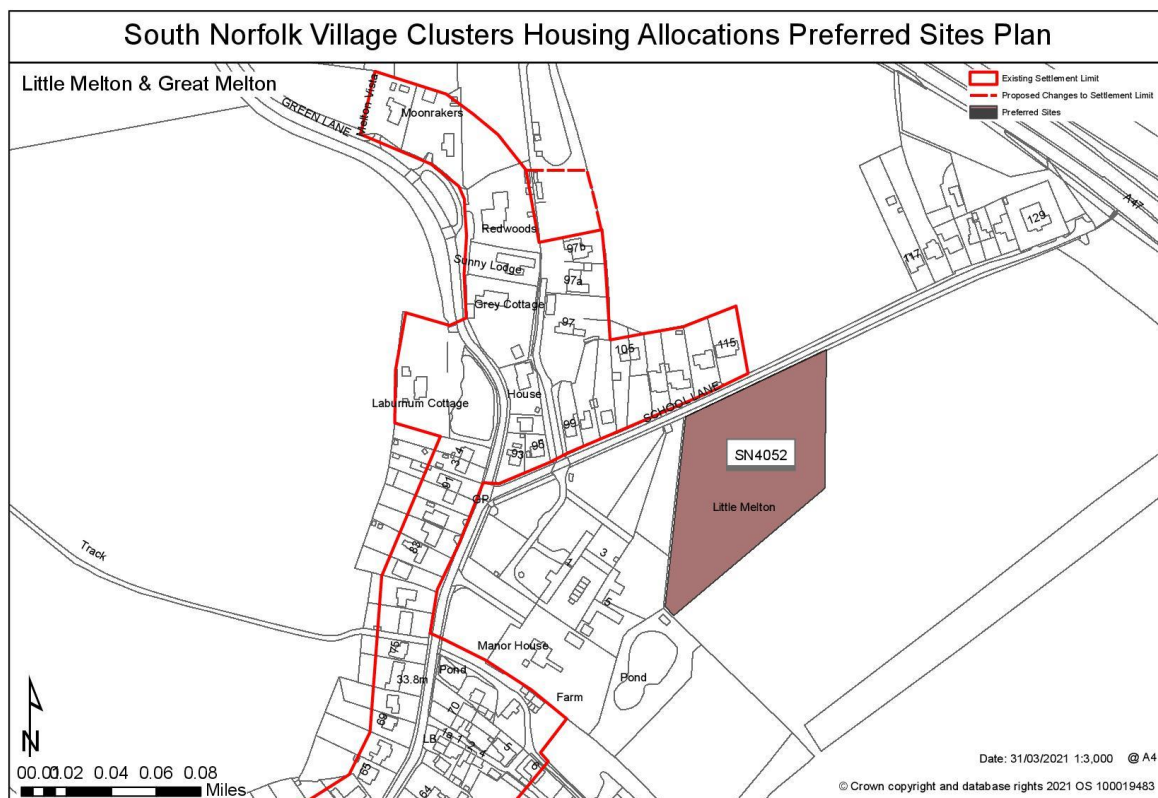


QUESTION 81: Do you support or object to the proposed use of the site? Please explain your reasons

Site: SN4052, Land south of School Lane and east of Manor Farm Barns, Little Melton

Preferred for up to 25 dwellings on a site of 1 hectare.

Reasoned justification: Whilst peripheral to the village, the site is reasonable well related to existing services and facilities. The site is located to the south of School Lane where there are reasonable verges but no footways, the road would need to be widened and include footpaths. It would also need to be demonstrated that sufficient visibility splays can be achieved, prior to accepting development is acceptable. Whilst the site is located within a residential context, located to the west is Manor Farm Barns which is considered a non-designated heritage asset, the impact of the setting would need to be considered. In landscape terms, the site is relatively open where the Southern Bypass Landscape Protection Zone seeks to protect openness. The site does not have any significant arboricultural issues.



QUESTION 82: Do you support or object to the allocation of the preferred site?

Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Shortlisted Sites

On the basis of the assessment undertaken the following site(s) have been shortlisted:

Site	Reasons not preferred for allocation:
SN0488	<p>Land north of School Lane (between No115 and No117), Little Melton</p> <p>Shortlisted for up to 25 dwellings on a site of 1 hectare.</p> <p>NCC Highway Authority have raised site access concerns; the site is accessed via School Lane which is a constrained road that would need to be widened and include footpaths. Poor visibility has also been identified and it would need to be demonstrated that adequate visibility at the junction can be achieved, prior to accepting any further development off School Lane. In addition, any loss of hedgerow along the verge would need to be assessed prior to removal.</p> <p>Whilst the site is relatively well screened, the site is also located within the Southern Bypass Landscape Protection Zone where existing local plan policy requirements set to retain openness, any scheme would need to take this into consideration and justify any erosion of this protection zone. Surface Flood has been identified to the site frontage and highway, however it is considered that this could be mitigated.</p>
SN2044	<p>Land north of Braymeadow Lane, Little Melton</p> <p>Shortlisted for up to 25 dwellings on a site of 1 hectare.</p> <p>The wider site is significantly too large in the context of the Village Clusters document therefore, subject to a reduction in size and scale of up to 25 dwellings, the site would be considered suitable. The land considered acceptable for development is the land adjoining existing development on Braymeadow and Greenacres to the west. Highway constraints have been identified; access via Braymeadow Lane is narrow and would require widening, including the provision of a footway, therefore the site would be subject to achieving satisfactory access. In light of this, it has also been identified that there is significant number of roadside trees in closest proximity to the existing development</p>

Rejected Sites

The following site(s) were promoted for development but have been considered to be unreasonable alternatives on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0182	<p>Land north of Mill Road, Little Melton (west of village hall and playing field), Little Melton</p> <p>Whilst the site is immediately adjacent the current settlement limit for Little Melton, it is actually appears detached from existing area of settlement to the east and feels removed from village due to the rural section of Mill Road it is accessed off. Access via Mill Road is constrained and there is concern that it may not be possible to achieve required visibility due to road alignment and limited length of frontage. Required highway works (if achievable within highway) would impact existing hedges & trees. Heritage impacts have also been highlighted in relation to the setting of the Grade I listed church immediately south of the site, concerns with the potential erosion of rural and open view in a north east direction. It has also been highlighted that there is an old oil pipeline that crosses the site which could heavily constrain development.</p>
SN0397	<p>Land north of No46 Mill Road, Little Melton</p> <p>The site is located to the end of a restricted driving where access to the site could require 3rd party land, which at this stage has not been identified by the promoter. The site is situated to the north of existing linear residential dwellings where development of the site would relate poorly to the existing form and character. There are few other constraints.</p>
SN0454	<p>Keyline Builders Site, Little Melton Road, Beckhithe, Little Melton</p> <p>Whilst the site is considered as brownfield, which is predominantly encouraged, the site is considered remote from the main part of the settlement, where footway provision likely to be achievable. It has also been highlighted that whilst the site benefits from an existing access via Little Melton Road, improvements may be difficult to secure as visibility splays are over third-party land. It is also noted that the site is currently being used for commercial use, where current leases are still active;</p>

Site	Location and Reasons for Rejection
	the development of the site could result in the loss of an employment site.
SN0591	<p>Land north of 5A School Lane, Little Melton</p> <p>The site is considered to have an inadequate access and an unresolvable high surface water flood risk across part of the site. Whilst the site is reasonably well located, with the School located immediately adjacent, access to the site is via a very narrow private access between dwellings where a satisfactory access is not achievable. It is also considered that the location of an access here, between residential dwellings would raise concerns with amenity issues with No7 and No9 School Lane.</p>
SN3001	<p>Land to the south of Great Melton Road, Little Melton</p> <p>The site is heavily constrained to a small area that is considered developable. A large part of the western side of the site is affected by high risk surface water flooding. It has also been identified that the ORSTED cable route crosses the site, which is the underground routing of power cables for offshore wind turbines. Whilst access could be achieved via Gt Melton Rd this would require c/w widening to 5.5m min and 2.0m wide f/w at site frontage. The site would also require a footway and further widening which doesn't appear feasible within the existing highway. It is considered that any significant landscape harm can be mitigated.</p>
SN3007	<p>Land adj Willow Cottage, 7 School Lane, Little Melton</p> <p>Whilst the site is located within a residential context and neighbours the primary school, the site is backland development. Where development here would be out of keeping with the exiting settlement pattern, requiring a convoluted access and with potential amenity concerns for existing residents. The site is also constrained to developable land as a large part of site has been identified as medium- high risk of surface flood.</p>
SN4058SL	<p>Land west of Burnthouse Lane, Little Melton (south of SN4072)</p> <p>Development of the site would result in a poor relationship with existing development, both in terms of form and connectivity. Development of the site would also impact on the rural character of the southern end of the village, by eroding the dense woodland setting along Burnthouse</p>

Site	Location and Reasons for Rejection
	Lane. The site is also at the limits of accessibility to services in terms of distance, a problem which is exacerbated by the lack of footways.
SN4072SL	<p>Land west of Burnthouse Lane, Little Melton (north of SN4058)</p> <p>Development of the site would have an urbanising effect on this rural location. Site is also at the limits of accessibility to services in terms of distance, a problem which is exacerbated by the lack of footways.</p> <p>Further to this there is insufficient frontage to provide for safe access and footway provision (no safe walking route to school).</p>

QUESTION 83: Do you think that any of the shortlisted or rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

QUESTION 84: Do you think that any of the shortlisted sites should be rejected? Please add additional comments to explain your response.

24. Morley and Deopham

Form and character

Morley

Morley (formerly the parishes of Morley St Peter and Morley St Botolph) has a widely dispersed settlement pattern. Historically the settlement has developed around two isolated parish churches and a number of farmsteads.

The main area of development in the parish is located at Morley St Botolph and extends along Chapel Road, The Street and Deopham Road. There is also a significant linear development in the south of the parish at Hill Road, astride the former A11, which adjoins development at Besthorpe within Breckland District and is part of the area covered by the Attleborough and Snetterton Heath Area Action Plan.

The other significant development within the parish is Wymondham College, a large secondary boarding and day school. The College is located in the south of the parish in an area otherwise characterised by isolated and dispersed dwellings and farms.

Deopham

Deopham is a linear village. Whilst it does not have a centre it has distinct areas around Low Common, Coldham Green and Deopham Green.

Services and Community Facilities

There is a limited range of facilities that are widely dispersed through the village including a preschool, primary school, and a village hall. Wymondham College, a state maintained secondary boarding and day school provides some local employment opportunities.

Settlement Limit and Constraints

The settlement limits have been drawn to retain the existing wooded character of the settlements while allowing for further limited infill development in the Morley St Botolph area. No alterations are proposed to the existing Settlement Limit.

QUESTION 85: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

9 sites have been promoted for consideration, of which none were identified as preferred or shortlisted sites.

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0130SL	<p>Land east of Brecon Lodge, Golf Links Road</p> <p>The site is isolated from the main built extent any settlement, remote from most services with no safe walking route to the school. Development of the site would result in harm to the landscape and townscape by virtue of the consolidation of the built form which is currently sporadic. In addition, improvements to the local road network would be required to provide footpaths.</p>
SN0356	<p>Land west of Golf Links Road, Morley St Botolph</p> <p>The site is remote from most services, detached from the main part of the settlement and there is no safe walking route to the school. It would have a detrimental impact on the landscape and townscape by virtue of its extension into the countryside to the south. Achieving an access and footway would require frontage hedge/tree removal and there is a surface water flood risk.</p>
SN1033	<p>Adjacent Attleborough Road/Hill Road</p> <p>Morley St Peter is a small hamlet without services and facilities, there is no footpath provision resulting in access being predominantly by car and no safe walking route to the school. The limited development is sporadic with a loose grain and development of this site would be at a higher density which would not reflect the form and character of the area having a negative impact on the landscape. In addition, a surface water flow path crosses the site reducing the developable area, and it is unlikely to be able to achieve satisfactory access with limited frontage and hedgerow to remove at Attleborough Road and the adjacent junction.</p>

Site	Location and Reasons for Rejection
SN3012SLR EV	<p>Adjacent to Fir Grove, Deopham Road, Morley St Botolph</p> <p>Although it is adjacent to a settlement limit, the site is remote from most services and there is no safe walking route to the school resulting in access being predominantly by car. It is not suitable as the site is well wooded which contributes to the character of local area and would have an adverse impact on the setting of the adjacent listed building. There is a small area of surface water flood risk in south-east corner of site. Highways concerns have also been identified.</p>
SN4027	<p>Land North of Deopham Road, Morley</p> <p>The site is considered to be an unreasonable option for allocation, even with a reduced number of dwellings. The site is remote from all services, apart from the school, and is detached from the main part of the settlement. There is no safe walking route to the other village facilities. It would have a significant detrimental impact on the landscape and townscape by virtue of its open rural nature and remote location in the countryside away from the main part of the settlement. Achieving an access would require some frontage hedge removal and there is a possible surface water flood risk.</p>
SN4035	<p>Land north of Wymondam Road, Deopham</p> <p>Deopham is a small hamlet without services and facilities, there is no footpath provision resulting in access being predominantly by car and no safe walking route to the school. The site is detached from any development therefore standing alone in the landscape which will have a negative impact and will also an impact on the setting of the church to the north-west</p>
SN4041	<p>Land to the east of Hill Road</p> <p>The site is remote from most services and there is no safe walking route to the school. It is out of scale with the existing settlement and would have a detrimental impact on the landscape and townscape by virtue of its extension into the countryside to the east. A reduced site area would not address the identified concerns. Achieving an access and footway would require tree removal. The site is also affected by a surface water flood path and is in risk of significant surface water flooding.</p>
SN4042	<p>Land to the north of Norwich Road</p>

Site	Location and Reasons for Rejection
	<p>The site is remote from most services and there is no safe walking route to the school. It is out of scale with the existing settlement and would have a detrimental impact on the landscape and townscape by virtue of its extension into the countryside to the east. A reduction in the size of the site would not address the constraints identified. Achieving a suitable access and footway would require tree removal. The site is also affected by a surface water flood path and is in risk of significant surface water flooding.</p>
SN4073 SL	<p>Land adjacent Clearview, Hookwood Lane</p> <p>Morley St Peter is a small hamlet without services and facilities, there is no footpath provision resulting in access being predominantly by car and no safe walking route to the school. Hookwood Lane is particularly narrow. The limited development on Hookwood Lane is sporadic with a loose grain, development of this site would be at a higher density and would not reflect the form and character of the area, although the site is relatively contained. There are significant mature trees within the site and a strong line of trees along the frontage. There is a flooding risk from a surface water flow path adjacent to the site.</p>

**QUESTION 86: Do you think that any of the rejected sites should be allocated?
Please add additional comments to explain your response.**

Form and Character

Mulbarton

Historically Mulbarton developed with cottages and individual properties fronting the three roads around The Common. More recently, estate development has taken place on a large scale to the south of The Common which has altered the form and character of the village. As a result of past planning policies, The Common has remained as a large undeveloped space in the centre of the village and is important in terms of both visual amenity and recreation opportunities. There has been little development on the edges of The Common in order to preserve its impressive open appearance and allow views out over the surrounding countryside, drawing the countryside into the 'core' of the village.

There is also a good buffer of open farmland between the B1113 and the western edge of new residential areas south of The Common which contributes to the setting of the village.

The view of the church, north of The Common, is prominent from all parts of The Common. The special character of this area has been recognised by the designation of a Conservation Area in 1977, which was extended in 1994.

Bracon Ash

The parish of Bracon Ash lies to the south-west of Mulbarton on the B1113. There are three distinct settlement groupings, including the area around the church and the area at Hethel. The main settlement has developed in a linear fashion along The Street, Hawkes Lane and Poorhouse Lane and comprises mainly frontage properties. It is separated from Mulbarton by agricultural land to the south of Cuckoofield Lane which contributes to its individual identity. Within the village, there is an important gap to the north of Mergate Farm, which maintains the segregation between the farm and the village. The B1113 gives reasonable access via the A140 to Norwich.

Swardeston

Swardeston has developed either side of the B1113, with outliers of development around The Common. The historic 'core' of the village is to the west of the main road where there are a number of older cottages facing The Common. More recent estate scale development has taken place to the east of the B1113.

The focus of the village is The Common which occupies some 21 hectares. There has been some limited infilling in the surrounding settlement groups but its character as a large, informal open space crossed by a network of unmade tracks has remained and

contributes greatly to the pleasant rural character of the village. There is an outlier of development to the south of the road leading to Lower East Carleton. The landscape to the east of the village is open.

East Carleton

The parish is predominately rural with the main settlement having developed with frontage properties along Rectory Road, Hethersett Road and Wymondham Road.

Services and Community Facilities

The cluster possesses a good range of facilities which includes infant and junior schools, farm shop, GP surgery, social club, village hall and scout/guide hall, convenience stores, hot food take-aways, car MOT garage, pub and children's playgroup. The area has good access to Norwich via the B1113 and A140 and there is a regular bus service.

Settlement Limit and Constraints

Mulbarton and Bracon Ash

The Settlement Limit has been drawn to include the main built form of the settlement and include the allocated land. The village hall, Old Hall Farm and the church and rectory are excluded, but there are further small clusters of development with boundaries at the north and west of the common. In Bracon Ash, development at Poorhouse Lane, The Street and Hawkes Lane are included, but Mergate Farm and the small cluster of dwellings off Mergate Lane have been excluded. Infill development opportunities have been created at The Rosery and Norwich Road in Mulbarton and at Hawkes Lane and the nurseries in Bracon Ash. An amendment is proposed to the Settlement Limit of Bracon Ash in order to exclude the triangular area of land used as a green. The Settlement Limit will also be amended to include recent planning permission 2017/2131. These changes are shown on the policies map.

Swardeston

The Settlement Limit has been drawn to include the main built form of the settlement and include the previously allocated land. The Settlement Limit is fragmented; the largest group along Main Road excludes Roadside Nursery and the larger residences around the church. In addition, there is a Settlement Limit around two groups of dwellings to the north and west of the common, on Intwood Lane and The Common. There is an opportunity for limited infill development on Intwood Lane. There are problems of surface water drainage particularly on the east side of the village and estate scale development would have to overcome this. No alterations are proposed to the existing Settlement Limit.

The existing primary school at Mulbarton is noted as operating at capacity. However there remains space in the nearest alternative at Newton Flotman. Further exploration will be needed to ensure primary school needs can be met.

QUESTION 87: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

24 sites have been promoted for consideration, of which 2 were preferred for allocations but no further sites were shortlisted.

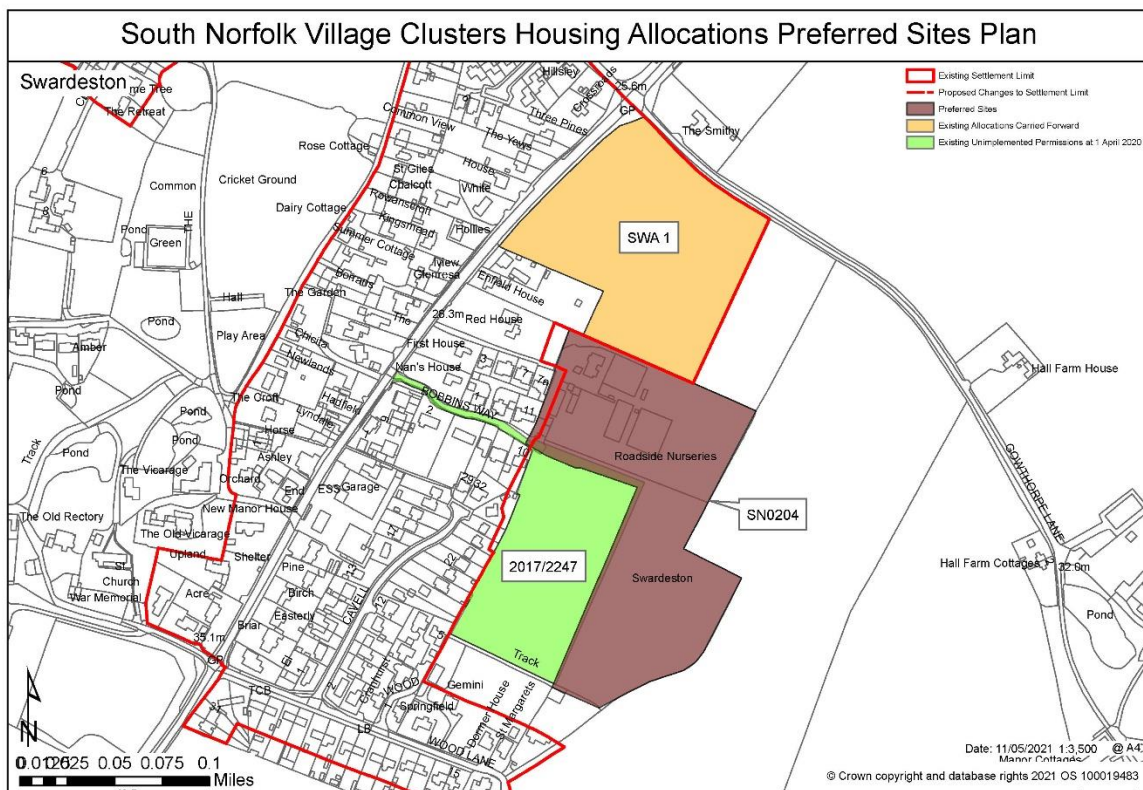
Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Site: SN0204, Bobbins Way, Swardeston

Preferred for up to 25 dwellings on a site of 1.6 hectares

Reasoned justification: Promoted for a larger site of 3.3 hectares. As promoted the site is of a scale that would have a significant impact on the wider landscape. However, the site is considered suitable for allocation at a reduced scale of 1.6 hectares based on the Roadside Nurseries element of the site. Development would continue to have some adverse landscape impacts, due to identified flood risk constraints being likely to restrict development on those parts of the site closest to the existing settlement. This would result in a suboptimal relationship between new development and the main village. It would need to be demonstrated that a form of development could be achieved which relates suitably to the existing village. In order to mitigate highways concerns a development of more than 25 homes may be required. Should this be the case careful consideration would need to be given to mitigating landscape impact.



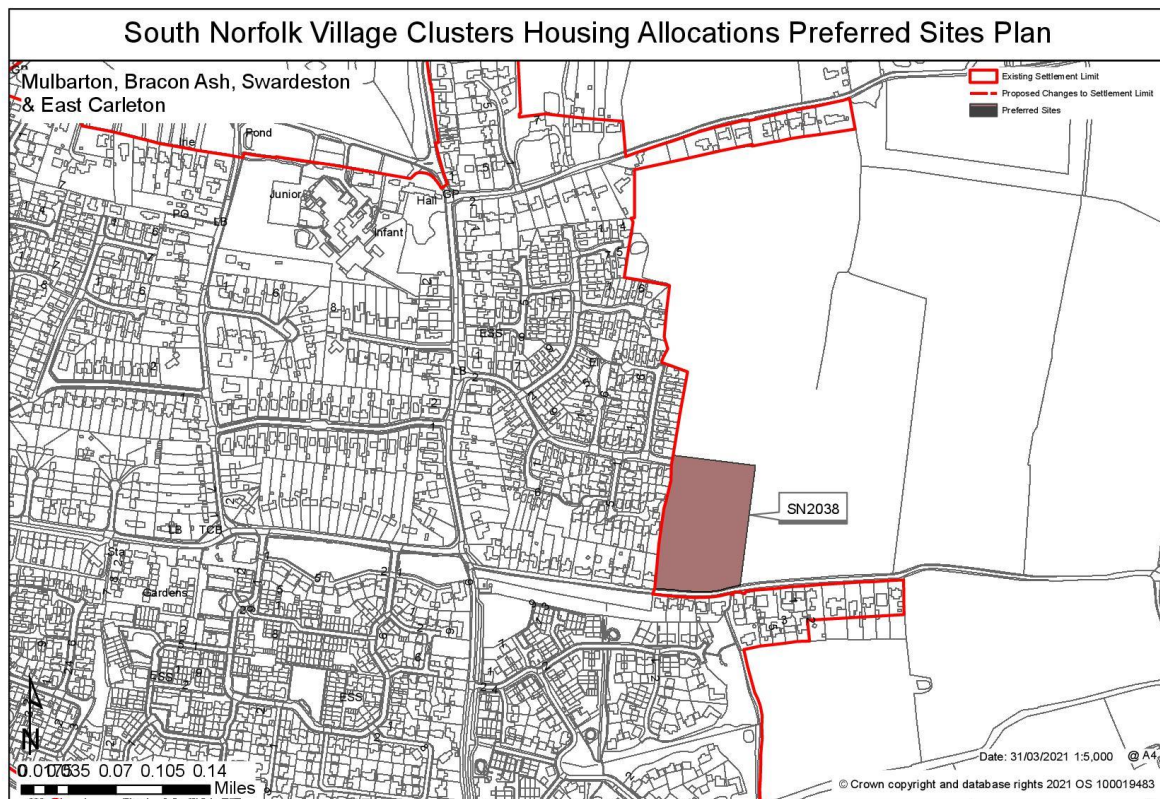
QUESTION 88: Do you support or object to the allocation of the preferred site?

Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Site: SN2038, South of Rectory Lane, Mulbarton

Preferred for up to 35 dwellings on a site of 1.5 hectares

Reasoned justification: The site is well located in terms of access to services and facilities. There are few constraints on the site. Whilst it would extend into the countryside, the site would be read largely against the backdrop of existing housing. Highways considerations mean that a smaller development at the southern end of the site, accessed from Bluebell Road, is the only appropriate option.



QUESTION 89: Do you support or object to the allocation of the preferred site?

Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0026SL	<p>Jasmine Cottage, The Street, Bracon Ash</p> <p>The site is backland development, out of keeping with the exiting settlement pattern, requiring a convoluted access and with potential amenity concerns for existing residents. Highways concerned about the suitability of the local road network. Surface water flood risk and potential loss off trees would also need to be addressed.</p>
SN0195	<p>Land off the B1113 Norwich Road, Bracon Ash</p> <p>Poor relationship with existing development, both in terms of form and connectivity, as well as the erosion of gap between Bracon Ash and Mulbarton and the impact on the setting of Mulbarton Conservation Area. The current access is too narrow and visibility improvements appear to require third party land. Flood risk is a constraint, with most of the site in Zone 2 and parts in Zone 3a.</p>
SN0247	<p>Site off Low Common, East Carleton</p> <p>Site not suitable for allocation or inclusion in settlement limit due to: remoteness from the services and facilities in Swardeston and Mulbarton, exacerbated by the lack of footways; out of keeping in terms of form and character; and possible deliverability issues, specifically regarding a suitable access</p>
SN0315	<p>Land to the east of Mulbarton</p> <p>The wider site is significantly too large in the context of the Village Clusters document. No smaller parts of the site are considered suitable due to the poor relationship with existing settlement (i.e. detached by intervening fields), and the consequent townscape/landscape concerns. Whilst parts of the site are in close proximity to some local services and facilities, actual accessibility is much more limited due to the constraints of the local highway network. Areas of the site are also affected by surface water flood risk and heritage concerns.</p>
SN0367SL	<p>Land off Chesnut Close, Swardeston</p>

Site	Location and Reasons for Rejection
	<p>Not suitable for inclusion as a settlement limit extension due to impact on the character of the area, particularly The Common, and access constraints; the site has limited accessibility to local services and facilities, with many of the local roads having no footways.</p>
SN0426	<p>Land to the west of Norwich Road, Swardeston</p> <p>The site is not considered suitable for allocation due to the separation from the main part of the settlement by the undeveloped grounds of Swardeston House; the site would impact adversely on both the landscape and townscape, an issue that would be emphasised by the loss of frontage vegetation to create a suitable access. Potential impact on the setting of the Grade II* Listed church, and adjoining listed Old Rectory, Old Vicarage and War Memorial. Pedestrian connectivity is also poor.</p>
SN0428SL	<p>Land north of Rectory Road, East Carleton</p> <p>East Carleton does not currently have a Settlement Limit to extend, and the site is at the margins of the acceptable distances to services, on roads that have very limited footway provision (and sections which are unlit and subject to the national speed limit). It is also not suitable due to harmful impact on the character of area that would result from the removal of the trees on site.</p>
SN0496REV	<p>Land north of Mulbarton</p> <p>95 dwellings is larger than being sought in the VCHAP and it is not clear whether the 60 dwellings with a doctors surgery and care home would be (a) deliverable, or (b) possible to require. In any event, the site is detached from the rest of the settlement, and has both heritage concerns (impact on the listed church, Paddock Farm, and the Conservation Area) and landscape concerns (erosion of rural character from the public footpaths to the east). In terms of accessibility the site requires footways improvements to the B1113 and also to the footpath via the churchyard; however, a significantly reduced scheme would be unlikely to connect to the churchyard footpath and it is not clear what the B1113 junction arrangement would be for a smaller scheme.</p>
SN0517SL	<p>Land off The Common, Swardeston</p> <p>Not suitable for inclusion as a settlement limit extension due to impact on the character of the area, particularly The Common, and access</p>

Site	Location and Reasons for Rejection
	constraints. Neither of the adjoining small groups of dwellings are within the Settlement Limit. The site has limited accessibility to local services and facilities, with many of the local roads having no footways.
SN0549SL	<p>Barracks Meadow, Hawkes Lane, Bracon Ash</p> <p>Not suitable for allocation or a settlement limit extension of the scale proposed, which would be out of keeping with the form and character of the location and have potential heritage concerns re Home Farm House and Mergate Farm. Access is along the narrow Hawkes Lane, with no footways and limited visibility at bends.</p>
SN0551	<p>Land to the rear of Almond Villa, Intwood Lane, Swardeston</p> <p>The site is at the limits in terms of distances to services and the roads around the site are narrow, unlit, with no footways, making walking/cycling an unattractive option. The site would be backland development, out of keeping with the frontage only development at present and may also have amenity implications. The main concern with this site is the inability to create a suitable access.</p>
SN0600REV	<p>Land to the east of Hethersett Road, East Carleton</p> <p>This is not suitable as a settlement limit extension or allocation for housing, given the considerable distance from all of the main services and the intrusion into countryside, which would generally be out of keeping with this rural location.</p>
SN1037	<p>The Old Nursery, The Drift, Lower East Carleton</p> <p>The site not suitable for allocation or inclusion in settlement limit due to remoteness from key services and facilities and the narrow roads with no footways between the site and Swardeston/Mulbarton (including stretches under the national speed limit). The site does not appear to have direct access to the adopted highway, instead being accessed via the unadopted The Drift. Even at a reduced site size, development in this location would form a largely isolated group of dwellings in the countryside.</p>
SN1058	<p>Land east of Swallow Barn, Wymondham Road, East Carleton</p> <p>A previous refused application has demonstrated that the site has limited constraints and that a suitable access could be achieved; however the site is beyond the required distance to services for</p>

Site	Location and Reasons for Rejection
	<p>everything other than local employment, and the routes to Mulbarton generally have no footways and sections at the national speed limit. The site is part of a small group of buildings, detached from East Carleton village, and not suitable for a Settlement Limit as intensifying development here would erode the rural character of the area.</p>
SN1059SL	<p>Land at Paddock Cottage, Swardeston Lane, East Carleton</p> <p>A previous permission for a single dwelling on this plot has been implemented, which now makes further development difficult to achieve in terms of access and form of development (which would be piecemeal backland). Notwithstanding this, the site is at the limit in terms of distance to services/facilities, and beyond 3km from Mulbarton Primary School. This location currently does not have a settlement limit and is not considered appropriate for a new settlement limit, which would encourage intensification of development in a rural location with generally poor access to services/facilities.</p>
SN2039	<p>Land north of Rectory Lane, Mulbarton</p> <p>The site is well located in terms of distance to services and facilities. However, the access using Rectory Lane is not appropriate (narrow, unlit, lack of footways). In townscape/heritage terms, estate style development would be out of keeping with the rural character of Rectory Lane with potential impacts on the setting of nearby listed properties. Loss of the intact hedge closest to the village to create any access/visibility would also be a concern.</p>
SN2087	<p>South of Cuckoofield Lane, Bracon Ash</p> <p>The site is relatively well located in terms of the distance to local services and facilities. However, the site would diminish the small gap separating the settlements of Bracon Ash and Mulbarton. The irregular shape of the site, and the presence of TPO trees would constrain development. The access as proposed via the Local Plan submission is very narrow and would have amenity implications for occupiers of the adjoining properties. An alternative access was proposed via the withdrawn application however this would involve taking a road through the boundary hedge into the agricultural field to the east of Park Nook, which would have a further urbanising effect.</p>
SN2165	<p>Land south of Wymondham Road, East Carleton</p>

Site	Location and Reasons for Rejection
	<p>Not suitable for an allocation due to remote location beyond the required distance to services for everything other than local employment, and the routes to Mulbarton generally have no footways or lighting and sections at the national speed limit. Development would represent an isolated group of dwellings in the countryside, eroding the rural character, which would be further diminished by the loss of hedgerow to create an access</p>
SN2167REV	<p>Land east of Hethersett Road, East Carleton</p> <p>This is not suitable as a settlement limit extension or allocation for housing, given the considerable distance from all of the main services and the intrusion into countryside. Development would represent an isolated group of dwellings in the countryside, eroding the rural character.</p>
SN4032	<p>Land east of Norwich Road, Bracon Ash</p> <p>Although the site could potentially form an extension to the existing BRA1 Local Plan allocation, it would become significantly more intrusive in the open landscape and encroach into the rural setting of the listed Home Farm House. There would also be significant highways concerns about further development in this location, including safe non-car access to local services and facilities in Mulbarton.</p>
SN4059	<p>Corner of Brick Kiln Lane, Mulbarton</p> <p>The site is reasonably well located in terms of distance to services and facilities and has few on-site constraints. However, access using The Rosery is not appropriate as the road is narrow, unlit, lacks footways, and has a constrained junction with Long Lane/Cuckoofield Lane. The site would also have a poor relationship with existing development, particularly as there is no obvious connectivity with the recently completed housing off Long Lane.</p>
SN4082	<p>Land at Intwood Lane, Swardeston</p> <p>The site is at the limits in terms of distances to services and the roads around the site are narrow, unlit, with no footways, making walking/cycling an unattractive option. Development of the site would erode the rural character of the area, impacting on the higher plateau landscape and encroaching into an undeveloped part of the Southern Bypass Landscape Protection Zone.</p>

Site	Location and Reasons for Rejection
SN4086	<p>Land south of Rectory Road, East Carleton</p> <p>The site itself has few constraints and frontage development would be in keeping with the form and character of the settlement, subject to assessment of the trees along Rectory Road. However, the site is beyond of the required distances to most services/facilities, on roads that have very limited footway provision (and sections which are unlit and subject to the national speed limit).</p>

QUESTION 90: Do you think that any of the rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

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Form and Character

Needham

Needham is a linear village of mainly detached dwellings on single plot frontage along the former A143. The village is located along the foot of the northern valley slope of the River Waveney. Most development has been concentrated between the village hall and Whitehouse Farm in a linear form.

The northern end of the village has a more open aspect and includes a semi-derelict sunken area of ex-gravel pits. The surrounding area comprises valley slopes rising above the village to the north and characterised by large fields with few hedgerows or trees. To the south, the valley floor has a mixture of arable fields and many mature trees providing an attractive rural setting.

Brockdish

The parish contains Brockdish and Thorpe Abbots. Brockdish is primarily a linear village located along the northern side of the Waveney Valley close to the A143. The village core is centred on the junction of The Street/Scole Road and Grove Road.

A separate area of residential development is located a short distance to the west near the church. Separation of these two distinct parts of the settlement should be maintained in order to preserve the character of the conservation area with its many listed buildings.

Thorpe Abbots comprises a small group of mainly detached houses located on frontage plots around the junction of The Street and Mill Road, approx. 2.5 kilometres west of Brockdish. There has been a conservation area designated around Thorpe Abbots since 1994.

Starston

The parish contains a dispersed form of development which includes a ribbon of development fronting onto The Street. The row extends along the northern slopes of a shallow valley toward the junction with Church Hill, Redenhall Road, Railway Hill and Harleston Road which, combined with the setting of the church and the bridge, forms an attractive focal point. A wide area is defined as a conservation area which is distinguished by the presence of some notable buildings. The surrounding area is open and affords distant views.

Wortwell

There are two main areas which together form the established village of Wortwell. The main part of the village is along the line of High Road whilst the remainder, known as Low Street, has developed along Low Road. Individual dwellings and farmsteads are dispersed throughout the remainder of the parish. The A143, which bypasses the village, provides good links to Harleston, the A140 and Diss to the west, and to Bungay and the A146 to the east.

Services and Community Facilities

The cluster has a range of social and community facilities including village halls and public houses. The villages also have recreation areas, local employment opportunities and bus services.

Settlement Limit and Constraints

Needham

The settlement is constrained to the west by the Bypass and Flood Zones 2 and 3 to the north and east. The Settlement Limit is drawn to provide for some limited infill development within the existing village core. The area of development adjacent to the Harleston bypass roundabout is excluded as it is within the flood zone. The Settlement Limit also excludes the church and village hall and the land opposite as it contributes to the open character and rural appeal of this part of the village. No alterations are proposed to the existing Settlement Limit.

Brockdish

The Settlement Limit has been drawn to include the main built form of the settlement at Brockdish and allow for some limited sensitive infill within it. A minor addition to the Settlement Limit has been drawn to include a single dwelling that was approved adjacent to the eastern edge of development along The Street in January 2019 (2018/2293). This change will be shown on the policies map

No Settlement Limit has been defined at Thorpe Abbots due to the extensive conservation area and its remoteness from services and facilities.

Starston

Due to its dispersed character, attractive valley landscape and extensive conservation area, the Settlement Limit has been drawn to reflect the existing settlement form in three separate parts to prevent further development extending into the surrounding open countryside. No alterations are proposed to the existing Settlement Limit.

Wortwell

The Settlement Limit has been drawn to include the main built form of the settlement along High Road. A minor extension to the Settlement Limit has been drawn to include the three dwellings granted planning permission in October 2018 (2018/2019) to the south of High Road. This change will be shown on the policies map.

QUESTION 91: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

15 sites have been promoted for consideration, of which 3 were identified as preferred allocations. No further sites were identified as shortlisted sites.

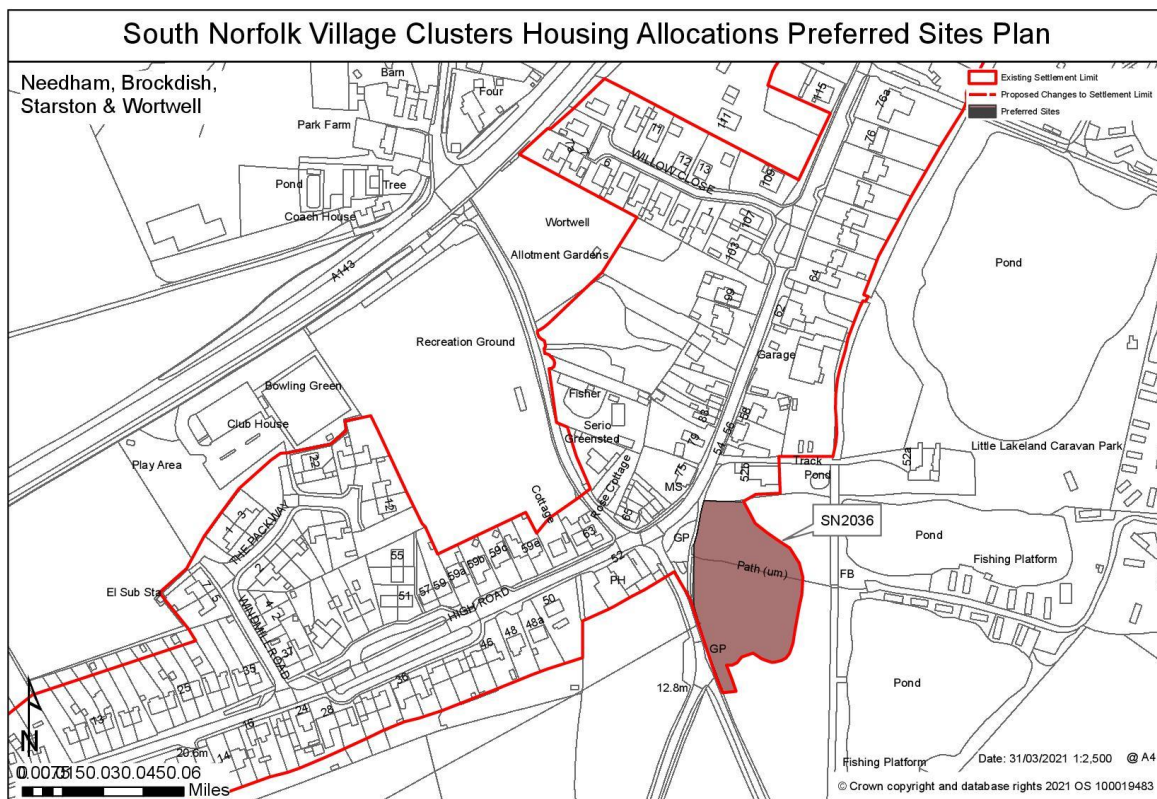
Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Site: SN2036, Land at the junction of High Road and Low Road, Wortwell

Preferred for 10 dwellings (net gain of 5) on a site of 1.31 hectares

Reasoned justification: Part of the site is already allocated for approximately 5 dwellings in the current Local Plan (WOR1). The site promoter is seeking a small increase in numbers, with some affordable units and an area of wildlife/amenity land. This should be achievable within the existing allocated site, which extends to 0.4ha, and Policy WOR1 already requires provision of amenity space on adjoining land, outside the Settlement Limit. However, any amended Policy would need to emphasise the requirements to protect the setting of the listed pub opposite and the rural gap between the parts of Wortwell centred on High Road and Low Road. Any increase in numbers could also have implications in terms of further highways improvements. The remainder of the site which is not currently allocated is Flood Risk Zones 2 and 3, and contributes to the rural gap within the village, and therefore would not be appropriate to allocate for housing.

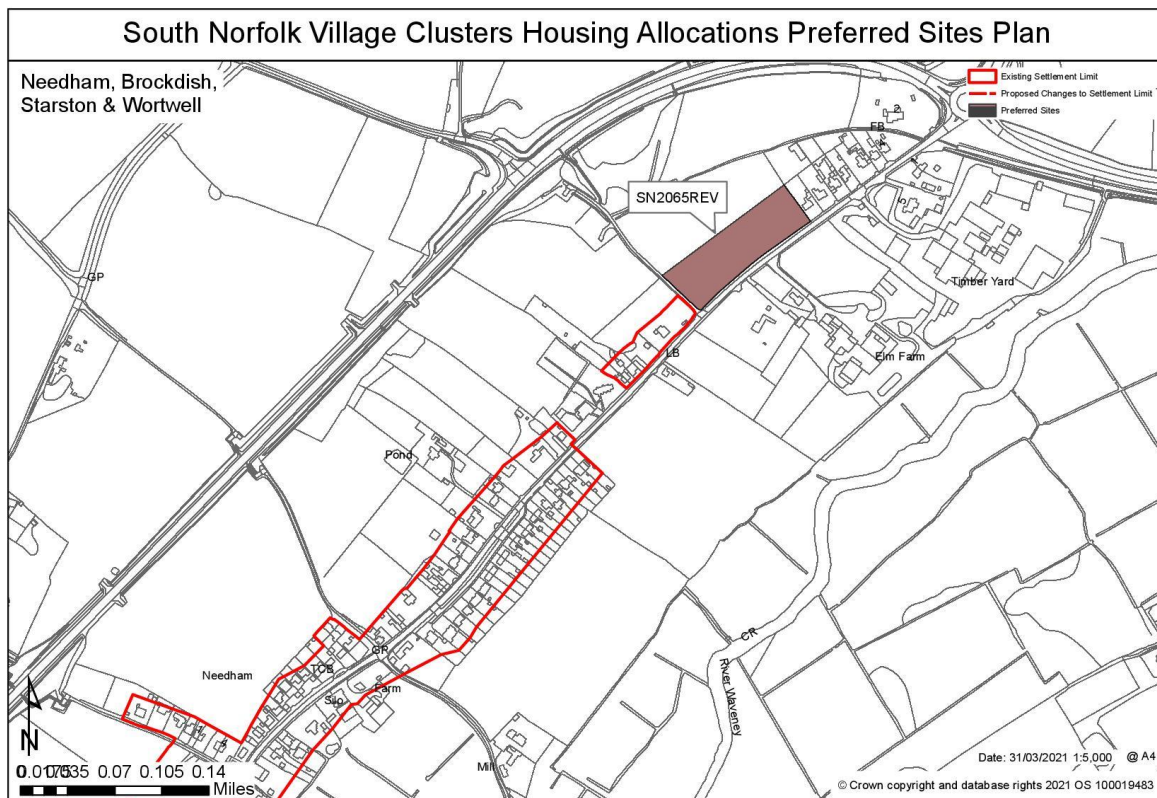


QUESTION 92: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Site: SN2065REV, Land north of High Road and Harmans Lane, Needham

Preferred for up to 15 dwellings on a site of 0.9 hectares

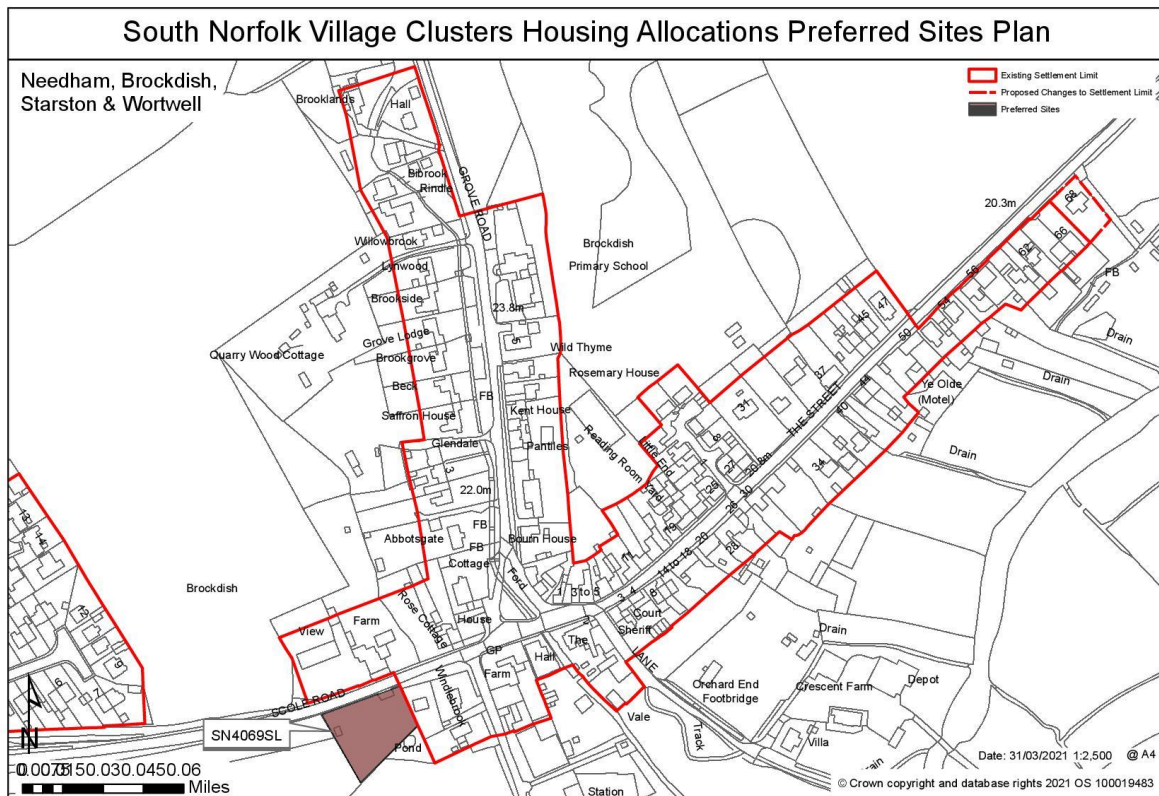
Reasoned justification: The site is adjacent to the settlement limit and the services of the village are accessible as there is a continuous footpath along High Road. The site could provide for enhancement to cross the A143, such as a central refuge, to improve connectivity to Harleston and the school. The site is within the river valley but contained within the landscape on the opposite side of the road to the river. The frontage hedge is not continuous, and access could be achieved with minimal loss. The site area has been reduced to remove from Flood Zones 2 and 3 to the rear.



QUESTION 93: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Preferred for a Settlement Limit Extension on a site of 0.18 hectares.

Reasoned justification: The site is adjacent to the settlement limit, and although it is 6k to the primary school it does have access to other facilities. It is in the main part of the village and would be an extension to the built form respecting the existing pattern of development with only a very localised and limited impact on the river valley and Conservation Area. There is an existing access and any loss of leylandii along the frontage would not be detrimental.



QUESTION 94: Do you support or object to the proposed use of the site? Please explain your reasons

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0057	<p>Land south of Sancroft Way, Wortwell</p> <p>The site is contained however it is also in an elevated position and would intrude into the River Valley landscape. Concerns have also been raised about the connectivity of the site – access via Sancroft Way appears to be subject to a ransom strip and access via Low Road is not achievable in highway safety terms</p>
SN0156	<p>Site opposite village hall, High Road, Needham</p> <p>The site is adjacent to the settlement limit and the services of the village are accessible as there is a continuous footpath along High Road. However, the site is within the river valley with open, uninterrupted views from and of the Listed church. It would have a significant detrimental impact on the setting of the church and within the landscape, from the Angles Way trail and the wider footpath network.</p>
SN0385	<p>Land west of Church Lane, Brockdish</p> <p>The site is adjacent to the settlement limit, and although it is 6k to the primary school it does have access to other facilities. However, Church Road is narrow and achieving an adequate access would be problematic. Because access would be from Church Road as there is no opportunity through the existing estate, it would have a poor relationship with the existing settlement. It would also be a significant intrusion into the landscape extending the built-up area northwards and not respecting the existing pattern of development.</p>
SN0464SL	<p>Land west of Mill Road, Thorpe Abbots</p> <p>Thorpe Abbots is a small hamlet with very few services and facilities and is 8k from the nearest primary school. The roads are narrow and there is no footpath provision resulting in access being predominantly by car and no safe walking route to the school. The site is within a Conservation Area and its open aspect contributes to the rural character of the hamlet and development would have a detrimental</p>

Site	Location and Reasons for Rejection
	<p>impact on the landscape and townscape. Achieving an access and footway would require on site and frontage hedge/tree removal and there is a surface water flood risk.</p>
SN2001SL	<p>Land west of Cross Road, Starston</p> <p>Starston currently does not have a settlement limit. The site is in a rural location and would represent an encroachment into the open countryside. Significant highways concerns, particularly relating to the wider road network, have been identified.</p>
SN2006SL	<p>Land north of High Road (between No171 and Meadow Cottage), Wortwell</p> <p>The site is in a rural setting with limited development, and lies wholly within a River Valley setting. Development of the site would result in the loss of a gap that contributes positively to the rural character of the area.</p>
SN2121A	<p>Land south of High Road, Wortwell</p> <p>Whilst the site is reasonably located for the local facilities in Wortwell, pedestrian access would require a suitable crossing on High Road. However the site has a number of overriding constraints: it has not been demonstrated that suitable visibility splays can be achieved on the inside of the bend in High Road, particularly given the TPO tree on the highway boundary; there are likely to be significant mitigation measures necessary to address surface water flood risk (if this is achievable at all); the site as proposed would be out of keeping in terms of townscape, introducing an uncharacteristic form of estate development; and even reduced to frontage only development, the site would extend the settlement further into the designated River Valley Landscape.</p>
SN2121B	<p>Land west of Low Road, Wortwell</p> <p>The site is centrally located within the village; however, this location would have implications for the character of the area and the designated River Valley landscape, as it would significantly close the gap between the parts of the village along High Road and Low Road. An application for a single dwelling in this gap was refused at appeal in 2018 due to the impact on the character of the area. The site would also impact on the setting of the adjacent Wortwell Bell public house.</p>

Site	Location and Reasons for Rejection
	<p>A 2018 planning application on the part of the site closest to the pub was also refused due to the loss of important hedgerow and possible conflict between the amenity of future residents and the viability of the pub.</p>
SN2121C	<p>Land north of Sancroft Way, Wortwell</p> <p>The site would erode the attractive River Valley landscape that separates the areas of Wortwell centred on High Road and Low Road. The site would also adversely impact on the setting of the two listed buildings on the opposite side of Low Road, Says Farmhouse and Tyrells Barn. A single dwelling on this site was dismissed at appeal in 2018 for the aforementioned reasons, despite a lack of land supply at the time. Highways also consider Low Road in this vicinity to be substandard in terms of width and footways.</p>
SN4063	<p>Mill Hill, High Road, Wortwell</p> <p>The site would have a poor relationship with the existing linear pattern of development and which would result in an adverse landscape and townscape impact. Significant highways concerns have also been raised about the potential to create a suitable vehicular access to the site.</p>
SN4066SL	<p>Land adjacent to 29 Low Road, Wortwell</p> <p>The site is at significant risk of flooding although a frontage development scheme may be acceptable subject to significant flood risk assessment. However, the site is wooded and contributes significantly to the landscape character and development of the site would consequentially result in an adverse impact on the River Valley landscape setting. Highways constraints have also been identified.</p>
SN4084	<p>Land east of Low Road, Wortwell</p> <p>The site is almost entirely within Flood Risk Zones 2 and 3, and the LLFA has also identified severe constraints, requiring significant mitigation, in terms of surface water flood risk. The site would significantly erode the rural River Valley gap between the parts of the settlement centred on High Road and Low Road and the form/layout of the site would have a poor relationship with existing development on Low Road. There are also potential impacts on the rural setting of</p>

Site	Location and Reasons for Rejection
	the listed Tyrells Barn, when approaching from the north. Highways have identified that Low Road is substandard in the vicinity of the site.

QUESTION 95: Do you think that any of the shortlisted or rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

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27. Newton Flotman and Swainsthorpe

Form and character

Newton Flotman

The main settlement of the parish lies on the A140 in the Tas Valley, where the boundaries of Saxlingham Thorpe and Newton Flotman parishes meet. Development within the settlement is nucleated, with almost all residential development in the village occurring to the north of the river. The valley side development is visually prominent when approaching the village from the south-west. Little development has occurred on the east side of the A140 in the attractive valley floor area of the Tas Valley, and the A140 acts as a bypass for the village. Much of this eastern area is now included within the enlarged Shotesham Conservation Area. Church Road provides a strong boundary when approached from the north with the church being strikingly prominent.

Swainsthorpe

Development is concentrated between the A140 and the railway line. The settlement is characterised by detached dwellings with the central focus being around the Church and its setting. This is an attractive undeveloped space in the village where development would be inappropriate. Despite recent new development the village has maintained a rural feel which has been achieved by the retention of attractive features such as ponds within the village. Some of this new development has taken place along very narrow and substandard roads.

Services and Community Facilities

Newton Flotman has a good range of services and facilities. The main part of the village contains a GP surgery, primary school and pre-school, village hall, residential care home, motorbike salesroom, stage school, recreation areas and allotments. There is a restaurant to the south of the village, and local employment at the animal feed mill to the south of the river. The village possesses a good direct link via the A140, to Norwich and Long Stratton and there are regular bus services. There are limited facilities at Swainsthorpe comprising a pub on the main A140, a bus which stops on the A140 and a Bowling Green.

Settlement Limit and Constraints

Newton Flotman

The Settlement Limit has been drawn to include the main built form of the settlement and include the allocated land, NEW1 made within the 2016 Site Allocations Plan. The village hall, rectory and church are excluded from the Settlement Limit, as is the animal feed mill and all housing on the east of Ipswich Road.

Swainsthorpe

The Settlement Limit has been drawn to include the main built form of the settlement, preventing further extension into the surrounding countryside. Due to the limited services and facilities available, the narrowness of local roads, the boundary has been drawn to allow for only very limited infill.

No alterations are proposed to the existing settlement limits within this cluster.

QUESTION 96: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

7 sites have been promoted for consideration, of which 1 was identified as a preferred site and 1 site was shortlisted.

Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Shortlisted Sites

On the basis of the assessment undertaken the following site(s) have been shortlisted:

Site	Location and reasons not preferred for allocation:
SN4025	<p>Land off Grove Way, Newton Flotman</p> <p>Shortlisted for up to 25 dwellings on a site of 1.1 hectares.</p> <p>There is existing residential development located to the eastern boundary of the site, where development to the east would be more reflective of the form and character of the area. Few site constraints.</p>

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0191	<p>Church Road, Swainsthorpe</p> <p>Unresolvable highway issues and impact on landscape. Access to the site is via a private drive which would need upgrading where it is not clear whether the land is within the applicant's ownership or whether it would involve the requirement for third party land. Furthermore, development of the site is considered to represent a breakout into the wider countryside to the south and east, which would harm the landscape/townscape of Swainsthorpe</p>
SN0542	<p>The Paddock, East Side of the Vale, Swainsthorpe</p> <p>The site is considered to be remote from services and facilities in Swainsthorpe where highway safety concerns have also been identified. Development is also considered to have an adverse impact on the landscape and townscape representing a breakout into the open countryside and would be highly visible from Church Road.</p> <p>Furthermore, it would also impact upon the setting of the Henstead Union Workhouse which is a non-designated heritage asset.</p>
SN0594	<p>Lowlands, Ipswich Road, Newton Flotman</p>

Site	Location and Reasons for Rejection
	<p>The site is considered to be unreasonable as an allocated site. Access to the site is gained via the A140 where accessing services and facilities would require crossing the road, which is considered to be unsuitable and unsafe. The A140 is a Corridor of Movement where stopping/turning movements would be unacceptable. Furthermore, development of the site is also considered to have a landscape impact as it slopes down towards the River Valley. It is considered that these issues cannot be mitigated against.</p>
SN0603	<p>Land off Church View, Swainsthorpe</p> <p>The harmful impact on the existing townscape and landscape. The site is situated on land that is elevated to the north of Swainsthorpe where it is highly visible within the landscape, particular in the approach to the village from the A140. It is not considered that the landscape impact could be mitigated through screening and a development of reduced scale would not sufficiently address this concern.</p>
SN3002	<p>Land to the rear of Briar Lane, Swainsthorpe</p> <p>The access point at Briar road being a narrow public right of way where the site has limited frontage to provide safe access. Development of the site would also impact upon the setting of Swainsthorpe Church grade II* listed building which is currently unbuilt in character and provides a rural connection to the south of the church.</p>

QUESTION 98: Do you think that any of the shortlisted or rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

QUESTION 99: Do you think that any of the shortlisted sites should be rejected? Please add additional comments to explain your response.

28. Pulham Market and Pulham St Mary

Form and character

Pulham Market

Pulham Market is a nucleated village which has developed around an attractive village green. A large number of attractive buildings front the green and are included within a larger conservation area. The village green affords an open aspect for the village centre. There has been considerable development in the second half of the twentieth century to the north and west of the conservation area at Falcon Road, Julians Way, Mill Close and Springfield Walk. In addition, infill development has occurred within the built-up area of the village.

Land around the village is gently rolling and offers distant views across mainly arable land. This gives the village its attractive rural setting. The former route of the B1134 (Tattlepot Road) provides a good link to the A140 linking to Norwich and Long Stratton to the north and Diss to the south. To the west, there is a relatively good link to Harleston.

Pulham St Mary

The main village is located centrally within the parish. It developed in a linear form east-west with development later being located on a north-south axis along North Green Road, Station Road and Mill Lane, and later still, estate development at Goldsmith Way, Bond Close and Chestnut Road. This has resulted in a village with both linear and nucleated features. The ribbon of local authority housing on Norwich Road reinforces the linear form at the western end of the village.

In the centre of the village the grounds of 'The Grange' form a large undeveloped area which adds to the open character of the village, as does the area to the north of The Street around the churchyard. Large parts of the village containing a variety of historic buildings fall within a Conservation Area, which extends to the river meadows south of The Street as far as Dirty Lane. The village has good road access via Starston to Harleston to the east and via Pulham Market to the A140 to Norwich, Long Stratton and Diss to the west.

Services and Community Facilities

The settlements have a range of social and community facilities including a preschool, primary school, shop, post office and village hall, public houses, allotments, bowling green, tennis court and recreation ground. There is also a GP Surgery with dispensary and a regular bus service.

Settlement Limit and constraints

Pulham Market

The Settlement Limit has been drawn to include the main built form of the settlement. There are some opportunities for limited infill within the Settlement Limit.

There is some capacity in the primary school and there are possible opportunities for expansion. This may require larger than minimum scales of growth to justify. Further exploration will be needed to ensure primary school needs are appropriately met.

Pulham St Mary

The Settlement Limit has been drawn to include the main built form of the settlement but to exclude the churchyard and the grounds of The Grange which contribute to the character of the village.

No alterations are proposed to the existing settlement limits within this cluster.

QUESTION 100: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

14 sites have been promoted for consideration, of which 2 have been identified as preferred allocation site and 2 further sites were shortlisted.

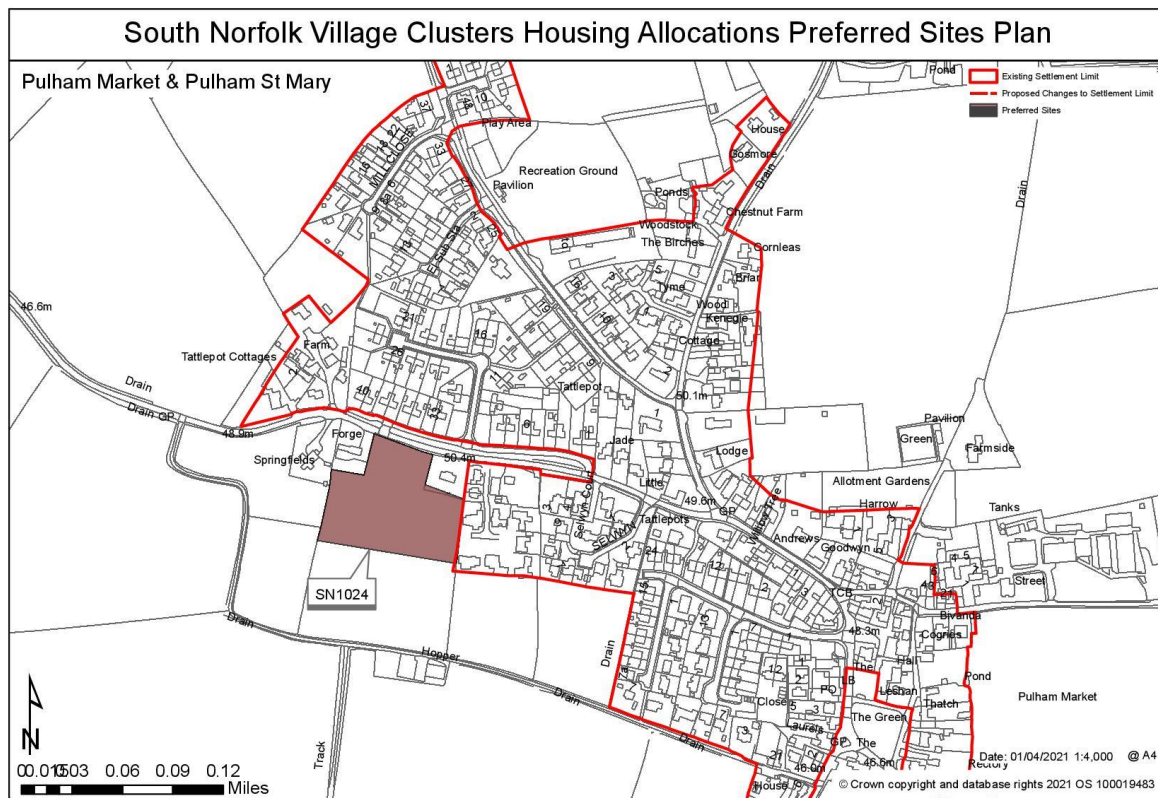
Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Site: SN1024, Ladbrookes, Tattlepot Lane, Pulham Market

Preferred for up to 20 dwellings on a site of 1.3 hectares.

Reasoned justification: The site is considered suitable for allocation. The site relates well to the existing settlement and services and facilities within it. The site is prominent within the landscape but impacts could be mitigated with appropriate landscaping. A continuous frontage footway linking to tie in with provision at PUL1 would be required.



QUESTION 101: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Shortlisted Sites

On the basis of the assessment undertaken the following site(s) have been shortlisted:

Site	Location and Reasons not preferred for allocation:
SN0418	<p>Land at Cook's Field, Jocelyn Close, Pulham Market</p> <p>Shortlisted for up to 15 dwellings on a site of 0.66 hectares.</p> <p>The site is considered reasonable for an allocation of up to 15 dwellings, subject to highways considerations and landscape mitigation. Highways have raised concerns about the potential to form an acceptable access and the suitability of the local highway network. The site is not likely to be suitable for development at higher densities than promoted due to edge of settlement location.</p>
SN1027	<p>Land east of Goldsmith Way, Pulham St Mary</p> <p>Shortlisted for up to 20 dwellings on a site of 1.27 hectare.</p> <p>The site is well related to the existing settlement and a range of services and facilities. However, whilst the Highway authority have indicated that a suitable access could be formed to the site, Poppy Lane is constrained and would require improvement. Allocation of the site would include an area for Public Open Space (POS).</p>

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0166	<p>Gosmore, w/o Colegate End Lane, Pulham Market</p> <p>The development of the site would have detrimental impacts on townscape and designated heritage assets could not be reasonably mitigated</p>
SN0363SL	<p>The Maltings, Station Road, Pulham St Mary</p>

Site	Location and Reasons for Rejection
	The site is not suitable as an extension to the Settlement Limit due to the detrimental impact it would have on the townscape and the setting of The Maltings. Access to the site also appears problematic.
SN0398	<p>Land south of The Street, Pulham St Mary</p> <p>The site is not considered to be suitable due to a detrimental impact on the form and character of the existing settlement, as well as an adverse impact on the setting of the church.</p>
SN0407	<p>Land north of Colegate End Road, Pulham Market</p> <p>The site is separated from the main settlement and would have a detrimental impact on the form and character of the area (townscape). There are also highways concerns as it is situated on a narrow land and close to a bend in the road.</p>
SN0430	<p>Land east of Station Road, Pulham St Mary</p> <p>There are concerns over the suitability of the site access, the impact on the setting of the Conservation Area and the Cordon Sanitaire of the STW.</p>
SN0575	<p>Flanders Meadow, Station Road, Pulham St Mary</p> <p>The site relates poorly to main settlement and development of this site would have a detrimental impact on the rural character of area.</p>
SN1053	<p>Land west of Mill Lane, Pulham St Mary</p> <p>The site has an acceptable relationship with local services and is relatively contained within the landscape. However, the site would have poor relationship with the townscape due to the orientation of the dwellings on the opposite side of Mill Lane to the east.</p>
SN2095	<p>East of Colegate End Road, Pulham Market</p> <p>The development of the site would have an unacceptable impact on townscape and heritage assets that could not be mitigated.</p>
SN2096	<p>West of Mill Lane, Pulham Market</p> <p>Development of the whole site would have unacceptable impacts on landscape, townscape, the highway network and heritage assets. Development of south eastern corner is the only area likely to acceptable, subject to mitigation of resolution of highway constraints</p>

Site	Location and Reasons for Rejection
	and flood risk issues. The Highway Authority have raised concerns about the capacity of the local highway network.
SN4085SL	Land adjacent Orchard Court, Station Road, Pulham Market The site is remote and has poor connectivity to the main settlement. As a result the development of the site would have a detrimental impact on the landscape and the character and appearance of the area.

QUESTION 103: Do you think that any of the shortlisted or rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

QUESTION 104: Do you think that any of the shortlisted sites should be rejected? Please add additional comments to explain your response.

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29. Rockland St Mary, Hellington and Holverston

Form and character

Rockland St Mary

Development is concentrated along The Street with a small detached cluster of development at Rockland Staithe to the east of the village, and an isolated group of houses to the west at The Oaks, Bramerton Lane. A small number of individual dwellings and farmsteads are widely dispersed throughout the remainder of the parish. The village has developed a linear settlement form based along Rookery Hill and The Street. It has experienced some limited estate development, particularly at the eastern end of the village adjacent to Surlingham Lane together with some infill development.

The village is set on the Yare Valley, and consequently in close proximity to the Broads, with a smaller tributary valley to the south, which together with good views from within the built-up area of the surrounding landscape and the good tree and hedge planting throughout, give the village a pleasant rural character. Most of the parish to the east of the village, including Rockland Staithe, lies within the Broads Authority area. Bramerton Lane / Rockland Road (C202) which meets the A146 at Trowse provides a relatively quick link to Norwich and the A47. Run Lane links to the A146 at Hellington Corner.

Hellington

The parish is very rural in character consisting of a few individual dwellings and farms, with isolated clusters of development at Hellington Corner and Hellington Hill. The A146 runs through the south of the settlement providing a good link to Norwich.

Holverston

The parish is sparsely populated consisting of a few individual dwellings and farms all set in open countryside. The A146 runs through the south of the parish providing a good road link to Norwich.

Services and Community Facilities

The cluster has a range of social, recreational and community facilities including a primary school, post office, shop, pub, doctors surgery and village hall. The village has the benefit of mains sewerage and a bus service.

Settlement Limit and Constraints

Rockland

The Settlement Limit has been drawn to include the main built form of the settlement along The Street, as well as along School Lane and development around Surlingham Lane on Bee-Orchid Way. The boundary is close to but does not adjoin the Broads Authority area. No alterations are proposed to the existing Settlement Limit.

Holverston and Hellington

There is currently no Settlement Limit in Holverston and Hellington and no alterations are proposed.

QUESTION 105: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

7 sites have been promoted for consideration, of which 3 were preferred in whole or in part. No further sites were shortlisted.

Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocations:

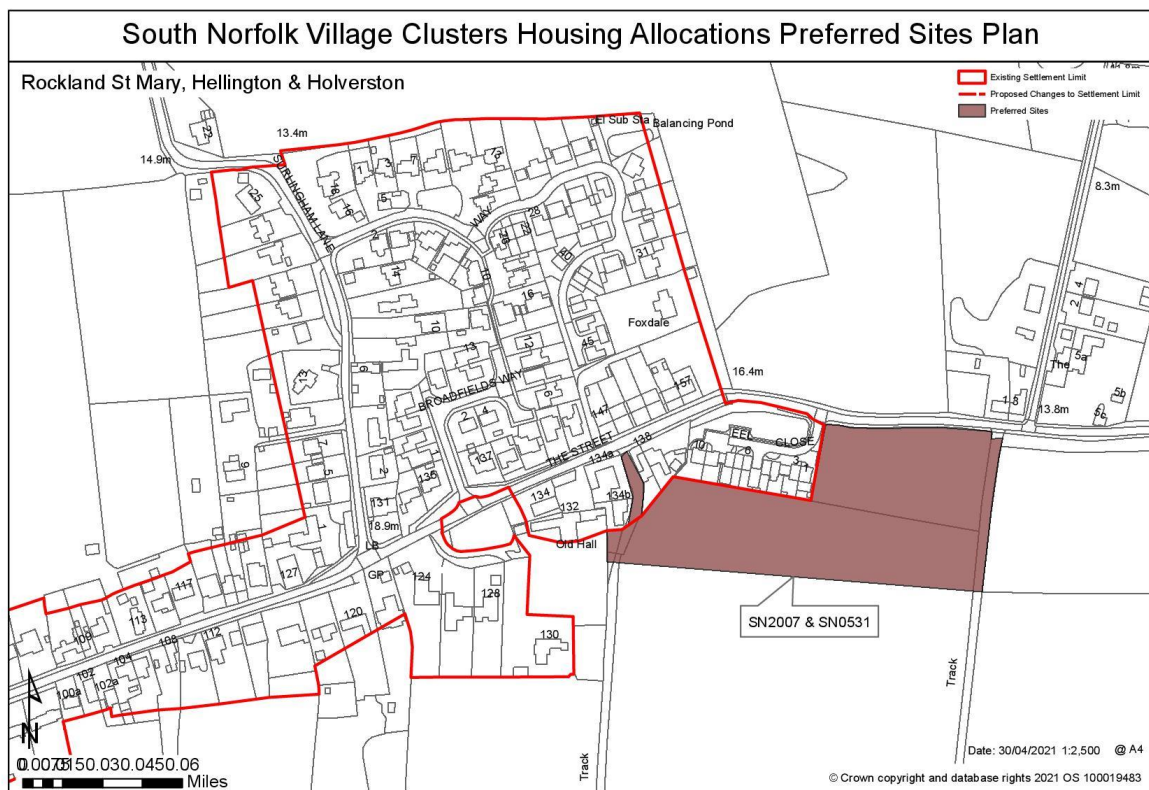
Site: SN2007, Land south of New Inn Hill, Rockland St Mary & (Part of) SN0531, Land west of Lower Road, Rockland St Mary

Preferred for up to 25 dwellings on a site of 1.05 hectares.

Reasoned justification: Whilst the site extends beyond the eastern extent of the main village and is fairly prominent as it is on a ridge, the precedent for development has been established by the adjoining Eel Catcher Close development.

It is expected that a suitable access can be achieved and the site is relatively well related to the services and facilities in the village. The development of SN2007 in combination with, part of, SN0531 helps to ensure that allocation scales of growth can be achieved and a development incorporating SN0531 appears to offer the potential for an additional footway access back to the main village.

SN0531 is promoted as a much larger site, however the development of the whole, or substantial parts, of the larger site is considered to have significant detrimental landscape and townscape impacts. The development of the larger site would also be inconsistent of the overall aims of the plan.

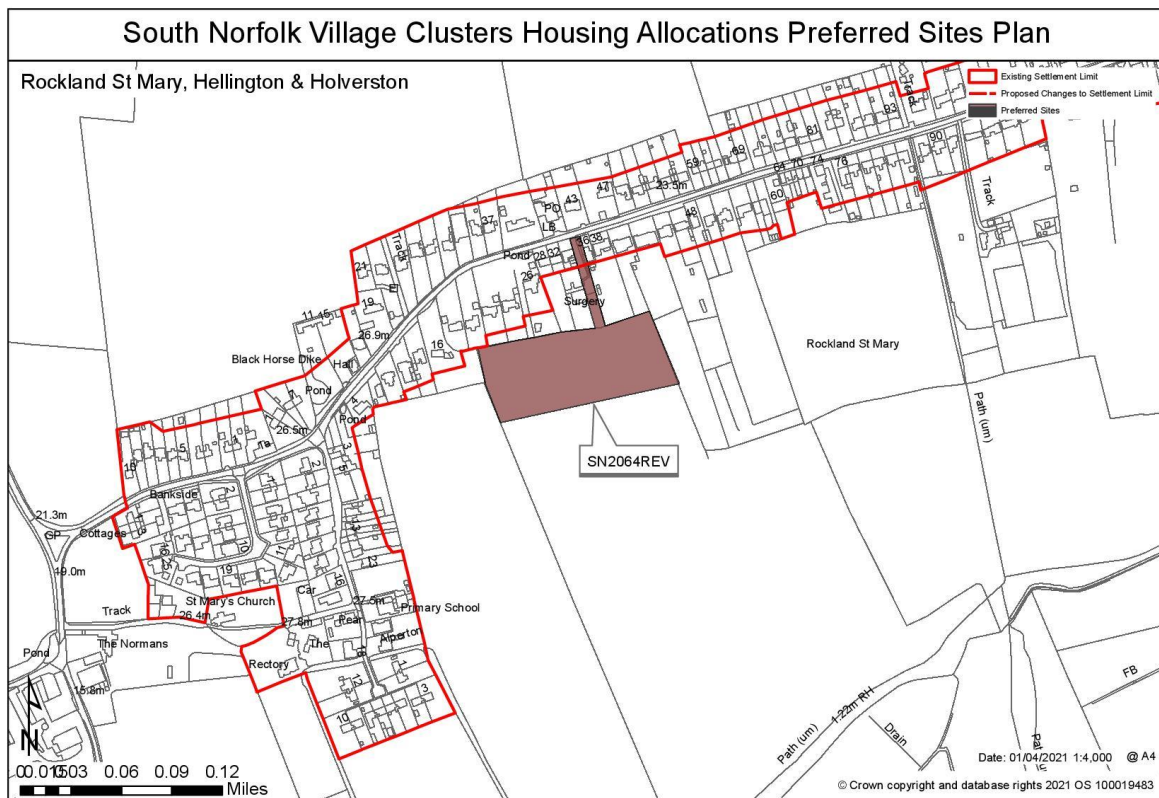


QUESTION 106: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Site: SN2064REV, Land to the south of The Street, Rockland St Mary

Preferred for up to 25 dwellings on a site of 1 hectare.

Reasoned justification: Whilst the site extends into open space beyond the linear pattern of existing development there is existing development to the south of The Street, as the road curves to the west with development protruding to the south along School Lane to the west of the proposed site. It would need to be demonstrated to the satisfaction of the Highways Authority that an appropriate access into the site, with adequate visibility, can be achieved. Otherwise the site relates relatively well to services and facilities within the village.



QUESTION 107: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0165	Land north of Bramerton Lane & Rookery Hill, Rockland St Mary The development of the site is considered to have a detrimental impact on the character of the western entrance to the village. Potential access issues have also been identified.
SN2061REV	North of The Street, Rockland St Mary (access between No101 and 103 The Street) Development of the site would intrude into open landscape to the north, away from the existing linear pattern of development of the settlement. This is considered to be detrimental to the character and appearance of the area. There are also concerns about whether a suitable access to the site could be formed.
SN2063	Land north of The Street (behind Post Office), Rockland St Mary Development of the site would intrude into the open landscape to the north, away from the existing linear pattern of development of the settlement. This is considered to be detrimental to the character and appearance of the area. There are further concerns about whether a suitable access could be formed.
SN2070	West of the Oaks, Rockland St Mary The site is remote from, and poorly connected to the main settlement. The development of the site is considered to be detrimental to the character and appearance of the area.

QUESTION 108: Do you think that any of the rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

Diss and District Neighbourhood Plan

The Diss and District Neighbourhood Plan covers an area that includes the following settlements that are, or form part of, a South Norfolk Village Cluster: Burston, Shimpling, Diss, Roydon and Scole.

The Diss and District Neighbourhood Plan is being prepared by the Diss and District Neighbourhood Plan Steering Group and is expected to be published for consultation in summer 2021. The Diss and District Neighbourhood Plan will include site allocations for residential development, based upon housing requirements for different areas as set out in the Greater Norwich Local Plan (GNLP).

The housing requirement identified for Diss is 250 homes, this is set out in the GNLP. The indicative housing requirements for Burston and Shimpling, Roydon and Scole is a minimum of 25 homes each, a minimum of 75 homes in total.

To ensure transparency, the chapter includes the list of the sites in Roydon that have been promoted to the Council for consideration. The assessment and allocation of sites for Roydon will be undertaken through the Neighbourhood Plan, relevant details of the site(s) promoted to the Council have been shared with the Neighbourhood Plan steering Group

Details of the Diss and District Neighbourhood Plan can be found here: www.ddnp.info.

Form and character

The main development in the parish is concentrated in three areas. There is the main village of Roydon; an area of settlement around Baynards Green; and parts of the settlement of Diss to the west of Shelfanger Road and north of Factory Lane, and along Tottington Lane west of Fair Green (both of which are within Diss Settlement Limit and considered with Diss). The parish also contains clusters of development around Brewers Green and part of Bressingham Common along Bressingham Road. Roydon village is located on the A1066 overlooking the Waveney Valley, and comprises several residential estates to the north of the road and a ribbon of development along its south side. To the east, an area of open fields containing an isolated row of dwellings on Factory Lane separates Roydon from the developed area of Diss. Elsewhere, the village is surrounded by open farmland affording attractive views to Snow Street and a shallow valley to the north, and across the larger Waveney Valley to the south. At Baynards Green, development is of a linear nature along Snow Street, Baynards Lane and Hall Lane. These

combine to create an attractive environment, where trees are integral to the setting of the dwellings.

The A1066 provides Roydon with a direct east-west link to Diss and other settlements along the Waveney Valley. Old High Road provides a further link to the centre of Diss via Roydon Road. The B1077 Shelfanger Road links northward to Shelfanger and Attleborough.

Services and Community Facilities

The village contains a range of facilities including a preschool, primary school, service station, village hall and pub. The village also has space for recreation and a limited bus service.

Settlement Limit and Constraints

The Settlement Limit has been drawn to include the main built form of the settlement and to maintain the separation of the two parts of the village, and that of Roydon and Diss. No alterations are proposed to the existing Settlement Limit

QUESTION 109: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred, Shortlisted and Rejected Sites

For the reasons set out above, the suitability of development sites promoted for consideration in Roydon are not set out here. However, for the purposes of transparency a list of sites promoted to the Council for consideration is set out below:

Reference:	Address:
SN0526	Land at High Road, Roydon

31. Saxlingham Nethergate

Form and character

Development within the parish is concentrated at Saxlingham Nethergate with smaller concentrations at Saxlingham Thorpe and Saxlingham Green, and a small cluster of dwellings at West End. The remainder of the parish comprises scattered individual dwellings and farmsteads.

Saxlingham Nethergate has developed from a linear settlement form with development historically taking place along the south side of both The Street and Church Hill. This contrasts with the opposite frontage of The Street and Church Hill which is generally wooded and makes an important contribution to the rural character of the village. Estate development has taken place at Kensington Close, Steward Close and Pitts Hill Close. Church Green is a particularly attractive open space which contributes to the attractive setting of The Old Rectory, the church and The Old Hall, all of which are listed buildings. The importance of this area is reflected by its inclusion in the conservation area, which also includes Church Hill and The Street. The village is set in an attractive valley landscape based on a tributary of the River Tas. The local road network comprises a mixture of C class and unclassified roads, with the exception of the A140 which runs north-south through the western limit of the parish, providing good links from the village to Norwich and Long Stratton.

Services and Community Facilities

The village has a preschool, primary school, village hall, and recreation space. There is also a regular bus service.

Settlement Limit and Constraints

The Settlement Limit has been drawn to include the main built form of Saxlingham Nethergate. No alterations are proposed to the existing Settlement Limit

QUESTION 110: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

4 sites have been promoted for consideration, of which none were identified as preferred or shortlisted sites.

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN00198SL	<p>6 Kensington Close</p> <p>The site is adjacent to the settlement limit and existing modern residential properties however it is land-locked with no access into it. It would be contained within existing hedge boundaries but would be out of character with the surrounding development and would impact on residential amenity.</p>
SN4005	<p>North of Norwich Road</p> <p>The site is adjacent to the settlement limit but there is no continuous footpath back to the village and there would not be a safe walking route. The site is out of scale with the village and would extend into the landscape and wider views to the north, elongating the village. Access from Norwich Road would require the removal of substantial mature hedging.</p>
SN40007SL	<p>Land south of Norwich Road</p> <p>The site is already located within the Settlement Limit. Proposals would be assessed against current DM policies which already support development here in principle. Access, design, layout and landscaping would be the main considerations to be dealt with through a planning application.</p>
SN4034SL	<p>Land west of Sandpit Lane</p> <p>It is detached from the village and remote from the school and other services with poor connectivity along very narrow, single track, unlit roads with no footpaths. The site is visually contained but development here is sporadic and this type of consolidation would be out of</p>

Site	Location and Reasons for Rejection
	character. It would require the removal of established frontage hedging which would significantly add to this impact.

QUESTION 111: Do you think that any of the rejected sites should be preferred for allocation? Please add additional comments to explain your response.

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Diss and District Neighbourhood Plan

The Diss and District Neighbourhood Plan covers an area that includes the following settlements that are, or form part of, a South Norfolk Village Cluster: Burston, Shimpling, Diss, Roydon and Scole.

The Diss and District Neighbourhood Plan is being prepared by the Diss and District Neighbourhood Plan Steering Group and is expected to be published for consultation in summer 2021. The Diss and District Neighbourhood Plan will include site allocations for residential development, based upon housing requirements for different areas as set out in the Greater Norwich Local Plan (GNLP).

The housing requirement identified for Diss is 250 homes, this is set out in the GNLP. The indicative housing requirements for Burston and Shimpling, Roydon and Scole is a minimum of 25 homes each, a minimum of 75 homes in total.

To ensure transparency, the chapter includes the list of the sites in Scole that have been promoted to the Council for consideration. The assessment and allocation of sites for Roydon will be undertaken through the Neighbourhood Plan, relevant details of the site(s) promoted to the Council have been shared with the Neighbourhood Plan steering Group

Details of the Diss and District Neighbourhood Plan can be found here: www.ddnp.info.

Form and character

The village is located partly on the edge of the Waveney Valley. The village is centred around the junction of the former routes of the A140 and A143. The village contains extensive frontage development to the north and east of this junction backed by several large housing estates. Relatively little development is located on the western side of the former A140, except for some limited frontage development along The Street and a small housing estate to the south of Diss Road. The area around the junction forms the village core and includes a variety of buildings of considerable historical significance.

Approximately half of the village consists of relatively modern dwellings of which many are detached, and the village is characterised by several open spaces near the centre, some of which afford views over the surrounding countryside. The A140 and A143, which both bypass the village, provide direct links to Norwich and Ipswich and to towns along the Waveney Valley. The A1066 to the west of the village links Scole to Diss, with Diss railway station around 2.5km from the village.

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Services and Community Facilities

The settlement has a range of social and community facilities including a primary school, shop, pub and playing field pavilion. The village has the benefit of mains sewerage and there is a regular bus service.

Settlement Limit and Constraints

The Settlement Limit has been drawn to include the main built form of the settlement and to protect the setting of the Conservation Area around the village centre and church from inappropriate development to the west. The boundary also includes a residential allocation behind the affordable housing scheme at Flowerdew Meadow opposite the school. No alterations are proposed to the existing Settlement Limit.

QUESTION 112: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred, Shortlisted and Rejected Sites.

For the reasons set out above, the suitability of development sites promoted for consideration in Scole are not set out here. However, for the purposes of transparency a list of sites promoted to the Council for consideration is set out below.

Reference:	Address:
SN4023	Land south of Bungay Road, Scole
SN2066	1 Bridge Road, Scole
SN0527REV	Land south of Bungay Road, Scole
SN0338REV	Land at Rose Farm, Bungay Road
SN0339SL	Land at Street Farm, west of Low Road
SN4022	Land east of Norwich Road, Scole
SN0511	East of North Road and north of Ransome Ave, Scole

33. Seething and Mundham

Form and Character

Seething

The village of Seething has developed a linear form along Seething Street. It is characterised by predominantly one plot depth development. The abundance of tree and hedge planting especially along road frontages, together with the large open grounds of the church, and the undeveloped frontage of The Street east of the Church affording good views of the surrounding open countryside, all contribute to the rural setting of the village. This is recognised by its designation as a conservation area.

A particularly attractive feature of the village is the large pond and adjacent woodland area which are an integral part of the setting of Mere House and White Lodge, both listed buildings. To the north-east of the main built-up area is a ribbon of development comprising council housing set in open countryside. The north and north-west of the parish comprises attractive valley landscape which contributes towards the rural setting of the village. Road links exist via Brooke Road (C203) and the B1332 to the west, and to Loddon and the A146 to the east.

Mundham

The parish has a very dispersed settlement pattern of individual dwellings and farms, isolated clusters of development at the London Road/Mundham Road junction and at Mundham Common Road. The remainder of the parish is predominately agricultural.

Services and Community Facilities

The cluster has a range of social, recreational and community facilities including a primary school, shop and village hall. There is a limited bus service.

Settlement Limit and Constraints

The Settlement Limit has been drawn to include the main built areas of the settlement. It is split into three parts to exclude the area around the ponds in order to preserve the rural character of the village. The existing southern-most Settlement Limit will be extended westwards to include the linear development to the west of Seething Road, incorporating the two new dwellings approved under planning permission 2018/1033 in July 2018. A new length of Settlement Limit to the north is proposed to be drawn around existing linear development. These changes are shown on the policies map.

It is also proposed that the Settlement Limit be extended around to specific preferred sites as set out in the preferred and shortlisted sites section.

QUESTION 113: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

6 sites have been promoted for consideration, of which 2 have been preferred as allocation sites and 2 have been preferred as Settlement Limit extensions. One further site (SN0588SL) that has been promoted to the Council has now obtained planning permission for development in July 2018.

Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

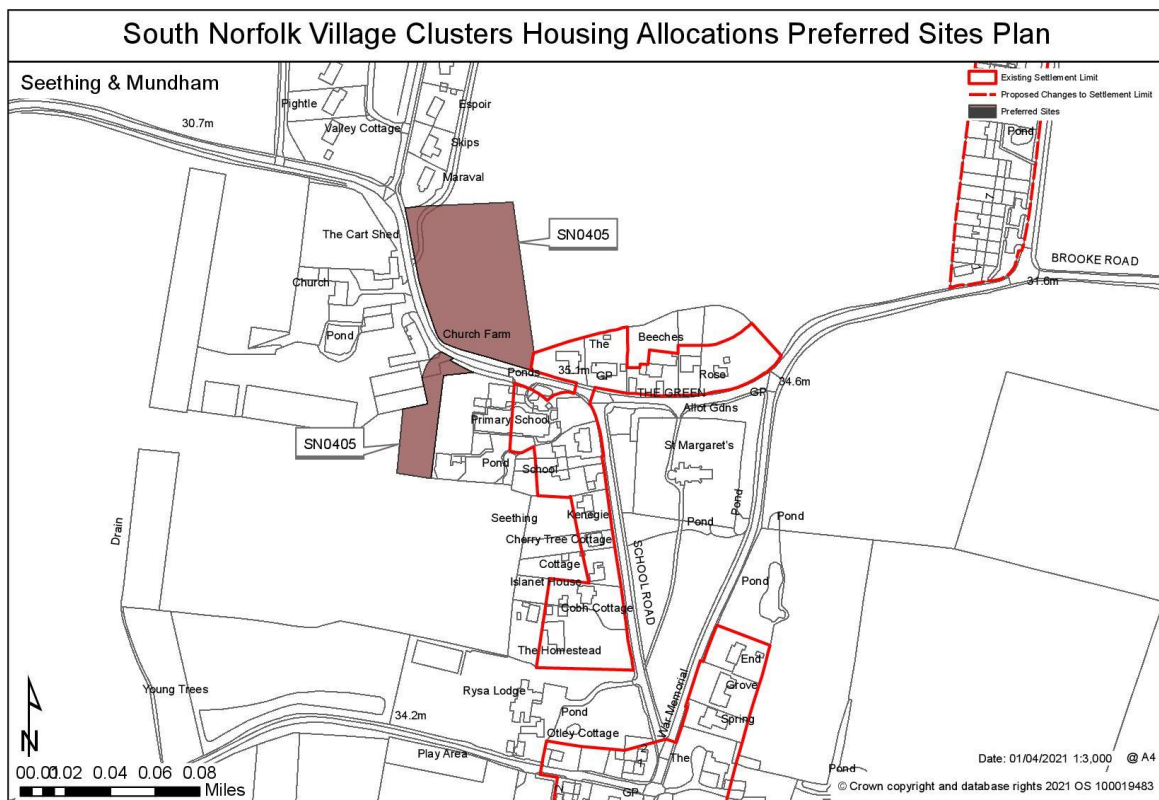
Site: SN0405, Land to North and South of Brooke Road, Seething

Preferred for up to 20 dwellings on a site of 1.25 hectares.

Reasoned justification: Three parcels of land have been promoted in this location. Of these two sites are preferred for allocation:

- (1) The land to the north of Brooke Road is well related to the school. Development is subject to mitigation of constraints, particularly the highway impacts, impacts on existing hedgerow/trees, landscape considerations and heritage issues; and,
- (2) Discussion needs to be undertaken with the school as to whether land between the school and the Church Farm buildings could provide (a) additional car-parking and/or (b) an alternative pedestrian access to the school.

The third parcel of land, 'the cart shed', immediately north of Church Farmhouse is not considered suitable for allocation as this forms part of the setting of a notable non-designated heritage asset within the Conservation Area, contributing significantly to this rural approach to the village.

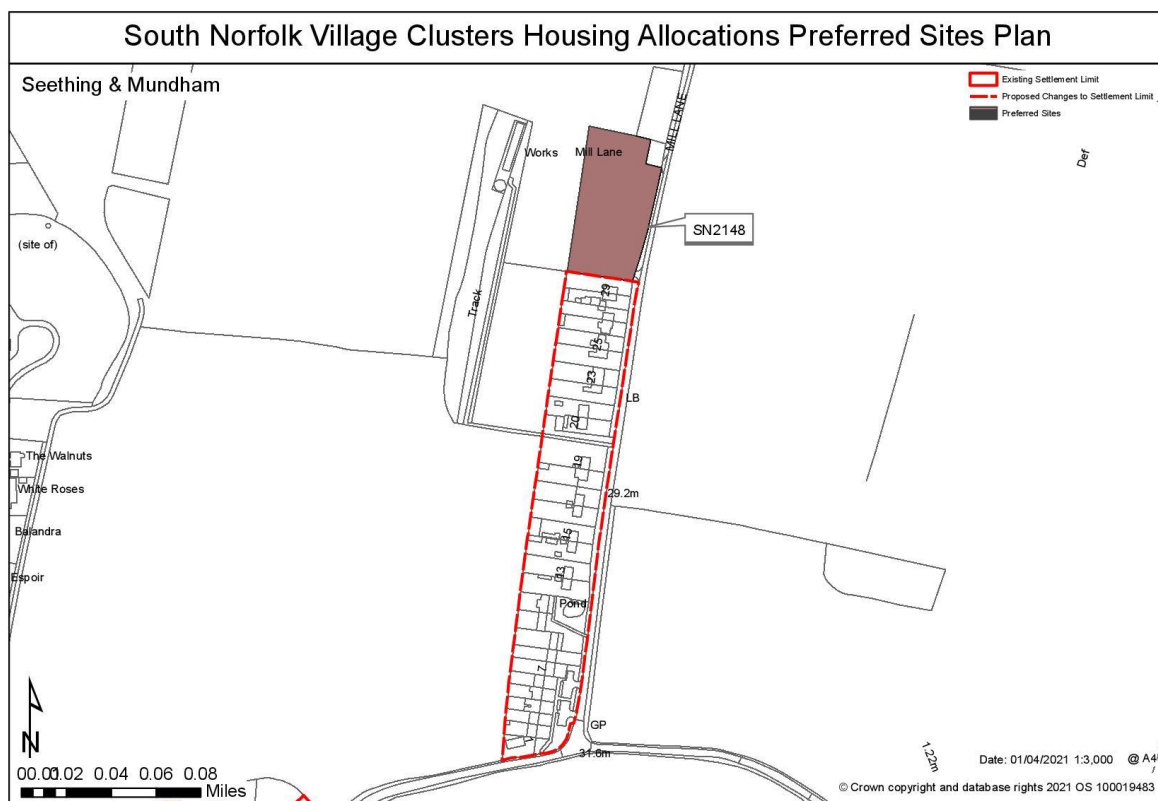


QUESTION 114: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Site: SN2148, Land to the west of Mill Lane, Seething

Preferred for up to 12 dwellings on a site of 0.5 hectares.

Reasoned justification: Although at the edge of the village, the site is less than 1km from the local services and facilities; Mill Lane has no footways, but wide verges, and there are footways on the main Brooke Road (although some upgrades may be required). The north east corner of the site contains a small waste-water treatment plant; however, the site itself has few features and is relatively unconstrained, and a small extension to the current linear pattern of development is considered reasonable. Allocating this site would require a Settlement Limit to be defined for the remainder of Mill Lane.



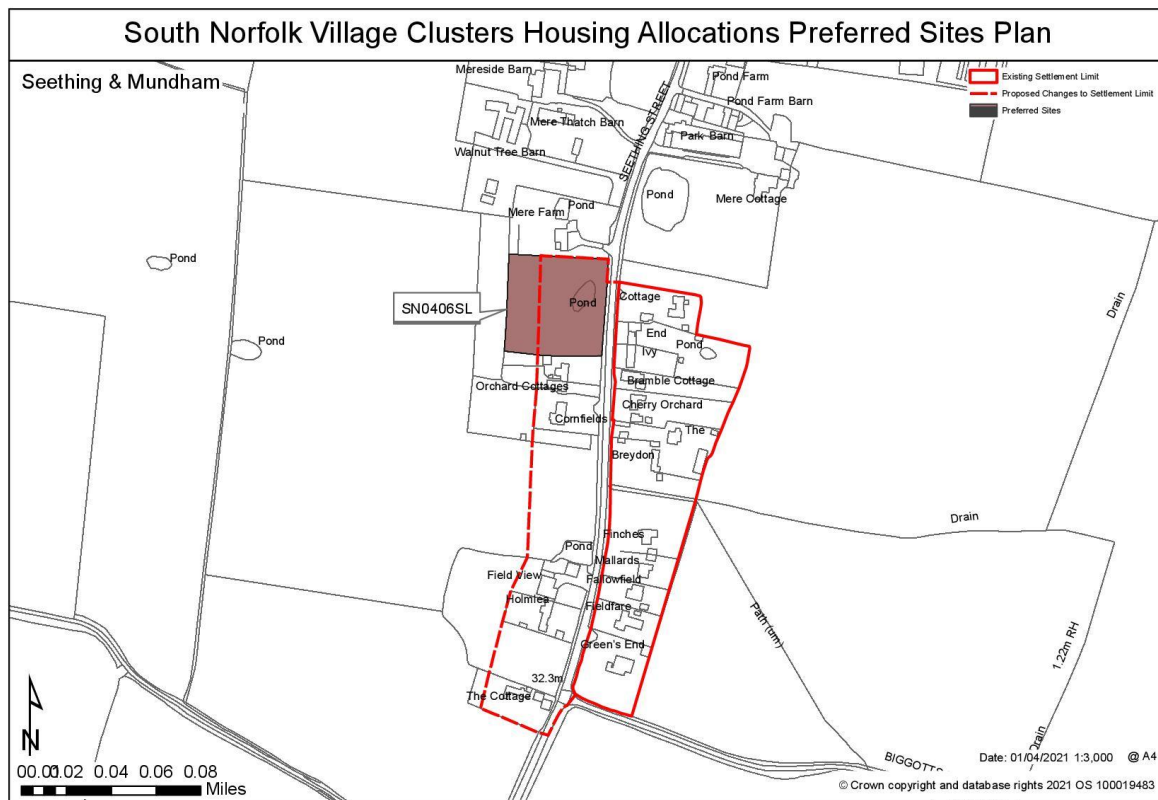
QUESTION 115: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Site: SN0406SL, Land to the west of Seething Street, Seething

Preferred for a Settlement Limit Extension on a site of 0.46 hectares

Reasoned justification: Land to the west of Seething Road does not currently have a Settlement Limit south of Pear Tree House. South of Mere Farm three small Settlement Limit extension sites have been proposed, SN0406SL, SN0587SL and SN0588SL - the latter now has permission for two dwellings.

SN0406SL is considered reasonable for a settlement extension, to accommodate a linear type of development, subject to mitigation of constraints in highway, impact on existing hedgerow/trees, and heritage terms. Given the on-site constraints, this may be limited to 1 or 2 dwellings. In combination with SN0587SL and SN0588SL, this would require a new section of Settlement Limit on the west side of Seething Road, from Mere Farm to The Cottage.



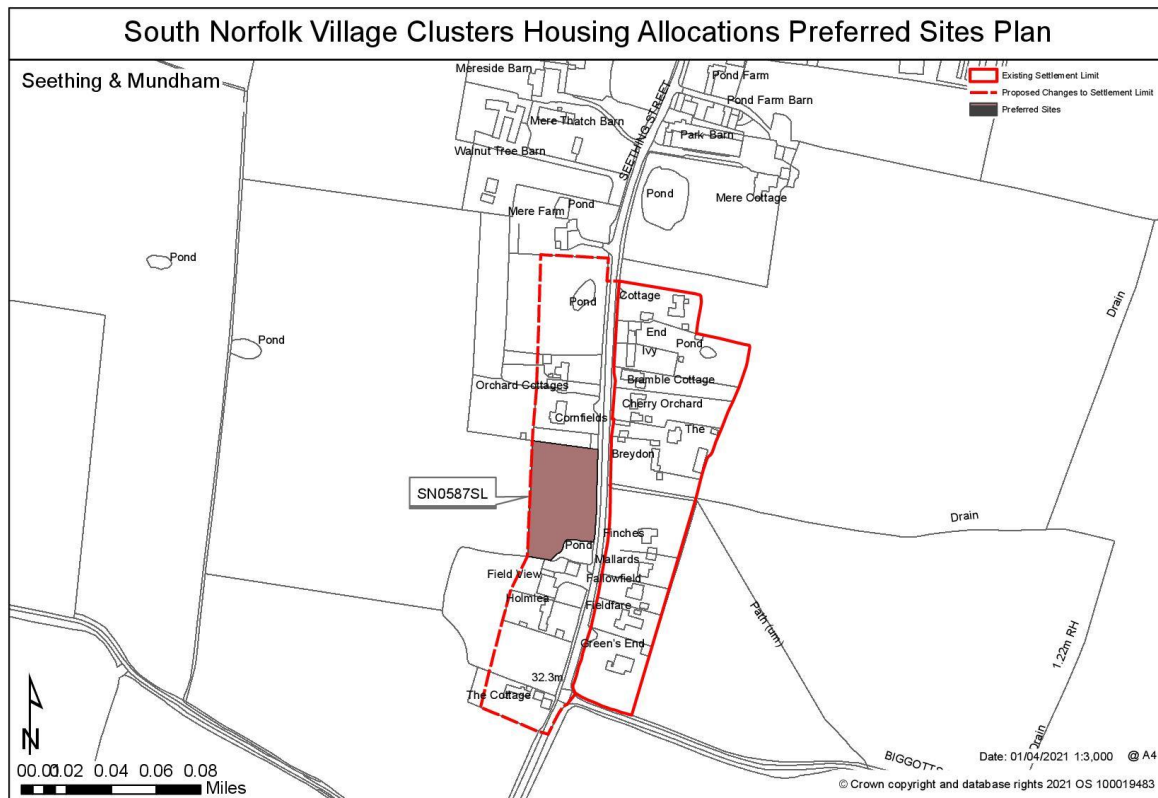
QUESTION 116: Do you support or object to the proposed use of the site? Please explain your reasons.

Site: SN0587SL, Land to the west of Seething Street, Seething

Preferred for a Settlement Limit Extension on a site of 0.36 hectares

Reasoned justification: Land to the west of Seething Road does not currently have a Settlement Limit south of Pear Tree House. South of Mere Farm three small Settlement Limit extension sites have been proposed, SN0406SL, SN0587SL and SN0588SL, the latter now has permission for two dwellings.

SN0587SL is considered reasonable for a settlement extension, to accommodate a linear type of development (approx. 5 properties), subject to mitigation of constraints on the highway, the impact on existing hedgerows/trees, and heritage terms. In combination with SN0406SL and SN0588SL, this would require a new section of Settlement Limit on the west side of Seething Road, from Mere Farm to The Cottage.



QUESTION 117: Do you support or object to the proposed use of the site? Please explain your reasons.

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN1035	<p>Land South of Wheelers Lane, Seething</p> <p>Although located close to the centre of the village, the site is not considered reasonable principally due to the poor highway network, with visibility restricted by narrowness and alignment, and also at the junction with Seething Road. The adjoining former garage site has been redeveloped for three properties and infilling this gap between those houses and the village hall playing fields would erode the rural character of Wheelers Lane.</p>

QUESTION 118: Do you think that any of the rejected sites should be allocated instead of, or in addition to, the preferred sites? Please add additional comments to explain your response.

34. Spooner Row and Sutton

Form and character

The village has developed as four significant settlement groupings, with the Norwich to Ely railway line and agricultural land separating the groups. The large open spaces between these settlement groups contribute to the character of the village. To the north-east, across the A11, is Sutton which is a small hamlet.

Services and Community Facilities

Spooner Row has a station on the Norwich to Ely railway line. It has a minor road connection to the A11 providing access to Attleborough, Wymondham and Norwich. The village hall, rail halt and primary school are in the School Lane/Station Road cluster. There are also preschool facilities in the village.

Settlement Limit and Constraints

The Settlement Limit has been drawn to include the main built form of the settlement but excludes the school playing field. No alterations are proposed to the existing Settlement Limit.

QUESTION 119: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

15 sites have been promoted for consideration, of which 3 were identified as preferred allocations. No further sites were shortlisted.

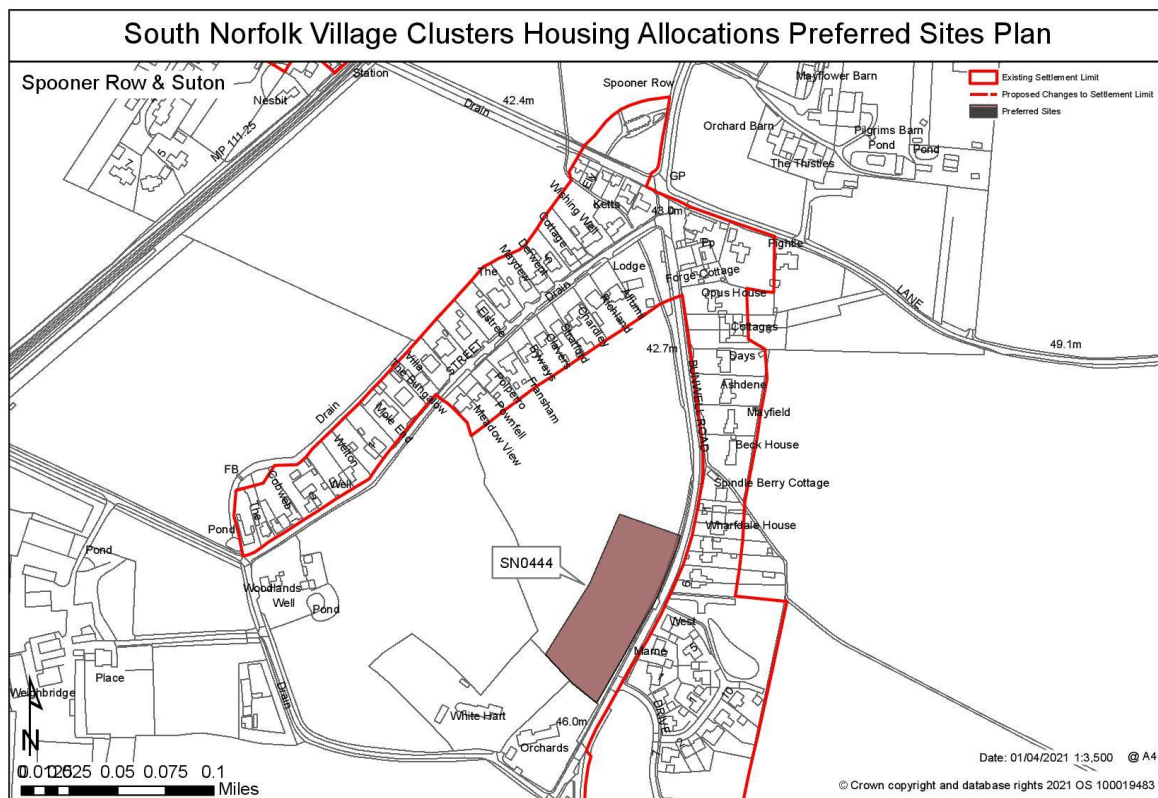
Preferred Allocations

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocations:

Site: SN0444, Land west of Bunwell Road, Spooner Row

Preferred for up to 15 dwellings on a site of 0.7 hectares.

Reasoned justification: Option for allocation subject to a reduction in the overall site area to meet to the objectives of the VCHAP and to avoid the identified areas of flood zones 2 and 3a within the site. It is also been raised roadside ditches within the site help manage surface water across a wider area. Development would be subject to confirmation of suitability from the Lead Local Flood Authority. Development would be to the south of the site and would complement the new development on the opposite side of Bunwell Road and relates suitably to the existing village. Development to the south of the site would result in the loss of hedgerow along the road frontage in order to create a suitable access into the site.



QUESTION 120: Do you support or object to the allocation of the preferred site?
Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

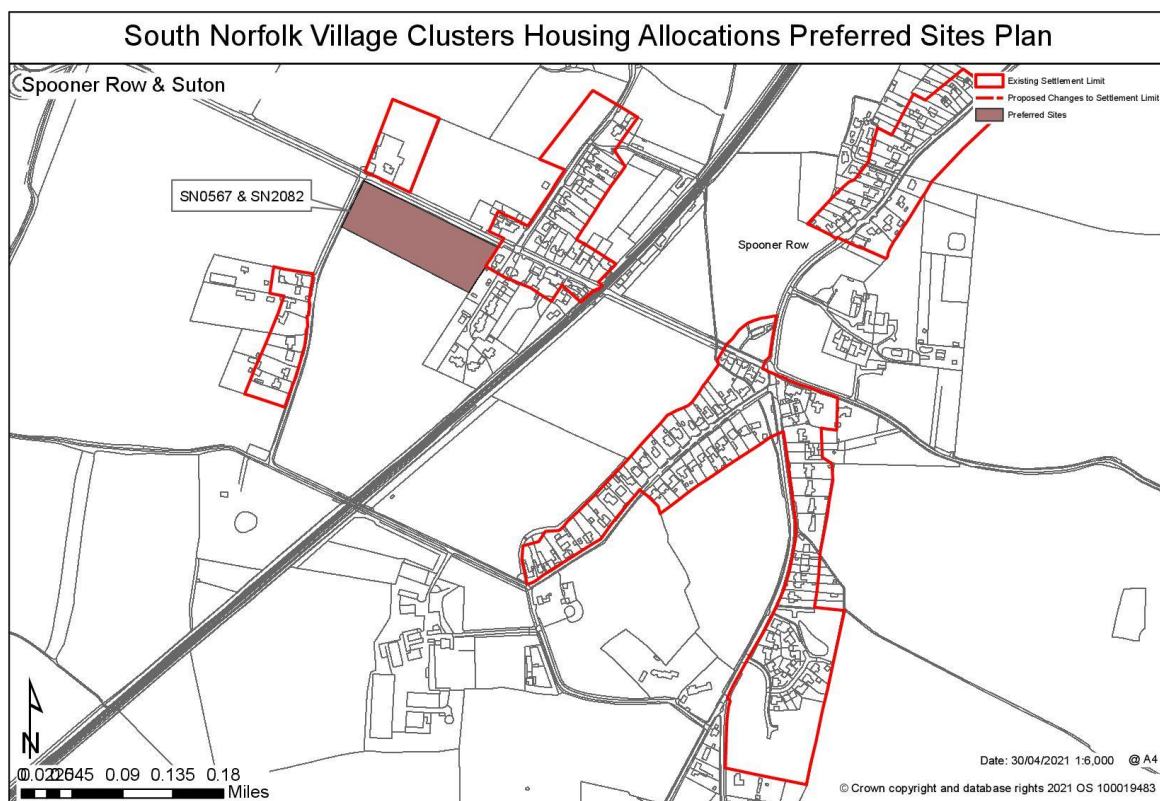
Site: SN0567, Land south of Station Road and west of Queensland, Spooner Row & (Part) SN2082, Land south of Station Road and east of Top Common

Preferred for up to 25 dwellings on a site of approximately **1 hectare**

Reasoned justification: This proposed allocation comprises two adjacent sites, Site SN0567 and SN2082. Site SN0567 lies adjacent to Station Road at the front of the site and has previously had the benefit of planning permission. Site SN2082 lies behind SN0567. As promoted SN2082 is a much larger site and only the element nearest SN0567 is preferred for development. This reduces landscape impacts and bring the overall scale of development in line with the aims of the plan.

Access to the site would need to be achieved via Station Road, this would result in the loss of frontage hedgerow, and the possible need to remove off-site trees. However, the site has a good relationship with the existing settlement and a linear form of development along the frontage of the site would complement the existing pattern of development.

There would be a landscape impact resulting from the development that would need to be addressed by way of an appropriate landscaping scheme.



QUESTION 121: Do you support or object to the allocation of the preferred site?
Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Rejected Sites

The following site(s) were promoted for development but have been considered to be unreasonable alternatives on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0227	<p>Land at Eleven Mile Lane, Sutton</p> <p>A number of constraints have been identified, including highways concerns about creating an appropriate access into the site as well as the wider highway network. An estate form of development is also considered to be an inappropriate form and scale of development in this rural settlement which is characterised by a small scale mainly linear pattern of development.</p>
SN0404	<p>Land to the south-east of Chapel Road, Spooner Row (rear of allocation SPO1)</p> <p>Development of the site would constitute backland development and would have an adverse impact on the form and character of the existing linear pattern of development. It would also have a detrimental impact on the approach to the village from the north. Access would be required through existing allocation and may require the loss of additional hedgerow.</p>
SN0445	<p>Land south of Station Road, Spooner Row</p> <p>As promoted the site is excessive in scale however it could be reduced in size. Notwithstanding this, development of the most logical areas of the site would be constrained by significant areas of flood zone 2 and 3a. Significant offsite highway works have also been identified as necessary to make this site acceptable in highway terms. There would also be a detrimental landscape impact associated with the development of this site.</p>
SN0446	<p>Land north of Guilers Lane and east of Chapel Road, Spooner Row</p> <p>Development of the site would impact on both designated and non-designated heritage assets and would also have a detrimental impact on the form and character of this part of the settlement. There would also be a likely landscape impact resulting from the loss of hedgerow and mature trees. A smaller area of development is not</p>

Site	Location and Reasons for Rejection
	considered to address these concerns adequately due to the prominent location of the site.
SN0447	<p>Land west of Chapel Road, Spooner Row</p> <p>Due to the identified areas of flood risk within the site, development would be concentrated to the north of the site, closest to the rear of existing properties along Chapel Road. This would lessen the erosion of the gap between the two distinct areas of the settlement but would impact on identified heritage assets and result in the loss of hedgerow and mature trees along Chapel Road. Off-site highway works would also be required.</p>
SN0448	<p>Land west of School Lane and north of the school</p> <p>School Lane has been identified as being constrained in highways terms and is not considered to be appropriate for further development (following development of the existing allocation site SCO2). Although the site relates reasonably well to the settlement, development of the scale proposed and/ or of an estate form is not considered to be compatible in either form or character with the existing linear pattern of development.</p>
SN0568	<p>Land to south of Station Road and west of Top Common, Spooner Row</p> <p>Due to identified on-site constraints development would be to the south of the site and would appear detached from the main body of the settlement when viewed from Station Road. Development of the site would have an adverse landscape impact and would also likely result in the loss of frontage hedgerow. A suite of off-site highways works have been identified and it would need to be confirmed that access into the site could be achieved.</p>
SN0569	<p>Land west of Bunwell Road and south of Queens Street, Spooner Row</p> <p>Development of the site would erode the rural character that is in evidence, particularly on the approach to the settlement along Bunwell Road. Furthermore, the adjacent listed building faces into the site and development of the site would have a detrimental impact on its setting. Highways have also raised significant concerns about</p>

Site	Location and Reasons for Rejection
	the ability to achieve appropriate visibility splays if developing this site.
SN2101	<p>Land to the North and East of Spooner Row.</p> <p>Site SN2101 was promoted as a 'garden village' site in the settlement of Spooner Row. Due to its strategic scale the site is considered to be inconsistent with emerging Policy 7.4 (Village clusters) of the Greater Norwich Local Plan and has been rejected on this basis.</p> <p>As the proposal falls outside the scope of the Village Clusters Housing Allocations Plan, the garden village proposal has not been subject to a detailed assessment within this plan.</p> <p>However, the site was also promoted as a number of smaller parcels and these sites have been considered on their own merits, in accordance with the VCHAP objectives. The individual site references are: SN0444, SN0445, SN0446, SN0447 and SN0448.</p>
SN2157	<p>Land at Great Expectations, London Road, Sutton</p> <p>The site is excessive in size however it could be reduced in size to meet the objectives of the VCHAP however it is remote from the main centres of development with poor connectivity and it would have an adverse landscape impact. The site currently has a number of commercial tenants as well as a leisure school which may be affected by residential development on the site.</p>
SN2181	<p>Land east of School Lane, Spooner Row</p> <p>Significant highways constraints have been identified, including concerns about the possibility of creating a suitable access to the site and the impact on School Lane. An identified area of flood risk to the north of the site would reduce the developable area.</p> <p>Development on this parcel of land would constitute backland development.</p>
SN3022	<p>Land to south of Station Road and west of Top Common, Spooner Row</p> <p>The site is detached from the main areas of the settlement and is not adjacent to any existing settlement boundaries. Development of this site would result in encroachment into the countryside, beyond the existing boundaries of the settlement and would have a landscape</p>

Site	Location and Reasons for Rejection
	impact as a result. Development of the site would also result in the loss of frontage hedgerow and trees.
SN4060	<p>Land south of Hill House, Bunwell Road, Spooner Row</p> <p>The site is excessive in scale but has been promoted for a small number of dwellings. The site is detached from the settlement and is poorly connected. Development of the site at any scale would result in an intrusion into the rural landscape. Development of the site would also result in the loss of the frontage trees and hedgerows, altering the rural approach towards the settlement.</p>

QUESTION 122: Do you think that any of the rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

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

Form and character

Stoke Holy Cross

Within the parish of Stoke Holy Cross there are two main areas of settlement, the main village lying astride the C201 road connecting Norwich and Hempnall in the west of the parish, and the settlement of Upper Stoke which lies on its eastern boundary. This latter area forms part of the settlement of Poringland and is covered by the Poringland Settlement Limit.

Historically the village developed around the mill which forms the principal building in the small conservation area which was designated in 1975. The village has traditionally had a strongly linear form which developed along the eastern banks of the River Tas away from the older historic part of the settlement around the mill. More recent estate development has taken place on the eastern side of Norwich Road where the village has grown up the slope of the valley.

Shotesham

Development within the parish has been concentrated along the Street to form the established village of Shotesham. The village has developed a linear settlement form with one plot depth only. The whole village is set within an attractive valley landscape with a particular feature being the abundance of trees and hedges which fill the significant gaps that separate many of the buildings and therefore are important in maintaining the rural character of the village.

The main built-up area together with part of Shotesham Common is a conservation area, designated since 1973. This was extended in 1994 to include the attractive landscape to the west associated with Shotesham Hall.

Caistor St Edmund and Bixley

Caistor St Edmund is situated in the Tas Valley and is the site of the remains of a Roman market town. Development within the parish is sparsely populated with development concentrated along Stoke Road and Caistor Lane and the remainder of the parish displaying a dispersed settlement pattern of individual dwellings. The parish is located close to the A140 and A47 allows good access to Norwich and further afield.

Bixley is predominately rural in nature with isolated dwellings. The B1332 allows good access to the south towards Poringland, but also to the north to A146 and A47.

Services and Community Facilities

The cluster possesses a wide range of facilities, including a primary school and a pre-school, pub, village hall and recreation facilities including a skate park. The C201 provides a direct link from the village to Norwich and there are bus links. This road crosses over the A47 Norwich Southern Bypass, but no access on to the A47 is provided at this point and therefore traffic wishing to access the A47 either has to go via the Norwich Ring Road, Poringland or Dunston, the latter being unsuitable to any increase in traffic due to the narrow nature of the lanes through Dunston to the A140.

Settlement Limit and Constraints

Stoke Holy Cross

The Settlement Limit has been drawn to include the main built form of the settlement and recent new housing development. The boundary allows for additional infill development on Long Lane and elsewhere in the village but has been drawn to protect the more rural character of the village in the southern and northern extremities of development along Norwich Road.

There remains capacity within Stoke Holy Cross primary school. It is noted however that the school admits from a wider area that is growing. Further exploration will be needed to ensure primary school needs can be met.

Shotesham

Due to the limited services available and the attractive valley landscape the Settlement Limit has been drawn around the existing built up area to prevent further ribbon development extending into the surrounding countryside. The area from the walled frontage of Shotesham House and the Old Barn southwards along The street has been excluded from the Settlement Limit because of the importance this area has in contributing towards the form of the village. Any proposals for new development within the boundary must take account of the character of the well-established conservation area and positively enhance it.

No alterations are proposed to the existing settlement limits within this cluster.

QUESTION 123: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

9 sites have been promoted for consideration, of which 1 has been identified as a preferred allocation site. No further sites were shortlisted.

Preferred Sites

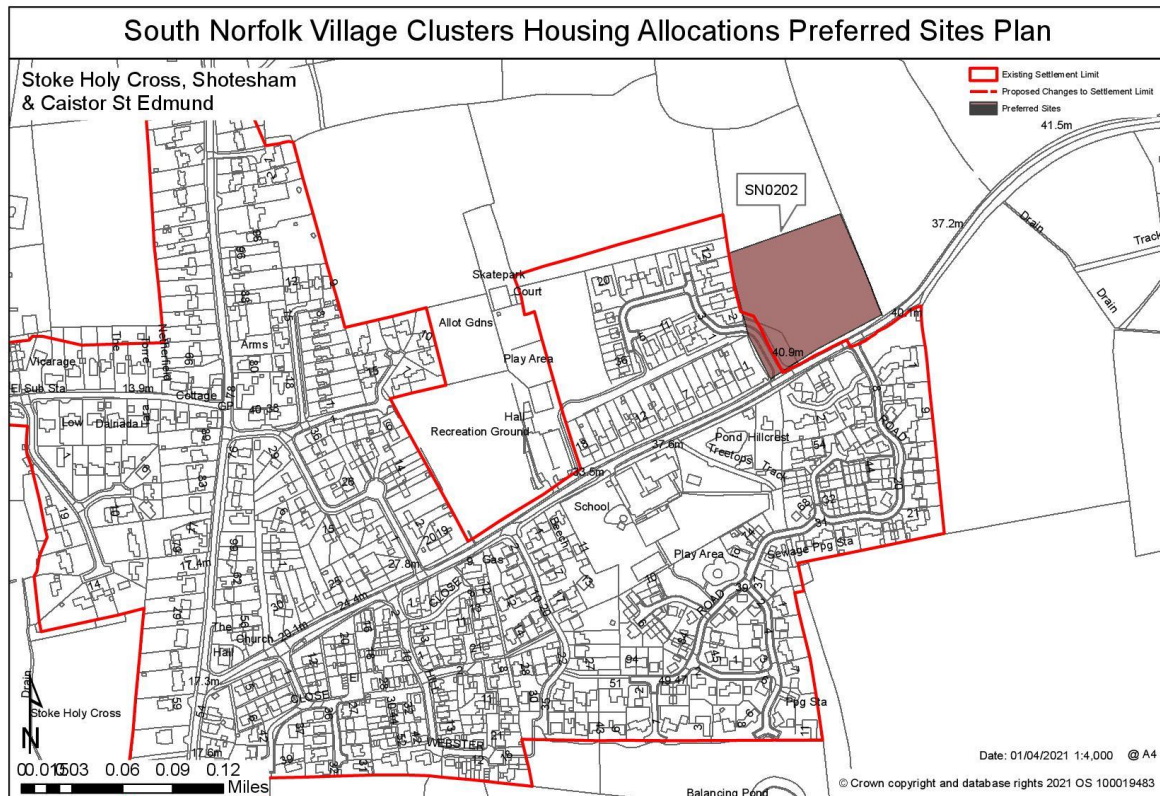
On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

DRAFT

Site: SN0202, Land north of and adjoining Long Lane, Stoke Holy Cross

Preferred for up to 25 dwellings on a site of 1.3 hectares.

Reasoned justification: The site relates well to the existing settlement and benefits from good access to the local services. Access to the site would be achievable and off-site highway works could reasonably address the highways issues identified. However, development of this site would have an impact on the wider landscape setting, in particular in long views across the Tas Valley, and this would be difficult to mitigate.



QUESTION 124: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0197	<p>Land north of Long Lane, Stoke Holy Cross</p> <p>The site is well connected to the settlement, however there are significant highways concerns about access into the site. Concerns have also been raised about the existence of a ransom strip between this site and the adjacent development have been raised which could affect deliverability. Significant landscape concerns have also been raised in respect of the impact that further development in this location could have on the wider views across the Tas Valley. If it can be demonstrated that highway concerns can be overcome and a scheme that is acceptable in landscape terms is achievable then this site might be viewed as being reasonable, but this conclusion cannot be drawn at this point.</p>
SN0524	<p>Land south of Long Lane, Stoke Holy Cross</p> <p>An overall reduction in size could address concerns about the scale of development proposed. However, there would remain landscape concerns about further eastward extension of the village in the river valley landscape and in respect of highways safety matters, including ongoing speed compliance issues and the difficulties creating a safe pedestrian footpath to the south.</p>
SN0532	<p>Land east of Norwich Road, Caistor St Edmund</p> <p>The site has poor connectivity and is remote from services, including the local primary school. Other identified constraints include highways access, residential amenity and potential landscape issues.</p>
SN0534	<p>Land north of The Street, Shotesham</p> <p>The site is poorly connected to the local services, including the local primary school. Development of the site would have an impact on the historic environment, including Listed Buildings and the Conservation Area.</p>
SN0590	<p>Land north of The Street, Shotesham</p>

Site	Location and Reasons for Rejection
	<p>The site is poorly connected to local services, including the local primary school. Development of the site is proposed to retain the existing playing field however it would result in the loss of the existing trees and hedgerows along the road frontage to create an acceptable access. Development of this site would therefore also have a harmful impact on the local landscape character, the townscape and the Conservation Area.</p>
SN2091	<p>Land of Norwich Road, Stoke Holy Cross</p> <p>Whilst the site benefits from good connectivity and no significant highways concerns have been identified, the site forms an important gateway to the settlement and development of the scale proposed would have a harmful impact on both the landscape and townscape setting. It would also contrast with the existing loose pattern of development in this location. Heritage concerns have also been identified due to the proximity of the site to the Grade II* Church of Holy Cross.</p>
SN4013	<p>Land to North East of Shotesham Road, Shotesham</p> <p>Constraints have been identified. These include the impact it would have on the landscape character of the area, the impact on the Conservation Area of Shotesham and the overall poor connectivity of the site to local services.</p>
SN4028	<p>Land at Highview, The Common, Shotesham</p> <p>The site is poorly connected to the local services, including the primary school, and development in this location would have a significant impact on a sensitive landscape setting due to the changes in topography of the site. The landscape impact of development in this location could not reasonably be mitigated.</p>

QUESTION 125: Do you think that any of the rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

Form and character

Surlingham

Surlingham has a linear character with no significant estate development. It comprises ribbons of continuous single plot depth development principally along The Street, The Green and Walnut Hill with off-shoots from these roads along New Road and Mill Road. Detached from this main group is Ferry Corner to the north, and Church Corner. The village retains a very rural character and is adjacent to the Broads.

Bramerton

Within the parish of Bramerton there are a number of groups of development; the main village running north to south along Framingham Lane and The Street; the development between, and on, Hill House Road and Mill Hill including that which overlooks the River Yare; and small developed frontages isolated from the main village on Surlingham Lane and Cory's Close.

The majority of the main settlement within the parish is a conservation area containing a number of listed buildings and important spaces within the settlement including the wooded parkland setting of Bramerton Hall. Bramerton is also in close proximity to the Broads.

Kirby Bedon

Kirby Bedon is a sparsely populated parish. It consists mainly of individual dwellings and farms, many with farm buildings associated and clusters of dwellings set in open countryside.

Services and Community Facilities

There is a reasonable range of facilities including a preschool, primary school, village hall, recreation facilities, pubs, shop and garage. The settlement is linked to the Norwich Area by the C202 which links via Bramerton to the A146 at Trowse close to its junction with the A47 Norwich Southern By-pass and provides good accessibility to the wider Norwich area. There is also a regular bus service.

Settlement Limit and Constraints

Surlingham

The Settlement Limit has been drawn to protect the rural nature of the settlement and the existing pattern of linear development.

Bramerton

The Settlement Limit has been drawn to include the main built form of the settlement along the Street and includes the former employment site at Church Farm which is now residential.

No alterations are proposed to the existing settlement limits within this cluster.

QUESTION 126: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

7 sites have been promoted for consideration, of which none were identified as preferred or shortlisted sites.

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0030	Land west of The Street and north of The Green, Surlingham The site would result in backland development that would be detrimental to the form and character of the settlement. Access to the site is also considered to be problematic, even if adjacent site SN2009SL was considered acceptable.
SN0366REV	Land north of Church Farm, Bramerton The site has a constrained access and the development of the site would be expected to have an adverse impact on a heritage asset (and adjacent listed building). The relationship with local services is poor.
SN0374SL	Builder's Yard, Beerlick's Close, Surlingham The extension to the settlement limit would be detrimental to the character and appearance of the area (townscape). There are also concerns relating to the access to the site and on-site flood risk.

Site	Location and Reasons for Rejection
SN2010REV	Land east of Mill Road, Surlingham Development of the site would extend the liner pattern of development into the countryside, to the detriment of the landscape. There would be a significant impact on trees on the site.
SN2016SL	Land west of The Covey, Surlingham The site is subject to identified flood risk issues and has a poor relationship to the existing settlement.
SN2045SL	Land west of Mill Road, Surlingham West The site is not considered to be suitable for a settlement limit extension without SN2010REV opposite, which has been rejected. It would have an unacceptable impact on the landscape by extending the built-up area in to the open countryside.
SN2009SL	Land west of The Street and north of The Green, Surlingham Development of the site would represent backland development that does not respect the form and character of the settlement. Access is also highly constrained with potential neighbour amenity issues.

QUESTION 127: Do you think that any of the rejected sites should be preferred for allocation? Please add additional comments to explain your response.

37. Tacolneston and Forncett End

Form and character

The main concentration of development within the parish of Tacolneston is based along Norwich Road and adjoins the built-up area of Forncett End to the south. Development in the remainder of the parish comprises scattered individual dwellings and farmsteads. The village developed as a predominantly linear settlement along Norwich Road with the addition of post war estate development, namely at Dovedale Road, Boileau Avenue and off Bentley Road in Forncett End.

Further estate development exists at The Fields to the west of Norwich Road. A significant break in the built-up frontage on both sides of Norwich Road exists to the north of the Manor House buildings whose setting in spacious grounds with good tree growth contributes towards the 'open' nature and rural character of this part of the village. The area to the north of the estate development at Dovedale Road is designated as a Conservation Area, which extends as far east as the church. This area has a distinctly rural character with mature trees.

In Forncett End a ribbon of development has extended along Long Stratton Road to the east with development limited to the north side of the road east of Chestnut Tree Farm with the southern side largely undeveloped and fronting open fields. Development has also extended along the south side of West Road and along both sides of Tabernacle Lane as far as Elm Tree Farm.

The B1113 provides relatively good access to Norwich and New Buckenham whilst the B1135 runs to the north providing access to Wymondham and Long Stratton. The remainder of the parish is served by 'C' class and unclassified roads.

Services and Community Facilities

The parish has a range of social and community facilities including a preschool, primary school, pub, village hall and recreation facilities. There is also a limited bus service.

Settlement Limit and Constraints

Tacolneston has two separate areas contained within settlement limits. A Settlement Limit has been drawn to include the main built form of the settlement whilst a smaller Settlement Limit has been drawn around the estate development at Dovedale Road to the north of the village. No alterations are proposed to the existing Settlement Limit.

QUESTION 128: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

12 sites have been promoted for consideration, of which 1 was identified as a preferred allocation site and 1 was shortlisted.

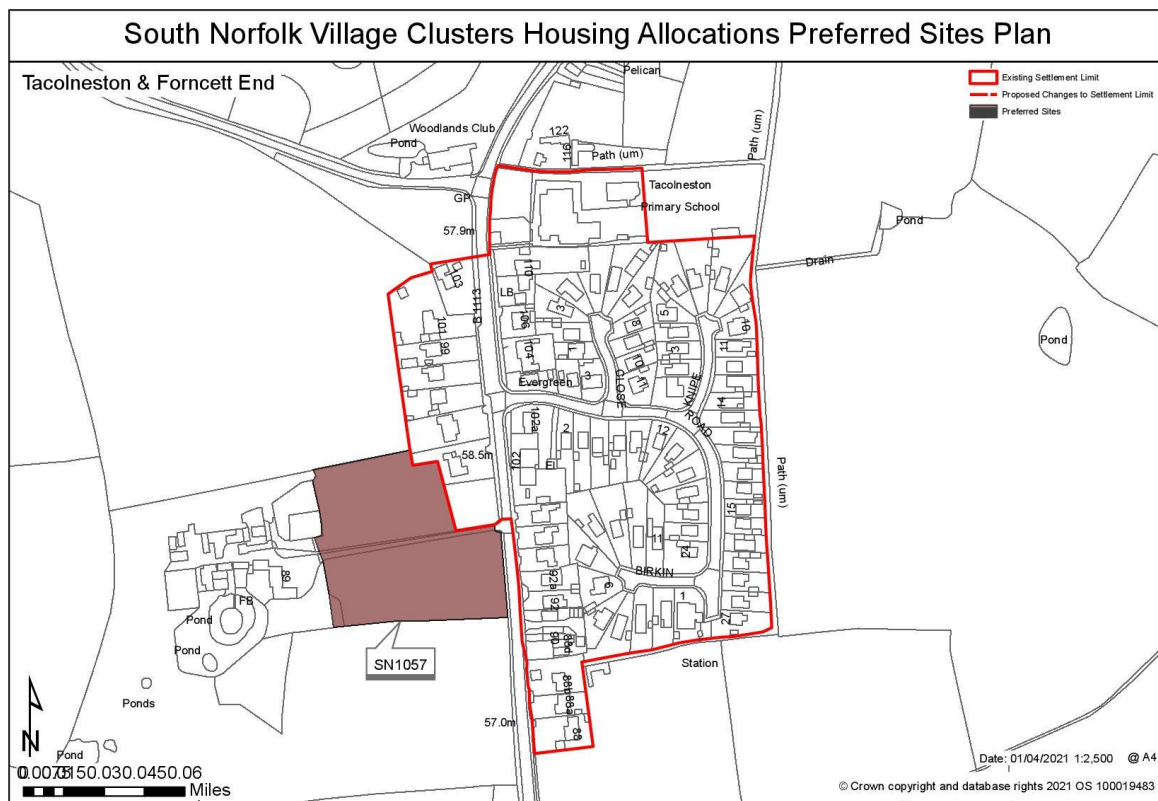
Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Site: (Part of) SN1057, Land to the west of Norwich Road

Preferred for up to 20 dwellings on a site of 0.7 hectares.

Reasoned Justification: The site is larger than typically sought within the Village Cluster Plan but has scope to be reduced in scale in line with the plans overall objectives. The site is within a sustainable location and relates well to existing development to the north of the settlement. Development of the site would be limited to the top section of the site only in order to reduce the landscape and townscape impact of new development in this location. Creation of an adequate access would require the removal of existing vegetation and trees along the site frontage and some additional highways safety works may be required to support the development of this site. The trees at the front of the site are subject to TPOs. Consideration would need to be given to the form of development on this site.



QUESTION 129: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Shortlisted Sites

On the basis of the assessment undertaken the following site(s) have been shortlisted:

Site	Reasons not preferred for allocation:
SN0602	<p>Land off The Fields</p> <p>Shortlisted for up to 14 dwellings on a site of 0.55 hectare.</p> <p>The site is adjacent to the settlement limits and an extant residential permission. It is well related to existing residential development and would have a limited impact of the landscape as it is contained by a western and southern boundary line. It could come forward as a comprehensive scheme with the existing allocation. Access should be from The Fields to the north, via the extant permission.</p>

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0016SL	<p>Land to the rear of 122 Norwich Road</p> <p>The site is an unreasonable site for both allocation and extension to the settlement limit because development would impact on the setting and significance of the Listed Buildings and Conservation Area. The traditional verdant setting of the group of dwellings at number 116 and 122 Norwich Road will not be preserved as a result of the reduction in the size of the curtilage at number 122. It is unlikely that satisfactory visibility could be provided at access, particularly to on-coming traffic and footway improvement to min 2.0m width would be required between site and school. Any removal of hedging to achieve highway requirements would be detrimental to the heritage assets.</p>
SN0084	<p>Horse Meadow, Talconeston</p> <p>As promoted the site is excessive scale in scale but it could be reduced in size. Development of the site would represent a significant break out to the east of Tacolneston which would be detrimental to the landscape</p>

Site	Location and Reasons for Rejection
	<p>and townscape. In addition, there is no continuous footway to catchment school and access from Chenery lane is not considered to be suitable as it is unclear if access can be achieved from the Poplars. It would require carriageway widening to 5.5m, a frontage footway and removal of existing hedges which would have a negative impact on the landscape.</p>
SN0086	<p>Land north of Common Road</p> <p>The site is unreasonable for allocation by virtue of its separation from the existing built form. Development would be an encroachment into the countryside and would have a detrimental impact on the landscape and townscape. Access could be achievable at Common Rd but given the narrow width of the road it would require carriageway widening to 5.5m min and a 2.0m footway. This would require the removal of frontage hedge/trees which would further impact on the landscape. It is not feasible to provide a footway to catchment school due to constraint in vicinity of Common Road/Norwich Road junction. There is also the possibility of surface water flooding as there is a small area of ponding in the southeast but it is unlikely to prevent development.</p>
SN0089	<p>Land south of Common Road</p> <p>Development of the site is unreasonable as it would be a significant breakout to the south of the existing village. The site is excessive in scale but could be reduced in size however development on this site would be detrimental to the landscape and townscape. Furthermore, access is likely to require removal of frontage hedge/trees. It is not feasible to provide footway to catchment school due to constraint in vicinity of Common Road/Norwich Road junction.</p>
SN0094	<p>Land north of Norwich Road</p> <p>The site is unreasonable for allocation as development would be an encroachment into the countryside and have a detrimental impact on the landscape and townscape. Access could be achievable at Common Rd but given the narrow width of the road it would require carriageway widening to 5.5m min and a 2.0m footway. This would require the removal of frontage hedge/trees which would further impact on the landscape. It is not feasible to provide a footway to catchment school due to constraint in vicinity of Common Road/Norwich Road junction. There is the possibility of surface water flooding as there is a small</p>

Site	Location and Reasons for Rejection
	area of ponding in the south-east but it is unlikely to prevent development.
SN2013	<p>Land at Black Barn</p> <p>The site is considered to be unreasonable as both an extension to the settlement limit and an allocation. The site is detached from the existing built form and would represent a breakout, which does not reflect the existing townscape. The access and local road network along Tabernacle Lane is not considered to be suitable for increased traffic by virtue of its restricted width and lack of footpaths and passing places. Highways officers have advised that it is unlikely to be possible to provide acceptable access visibility due to the limited frontage as well as the adjacent hedge/narrow carriageway. Development of the site would negatively impact on the setting of the designated heritage assets and it is not considered that the benefits of the proposal would outweigh this harm.</p>
SN2031	<p>Land east of Norwich Road</p> <p>Whilst the site relates well to the existing settlement limit development in this location would have a negative impact on the landscape. It would require the loss of significant trees and hedgerow which create the rural character of this part of Tacolneston and form a significant green break between two parts of the village. There are forward visibility issues to the south along the bend and a surface water flow path runs along the south of the site. These constraints significantly reduce the developable site area.</p>
SN4019	<p>Land to the south of Hall Road</p> <p>The site is an unreasonable site for allocation due to the detrimental impacts on the landscape and townscape. Development of the site would be a significant extension into the countryside which would not reflect the existing form of the settlement on this side of Norwich Road. It would negatively impact on the adjacent Conservation Area and Woodland TPO. Access is also not considered to be suitable as Hall Road is substandard, there is no safe walking route and visibility splays would require the removal of important countryside trees/hedging.</p>
SN4061SL	The Pelican, 136 Norwich Road, Talconeston

Site	Location and Reasons for Rejection
	<p>The site is unreasonable as an extension to the settlement limit as it would not reflect the existing form and character of the immediate area and would result in harm to the historic environment. New dwellings in this location will contribute towards eroding the open space behind the properties on Norwich Road and will cause harm to the character and appearance of the conservation area and impact on the Grade II listed Pelican PH. It would require improvement to existing footway to 2.0m between site and school and visibility splays which would also have a negative impact on the historic environment. There is surface water flooding although it is unlikely to prevent development.</p>
SN4062SL	<p>The Pelican, 136 Norwich Road, Talconeston</p> <p>Development of the site would be to the rear of numbers 126 to 134 Norwich Road and The Pelican public house which would not reflect the existing form and character. This will result in harm to the historic environment because it is located within the Conservation Area and would impact on The Pelican PH which is Grade II listed. It would require improvement to existing footway to 2.0m between site and school and visibility splays which would also have a negative impact on the historic environment.</p>

QUESTION 130: Do you think that any of the shortlisted or rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

QUESTION 131: Do you think that any of the shortlisted sites should be rejected? Please add additional comments to explain your response.

38. Tasburgh

Form and character

There are two main areas of settlement in the parish, Upper and Lower Tasburgh. Upper Tasburgh has developed as a nucleated settlement as a result of post-war estate development and lies above the Tas Valley which runs to the south and west. Lower Tasburgh is set in the Tas Valley and comprises an older ribbon of development strung along part of Grove Lane and Low Road. With the exception of a small estate at Harvey Close the character of Lower Tasburgh comprises single plot depth development of varying age with significant trees and hedges interspersed with important gaps that give it an attractive rural character. Upper Tasburgh has a good direct link onto the A140 linking Norwich and Ipswich and on which there are frequent bus services. Lower Tasburgh's links to this road are by minor roads, some of which are very narrow.

Services and Community Facilities

There is a good range of facilities including a village hall, recreation facilities, pub, preschool and primary school, which are primarily located in Upper Tasburgh. There is also a regular bus service.

Settlement Limit and Constraints

The Settlement Limit is fragmented. In Upper Tasburgh the Settlement Limit incorporates the main built-up area. The existing Settlement Limit in Lower Tasburgh has been restricted to development that is best located to access the available services. A small extension to the Settlement Limit in Lower Tasburgh has been drawn to incorporate the four dwellings approved by planning permission 2018/0290 as well as the adjacent properties. The revised Settlement Limit extends to (but excludes) the wildlife amenity area. These changes are shown on the policies map.

QUESTION 132: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

4 sites have been promoted for consideration, of which 1 was identified as a preferred allocation site. No further sites were Shortlisted.

Preferred Sites

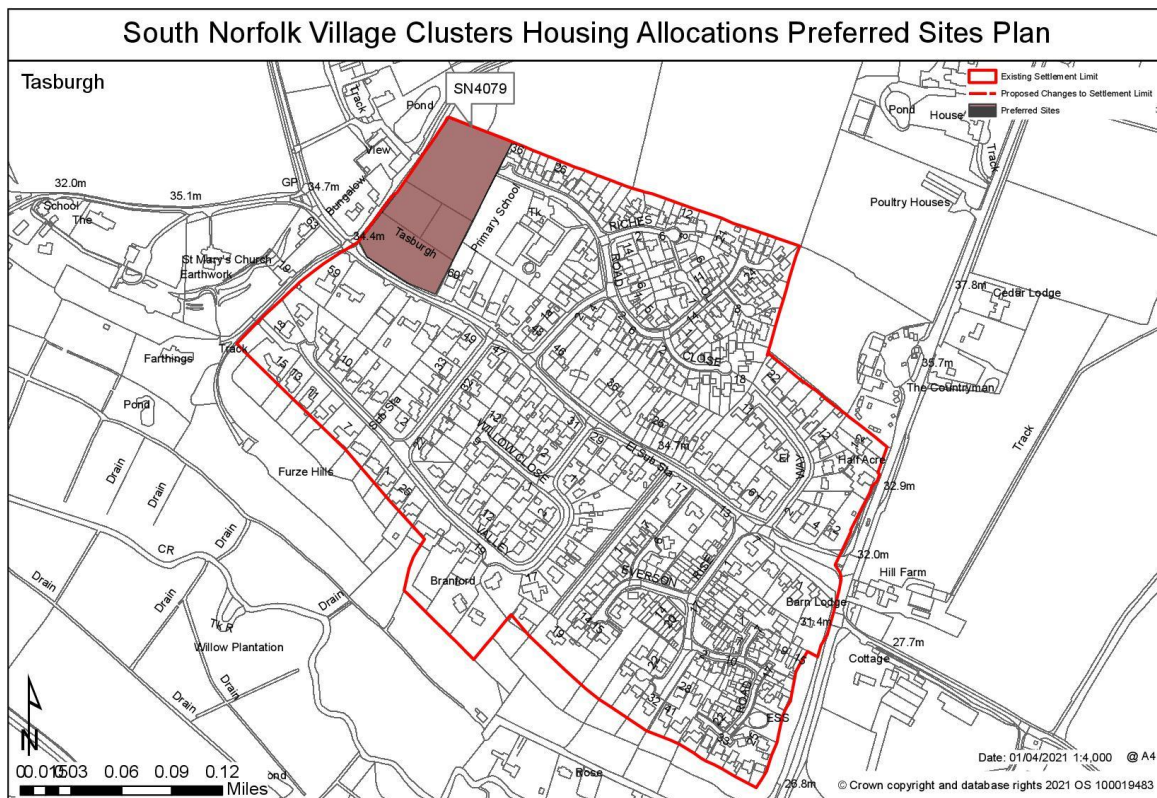
On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

DRAFT

Site: SN4079, Land north of Church Road and west of Tasburgh School

Preferred for up to 30 dwellings (net gain of 10) on a site of 1.14 hectares.

Reasoned justification: The applicants are seeking to increase the density of the site to more than it is currently allocated for under TAS1. Whilst the site is still considered a reasonable option for delivery the original allocation required consideration of school expansion which would require land from this site. Confirmation would be needed from NCC Education that this is no longer the case if the density is to be increased. Highways would also require highway improvement works and a road linking Church Road and Henry Preston Road.



QUESTION 133: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0005	<p>Hill Farm, Norwich Road</p> <p>Concerns regarding the provision of a safe and suitable access to the site have been identified. The local road network is also considered to be unsuitable either in terms of footways and poor visibility at adjacent road junctions. Development would also represent a breakout into the countryside to the east of the A140 (which is a Major Road Network) and is considered to have a harmful impact upon both the townscape and landscape. A development of reduced scale would not sufficiently address these concerns.</p>
SN0267	<p>Cedar Holdings, Ipswich Road, Tasburgh</p> <p>The site is considered to be an unreasonable option for development due to highway impact issues. Access to the site is proposed via the A140 which is a Major Road Network which is unlikely to provide a satisfactory and safe means of access.</p>
SN0413	<p>Land at Grove Lane</p> <p>The site is considered to be unreasonable due to access and highways issues, the impact upon the historic character and the detrimental impact development in this location would have on the townscape. The site is accessed via Grove Lane which is of restricted width and highways officers have advised that this would require widening to 5.5m across the frontage, as well as the provision of a 2m wide footway. There is limited development in the surrounding and immediate area which has maintained a distinct separation between Upper and Lower Tasburgh. Therefore, development in this location would impact upon the historic character of the village. It is not considered possible to mitigate this.</p>

QUESTION 134: Do you think that any of the rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

39. Tharston, Hapton and Flordon

Form and character

Tharston and Hapton

There are three main groups of development within the parish concentrated on The Street (Tharston), Chequers Road adjoining Long Stratton and in Hapton. Outside of these there are some isolated areas of sporadic development. The western edge of the parish adjoins the Tas Valley.

Development in The Street incorporates a variety of dwelling types alongside farms. This combined with substantial tree and hedge planting, especially along the road frontage gives the settlement its strong rural character.

In the south of the parish are housing estates off Chequers Road which are contiguous with Long Stratton, and towards the northern end of Chequers Road a broken ribbon of development. This ribbon is rural in character.

Hapton is a small settlement which has developed along the line of the B1135, The Street. Some development has occurred to the north of this and the settlement has experienced limited modern infill development.

Flordon

The settlement of Flordon comprises two physically distinct areas. One is situated around the main Norwich-London railway line bridge, and the other has developed further to the west around the parish church. The village has experienced limited estate scale housing development in the form of a small housing estate (St Michaels View) together with some more recent infill development.

The village is characterised by good tree and hedge planting together with significant open frontages which contribute towards its rural setting. To the south of The Street is a tributary valley of the River Tas which includes Flordon Common, an SSSI.

Services and Community Facilities

The cluster has limited facilities. There is a primary school, with some areas for recreation and employment and a limited bus service.

Settlement Limit and Constraints

Hapton

A new Settlement Limit has been drawn to include the main area of linear development to the north of the B1135. This would be extended to include the proposed allocation site should it be included in the final version of the plan. The Settlement Limit also extends to the south of the B1135 to the east of the settlement. These changes are shown on the policies map.

Flordon

The Settlement Limit is fragmented and drawn to include the estate development at St Michael's View to the west and the groups of dwellings either side of the rail track to the east. It excludes the Rectory, church room and a few dwellings on the south of The Street.

QUESTION 135: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

5 sites have been promoted for consideration, of which 1 has been identified as a preferred allocation site.

Preferred Sites

On the basis of the assessment undertaken the following site has been identified as a preferred allocation:

Preferred for up to 12 dwellings on a site of 0.48 hectares

[illegible]

253

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0255	<p>The Laurels, Land north of The Street</p> <p>Development of the site would represent backland development that would have a poor relationship with existing development. Whilst there is an existing access, The Street does not appear suitable for additional traffic nor can an adequate visibility splay be provided due to the limited site frontage. It is not considered possible to create a safe access to the site and it is also noted that there is no footpath provision for the entirety of Tharston. Development in this location would also have an impact on the listed buildings located within proximity of the site.</p>
SN0566	<p>Land north of The Street, Flordon</p> <p>Flordon has limited services and accessibility to services elsewhere is very limited. Although the site benefits from a new footpath to the south, this footpath stops to the north of the village and therefore there is no potential safe walking route to the Primary School in Hapton. There are also landscape and heritage concerns; St Michaels Church (Grade I LB) is located to the north east corner of the site.</p>
SN1051	<p>Land at The Street, Tharston</p> <p>The site is considered to be an unreasonable extension to the existing settlement limit due to highway concerns. Access to the site would require localised carriageway widening to 5.5m, 2m wide frontage footway and removal of existing frontage trees (these trees may have TPOs). However, the local road network is restricted in width and lacks a footway provision. There is no continuous footway to catchment primary school (the catchment school is Manor Field in Long Stratton rather than Hapton). Heritage impacts have also been identified, however the impact of development on the setting of the LB (Church Farm Cottage) could be reasonably mitigated.</p>
SN2147	<p>Land East of Greenways, Flordon</p> <p>The site is considered to be unsuitable for allocation due to its physical separation from the main settlement, access issues and the adverse</p>

Site	Location and Reasons for Rejection
	<p>impact development would have on the townscape. Whilst an extension of the existing footpath could be created it would require the use of land which is either highway verge or in third party land ownership. It would also require total removal of hedge and trees along the site frontage. Greenway is narrow with no footway and visibility at its junction with Station Road is limited by a bridge. The site is also detached from the village and the existing residential dwellings to the south.</p>

QUESTION 137: Do you think that any of the rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

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Form and character

Thurlton

The main concentration of development has developed in a linear settlement form based upon the historical road network based along Beccles Road, Church Road and Low Road although modern estate development off Beccles Road has resulted in a more nucleated form in this area. In addition to development, the village has experienced a considerable amount of modern infill development which has generally respected the existing character of frontage development. There is a detached group of houses at College Road, whilst the wooded grounds of All Saints Church and The Rectory provide a 'soft' edge to the village which makes an important contribution to its rural character.

The village is set in an attractive landscape with Thurlton Marshes and the Broads to the north and a small tributary valley immediately to the west with views of the surrounding countryside from within parts of the built-up area. Part of the parish lies with the Broads Authority area. Beccles Road provides a relatively a good link to Beccles and the A143 to the south, whilst the nearby B1136 links to the A146 and Loddon to the west and Haddiscoe and the A143 to Great Yarmouth to the east.

Norton Subcourse

The main concentration of development within the parish is based along Loddon Road/The Stree and adjoins the main built-up area of Thurlton. There is a small scattering of development based along Low Road with development in the remainder of the parish comprising dispersed individual dwellings and farmsteads. The village is set within a small tributary valley with the marshland of the River Yare within the Broads immediately to the north. The good open views of the surrounding landscape from within many parts of the built-up area, together with areas of good tree and hedge planting, provide the village with its essentially rural character.

The former B1140 provides a link to the A143, A146 and Beccles to the south, and to Reedham via the Reedham Ferry to the north. The B1136 links the village to Haddiscoe and Gt Yarmouth to the east and Loddon to the west.

Services and Community Facilities

The cluster has a range of social and community facilities including a preschool, primary school, post office and shop, public house and village hall. There are also opportunities for recreation and employment in the settlement. There is also a bus service serving the village and it has the benefit of main sewerage is available.

Settlement Limit and Constraints

Thurlton

The Settlement Limit includes the main built form of the settlement.

Norton Subcourse

The Settlement Limit includes the main built form of the settlement. No alterations are proposed to the existing Settlement Limit.

QUESTION 138: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

2 sites have been promoted for consideration, of which 1 has been identified as a preferred allocation site.

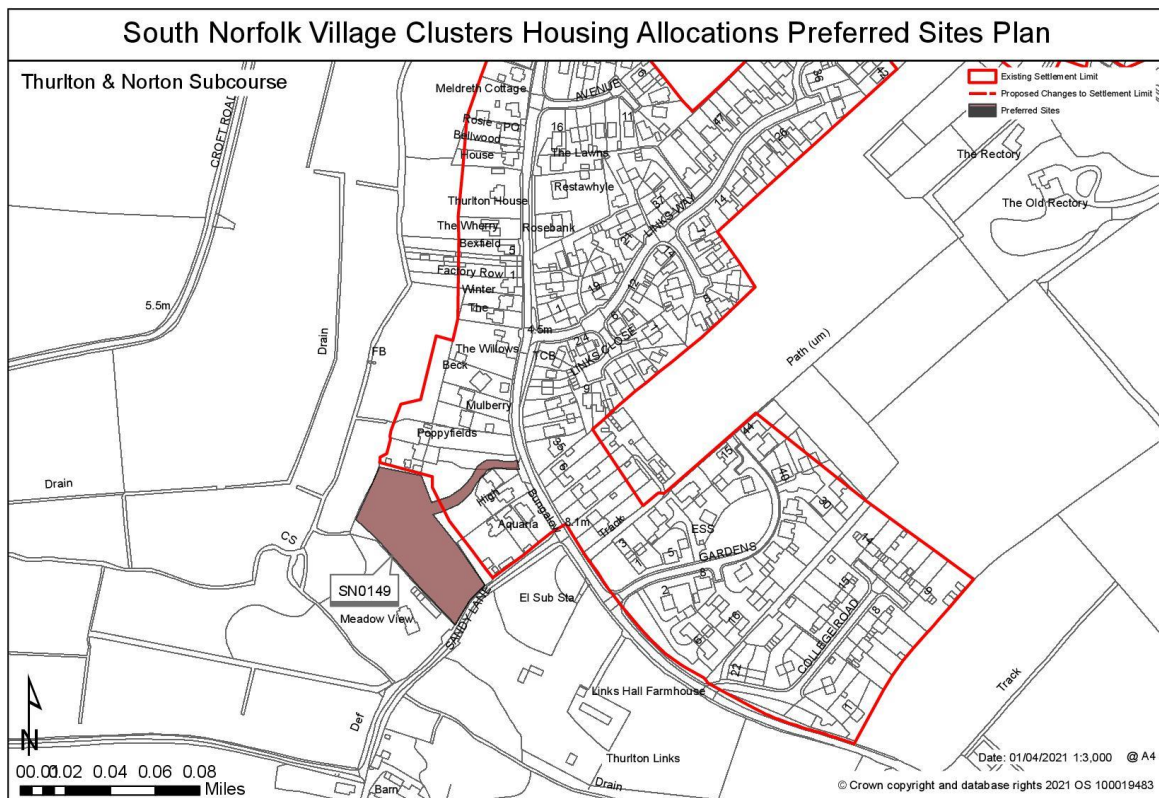
Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Site: SN0149, Land adjacent to Holly Cottage, west of Beccles Road, Thurlton

Preferred for up to 12 dwellings on a site of 0.51 hectares

Reasoned justification: The adjoining site has a partially implemented planning permission within the current settlement limit. This site is an extension to that using the same access. It is within the village with good access to services and the school. It will have a limited impact on the landscape which can be mitigated. Drainage requirements and retention of trees to the south will determine density. Adequate access will need to be achieved for an increased number of dwellings utilising the approved access from Beccles Road through the adjacent site



QUESTION 139: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0309	<p>Land south of Loddon Road, Norton Subcourse</p> <p>The site is adjacent to the settlement limit where development is characterised by a linear form of development. However, the site is out of scale with the village and would extend into the landscape elongating the village in wider views to the west with a detrimental impact on the setting of the listed church. There is no continuous footpath back to the village and there would not be a safe walking route to school. The constraints of the site in respect of the ditch and surface water flooding reduces the developable area and frontage hedging would have to be removed for access.</p>

QUESTION 140: Do you think that any of the rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

41. Thurton and Ashby St Mary

Form and character

Development within Thurton parish has been concentrated along Ashby Road north of the A146 and is contiguous with the main built-up area of Ashby St Mary. Development south of the A146 is limited to The Street and Loddon Road. In Thurton, detached clusters of development exist along Cookes Road, White Heath Road and Hall Road; in Ashby St Mary, a detached cluster of development exists at Mill Common, to the east of the built-up area, and scattered development at Low Common and along Folly Lane. The remainder of both parishes is made up of individual dwellings and farmsteads.

The village is based on the historic road network, in particular Mill Road/Ashby Road and The Street, although estate development has occurred on either side of Mill Road/Ashby Road, resulting in a nucleated settlement form. The village of Thurton is set in an attractive tributary valley of the River Yare. The wooded areas to the north and east of the village are a particularly attractive feature of the valley and are important in the rural setting of the village, and combined with the open character of The Street give the village an attractive semi-rural character. The A146 provides good road links with Norwich, Loddon and Beccles.

Services and Community Facilities

There is a range of facilities, including a preschool group, primary school, church, village hall, recreation facilities and pub. There is also a regular bus service. The village is on mains sewerage.

Settlement Limit and Constraints

The Settlement Limit includes the main built form of the settlement. No alterations are proposed to the existing Settlement Limit.

QUESTION 141: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

9 sites have been promoted for consideration, of which none were identified as preferred or shortlisted sites.

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0029	<p>Land south of Vale Road, Thurton</p> <p>The site is relatively well contained and could be developed without intruding into the wider landscape. However, access onto A146, which is a Principle Route, would not be appropriate. Access from the narrow access via Vale Road does not appear to be feasible.</p>
SN0470	<p>Land north of Vale Road, Thurton</p> <p>Although adjacent to the existing settlement limit and in a sustainable location, the local road network is considered to be substandard and unable to accommodate further growth. Consideration would also need to be given to the impact of development on the local landscape, particularly on the existing trees.</p>
SN0472	<p>Land south of Vale Road, Thurton</p> <p>The site has been considered as both an allocation and a settlement limit extension. Both forms of development are considered to have a detrimental impact on the landscape. Access constraints have also been identified.</p>
SN0585	<p>Land opposite Hill Farm Barn and Hill Top Barn, Mill Common, Ashby St Mary</p> <p>The site has been considered as both a settlement limit extension and an allocation. The site is removed from the main part of the settlement and located along a narrow country lane, resulting in a poor relationship to services. Development of the site would be expected to have an adverse impact on setting of non-designated heritage assets.</p>
SN2048	<p>Land East of The Street, Thurton</p>

Site	Location and Reasons for Rejection
	The site is relatively well contained within the existing structure of the settlement. However, as access is not possible from the A146 it is severely constrained due to the very narrow site frontage on to The Street.
SN4008	Land to the SW of The Street, Thurton The site forms an important part of setting of grade I listed church on the hill. Development on this site would have significant impact on the setting of the listed building.
SN4038	Land South of Mill Road, Ashby St. Mary Development of the site would have poor relationship with existing development to the east due to the lack of connectivity. There are potential access constraints from Mill Road.
SN4039	Land south of Mill Road, Ashby St Mary (reduced site) The site is promoted at a density that would result in an inefficient use of land. Development of a larger site would have poor relationship with existing development to the east due to the lack of connectivity. There are also potential access constraints from Mill Road
SN4040	Land south of Mill Common, Ashby St Mary This is primarily on the basis of adverse impacts on the local landscape including a requirement to remove existing vegetation and trees in order to create a suitable access and adequate visibility at the Mill Common/ Mill Road/ Ashby Road junction.

QUESTION 142: Do you think that any of the rejected sites should be preferred for allocation?

42. Tivetshall St Mary and Tivetshall St Margaret

Form and character

Tivetshall St Mary

Development in the parish is concentrated along The Street/Rectory Road in a linear form comprising mainly single plot development. Development is also concentrated around School Road which is the dividing line between the parishes of Tivetshall St Mary and Tivetshall St Margaret. Isolated clusters of development are located at Rectory Road but these are away from the facilities that the Tivetshalls share. Development in the remainder of the parish comprises individual dwellings and farmsteads. The village has an open rural character derived from the tree and hedge planting and views of the surrounding open countryside.

Tivetshall St Margaret

Development is concentrated along Green Lane, School Road and The Street in a linear form characterised by single plot development. This area is contiguous with development lying within the parish of Tivetshall St Mary and forms a single area of settlement joining both parishes.

Services and Community Facilities

There is a limited range of facilities shared by the Tivetshalls; a primary school and village hall which are located along the parish boundary between the two settlements. A public house is located away from the built-up areas on the A140 Norwich-Ipswich road. There are some opportunities for recreation and there is a limited bus service.

Settlement Limit and Constraints

The Settlement Limit has been drawn around the existing built-up area where the two parishes meet. It maintains the physical separation between the two built up areas to the south of The Street to prevent further extension of development into the surrounding countryside whilst allowing for limited infill development within it. Outlying areas, further from facilities have been excluded from the defined Settlement Limit. No alterations are proposed to the existing Settlement Limit.

QUESTION 143: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

10 sites have been promoted for consideration, of which 2 were identified as preferred allocation sites and 2 have been shortlisted.

Preferred Sites

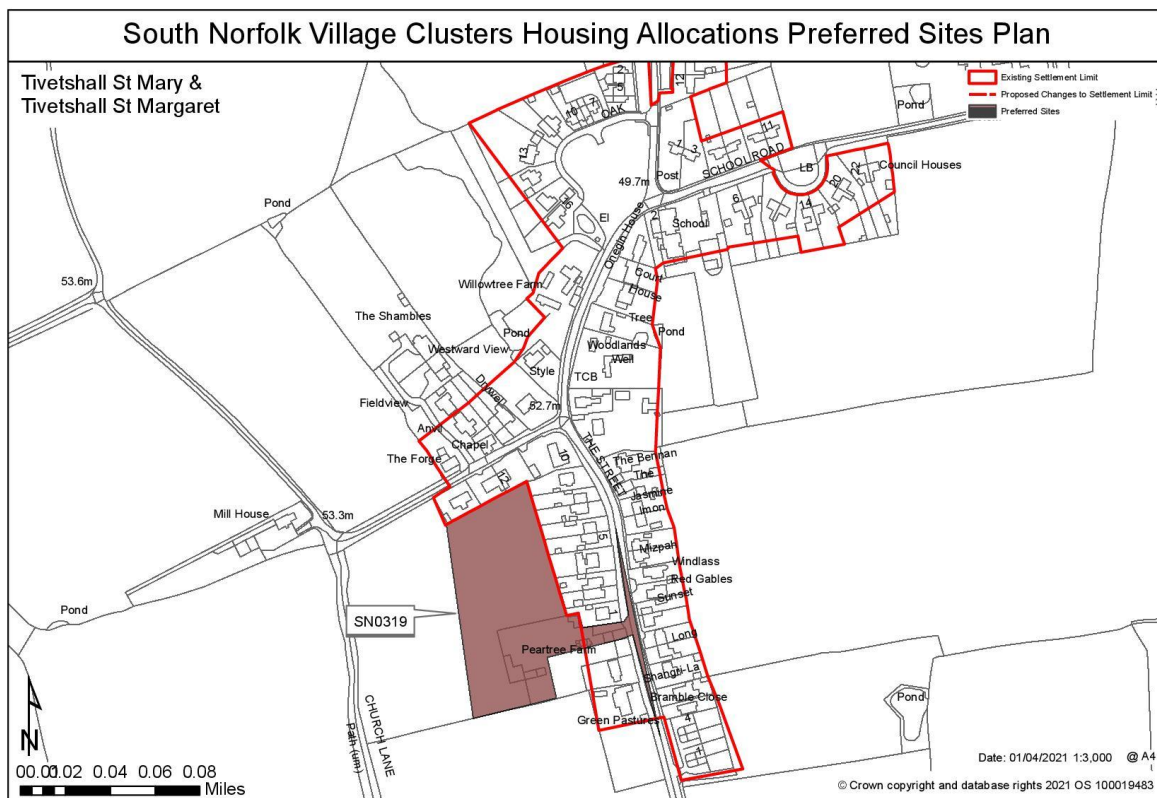
On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

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Site: SN0319, Pear Tree Farm, West of The Street, Tivetshall St Margaret

Preferred for up to 25 dwellings on a site of 1 hectare.

Reasoned justification: The site is located close to the school and village hall and adjacent to the settlement limits and, although there are no footways there are verges for walkers to step off the carriageway. Development on the site would read as part of the existing village and would be visually contained by field boundaries to the west and south with limited open views. Therefore, whilst development would disrupt the existing linear pattern the site would allow infill without significant incursion into open countryside. Potential contamination will need to be investigated but it is likely that this can be mitigated. The Highways Authority have confirmed that access would need to be widened from The Street through demolition of the old disused barn.

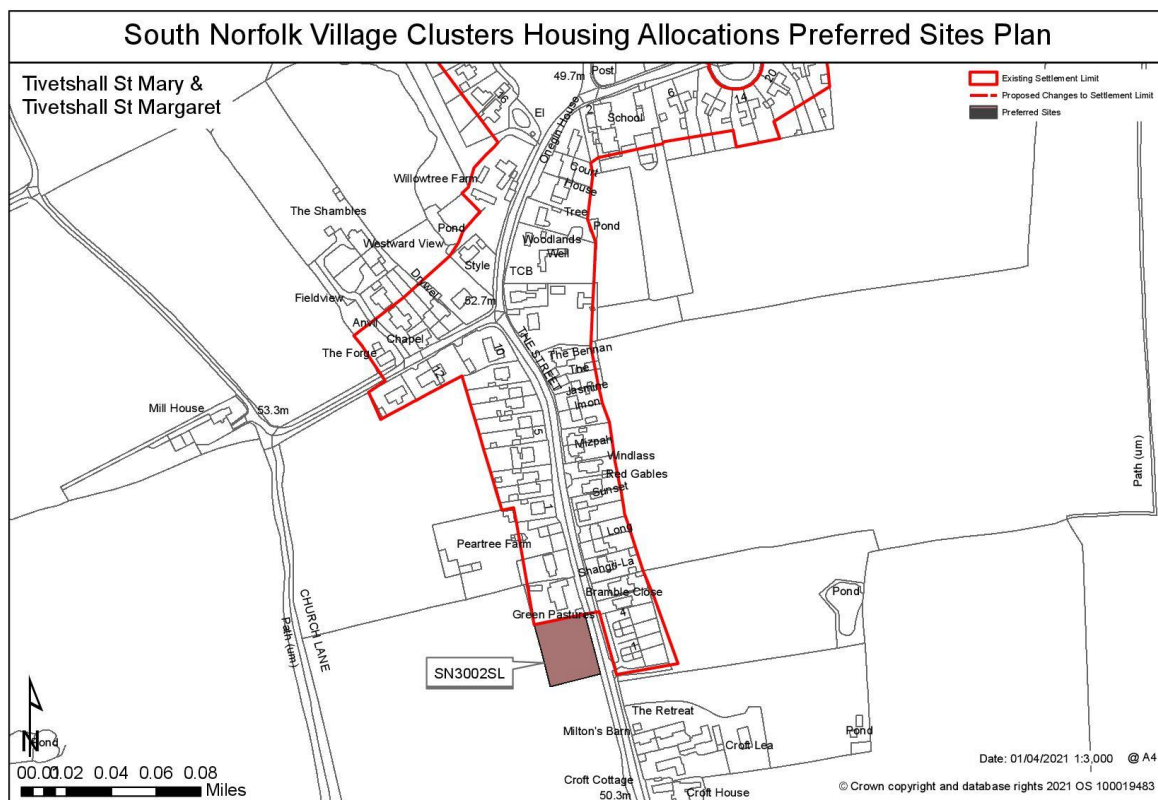


QUESTION 144: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Site: SN3002SL, Land south of Green Pastures, west of The Street, Tivetshall St Margaret

Preferred for a Settlement Limit Extension on a site of 0.18 hectares.

Reasoned justification: The site is considered to be a reasonable extension to the existing settlement limit. It is located relatively close to the school and village hall and is immediately adjacent to the settlement limit to the north and opposite the settlement limit to the east. The site is currently residential curtilage and already appears as part of the form of the village, albeit with a strong frontage hedge line which would need to be partially removed for access. New development in this location would read as part of the existing village fronting The Street, mirroring the residential development directly opposite. It would be a rounding-off of the built form without incursion into open countryside as the southern boundary is delineated by a public footpath.



QUESTION 145: Do you support or object to the proposed use of the site? Please explain your reasons

Shortlisted Sites

On the basis of the assessment undertaken the following site(s) have been shortlisted:

Site	Location and Reasons not preferred for allocation:
SN0318	<p>Pear Tree Farm, west of The Street</p> <p>Shortlisted for up to 10 dwellings on a site of 0.6 hectares.</p> <p>It should be noted that this is not an additional site, it is a smaller part of site SN0319 with the same proposed access point from The Street and, if allocated, it would be instead of SN0319.</p> <p>The site is located close to the school and village hall and adjacent to the settlement limits. Although there are no footways there are verges for walkers to step off the carriageway. The site would read as part of the existing village with existing residential development to the east and development would be visually contained by field boundaries to the west and south with limited open views. Therefore, whilst development would disrupt the existing linear pattern the site would allow infill without incursion into open countryside. Potential contamination from the previous use will need to be investigated but it is likely that this can be mitigated. Highways officers have confirmed that access would need to be widened from The Street through demolition of the disused barn.</p>
SN2103	<p>Land north of School Road</p> <p>Shortlisted for up to 15 dwellings on a site of 0.9 hectares.</p> <p>The site is located close to the school and village hall and adjacent to the settlement limits. Development in this location would read as part of the existing village and is visually contained with limited open views from the north. There would be some impact on Elm Farm to east which would be mitigated if the eastern hedgerow and trees were retained and enhanced. Highways officers have confirmed that all/most of the frontage hedge/trees would need to be removed to achieve an access into the site. School Road narrows to the east at this point and there are potential access constraints which it is may be possible to overcome through a reconfiguration of the local road layout but this would need to be agreed with NCC Highways.</p>

Site	Location and Reasons not preferred for allocation:
	NCC highways to confirm if could turn road into site making this the primary road and make remainder of School Road to the east into a side road.

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0317SL	<p>Land south of Mill Road</p> <p>The site is considered an unreasonable extension to the existing settlement limits due to highway concerns. Highways officers have commented on the inadequacy of Mill Road given its narrow width and poor junction with The Street. The site is located close to the school and village hall and adjacent to the settlement limit, although there is a lack of a continuous footpath. Development in this location would represent a breakout to the west and would continue a limited form of ribbon development along Mill Road. Potential contamination from the previous land use will need to be investigated but it is likely that this can be mitigated.</p>
SN2041	<p>Land east of Tivetshall</p> <p>The site is considered unreasonable due to its excessive scale, 18.9 ha (472 dwellings) in relation to the existing village. The possibility of smaller parts being developed has been considered but no alternatives have been found reasonable. Areas of the site are located close to the school and village hall and adjacent to the settlement limits, but the majority is not well connected. Development in this location would excessively disrupt the existing linear form of the village, extending the village into the open countryside to the detriment of its landscape setting. The School Road access is detached from the village and would not be acceptable as it would extend into the open countryside on a narrow rural road. Access from The Street is very restricted would involve the removal of a hedgerow/trees adjacent to the Listed Building.</p>

Site	Location and Reasons for Rejection
	In both instances, development at this scale would be harmful to highway safety using either access point.
SN2042REV A	<p>Land south of Rectory Road</p> <p>The site lacks connectivity to the village, as it is located at the southern edge some distance from the settlement limit. It does not reflect the existing form and character of development as the majority of the site is located behind the road frontage. It would also visually extend the village into the countryside and would be detrimental to the landscape setting of the village with no naturally delineated boundaries. The frontage could not achieve adequate visibility for access.</p>
SN2042REV B	<p>Land south of Rectory Road</p> <p>The site is considered unreasonable due to its lack of connectivity to the village, being located at the southern edge some distance from the settlement limit. It is a reduced site area and does run along the road frontage, reflecting the existing form and character of the adjacent development. In this respect it is more acceptable than the associated larger site: SN2042A. The alternative site also results in a longer frontage which could meet highway visibility requirements although would result in the loss of the hedgerow. However, it would visually extend the village into the countryside and would be detrimental to the landscape setting of the village with no naturally delineated boundaries.</p>
SN3006	<p>North of Croft Lea, east of The Street</p> <p>The site is considered unreasonable due to its lack of connectivity to the village and its intrusion into the open countryside, impacting on both a heritage asset and the local ecology. Whilst it is relatively close to the school and village hall and adjacent to the settlement limits it is physically less well connected due to it being largely behind existing development. It would disrupt the existing linear form of the village and visually extend the village into open countryside which would be detrimental to the landscape setting of the village. Development of this scale would be out of character and would impact on the setting of designated Listed Building to the south. Access is achievable from The Street but this would require the loss of the frontage hedgerow and trees which would further adversely impact on the Listed Building.</p>
SN4006	Land west of Hales Street

Site	Location and Reasons for Rejection
	<p>The site is considered to be unreasonable for allocation due to its very remote location away from the village and lack of access to services, in particular the distance to the primary school along unlit rural roads with no footpaths. There are site constraints; overhead lines and telegraph poles along the northern and eastern boundary, a UKPN sub-station in the NE corner, ponds in NW corner and mature trees within the site. These site constraints could be mitigated but would reduce the developable area. Any impacts on townscape and landscape could be mitigated through design and landscaping to include retention of the eastern boundary hedgerow.</p>

QUESTION 146: Do you think that any of the shortlisted or rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

QUESTION 147: Do you think that any of the shortlisted sites should be rejected? Please add additional comments to explain your response.

Form and Character

Toft Monks

Development within the parish has been concentrated around the junction of Yarmouth Road/Beccles Road, Post Office Road/Mardle Road and along Bulls Green Lane. Development within the remainder of the parish comprises individual dwellings and farmsteads.

The main village comprises two distinct areas which are separated by the open field to the south of Mardle Road and which is important in contributing towards the generally open appearance from which much of the attractive rural character of the village is derived.

Development along Yarmouth Road, both sides and along the west side of Bulls Green Lane has taken the form of ribbon development. Along Beccles Road development is limited to the east of the road whilst to the west is the open field separating the two parts of the village. To the north of Mardle Road is Grade 2 agricultural land.

Aldeby

Development within the parish has been concentrated in two separate conurbations at The Street and around Common Road. Individual dwellings and farmsteads are dispersed throughout the remainder of the parish.

Development at The Street is linear in form and comprises one plot depth along The Street, Beccles Road and Rectory Road. It is set in open countryside with the attractive Waveney Valley to the south and close to the Broads.

Development at Common Road comprises a small concentration of dwellings centred on the crossroads of Dun Cow road, Common Road and Lily Lane.

The settlement is characterised by tree and hedge planting along the road frontages although the open nature of the western side of Dun Cow Road, north of the crossroads, affords particularly good views of the surrounding countryside.

Much of the southern part of the parish lies within the Broads Authority area.

Haddiscoe

Development along The Street and Thorpe Road has resulted in a linear form of settlement characterised by one plot development the main exception being the Tayler and

Green housing at Mock Mile Terrace. The mainly undeveloped nature of the north side of Thorpe Road provides attractive views towards the River Waveney, which contribute to the rural character of the area. The detached area of development at Rectory Road also displays a strong linear form.

The settlement is an attractive valley landscape with the Waveney Valley to the north and a small tributary valley to the west. The settlement is also in close proximity to the Broads.

Wheatacre & Burgh St Peter

Development within the parish has been concentrated around the crossroads formed by Beccles Road, Staithe Road, Pitt Road and Mill Road. The remainder of the parish comprises a small number of widely dispersed individual dwellings and farmsteads with the exception of the small concentration of development at the River Waveney Centre in the east of the parish. Part of the built-up area of Burgh St Peter lies within the adjacent parish of Wheatacre and for the purposes of a village Settlement Limit is included within the boundary of Burgh St Peter.

The village of Burgh St Peter has developed a linear settlement form comprising one plot depth along Beccles Road, Staithe Road, Mill Road and Pitt Road. Good tree and hedge planting exists especially along the eastern side of Pitt Road, whilst elsewhere within the village a more open character prevails allowing for good views of the surrounding countryside, in particular the Waveney Valley which lies to the south and east and the Broads which are in close proximity to the north, south and east of Burgh St Peter.

Services and Community Facilities

The village cluster is served by a pub, garage, village hall, bowling green and primary school. There is also a limited bus service.

Settlement Limit and Constraints

Toft Monks

The Settlement Limit has been drawn to reflect the existing settlement form and to prevent further development extending into the surrounding open countryside whilst providing for some limited infill development within it.

Aldeby

The settlement limits have been drawn around the two main concentrations of development centred on The Street and Common Road. They have been drawn to allow for very limited infill due to the lack of facilities locally and to prevent the further extension

of development into the surrounding open countryside, in particular the adjacent valley landscape of the Waveney valley.

Haddiscoe

The Settlement Limit has been drawn around the existing development at Rectory Road to prevent the further extension of this detached ribbon of development and to protect its attractive rural setting, in particular the valley to the west and around the main built-up area along The Street and Thorpe Road. Due to the attractive rural setting and the limited range of facilities, only limited infill development opportunities are provided.

Wheatacre & Burgh St Peter

The Settlement Limit has been drawn to include the main built form of the adjoining settlements to allow for limited infill development only due to the rural nature of the area and limited facilities.

No alterations are proposed to the existing settlement limits within this cluster.

QUESTION 148: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

12 sites have been promoted for consideration, of which 2 were identified as preferred allocation sites and 1 was identified as a preferred settlement limit extension.

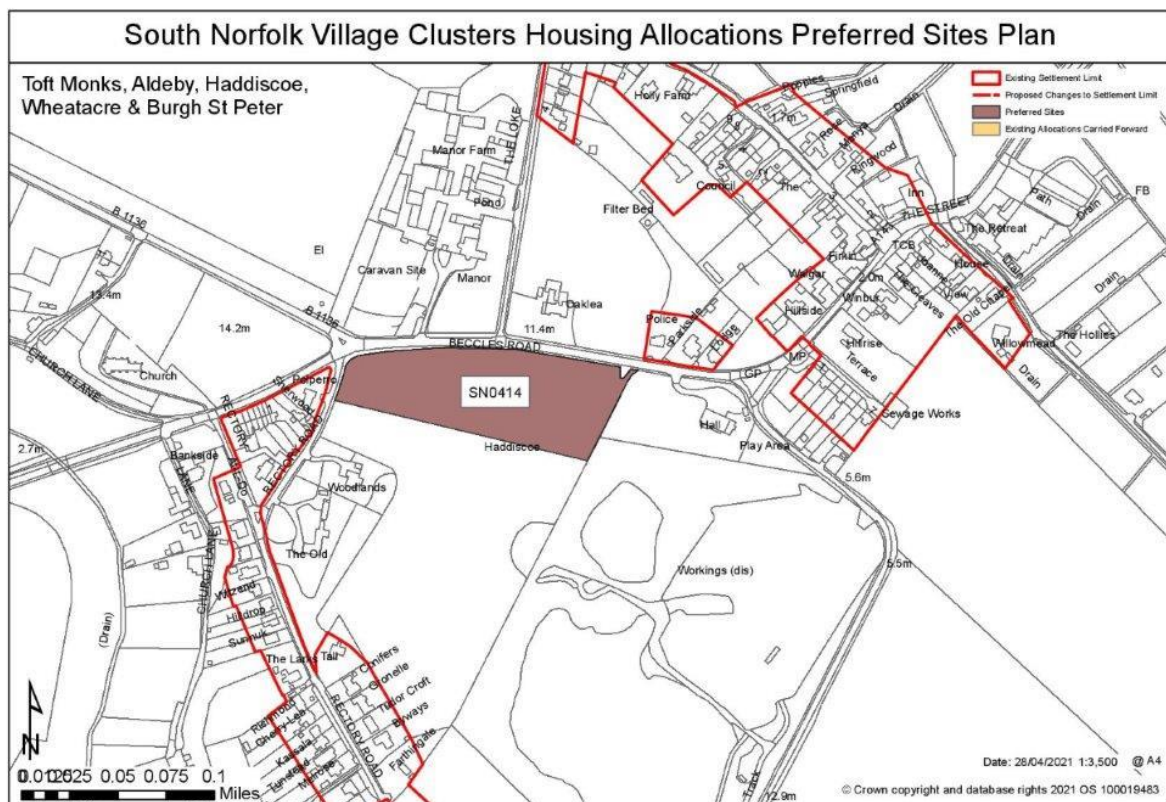
Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Site: (Part of) SN0414, Land south of Beccles Road, Haddiscoe

Preferred for up to 25 dwellings on a site of 1.2 hectares

Reasoned justification: The site is much larger than the scale of development currently being sought, however a smaller parcel could be a reasonable allocation for development, subject to achieving a suitable access and mitigation for landscape and heritage harm. All three sites front the A143, a Corridor of Movement. Whilst the north eastern site has The Lock running to the west this is a narrow and constrained access which is not considered to be an acceptable access point. An existing footpath runs to the northern side of the A143 whilst development of the southern parcel could allow for a new footway on this side of the road and a better located crossing point for the school. Development could have an impact on the setting of the Grade I listed Church and it is noted that on approach from the west the Church is a prominent feature in this rural landscape setting. Given the site size however, potential mitigation measures could be incorporated into the layout and design of the site include setting the buildings further back within the site. An indicative plan would need to demonstrate how the impact of development on these views could be appropriately mitigated.

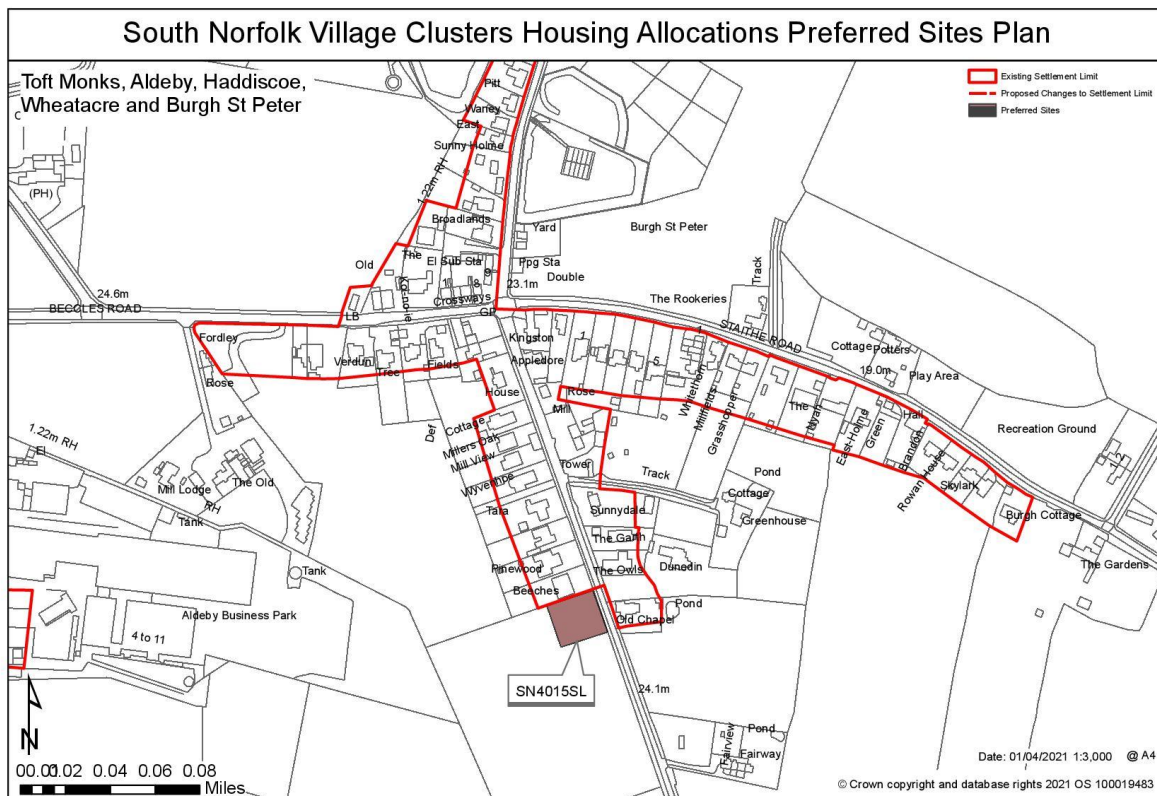


QUESTION 149: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Site: SN4015SL, Land west of Mill Road, Burgh St Peter

Preferred for a Settlement Limit Extension on a site of 0.18 hectares.

Reasoned justification: The site is located to the south of the existing Settlement Limit and is considered to be a reasonable option for a settlement limit extension. Development would need to be subject to achieving a satisfactory access, which may result in the loss of hedgerows and this would need to be addressed prior to development. Development on this site would need to respect the linear pattern of existing development to the north, thereby reducing the overall number of units achievable on the site.



QUESTION 151: Do you support or object to the proposed use of the site? Please explain your reasons.

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0014SL	<p>Land to the east of Rushley, Station Road, Aldeby</p> <p>Whilst the site is situated in-between a smaller group of dwellings along Station Road, it is separated from the main village and the surrounding local services and facilities, an issue exacerbated by the lack of local footways. The site is also heavily constrained by dense tree cover and hedging along all boundaries which would require removal and result in a negative landscape impact. Whilst the site doesn't currently appear to be agricultural rotation, the Agricultural Land Classification (ALC) for the site is Grade 2, which is very good quality agricultural land with minor limitations.</p>
SN0392	<p>Land at the junction of the A146 and B1136, Haddiscoe</p> <p>The site is located immediately adjacent to the Grade I listed St Mary's Church which also has an associated Grade II monument and memorial. Development of the site would result in harm to the setting of the Church, due to its position within a relatively open landscape. Development of the site would have a poor relationship with the existing pattern of development in evidence. It is unlikely that the required access visibility splays can be achieved without removal of large sections of the frontage hedgerow.</p>
SN0518	<p>Land at the post office and Beccles Road, Toft Monks</p> <p>The wider site is significantly too large in the context of this Plan document and no smaller parcels of the site are considered to be suitable for development due to the issues relating to access into the site. Access directly onto the A143 is considered to be unacceptable in highways terms and access onto Post Office Road to the north would require substantial road upgrades and the significant removal of an existing hedgerow. Highway safety concerns include increased slowing, stopping and turning movements at Post Office Road/ A143 junction where visibility is restricted. Although parts of the site are within close proximity to some local services and facilities, actual</p>

Site	Location and Reasons for Rejection
	accessibility to these is much more limited due to the constraints of the local highway network.
SN1031	<p>Land to the south / east of Bulls Green Lane, Toft Monks</p> <p>The site is considered to be unreasonable due to identified highway and access constraints. Access to the site would require road widening of Bull Green Lane and the removal of hedgerows. Bulls Green Lane is of narrow, single carriageway width with no footways and limited visibility and it has been concluded that there is no realistic possibility of creating an appropriate access into the site. Additionally, the surrounding highways network is considered to be substandard, including the junction with the A143. Landscape constraints have also been identified; whilst there is relatively new planting to the south-east and south-west, along the eastern boundary is a protected tree belt which would require further arboricultural investigation.</p>
SN2005SL	<p>Land off Bulls Green Lane, Toft Monks</p> <p>Identified highway and access constraints preclude inclusion of the site as a settlement limit extension. Access to the site would require road widening of Bull Green Lane and the removal of hedgerows. Bulls Green Lane is of narrow, single carriageway width with no footways and limited visibility and it has been concluded that there is no realistic possibility of creating an appropriate access into the site. Additionally, the surrounding highways network is considered to be substandard.</p>
SN4003	<p>Land to the east of Common Road, Aldeby</p> <p>Whilst parts of the site are in close proximity to some local services and facilities, actual accessibility to these is much more limited due to the constraints of the local highway network. Areas within the site are also affected by surface water flood risk, including on the highway and to the northern boundary. Development of this site would not respect the linear pattern of existing development in evidence.</p>
SN4010	<p>Land to the south of Beccles Road, Burgh St Peter</p> <p>Development of this site would result in backland development, out of character with the existing linear settlement pattern and requiring a convoluted access arrangement which could result in amenity issues for existing residents. Highways concerns about the suitability of the</p>

Site	Location and Reasons for Rejection
	local road network and the lack of footpath provision have also been raised.
SN4014	<p>Land to east of Common Road and south of Beccles Road, Burgh St Peter</p> <p>The site is heavily constrained by mature tree cover which has been identified as 'Priority Habitat – Deciduous Woodland'. Loss of part of this woodland would lead to its fragmentation. The site is also at the limits of accessibility to services in terms of an acceptable distance, and this is exacerbated by the lack of footways. Development of the site would need to respect the linear pattern of existing development in evidence in order to avoid an urbanising effect in this location. This would restrict development of the site to frontage development only where there is limited developable land due to the existing tree cover and identified surface water flood risk.</p>
SN4016	<p>Land to the east of Mill Road, Burgh St Peter</p> <p>The site is located off Mill Road which is both narrow and restricted. The site is also at the limits of accessibility to services in terms of an acceptable distance, and this is exacerbated by the lack of footways. Development of the site would need to respect the linear pattern of existing development in evidence in order to avoid an urbanising effect in this location. This would restrict development of the site to frontage development only</p>

QUESTION 152: Do you think that any of the rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

44. Wacton

Form and Character

Wacton is a small rural settlement situated only a few miles from the A140 to the southeast side of Long Stratton. The settlement is more concentrated to its north side along Church Road and Hall Lane but opens up south of Hall Lane at the green becoming more rural, with its large historic common to the far south.

Services and Community Facilities

There are limited services in the parish, but there is a village hall and recreational facilities.

Settlement Limit and Constraints

There is currently no Settlement Limit in Wacton and no alterations are proposed.

QUESTION 153: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

1 site has been promoted for consideration. None were identified as preferred or shortlisted sites.

Rejected Sites

The following site was promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN4029SL	<p>Wacton</p> <p>The site is considered to be unreasonable due to access and highways issues, the impact upon the historic character and the detrimental townscape impact the development would have. The site is also at the limits of accessibility to services in terms of distance, an issue exacerbated by the lack of footways. Areas of the site are also affected by surface water flood risk.</p>

QUESTION 154: Do you think that any of the rejected sites should be preferred for allocation? Please explain your reasons.

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Form and Character

The main concentration of development has taken place along Wymondham Road, High Street, Hackford Road, Church Lane and Low Street. Further clusters of development have taken place at Milestone Lane and The Green. Individual farmsteads and dwellings are sparsely distributed through the rest of the parish. The core of the village has frontage development formed into a doughnut shape, with local employment sites of the nursery and mushroom farm, along with some agricultural land, in the centre. A couple of small estate-type developments have grown up at All Saints Close and Hillside Crescent. Church Lane and Low St are located on the north-facing slope of a valley, and the dwellings here and on Hackford Road and Wymondham Road benefit from extensive views of the surrounding countryside. The Grade II listed windmill is a distinctive feature on the eastern side of the High Street and dominates the skyline of this part of the village. Good road links exist to Wymondham and Hingham via the B1135 and B1108 respectively.

Services and Community Facilities

There is a good range of facilities including a preschool, primary school, village hall and pub. The village has recreation areas, a regular bus service and has mains sewers discharging to the Wymondham sewage treatment works.

Settlement Limit and Constraints

The Settlement Limit has been drawn to include the main built form of the settlement and include the allocated land. There is a small break in the Settlement Limit where the central agricultural land is accessed (behind the mushroom farm on Church Lane).

The South Norfolk Place-making Guide advocates protection of the setting of local landmarks, such as Wicklewood windmill. New development should enhance the setting of the windmill, which is currently shielded by leylandii trees at the roadside. There are surface water drainage issues in the village, and development must address this issue. No alterations are proposed to the existing Settlement Limit.

It is noted that the primary school is operating near or at capacity. This is likely to be due to its role supporting growth in the Wymondham/Hethersett areas. Further exploration will be needed to ensure primary school needs can be met.

QUESTION 155: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

11 sites have been promoted for consideration, of which 2 were identified as preferred allocation sites and 1 was shortlisted.

Preferred Sites

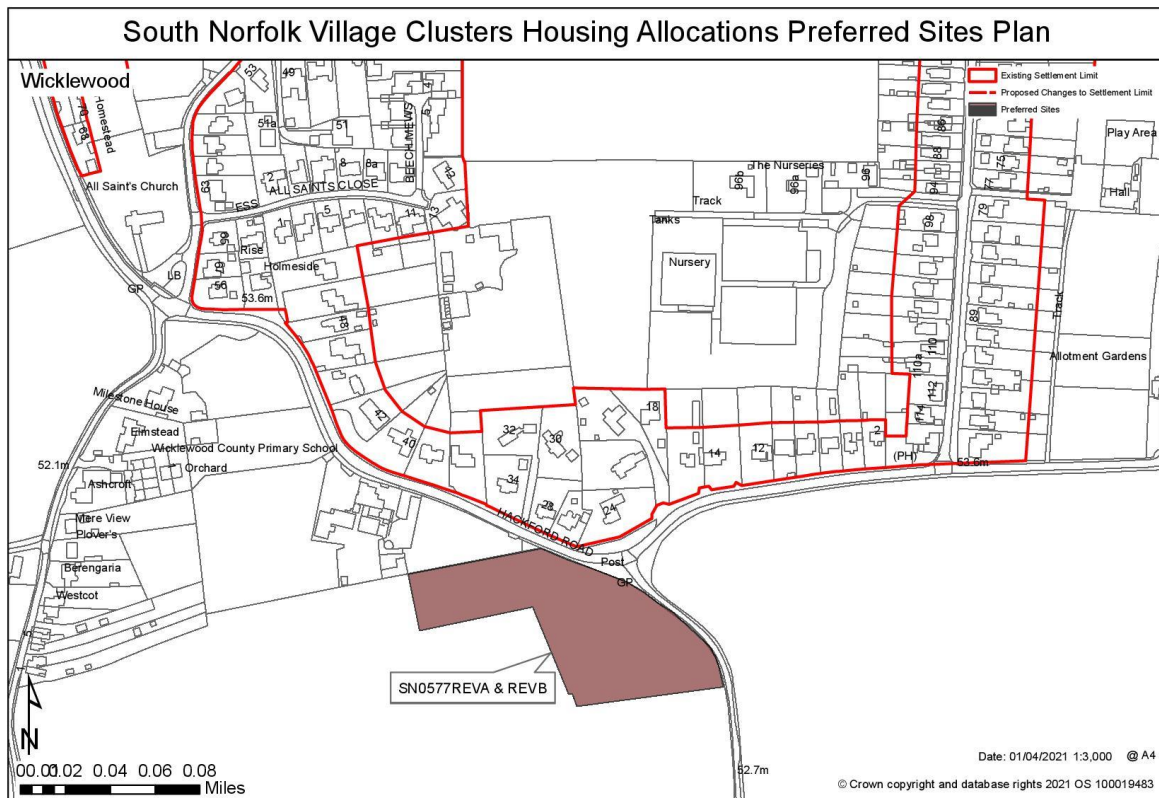
On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

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Site: SN0577REVA and REVB, Land to the south of Wicklewood Primary School

Preferred for up to 30 dwellings on a site of 1.2 hectares

Reasoned justification: The site is in a prominent location within the local landscape however with careful design it could enhance the gateway to the village. A Design Brief may be required for this site ensure appropriate design. The site is well connected to the settlement and highways matters could be reasonably addressed through the development of the site. Development of the site has potential to provide scope for expansion of the school.

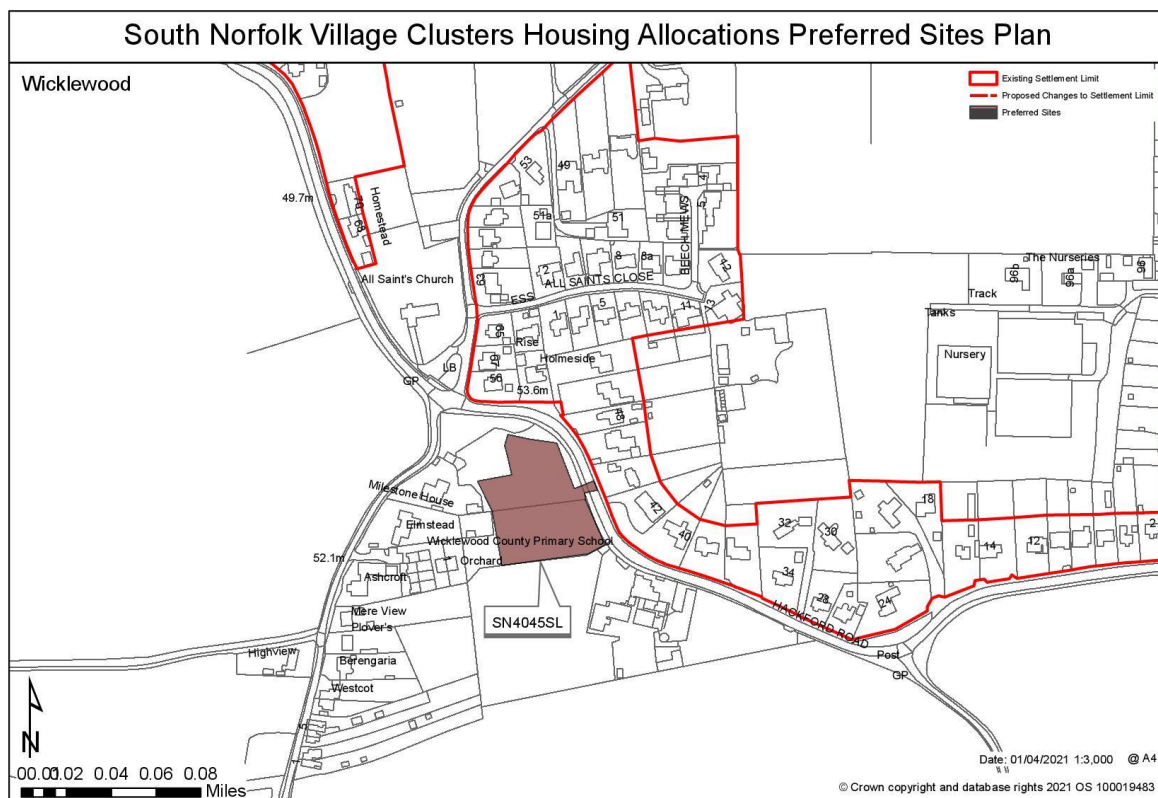


QUESTION 156: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Site: SN4045SL, Land south of Hackford Road

Preferred for up to 12 dwellings on a site of 0.49 hectares

Reasoned justification: The site relates well to the existing form of development and could accommodate a small allocation. Highways access to the site is likely to be acceptable although it may result in the loss of the frontage hedgerow. The site is within the setting of a listed building but due to the existing pattern of development is relatively well contained and with appropriate mitigation measures would not have a significant impact on the setting of the Church. Mitigation could include design measures to the north of the site to retain views of the Church from Hackford Road.



QUESTION 157: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Shortlisted Sites

On the basis of the assessment undertaken the following site(s) have been shortlisted:

Site	Location and Reasons not preferred for allocation:
SN4064	<p>Wicklewood Nurseries, High Street, Wicklewood</p> <p>Shortlisted for up to 15 dwellings on a site of 0.6 hectares.</p> <p>The site is subject to clarification being obtained about the future use of the remainder of the nurseries site and the possible loss of employment land. Access to the site is constrained which is likely to limit development.</p>

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0232REV	<p>Land to the south of Low Street, Wicklewood</p> <p>Significant highways concerns have been identified and it is not considered that it would be possible to overcome these issues.</p> <p>Development of this site would also have an impact on the form and character of this part of the settlement and would also have an impact on the setting of both designated and non-designated heritage assets.</p>
SN0249SL	<p>Land adjacent to former workhouse / hospital, Green Lane, Wicklewood</p> <p>The site includes a large number of TPO trees within the site boundaries which would significantly reduce the developable areas.</p> <p>The site is also detached from the main settlement and is therefore not considered to be an appropriate site for a settlement limit extension.</p> <p>Development of this site would also have an impact on the setting of the former workhouse to the east. Highways concerns have also been identified.</p>
SN0535	<p>Land to the south of Church Lane, Wicklewood</p>

Site	Location and Reasons for Rejection
	<p>Although the site could be reduced in size to meet the aspirations of the VCHAP it is considered to be unreasonable as an allocation as significant access constraints preclude development of the site. Access would need to be obtained via a narrow access driveway between two dwellings.</p>
SN0577REV B	<p>Land to the south of Wicklewood Primary School</p> <p>The proposal incorporates residential development as well as a suite of significant other benefits including additional car parking facilities for the school, open space and educational facilities. No evidence has been provided to confirm that these facilities would be required at this time or in this location. Access to the site would be achievable and the site is well connected, it is however very prominent within the landscape. It is considered that an alternative scheme on a smaller parcel of land would be the most appropriate option in this location (SN0577REVA).</p>
SN1036	<p>Land to the rear of Windfalls, Milestone Lane, Wicklewood</p> <p>The site has been considered as unreasonable as both an allocation and a settlement limit extension. The site relates poorly to the main settlement and significant access and connectivity constraints associated with its remote location have been identified.</p>
SN2179	<p>Land east of High Street, Wicklewood</p> <p>The site is excessive in size and would not meet the objectives of the VCHAP although the identified flood risks would restrict the developable area of the site. Nonetheless, development of the scale proposed would have an intrusive impact on the local landscape and townscape that could not be easily mitigated. Significant areas of the site also lie within Flood Zones 2 and 3.</p>
SN2179REV A	<p>Land east of High Street, Wicklewood</p> <p>The site has a significant area of identified flood risk that would impact upon the developable area of the site. Landscape and townscape impacts could be mitigated however the onsite areas of flood risk and the identified highways concerns, including poor connectivity of the site, are constraints that it is not considered to be possible to reasonably address.</p>

Site	Location and Reasons for Rejection
SN4001	<p>Land west of Milestone Lane, Wicklewood</p> <p>Development of this site would have a significant impact on the landscape character, as well as the setting of a Grade I listed Church. The topography of the site within the open landscape would result in development being visible in long views back towards the settlement and it would not be possible to provide reasonable mitigation to address this. Highways constraints could be addressed.</p>

QUESTION 158: Do you think that any of the shortlisted or rejected sites should be allocated instead of, or in addition to, the preferred site?

QUESTION 159: Do you think that any of the shortlisted sites should be considered unreasonable? Please explain your reasons.

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Form and Character

Winfarthing

Winfarthing has developed a linear settlement character along The Street, along part of Hall Road and along Mill Road southwards with outliers of development at Short Green and Goose Green. Winfarthing comprises mainly single plot frontage development including a mixture of housing types and some notable old buildings. The Street is characterised by several areas of open frontage formed mainly by the playing field and several farms which contribute towards the dispersed nature of much of the development, especially in the southern half of the village which has a very open aspect.

The village contains a conservation area in the centre containing a variety of development interspersed with open spaces and an attractive tree-lined area adjacent to St. Mary's Church. The visual interest along The Street is enhanced by a number of notable old buildings and complemented by the bends in the road.

Shelfanger

The settlement has developed along the B1077 and contains a mixture of old and new development centred on the junction of The Street, Church Road and Rectory Road, with newer extensions to the east and west. The built-up areas are surrounded by large open field with few trees or hedgerows affording distant views especially to the north and to the west.

Services and Community Facilities

The parish contains a limited range of facilities including a school, pub and village hall located a short distance away. No alterations are proposed to the existing Settlement Limit.

Settlement Limit and Constraints

Winfarthing

The potential for development is limited by the linear nature of Winfarthing. The existing Settlement Limit has been drawn to allow for limited infill within it. The Settlement Limit includes the areas within the main village which are developed but excludes the area considered to form an attractive setting to the church. The boundary therefore maintains the separation of the existing settlements while providing for limited infill development which should enhance the form and character of the village.

Shelfanger

Much of the existing built form of the settlement is within the flood zone areas and the limited facilities available and the form and character of the settlement limits the potential for further development if further intrusion into the countryside is to be avoided. The Settlement Limit has been defined to provide some limited infill development whilst precluding further expansion of the ribbon development to the east and west of the village.

No changes are proposed to the Settlement Limits.

QUESTION 160: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

13 sites have been promoted for consideration, of which 2 were identified as preferred allocation site and 1 was shortlisted.

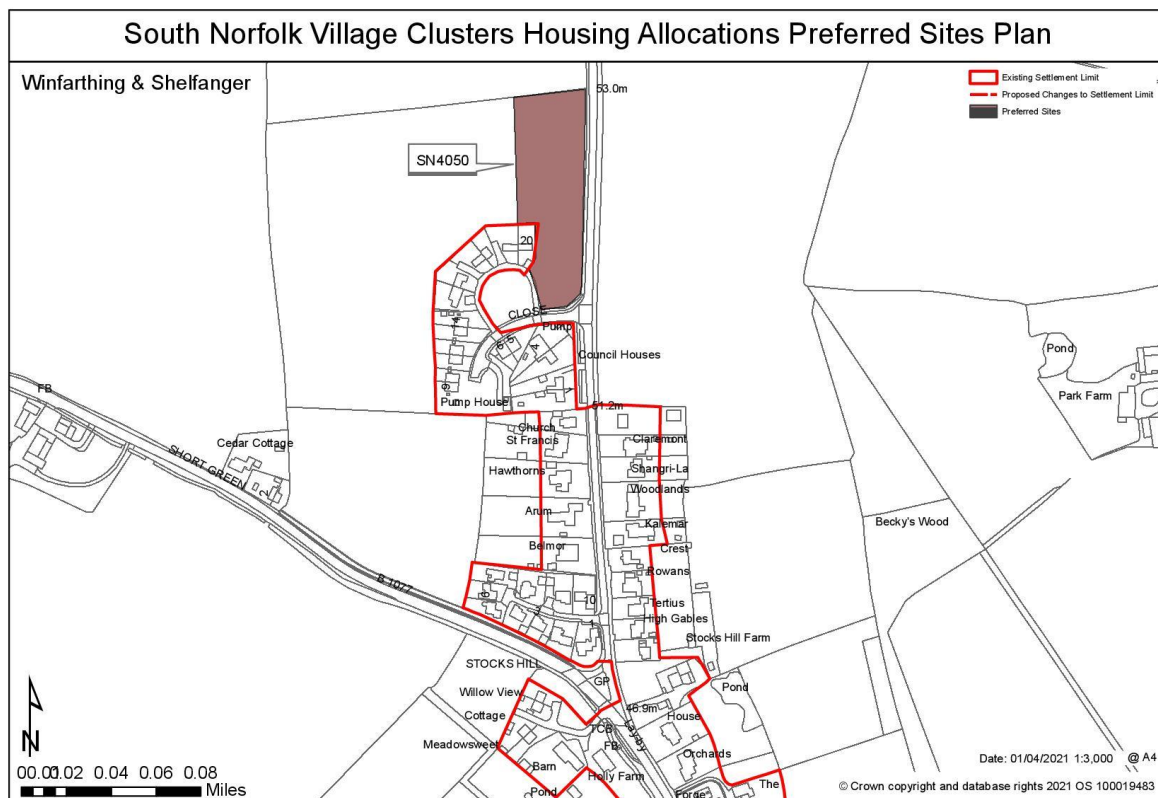
Preferred Sites

On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Site: SN4050, Land to the west of Hall Road, Winfarthing

Preferred for 15 dwellings on a site of 0.6 hectares

Reasoned justification: The site relates acceptably to the existing villages and would be suitable for development of approximately 15 dwellings, that would enable areas of flood risk to be excluded from development. A linear form of development along the road frontage would be the preferred development form. Through good design the development of this site could enhance the entrance to the settlement and would not result in harmful landscape or townscape impacts. Access to the site would be achievable.

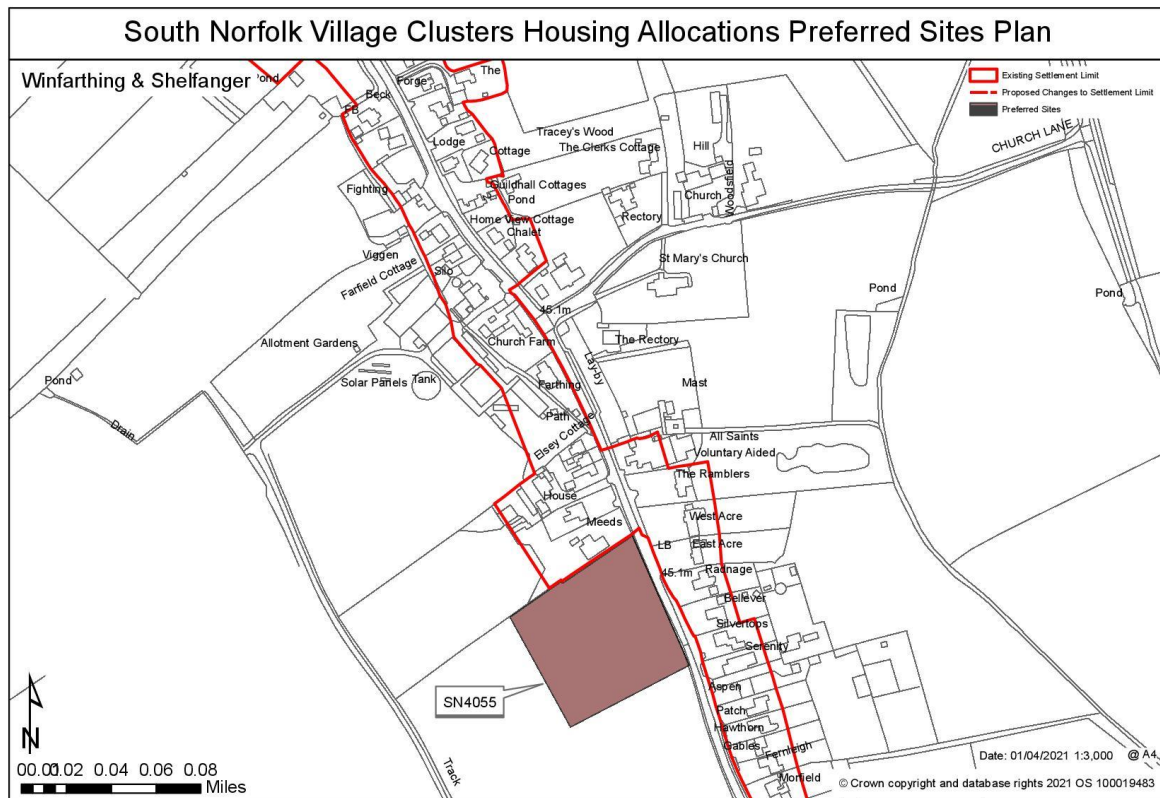


QUESTION 161: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Site: SN4055, Land off The Street, Winfarthing

Preferred for 25 dwellings on a site of 1 hectare.

Reasoned justification: The site benefits from good connectivity and relates well to the existing built form of the settlement. Through good design development of this site could provide an opportunity to create an attractive entrance to the village. Off-site highway works have been identified however these are considered to be achievable.



QUESTION 162: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Shortlisted Sites

On the basis of the assessment undertaken the following site(s) have been shortlisted:

Site	Reasons not preferred for allocation:
SN0399B	<p>Land to the east of Winfarthing Road</p> <p>Shortlisted for a Settlement Limit Extension on a site of 0.4 hectares.</p> <p>The site is therefore considered to be suitable as a settlement limit extension only. Development of the site would have an impact on nearby heritage assets and would require the total removal of a mature frontage hedgerow.</p>

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0005	<p>Hill Farm, Norwich Road</p> <p>Development of the site would represent a breakout to the east of the A140 which is considered to have a harmful impact upon both the townscape and the landscape. It is not considered that the impacts can be mitigated.</p>
SN0364	<p>Land to the south of Heywood Road, Shelfanger</p> <p>The site is considered to be unreasonable due to the significant highway safety issues and constraints resulting from the narrow width of the access roads between the site and the centre of the village.</p>
SN0399ASL	<p>Land to the north east of Rectory Road, Shelfanger</p> <p>Unsuitable as both an allocation and an extension to the settlement limit. The site relates well to the main settlement however forming a suitable access to the site is not considered achievable, nor are the associate highways works that would be required. There would not be a significant landscape or townscape impact however there would be a loss of the existing hedgerow and landscaping across the site.</p> <p>Potential surface water flooding constraints have also been identified.</p>

Site	Location and Reasons for Rejection
SN0556	<p>Land between Chapel Close and Short Green, Winfarthing</p> <p>The site is constrained by flood risk which would affect both the amount and location of development. Significant highways concerns have been raised and development of the site would also have a harmful impact on both the local landscape and the townscape.</p>
SN2049SL	<p>Land south of Stocks Hill, Winfarthing</p> <p>The site is considered to be an unreasonable option for a settlement limit extension due to the impact that its development would have on the local landscape resulting from its elevated position and its gateway position between the settlement and the surrounding countryside. Highways concerns have also been raised that would mean that development of the site is not achievable.</p>
SN3011	<p>Havencroft Poultry Site, Winfarthing Road, Shelfanger</p> <p>The scale of development proposed is considered to be unreasonable however even a reduced scale development in this location would result in harmful landscape character impacts and would adversely impact on the transition that it affords between the village of Shelfanger and the surrounding countryside.</p>
SN4074	<p>Land off Druids Lane, Shelfanger</p> <p>Significant highways constraints have been identified, in particular the narrowness of Druid's Lane. A solution to these constraints is not considered to be possible due to issues relating to land ownership. Townscape and landscape impacts could be mitigated and no other constraints have been identified.</p>
SN4076SL	<p>Land off Druids Lane, Shelfanger (This is a small site within SN4074)</p> <p>Significant highways constraints have been identified, in particular the narrowness of Druid's Lane. A solution to these constraints is not considered to be possible due to issues relating to land ownership. Townscape and landscape impacts could be mitigated and no other constraints have been identified.</p>
SN4075	<p>Land off Church Road, Shelfanger</p> <p>The site is considered to be an unreasonable option for development due to the identified highways issues, as well as the harmful impact development of the site would have on the gateway to the settlement</p>

Site	Location and Reasons for Rejection
	as development of the site would erode the existing transition between the built form of the settlement and the surrounding countryside. Harmful impacts have also been identified relating to designated heritage assets.
SN4077SL	Land off Church Road, Shelfanger Highways constraints, including access into the site, have been identified as well as the impact development of this site would have on the designated heritage assets and the harmful impact it would have on the approach into the village.

QUESTION 163: Do you think that any of the shortlisted or rejected sites should be allocated instead of, or in addition to, the preferred site?

QUESTION 164: Do you think that any of the shortlisted sites should be considered unreasonable?

Form and character

Woodton

The village has a predominantly nucleated settlement pattern based around Hempnall Road, The Street, Triple Plea Road and Chapel Hill. Some limited estate scale development has taken place in the village. The village is set in an attractive valley landscape being situated on a south facing valley slope with a smaller tributary valley to the east. The attractive setting of the village, the views of the surrounding countryside from various points of the village, and the good tree and hedge planting throughout, combine to give the village its attractive rural character. The B1527 provides a link to the A140 and Long Stratton to the west, whilst the B1332 to the east of the village provides links to Norwich and Bungay.

Bedingham

The northern part of this parish forms part of the built-up settlement area of Woodton. The majority of the parish is sparsely populated with development concentrated along School Road, with the remaining individual dwellings and farms showing a dispersed pattern.

Services and Community Facilities

The settlement has a range of social and community facilities including a preschool, primary school, post office and shop, pub, village hall and recreation facilities. There is also a limited bus service.

Settlement Limit and Constraints

The Settlement Limit has been drawn to include the main built form of the settlement. No alterations are proposed to the existing Settlement Limit.

The primary school continues to have some capacity and options for expansion, although larger than minimum scales of growth may be needed to justify such expansion. Further exploration will be needed to ensure primary school needs can be met.

QUESTION 165: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

9 sites have been promoted for consideration, 2 were identified as preferred allocation sites and 1 was identified as a preferred Settlement Limit extension.

Preferred Sites

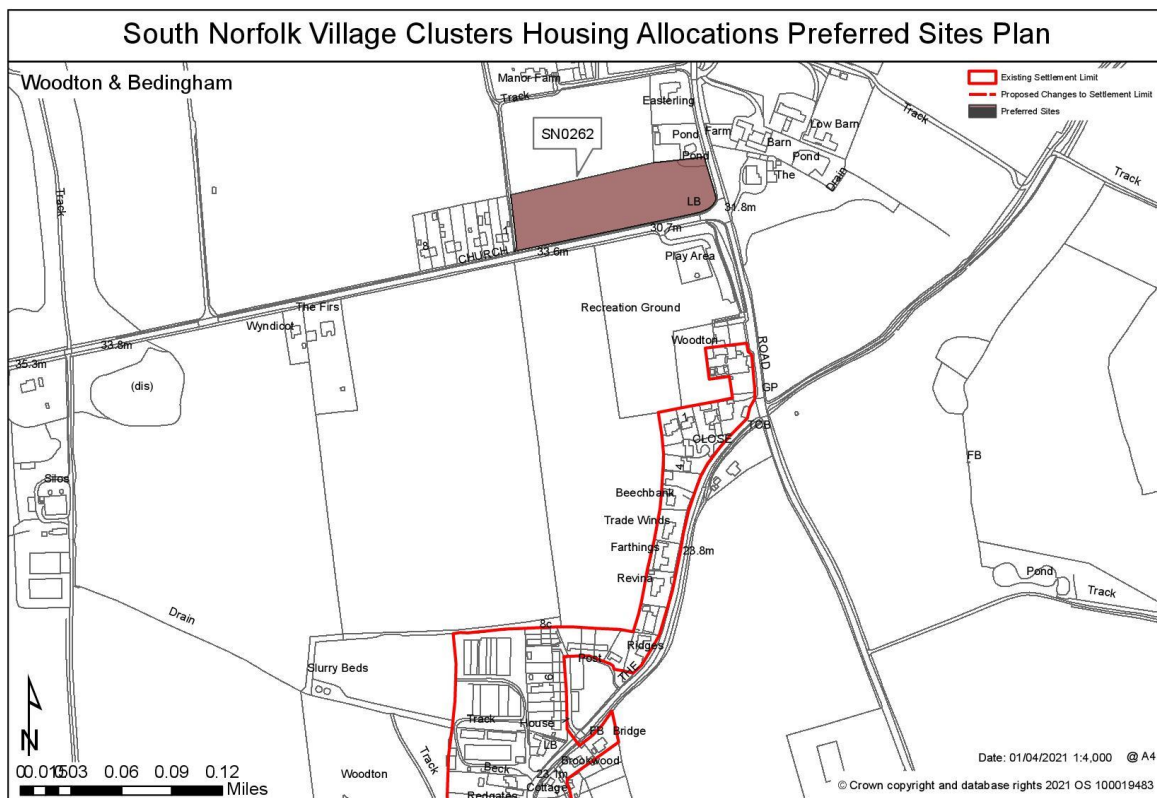
On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

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Site: SN0262, Land north of Church Road, Woodton

Preferred for up 10-15 dwellings on a site of 1 hectare.

Reasoned justification: The site is well located in relation to the primary school and is suitable for allocation, subject to it being demonstrated that there would not be unacceptable impact on the heritage asset to the north. Although separate from the main settlement it benefits from good connectivity and development in this location would be read in the context of the existing dwellings adjacent to the site. It would not have a significant detrimental impact on the wider landscape setting. Impacts on landscape could be mitigated if this site is developed in conjunction with other sites. Allocation of this site would not need to be reliant on the allocation of SN0268SL although if appropriate they could be combined as a single allocation to the north of Woodton. However, allocation of this site should not be at the density promoted and would need to be similar to the existing linear development adjacent to the site. A combination of development across this site, SN0268SL and SN0278 would be preferable in highway terms.

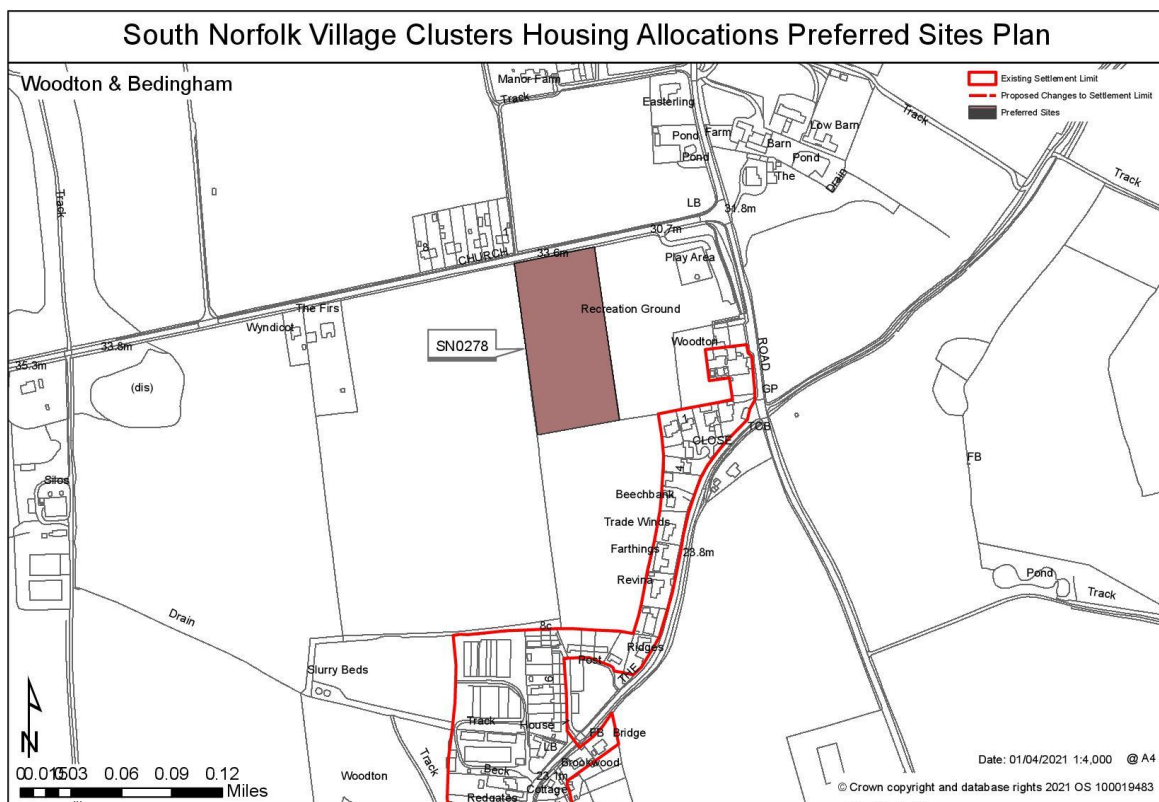


QUESTION 166: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Site: (Northern End of) SN0278, Land south of Church Road, Woodton

Preferred for up to 25 dwellings on a site of 1 hectare.

Reasoned Justification: The preferred site comprises the northern end of a larger total site that has been submitted. The allocation of the northern part of the site has the potential to create, along with the other promoted sites, a coherent development adjacent to the school and recreation ground. The allocation of the site would be subject to addressing identified highway concerns and minimising landscape impacts. The development of the land to the south of the identified site could be identified in preference to sites SN0262 and SN0268SL, if it were able to be developed in a way that enabled better links back to the services at the southern end of the village.



QUESTION 168: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0150	Land to the east of Chapel Hill and south of Hempnall Road Development in this location would have an adverse impact on the local landscape, as well as on local non-designated heritage assets.
SN0231REV	Land north of Suckling Place Whilst the site initially appears to be an obvious extension to an existing allocation, development on that site was allowed recognising that there were existing traffic movements associated with the former use of the site. There are however constraints at the crossroads junction (The Street/ Hempnall Road/ Chapel Hill) and the Hempnall Road /B1332 junction. The Street itself is also narrow, with restricted forward visibility and a poor junction with the B1332. It is not considered appropriate to extend the current allocation on the basis of the impact on the wider network.
SN1009SL	Land at the junction of Chapel Road and Sunnyside The site is considered to be unreasonable due to the landscape impact of developing it, as well as the highways access constraints. Loss of the trees and vegetation is also considered to have an adverse impact on the wider setting.
SN2100	Land north of Hempnall Road The site is considered unreasonable due to the landscape impact that would result from its development, in particular arising from the continued linear extension of the settlement and the overall topography of the site and the surrounding land.
SN2130	Land south of The Street The site is unreasonable due to the adverse impact that it would have on the townscape, as well as the landscape. The current open aspect forms an important feature of the streetscene as it leads into the more developed centre of the settlement.
SN4052	Land south east of The Street, Woodton

Site	Location and Reasons for Rejection
	<p>The site is considered to be unreasonable due to its scale and the adverse impact that this would have on the wider landscape setting. Access constraints to this site have also been identified which would be difficult to overcome satisfactorily.</p>

QUESTION 169: Do you think that any of the shortlisted or rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

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48. Wrenningham, Ashwellthorpe and Fundenhall

Form and character

Wrenningham

The village centre is linear, with ribbon development following Church Road, Wymondham Road and Ashwellthorpe Road, with a pocket of further development along Mill Lane. The primary school is located centrally where the four roads meet, and further along Mill Lane at the Norwich Road junction is the hamlet of Toprow.

The village is surrounded by large open fields interspersed with hedgerows and a few trees. Toprow lies along a shallow valley. Narrow lanes and mature trees contribute to the village's rural atmosphere. The B1113 provides a direct link to Norwich.

Ashwellthorpe & Fundenhall

The main concentration of development has taken place along both sides of The Street resulting in a predominantly linear settlement. A further ribbon of development extends at the western end of The Street, southwards on New Road. Some estate development has taken place at Knyvett Green and Greenwood Close on the south of The Street. To the north of The Street is Lower Wood, a large wooded area (and SSSI) forming an attractive backdrop to the village and contributing to the rural character and setting of the village. Good road links exist to Wymondham on the B1135 and Norwich via the B1135 and A11.

Services and Community Facilities

Facilities include a preschool, primary school, village hall, recreation facilities and pub. There is also a limited bus service.

Settlement Limit and Constraints

Wrenningham

The Settlement Limit has been drawn to include the main built form of the settlement- The Settlement Limit covers most development along Wymondham Road, Ashwellthorpe Road and Church Road, up to the junction at Hethel Road as well as limited infill on Church Road. The existing Settlement Limit has been extended to the west along Wymondham Road to include the three dwellings granted planning permission by 2018/2301. The clusters of development to the east of the church and to the north-east of Hethel Road are excluded from the Settlement Limit. The separate Settlement Limit at Mill Lane/Toprow includes most of the cluster of dwellings in that location and has been altered to allow limited infill. The road capacity of the village is a limiting factor. The South Norfolk Place-

making Guide suggests that in this area the nucleated clustered character of the settlements is maintained.

Ashwellthorpe

The Settlement Limit has been drawn to include the main built form of the settlement, but there are two breaks at Wood Farm and Church Farm. Planning permission 2011/0506 is still being built out. The permission site is not included within the Settlement Limit as this could risk its delivery. The site will be included within future iterations of the Settlement Limit when it is built out.

No alterations are proposed to the existing settlement limits within this cluster.

It is noted that Wreningham Primary School is operating at capacity. However, the nearest alternative at Hapton has space. Further exploration will be needed to ensure primary school needs can be met.

QUESTION 170: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

Preferred and Shortlisted Sites

15 sites have been promoted for consideration, 3 of which were identified as preferred allocation sites. No further sites were shortlisted.

Preferred Sites

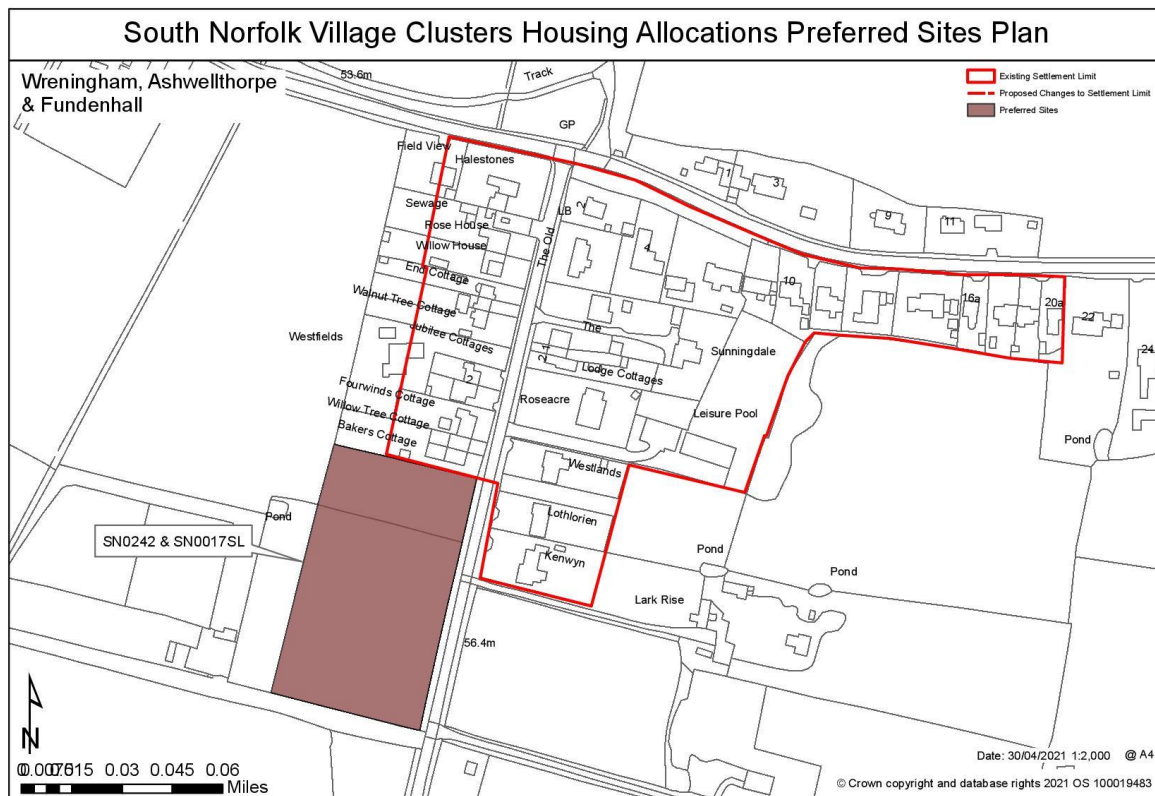
On the basis of the assessment undertaken the following site(s) have been identified as a preferred allocation:

Site: SN0017SL - Land to the west of New Road, Ashwellthorpe & SN0242 - Land to the west of New Road, Ashwellthorpe

Preferred for an allocation of 12 dwellings on a site of approximately 0.89 hectares.

Reasoned justification: Site SN0017SL is preferred in combination with site SN0242 to enable allocation scales of development, including affordable housing.

Whilst the site does not have direct footpath links to the school it is relatively well related to the nearby village hall, recreation ground and public house. The site is well contained within the existing field boundaries and is not considered to have a significant detrimental impact on the wider landscape. It would reflect the existing character of development and would read as an extension to the village. It is expected that the development of the site would require removal of some frontage hedge as carriageway widening and footways would be required. The scale of hedgerow loss could be reduced if access is gained towards the southern end of the site.

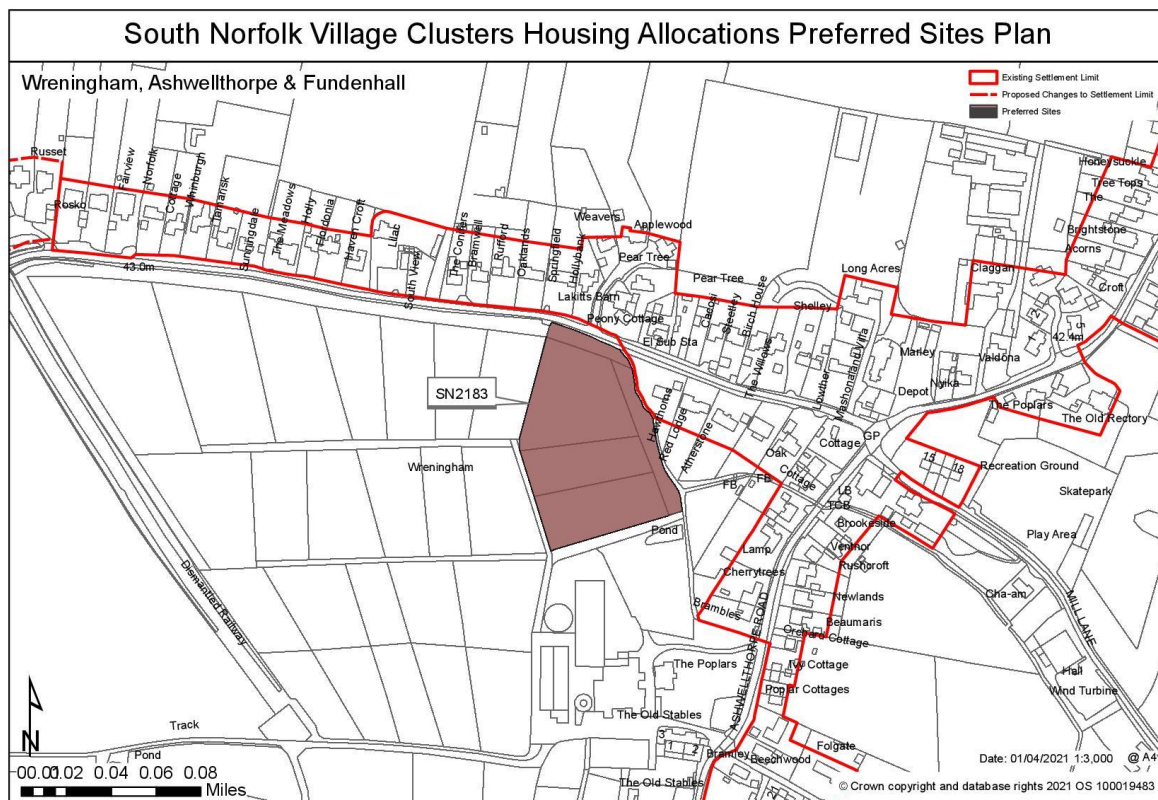


QUESTION 171: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Site: SN2183 - Land south of Wymondham Road, Wreningham

Preferred for up to 25 dwellings on a site of 1.1 hectares

Reasoned justification: It is adjacent to the settlement limit and close to the school and although the route has no footpath it is within the village 30mph speed restriction where there is already pedestrian movement and some verges. The size of the site is out of scale and character with the village as promoted, 2.1ha (52 dwellings) however, a reduced site area would relate to the existing settlement and read as part of the existing built form. It could be frontage development possibly with a small cul-de-sac to mirror the development on the opposite side of the road. It could be contained by substantial planting to the west so that it would not encroach significantly into the countryside to the south. It would require the removal of a frontage hedge line for access and the ditches and surface water would need to be addressed. There is a highway safety concern with access visibility onto The Street and the junction at Church Road and the development of the site would be subject to addressing these highway constraints.



QUESTION 172: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

Rejected Sites

The following site(s) were promoted for development but have been rejected on the basis of information available at the time of assessment.

Site	Location and Reasons for Rejection
SN0009SL	<p>Top Row</p> <p>The site is not close to any Settlement Limit and is very remote from services. It has very poor connectivity to the school along narrow, unlit roads with no footpaths and across the B1113. This also results in highway safety concerns because Top Row is limited in width and has substandard visibility into Norwich Road. It would be a significant intrusion within the landscape to the south and it is constrained by a TPO and flood risk to the south.</p>
SN0013SL REV	<p>New Road</p> <p>It is remote from the school and other services with poor connectivity along narrow, unlit roads with no footpaths. Development here is sporadic and as the site is physically and visually separate from the existing village it would be a significant intrusion in the wider landscape as it breaks into the open countryside to the south-west. Possible surface water flooding.</p>
SN0093	<p>Field 2484, w/o All Saints Church at junction of Hethel Road & Church Road</p> <p>It has poor connectivity to the school along narrow, unlit roads with no footpaths. This also results in highway safety concerns because of the poor visibility at the Church Road junction. The site is prominent at this junction and would have a negative impact on the adjacent Listed church and its setting. It would be an intrusion within the landscape encroaching beyond a natural edge of the settlement and access would require the removal of a strong frontage hedge line.</p>
SN0187	<p>Land adjacent to Rosko, north of Wymondham Road</p> <p>Although it is close to the school it has poor connectivity along a narrow road with no footpaths and limited verges. The size of the site is out of scale with the village, 2.04ha (51 dwellings) but could be reduced in scale. It is also out of character as it would be contrary to the existing settlement pattern of linear development and would encroach into the</p>

Site	Location and Reasons for Rejection
	countryside to the north with significant detriment to the landscape setting of the village. There is an issue with access as it has been blocked by the recent frontage development.
SN0213	<p>Timber Yard, The Street</p> <p>It is remote from the school although it is close to the limited services of the village hall and pub. The site does not have a road frontage, except for access, and would be a significant breakout to north which would be out of character with the surrounding townscape. The narrow access may require third party land to widen it and provide a footway and increased use could have a detrimental impact on adjoining residential properties. Ecological impacts would need careful consideration given the ancient woodland/SSSI to the north.</p>
SN0233	<p>Rose Farm, The Street</p> <p>It is remote from the school although it is close to the limited services of the village hall and pub. There is extant permission for 7 dwellings on a slightly smaller area and an increase in site area or numbers would be out of character with the surrounding density and have a greater negative impact on the townscape. Ecological impacts would need careful consideration given the ancient woodland/SSSI to the north.</p>
SN0234REV	<p>Land adjacent to Rose Farm, The Street</p> <p>It is remote from the school but it is close to the limited services of the village hall and pub. It would be a further significant breakout to north which would be out of character with the surrounding density and have a greater negative impact on the townscape. Ecological impacts would need careful consideration given the ancient woodland/SSSI to the north and providing access and widening the footway would require the removal of all the frontage hedge.</p>
SN0236SL	<p>Land to rear of 47 The Street</p> <p>It is remote from the school although it is close to the limited services of the village hall and pub. It does not have a road frontage, except for a narrow access, and would be a significant breakout to north beyond existing tree lines which would be out of character with the surrounding townscape. The very narrow access may require third party land to widen it and provide a footway which would have a detrimental impact</p>

Site	Location and Reasons for Rejection
	on adjoining residential properties. Ecological impacts would need careful consideration given the ancient woodland/SSSI to the north.
SN0239	<p>Land at New Road</p> <p>The site is next to the settlement limit but is remote from the school although relatively close to the village hall, recreation ground and public house. It is contained within the existing field boundaries but would have a negative impact on the wider landscape as it would encroach beyond existing development to the east and require removal of significant frontage hedge as carriageway widening and footways would be required.</p>
SN0431	<p>Land south of Hethel Road</p> <p>The smaller size of the site is more appropriate than SN0431REV, however it is still considered to be unreasonable. The site has poor connectivity to the school along narrow, unlit roads with no footpaths. This also results in highway safety concerns because of the blind bend and poor visibility at the Church Road junction. It is out of character as Hethel Road only has sporadic development to the north and comparatively this would be a large increase. This site is prominent to the south and would be a significant intrusion within the landscape requiring the removal of a strong frontage hedge line for access.</p>
SN0431REV	<p>Land south of Hethel Road</p> <p>It has poor connectivity to the school along narrow, unlit roads with no footpaths. This also results in significant highway safety concerns because of the blind bend and poor visibility at the Church Road junction. The size of the site is out of scale with the village, 2.8ha (70 dwellings), although it could be reduced in size. It is also out of character as Hethel Road only has sporadic development to the north. This site is prominent to the south and would be a significant intrusion within the landscape requiring the removal of a strong frontage hedge line for access.</p>
SN0598	<p>Land east of New Road</p> <p>It is remote from the school and other services with poor connectivity along narrow, unlit roads with no footpaths. It is a large site which is out of character with the village particularly as development here is sporadic. The site is physically and visually separate from the existing</p>

Site	Location and Reasons for Rejection
	village and it would be a significant intrusion in the wider landscape as it breaks into the open countryside to the south-east. Surface water flooding may occur.

QUESTION 173: Do you think that any of the rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response.

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Monitoring Framework

Topic	Indicator	Target
Housing supply	Number of Homes Completed	Delivery of 1,200 2018 to 2038 or 60 homes per annum
Housing supply	Number of Affordable Homes Completed	Affordable homes delivered as a percentage to total homes delivered in accordance with GNLP policy requirement
Housing supply	Number of planning permissions granted on allocated sites where S106 provides for policy compliant affordable housing	80%
Communities	Number of planning permissions granted on allocated sites where the housing mix meets policy requirements	80%
Communities	Number of Self-Build CIL exemptions	Contribute to maintaining South Norfolk's duty to provide serviced plots
Communities	Net change in number of core services and facilities	Neutral/Positive
Character	Number of planning permission granted on allocated sites which meet specified density requirements	80%

Site progress tracker for each allocation

Monitoring Framework also proposed to include a simple progress tracker for each site allocations. The target for each allocation would be for it to be complete by 31st March 2038. An example table to track site progress is set out below:

Topic	Reference / Progress Indicator
Site Reference	e.g. ALP1
Pre-application Enquiry Received	Yes or No
Outline Application	Submitted, Approved or Refused
Reserve Matter / Full Application	Submitted, Approved or Refused
Commenced	Yes or No
Completed	Yes or No

QUESTION 174: Do you agree with the proposed Monitoring Framework? Please add additional comments to explain your response.

Glossary

Accessible

In the case of community facilities and services (such as healthcare), easy to travel to or use. With reference to buildings or public transport, easy to enter and use by all.

Affordable housing

Housing provided for sale or rent at prices below the current market rate, which people in housing need are able to afford. Affordable housing tenures are defined in government guidance, as set out in Annex 2 of the National Planning Policy Framework.

Allocated

Land which has been identified for a specific use in the current Development Plan.

Area Action Plan (AAP)

A development plan document within the local plan that establishes a set of development proposals and policies for a specific area. In South Norfolk Area Action Plans have been written for Long Stratton and Wymondham.

Biodiversity

The variety of different types of plant and animal life in a region.

Biodiversity net gain

Refers to development having a positive impact on biodiversity, leaving it in a better state than before development occurred.

Brownfield land, brownfield site

Land or site that has been subject to previous development.

Brownfield Register

Brownfield land registers provide up-to-date information about sites that local authorities consider to be appropriate for residential development having regard to the relevant legislation.

Built environment

The man-made surroundings that provide the setting for human activity, ranging in scale from personal shelter to neighbourhoods to the large-scale civic surroundings.

Business use

Land use class covering light industry, offices, research and development.

Climate Change Mitigation

Actions taken to limit the magnitude or rate of global warming and its associated effects, usually involving a reduction in human emissions of greenhouse gases.

Commitments

Development proposals which already have planning permission or are allocated in adopted development plans.

Community facilities

Services that meet the day-to-day needs of a community such as village halls, post offices, doctors' and dentists' surgeries, play areas, recycling facilities, libraries and places of worship.

Community Infrastructure Levy (CIL)

A financial charge on new development introduced by the Planning Act 2008 as a tool for Local Authorities to help deliver infrastructure to support growth and development in their area. Within the Greater Norwich area the CIL 123 List sets out which infrastructure items may be funded by CIL payments.

Conservation area

Area of special historic and/or architectural interest which is designated by the Local Planning Authority as being important to conserve and enhance. Special planning controls apply within these areas.

County Wildlife Site (CWS)

Wildlife habitat identified and designated as being of particular local interest or importance by Norfolk County Council and the Norfolk Wildlife Trust but which is not of sufficient national merit to be declared as a Site of Special Scientific Interest. A CWS does not benefit from statutory protection but does have some protection in the planning system.

Cross-subsidy housing

The provision of a limited amount of market housing on a development site to ensure that the provision of affordable housing on the same site is equitable

Custom-Build

A form of self-build home that is, in some form, supported by a developer through a more hands off approach than a traditional self-build would entail.

Decentralised and renewable or low-carbon energy sources

Sources of energy that are renewable or low-carbon (or a combination of these) and locally based (on-site or near-site, but not remote off-site), usually on a relatively small scale. Decentralised energy is a broad term used to denote a diverse range of technologies, including micro-renewables, which can locally serve an individual building, development or wider community and includes heating and cooling energy.

Development

Defined in planning law as 'the carrying out of building, engineering, mining or other operations in, on, over, or under land, or the making of a material change of use of any building or land'.

Development Boundary

See Settlement Limit.

Development brief

A document describing and leading the form and layout of development in a prescribed area.

Development Plan

A set of plans guiding future development in the area. The Development Plan consists of the locally prepared Development Plan documents, including Neighbourhood Plans approved at referendum.

Development Plan Document

Locally prepared document on a specific topic which forms part of the Development Plan and which subject to independent examination before adoption, (also commonly referred to as DPDs.)

Employment use

Use primarily for industrial, warehousing, office or other business uses falling within classes B1, B2 and B8 of the use classes order.

Environmental Impact Assessment (EIA), Environmental Statement (ES)

Written assessment, submitted with certain kinds of planning application, which sets out the anticipated effects of the proposed development. Such statements deal with the full environment effects of development proposals and include any mitigation measures needed under the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2018

Exception site

A small site to be used specifically for affordable housing that would not normally be acceptable for housing as it would be subject to policies of restraint. These sites are generally located at the edge of existing settlements.

Five-year housing land supply

A requirement by Government for Local Planning Authorities to ensure that there is sufficient land available that is suitable, available and deliverable for housing development. The amount of land available should be sufficient to fulfil the housing requirement for the next five years.

Geodiversity

The variety of different types of geology, landforms, soils and physical processes in a particular region.

Greater Norwich Growth Board (GNGB)

A partnership between Broadland District Council, Norwich City Council, South Norfolk Council, Norfolk County Council and New Anglia Local Enterprise Partnership (LEP) to provide homes, jobs and infrastructure. It also provides strategic direction, monitoring and co-ordination of the Greater Norwich City Deal.

Green infrastructure

A network of multi-functional green space which delivers benefits to both the environment and the local community. Green infrastructure includes natural green spaces colonised by plants and animals and man-made managed green spaces such as areas used for outdoor sport and recreation including public and private open space. These spaces may include allotments, urban parks and designed historic landscapes as well as their many interconnections such as footpaths, cycleways, green corridors and waterways.

Greenfield land, greenfield site

Land which has not previously been built on, including land in use for agriculture or forestry. Greenfield land does not include residential garden land.

Habitat Regulations Assessment (HRA)

An HRA identifies any aspect of the emerging Local Plan that would have the potential to cause a likely significant effect on Natura 2000 sites or sites protected by European designations (Special Areas of Conservation, Special Protection Areas, Ramsar sites) either in isolation or cumulatively, and to identify appropriate avoidance and mitigation strategies where impacts are identified.

Heritage Asset

A building, monument, site, place, area or landscape with historic interest that provides a material record of history or meaning for a community. Heritage assets may be either 'designated' or 'non-designated' and have a degree of significance that merits consideration in planning decisions.

Historic environment

Aspects of the environment which result from the interactions between people and places through time.

Housing Delivery Test

Measures net additional dwellings provided in a local authority area against the numbers of homes required using national statistics and local authority data. The Housing Delivery Test data is published annually by the Secretary of State.

Inclusive Growth

A form of economic growth that aims to improve opportunities for everyone in the local community.

Index of Multiple Deprivation

A ward-level index made up from six indicators (income; employment; health deprivation and disability; education; skills and training; housing; and geographical access to services)

Infill development

Small-scale development filling a gap within an otherwise built up area.

Infrastructure

The network of services to which it is usual for most buildings or activities to be connected. Infrastructure includes physical services serving the particular development (e.g. gas, electricity and water supply; telephones, sewerage) and also includes networks of roads, public transport routes, footpaths etc as well as community facilities and green infrastructure.

Joint Core Strategy (JCS)

A key planning policy document for the Greater Norwich Area produced in partnership between Broadland, Norwich and South Norfolk that sets out the long-term vision for the area up until 2026. The JCS has a considerable impact on the Greater Norwich Local Plan

(GNLP) which in turn determines growth up until 2038 and will supersede the JCS when adopted.

Local Nature Reserve (LNR)

Area of botanical or wildlife interest where access and use by local people is encouraged through designation by the local authority.

Local centre

A group of shops or services forming a centre of purely local significance.

Local housing need

An assessment of the need for housing at a local level using the standard methodology set out by the Government.

Low-carbon

To minimise carbon dioxide emissions from a human activity.

Major development

For housing, development where 10 or more dwellings are to be provided or the site has an area of 0.5 hectares or more. For non-residential development, it means additional floorspace of 1,000m² or more or a site of 1 hectare or more.

Market Housing

Housing that is for sale on the open market without restrictions on the pricing or tenure.

Masterplan

A long term planning document that provides a conceptual framework to guide future growth and development.

Mineral Safeguarding Area

An area designated by minerals planning authorities (in the GNLP area being Norfolk County Council) which covers known areas of minerals deposits that are to be safeguarded from non-mineral development

National Planning Policy Framework (NPPF)

A document which sets out the Government's economic, environmental and social planning policies for England and how they should be applied. It provides a baseline structure from which locally-prepared plans (such as the GNLP) can be produced and it is a material consideration in planning decisions.

National Planning Practice Guidance (NPPG)

A web-based resource which brings together planning guidance on various topics into one easily accessible place. The guidance supports the NPPF but is not government policy.

Neighbourhood Plan

A plan prepared by a parish/town council or neighbourhood forum for a designated neighbourhood area. Once made by the Local Planning Authority it becomes part of the Development Plan for the area.

Non-strategic policies

Policies contained in a Neighbourhood Plan, or those policies in a local plan that are not strategic policies.

Norwich fringe

Area next to the city of Norwich, but lying in another administrative district which is predominantly developed, including open spaces encompassed within the developed area. In South Norfolk this area includes Colney, Costessey, Cringleford and Trowse.

Open Space

Areas of land that usually come forward as part of a development site which remain undeveloped but can generally be used for either formal or informal recreation purposes.

Permission in Principle

A form of planning permission which establishes the suitability of a site for a specific amount of housing-led development. The site must subsequently obtain consent for the technical details before development can proceed.

Planning conditions

A condition imposed on a grant of planning permission which can either require additional details to be agreed or restrict the use of the site.

Planning obligations

Legal agreements between a planning authority and a developer, or undertakings offered unilaterally by a developer to ensure that specific works are carried out, payments made or other actions undertaken which would otherwise be outside the scope of the planning permission. Often called Section 106 obligations. The term legal agreements may embrace S106.

Previously developed land

See Brownfield land.

Protected species

Any species which, because of its rarity or threatened status is protected by statutory legislation (The Wildlife and Countryside Act 1981 (as amended) and the Conservation (Natural Habitats etc) Regulations 1994).

Ramsar site

A European designation that protects areas of wetland.

Recreational Impact Avoidance and Mitigation Strategy (RAMS)

A strategy facilitating residential development, whilst at the same time adequately protecting wildlife sites from harm that comes with growth in rural areas from increased recreation pressure.

Renewable energy

Energy generated from sources which are non-finite or can be replenished. Includes solar power, wind energy, power generated from waste, biomass etc.

Rights of Way, Public Rights of Way

Public footpaths and bridleways as defined in the Countryside and Rights of Way Act 2000. The phrase 'rights of way' include the above and permissive routes where there is no legal right of way but access is permitted by the landowner.

Scheduled Ancient Monument

Ancient structure, usually unoccupied, above or below the ground, which is preserved by order of the Secretary of State. Works affecting an ancient monument must be approved by the Secretary of State.

[Section 106 Agreement \(S106\)](#)

See planning obligations

[Settlement Hierarchy](#)

A way of arranging settlements into a hierarchy based upon a number of criteria, such as population and services offered.

[Settlement Limit](#)

A boundary line defining the extent of the consolidated built-up area of a settlement. Further development will normally be acceptable within defined Settlement Limits, subject to site specific constraints or considerations. Sometimes also called development boundaries, settlement boundaries or village envelopes.

[Shared equity, Shared ownership](#)

Arrangements whereby home buyers may pay only part of the initial cost of buying their home. Shared equity means topping up a small deposit with an equity loan and acquiring the rest of the home with a mortgage. Shared ownership involves buying a stake in a home with the remaining proportion being owned by (typically) a housing association.

[Site Allocation DPD](#)

A document used to identify sites to accommodate the range of land uses necessary to implement the objectives of the local plan. South Norfolk adopted a site allocations document in 2015.

[Site of Special Scientific Interest \(SSSI\)](#)

Site or area designated as being of national importance because of its wildlife, plants or flower species and/or unusual or typical geological features. SSSIs are identified by Natural England and have protected status under the Wildlife and Countryside Act 1981.

[Special Area of Conservation \(SAC\)](#)

Special Areas of Conservation are defined in the European Union's Habitats Directive (92/43/EEC), also known as the Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora. They are defined to protect the 220 habitats and approximately 1,000 species listed in Annex I and II of the Directive which are considered to be of European interest following criteria given in the Directive.

[Special Protection Areas \(SPAs\)](#)

Special Protection Areas are strictly protected sites classified in accordance with Article 4 of the EC Birds Directive, which was amended in 2009 (Directive 2009/147/EC). They are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species.

[Starter homes](#)

New build properties built exclusively for first time buyers aged between 23 and 40 years. A number of criteria must be met for a dwelling to be considered as a starter home.

Strategic policies

Policies and site allocations which address strategic priorities in line with Section 19 of the Planning and Compulsory Purchase Act 2004.

Street furniture

Collective term for permanent structures installed within the highway, including footways and pedestrian areas. Includes street lighting columns, signs, seats, litter bins, telephone kiosks, post boxes etc.

Suitable Alternative Natural Green Space (SANGS)

A name given to green space that is of a quality and type suitable to be used as mitigation in relation to the protection of important natural spaces when residential development or growth is proposed.

Supplementary Planning Document (SPD)

Guidance published by the local planning authorities to provide further detailed information on how local plan policies are to be applied or interpreted. SPDs may be prepared jointly, particularly where a consistent policy approach is required over an area covered by more than one local planning authority. SPDs may be concerned with a particular issue, or may provide more detailed guidance of the development of a specific site, covering a whole range of issues. This is frequently referred to as a development brief.

Sustainability Appraisal (SA)

An appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.

Sustainable development

A term mostly derived from the 1987 Brundtland Report. Interpretation varies but typically the term means meeting economic and social goals without undermining the environment, as well as meeting needs of the present without compromising the environment for future generations. In 2015 the United Nations agreed 17 Sustainable Development Goals to be reached by 2030. The UK is amongst the countries leading the delivery of the Sustainable Development Goals.

Sustainable drainage system (SuDS)

Efficient drainage system which seeks to minimise wastage of water, including the use of appropriate groundcover to enable maximum penetration of clean water run-off into the ground and, where appropriate, recycling grey water within the development. Designed to minimise the impact of development on the natural water environment.

Travel Plan

A long term management plan/ strategy that seeks to deliver sustainable transport objectives and is regularly reviewed.

Use classes order

The Town and Country Planning (Use Classes) Order, 1987 (as amended), a statutory order made under planning legislation, which groups land uses into different categories

(called use classes). Change of within a use class and some changes between classes do not require planning permission.

[Village cluster](#)

A group of villages that share services and facilities, for example a primary school.

[Water stress](#)
































Water stress occurs when the demand for water exceeds the available amount of water, or when poor water quality restricts its use.

[Windfall site](#)

Site on which planning permission for housing development is granted during the plan period but which has not previously been identified in the plan for housing development.

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South Norfolk Village Clusters Allocation - Legend

	Existing Settlement Limit		Ancient Woodlands
	Proposed Changes to Settlement Limit		Broads Authority Area
	Preferred Site		County Wildlife Sites
	Preferred Site - Boundary to be Determined		Ramsar Sites
	Shortlisted Site		SSSI
	Shortlisted Site - Boundary to be Determined		Conservation Areas
	Rejected Site		Special Areas of Conservation
	Existing Allocations Carried Forward		Special Protection Areas
	Existing Unimplemented Permissions at 1 April 2020*		Norwich Southern Bypass Protection Zone
	Existing Unimplemented Permissions at 1 April 2020 on an Existing Allocation*		River Valley Landscape
	Cluster Boundary		Flood Zone 2
	Parish Boundary		Flood Zone 3
	Infant, Junior and Primary Schools		Surface Water Flood Depth 1-30
	Secondary Schools		Surface Water Flood Depth 1-100
	GP Practices		Surface Water Flood Depth 1-1000
			Surface Water Flood Hazard 1-30

* Unimplemented Permissions at 1 April 2020 only showing sites of 6 or more dwellings

South Norfolk Village Clusters Housing Allocations Plan



Alburgh & Denton

Shelton And Hardwick

Earsham

Redenhall With Harleston

Alburgh

Denton
Denton

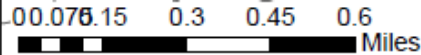
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SN0193

SN4031SL

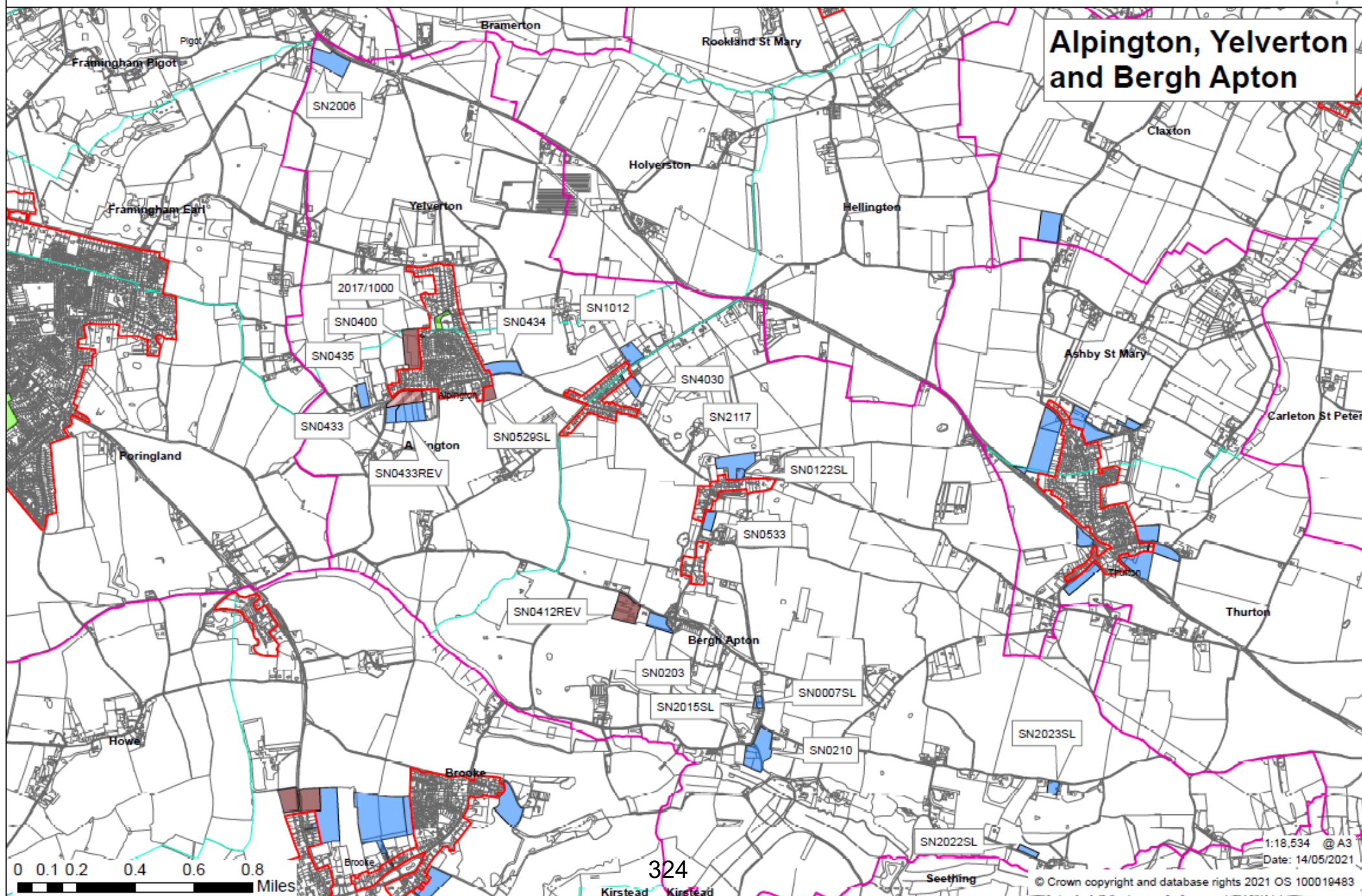
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Wortwell

South Norfolk Village Clusters Housing Allocations Plan

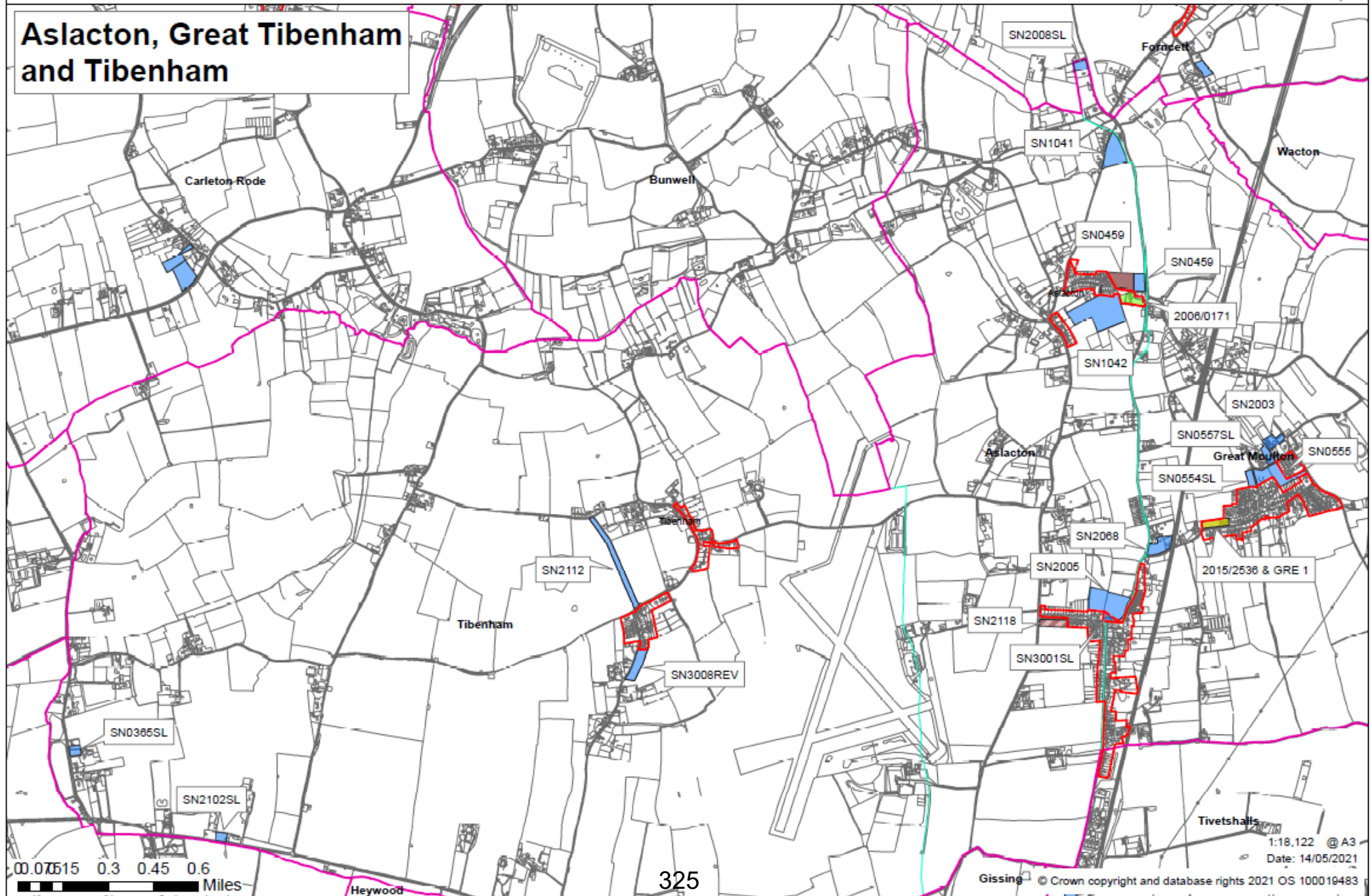
Alpington, Yelverton and Bergh Apton



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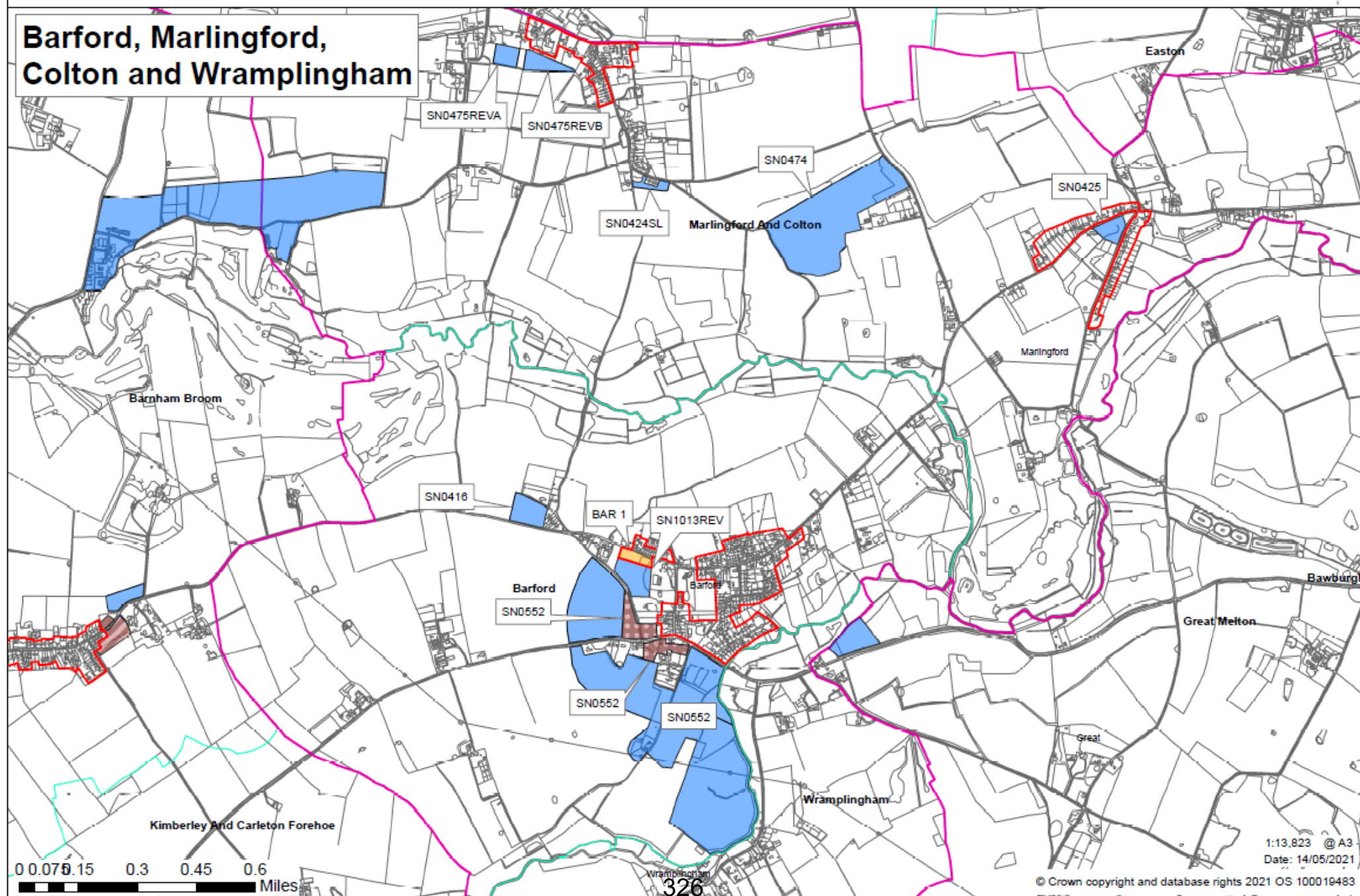


Aslacton, Great Tibenham and Tibenham



South Norfolk Village Clusters Housing Allocations Plan

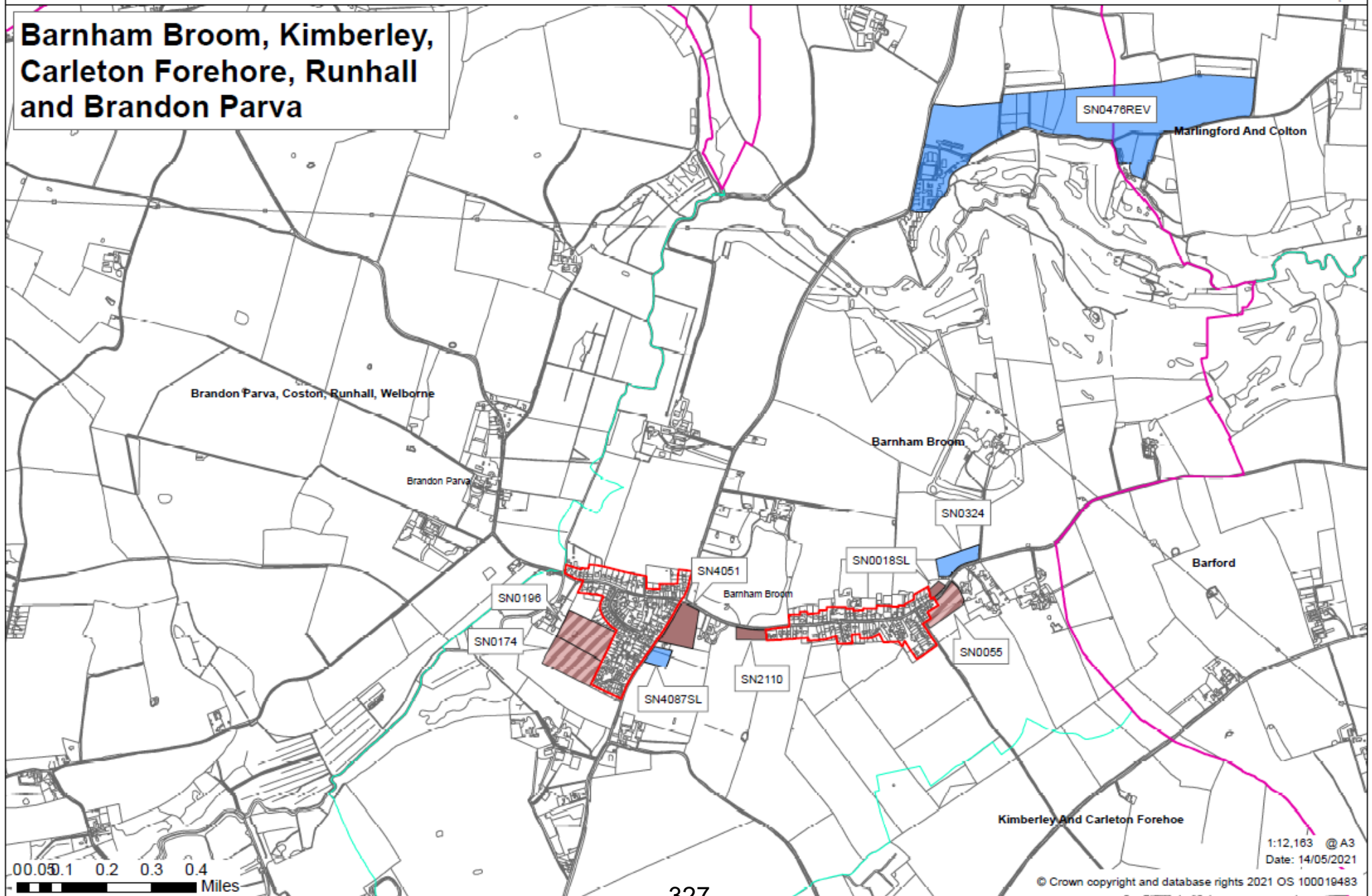
Barford, Marlingford, Colton and Wramplingham



South Norfolk Village Clusters Housing Allocations Plan



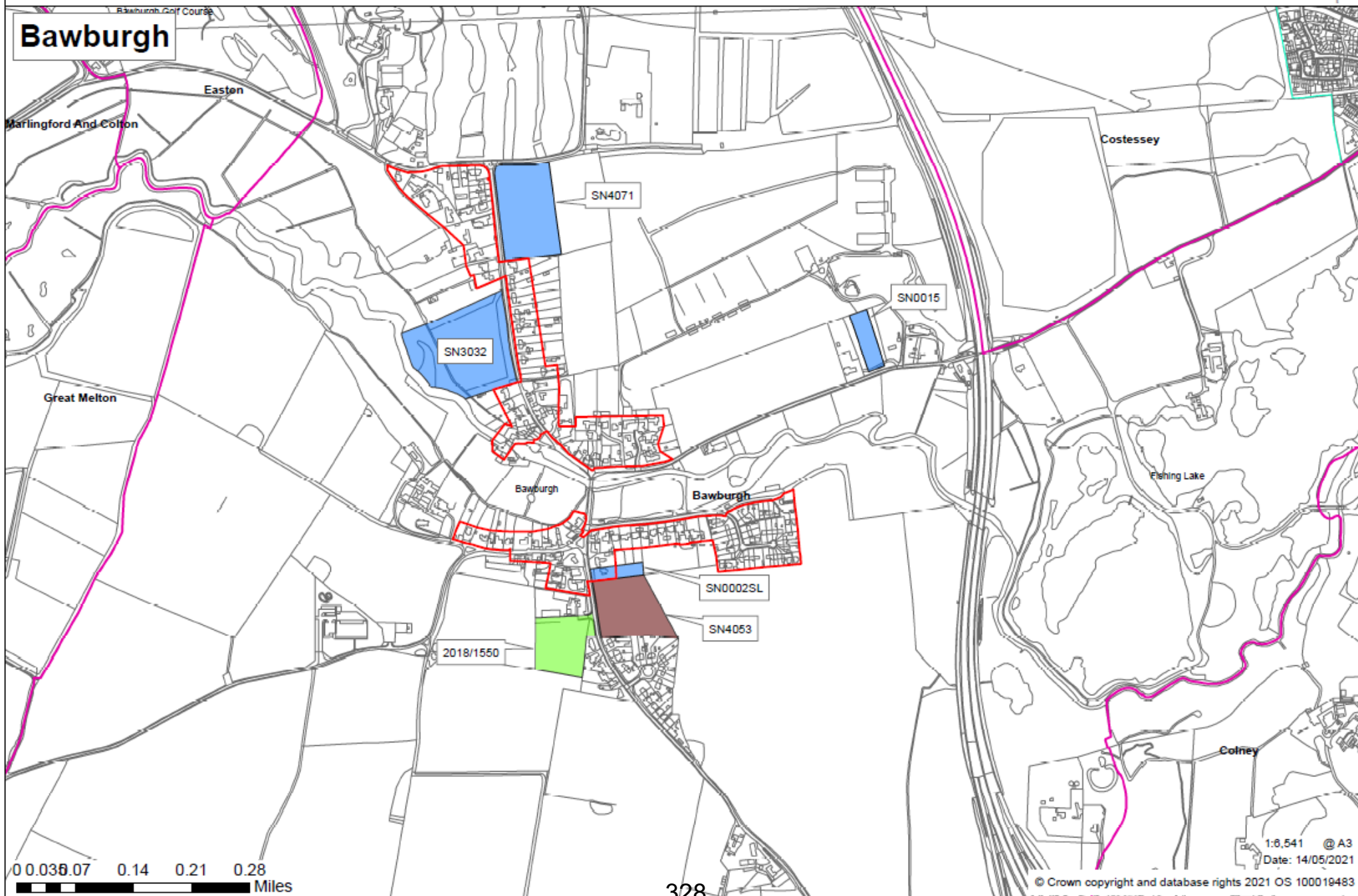
**Barnham Broom, Kimberley,
Carleton Forehoe, Runhall
and Brandon Parva**



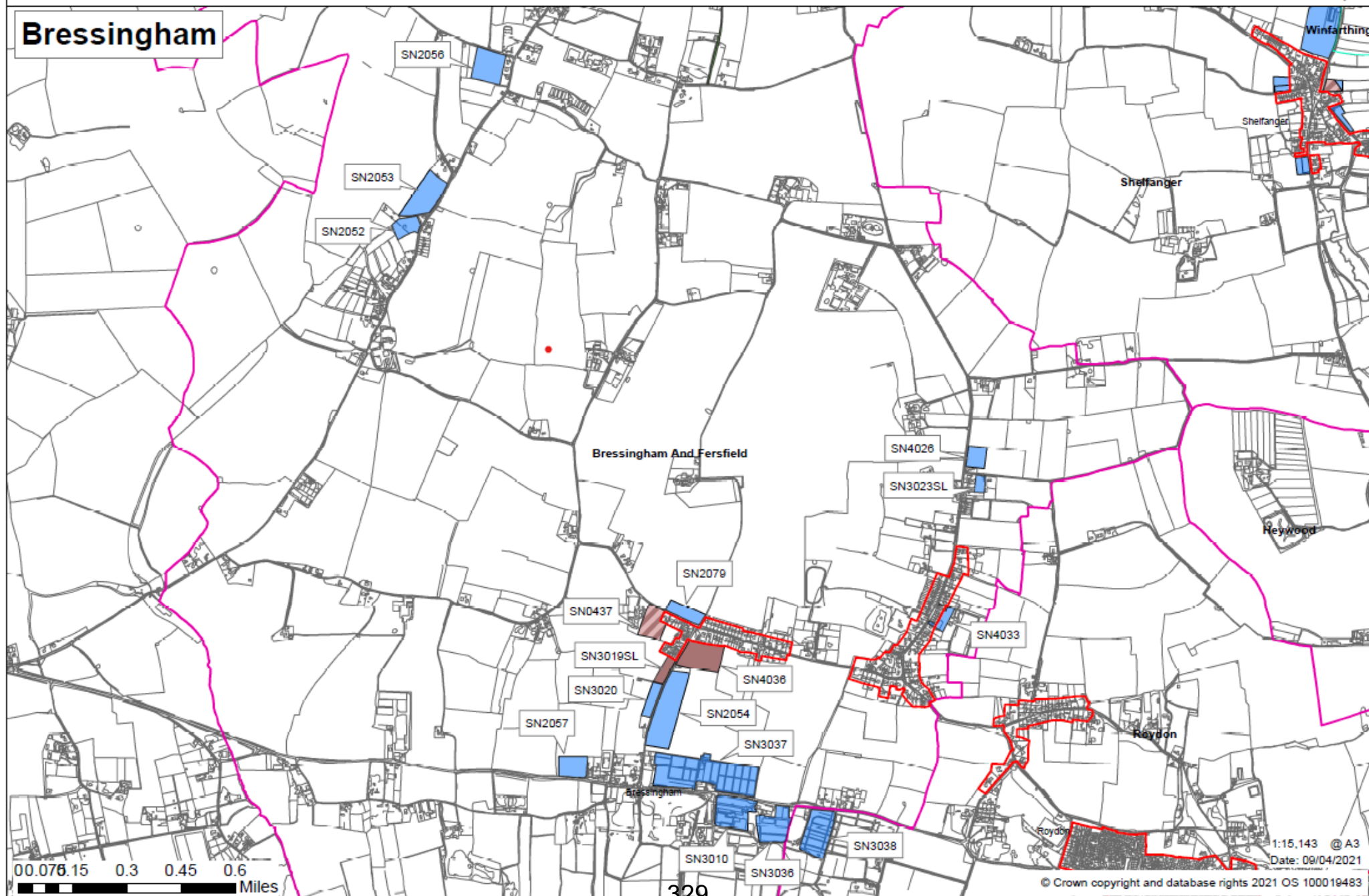
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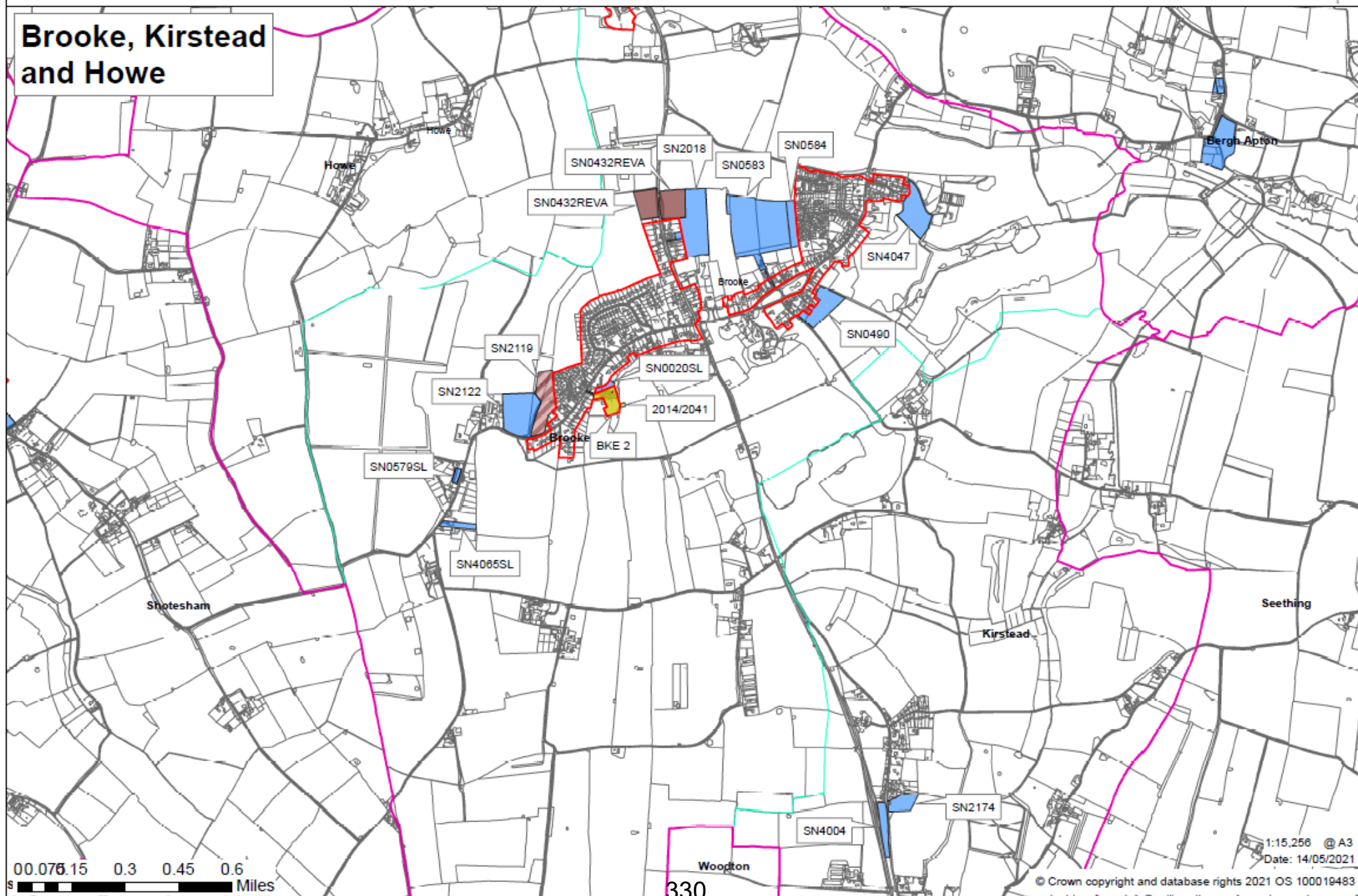


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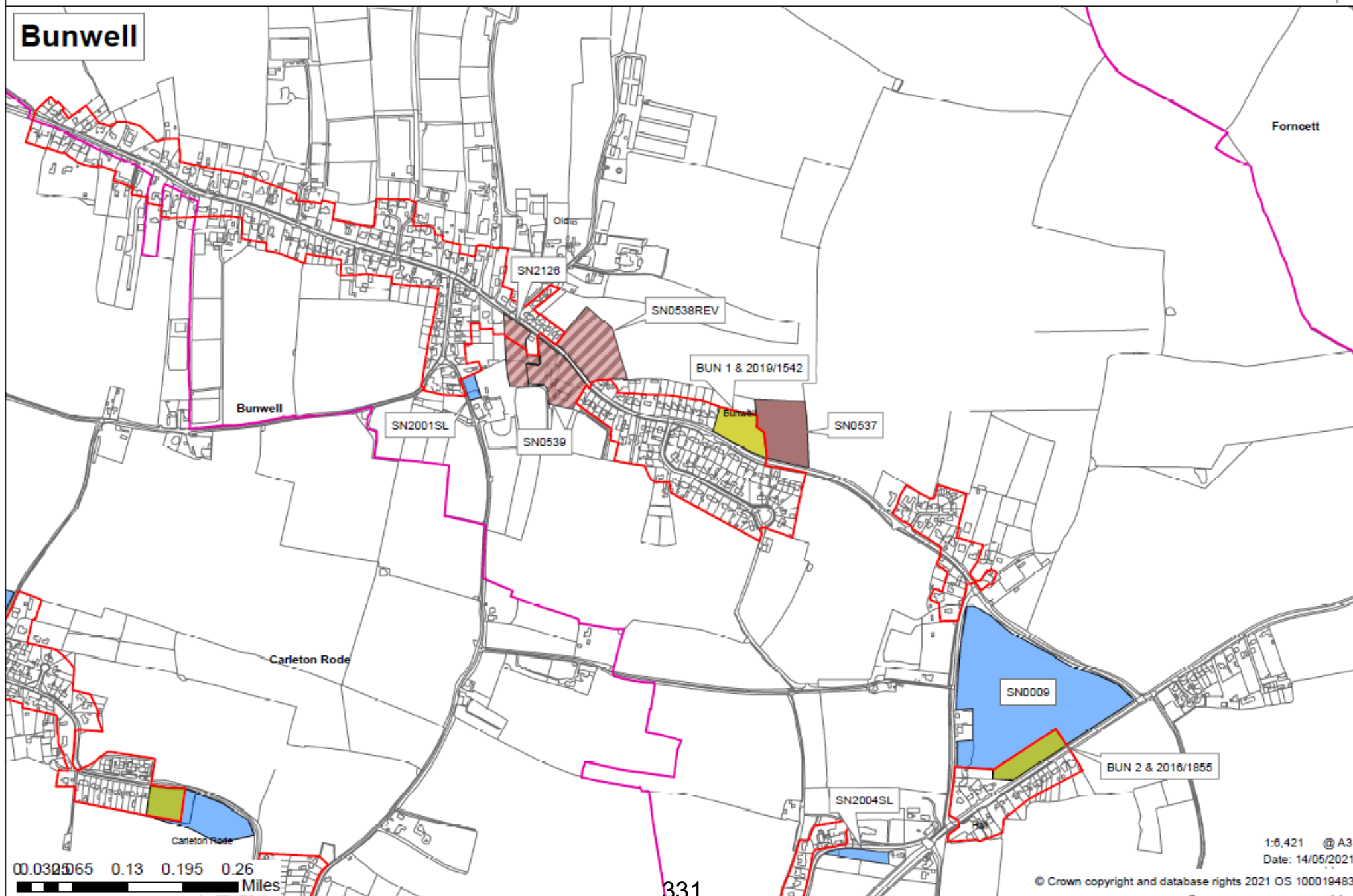


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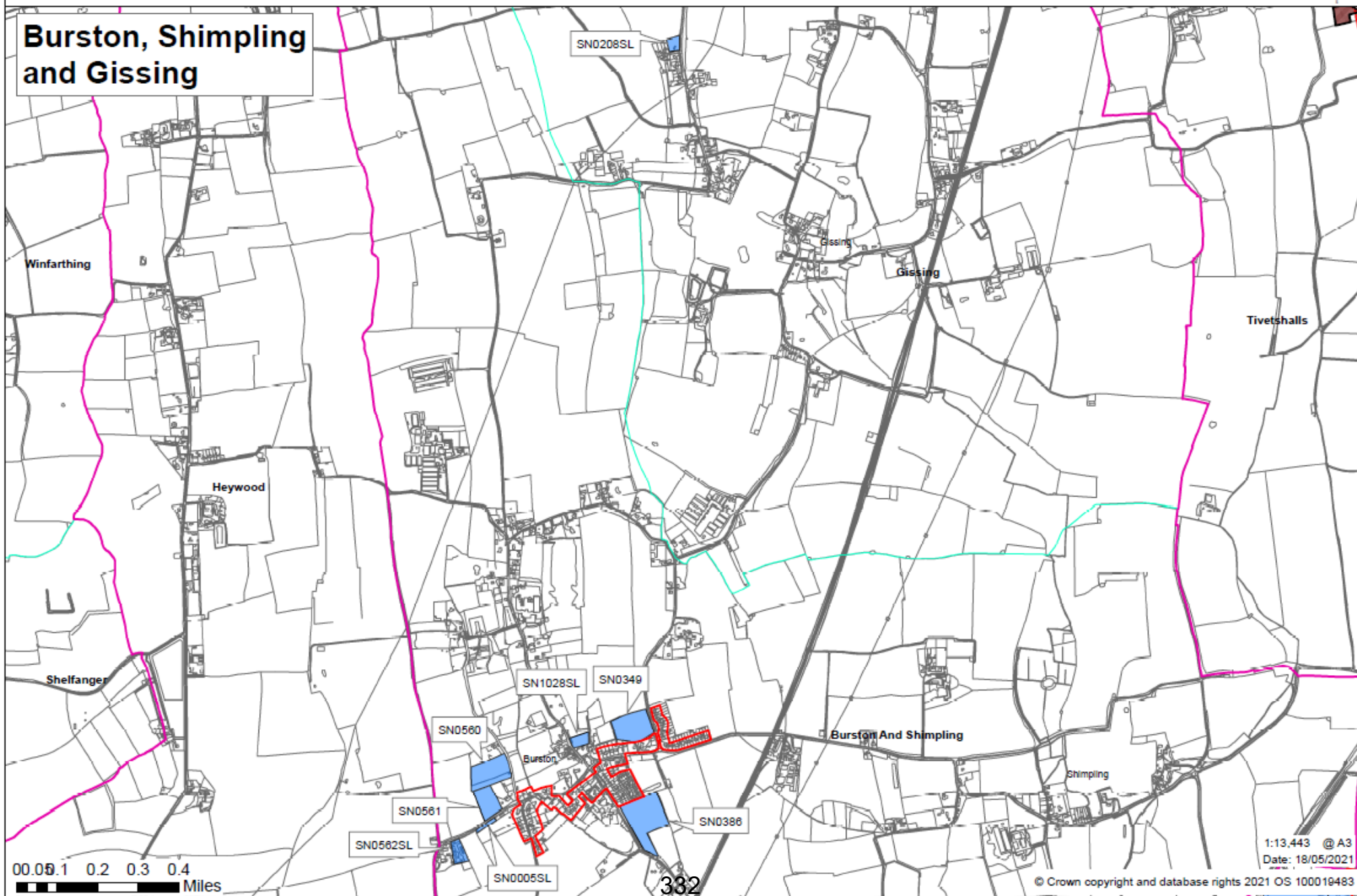
Brooke, Kirstead and Howe



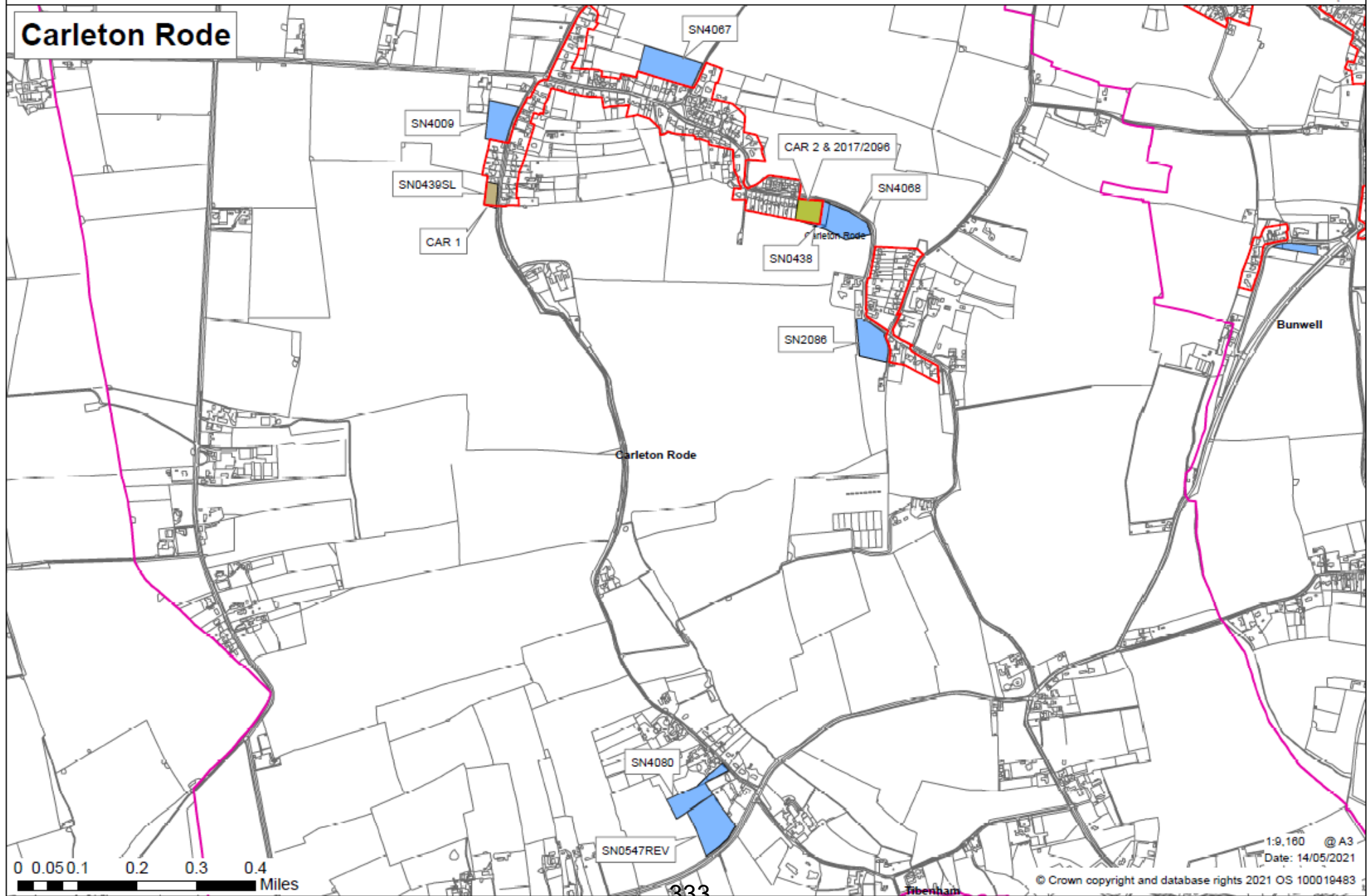
South Norfolk Village Clusters Housing Allocations Plan



South Norfolk Village Clusters Housing Allocations Plan



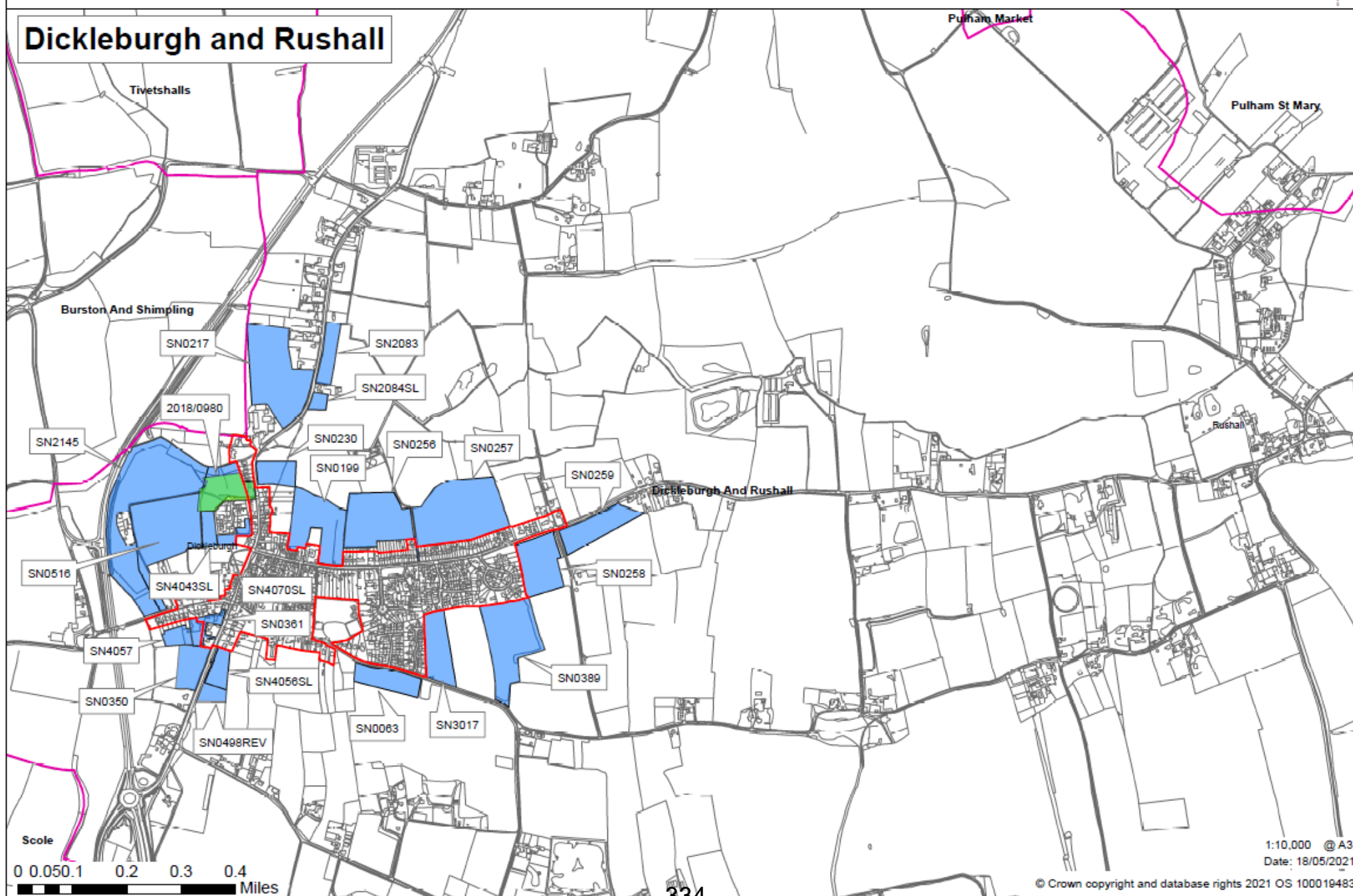
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South Norfolk Village Clusters Housing Allocations Plan



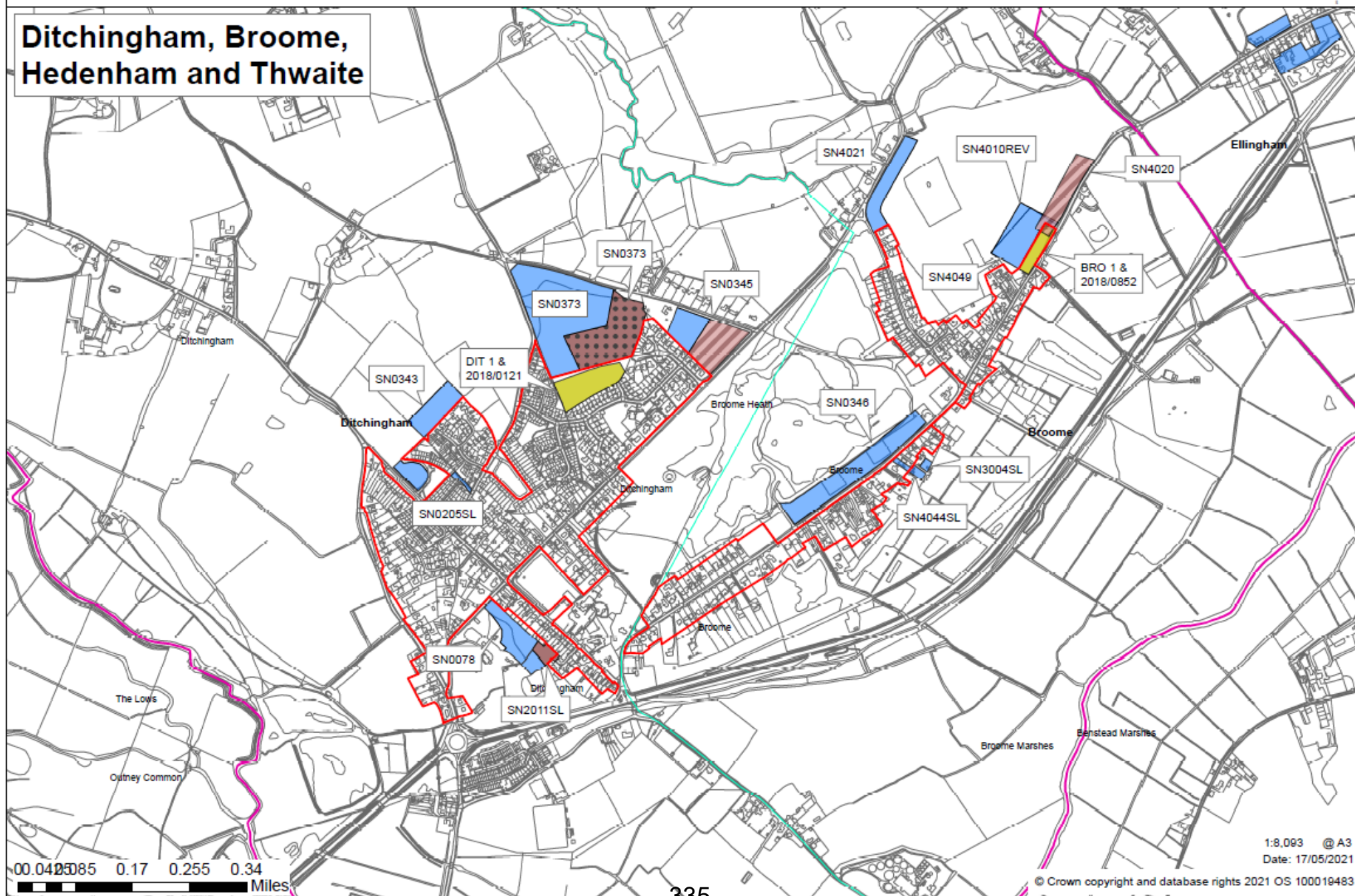
Dickleburgh and Rushall



South Norfolk Village Clusters Housing Allocations Plan



**Ditchingham, Broome,
Hedenham and Thwaite**



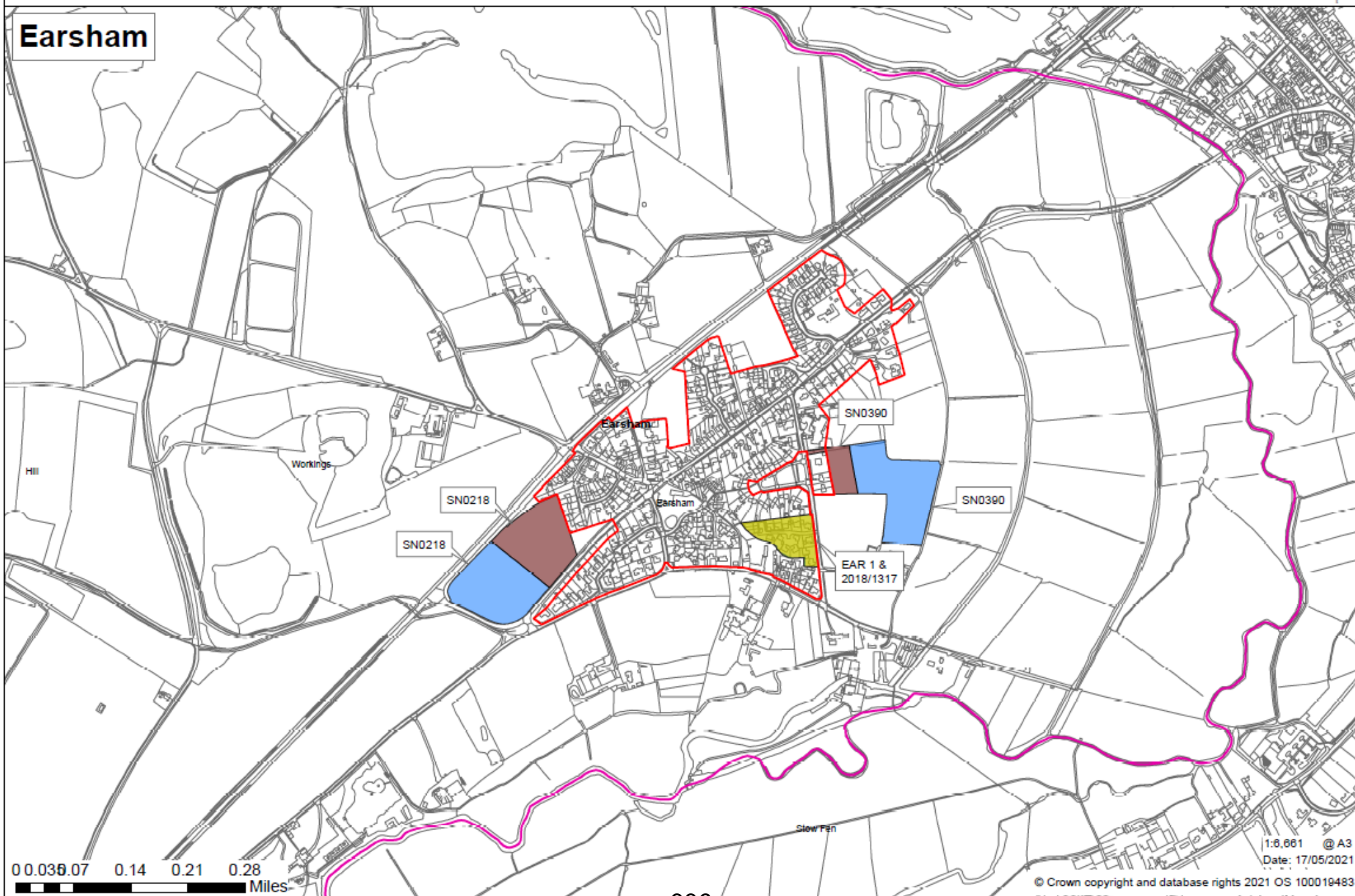
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South Norfolk Village Clusters Housing Allocations Plan



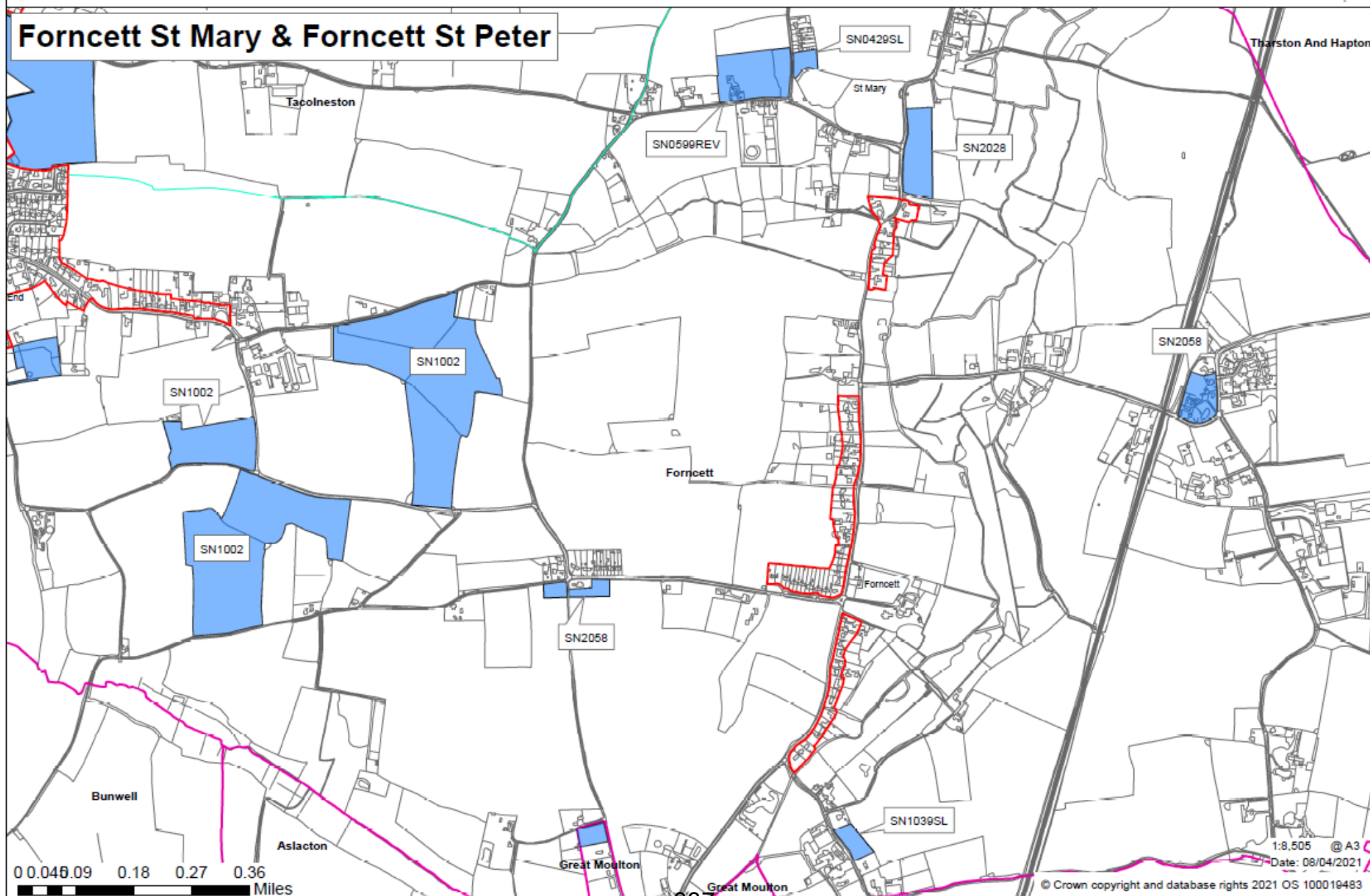
Earsham



South Norfolk Village Clusters Housing Allocations Plan

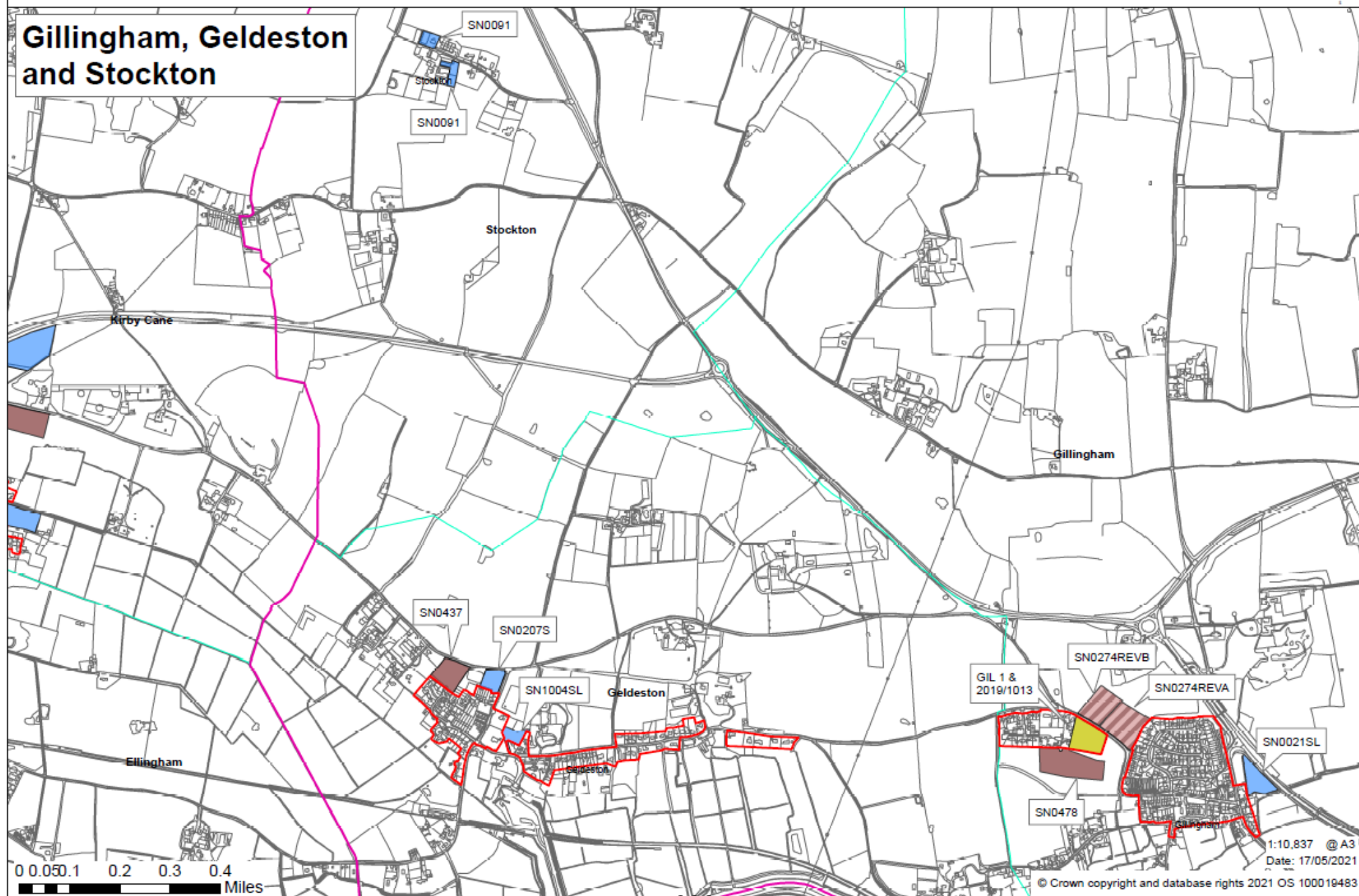


Forncett St Mary & Forncett St Peter

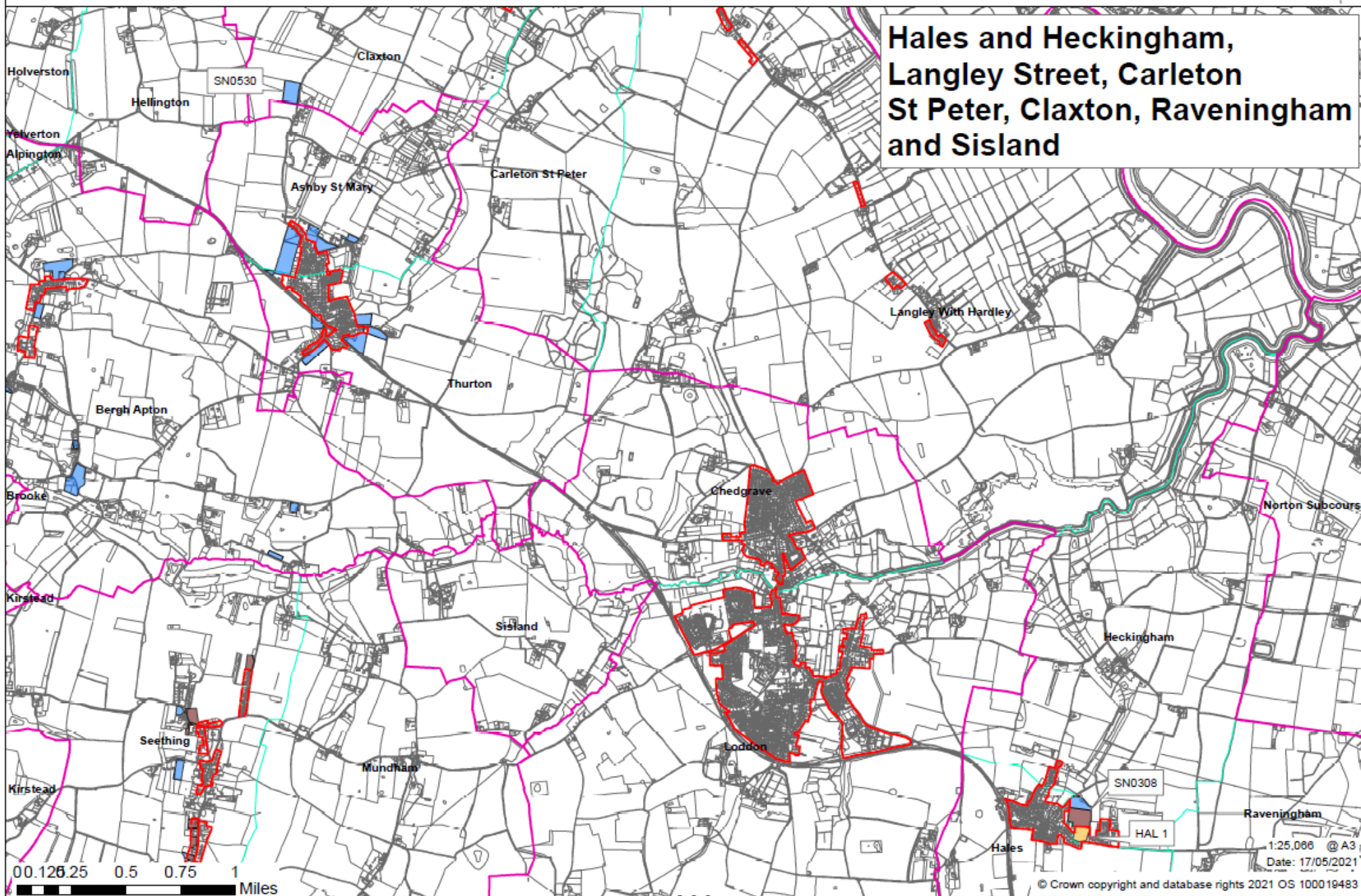


South Norfolk Village Clusters Housing Allocations Plan

Gillingham, Geldeston and Stockton



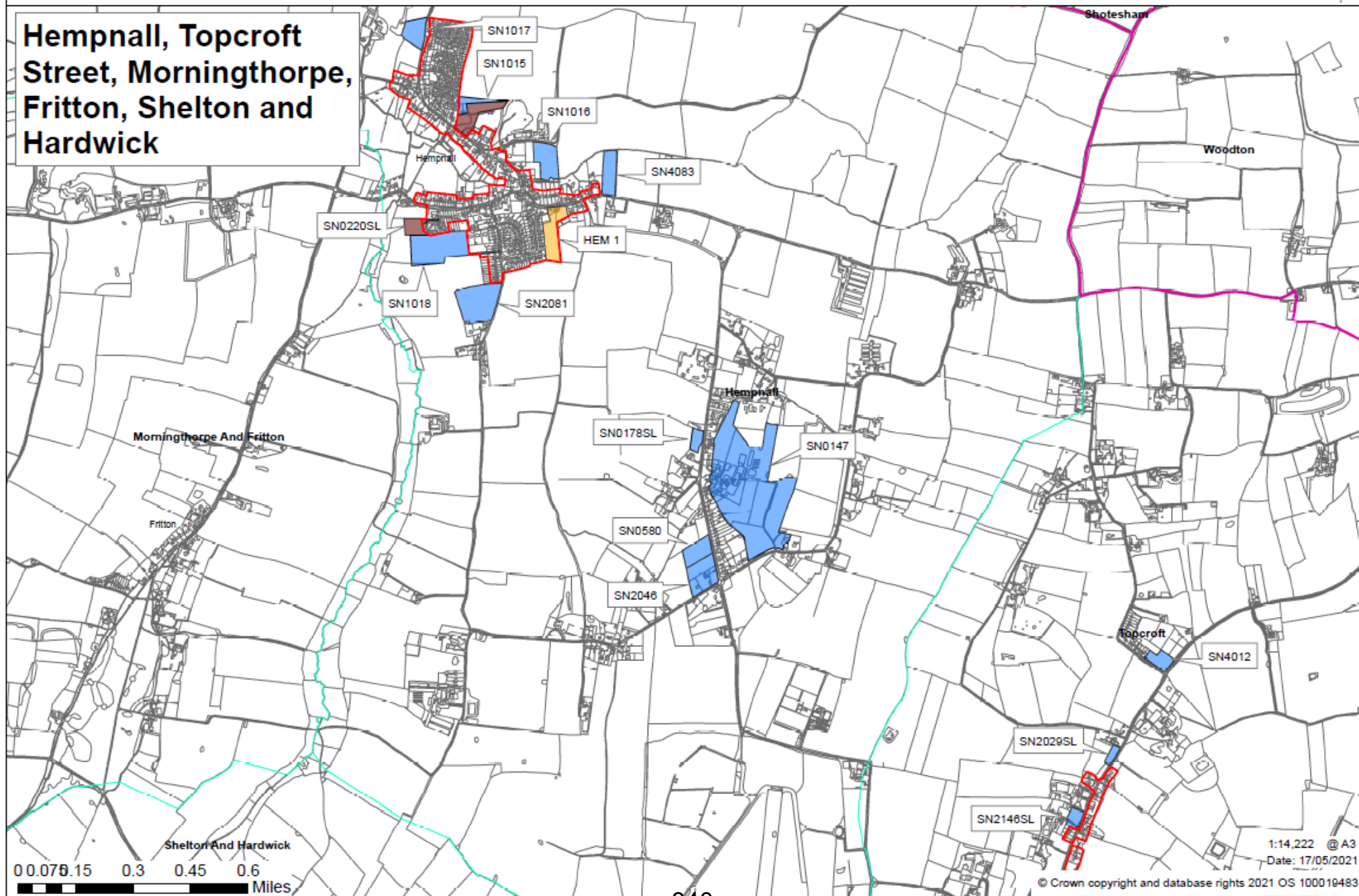
South Norfolk Village Clusters Housing Allocations Plan



South Norfolk Village Clusters Housing Allocations Plan



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



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Date: 17/05/2021

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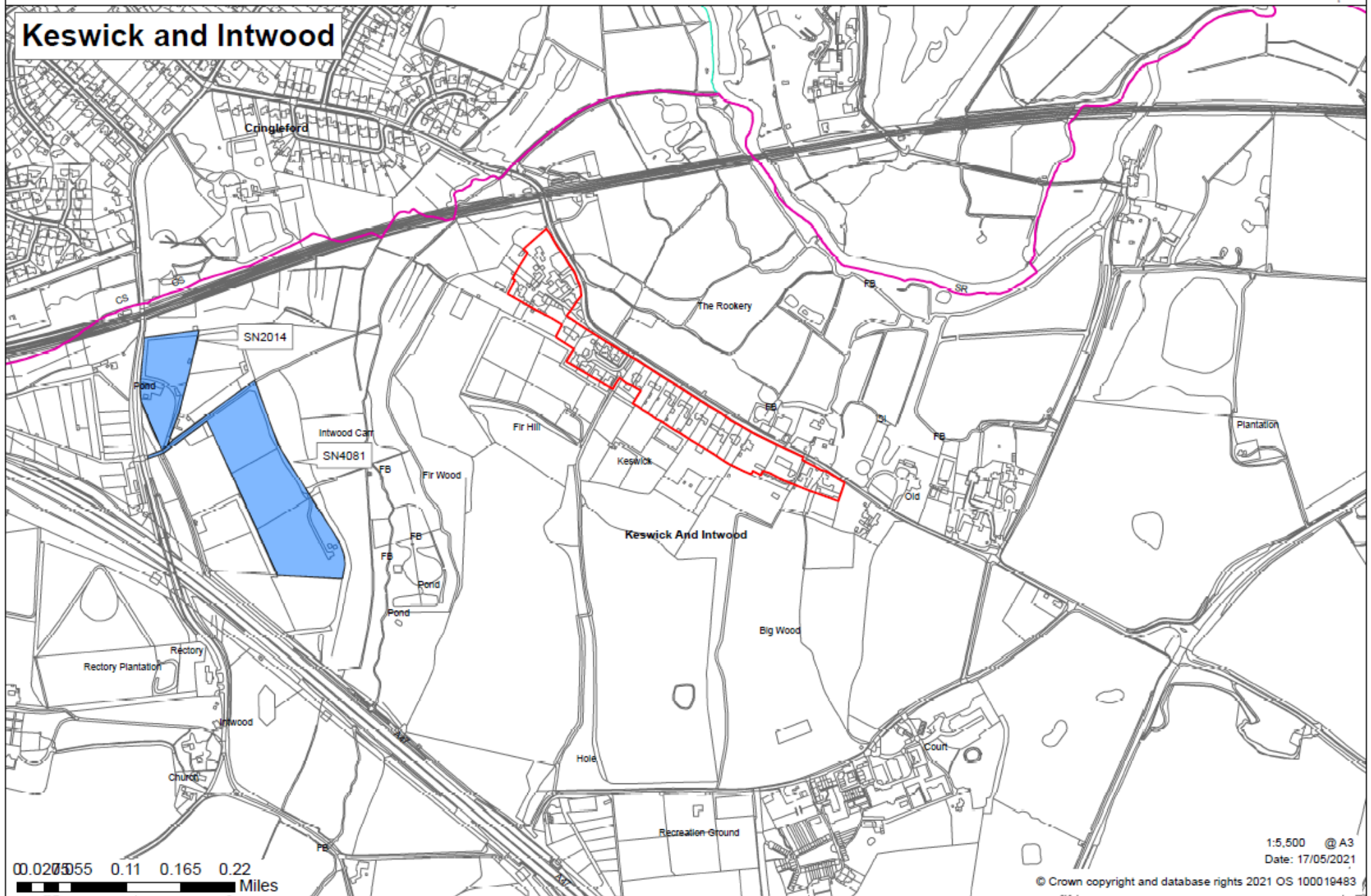
South Norfolk Village Clusters Housing Allocations Plan



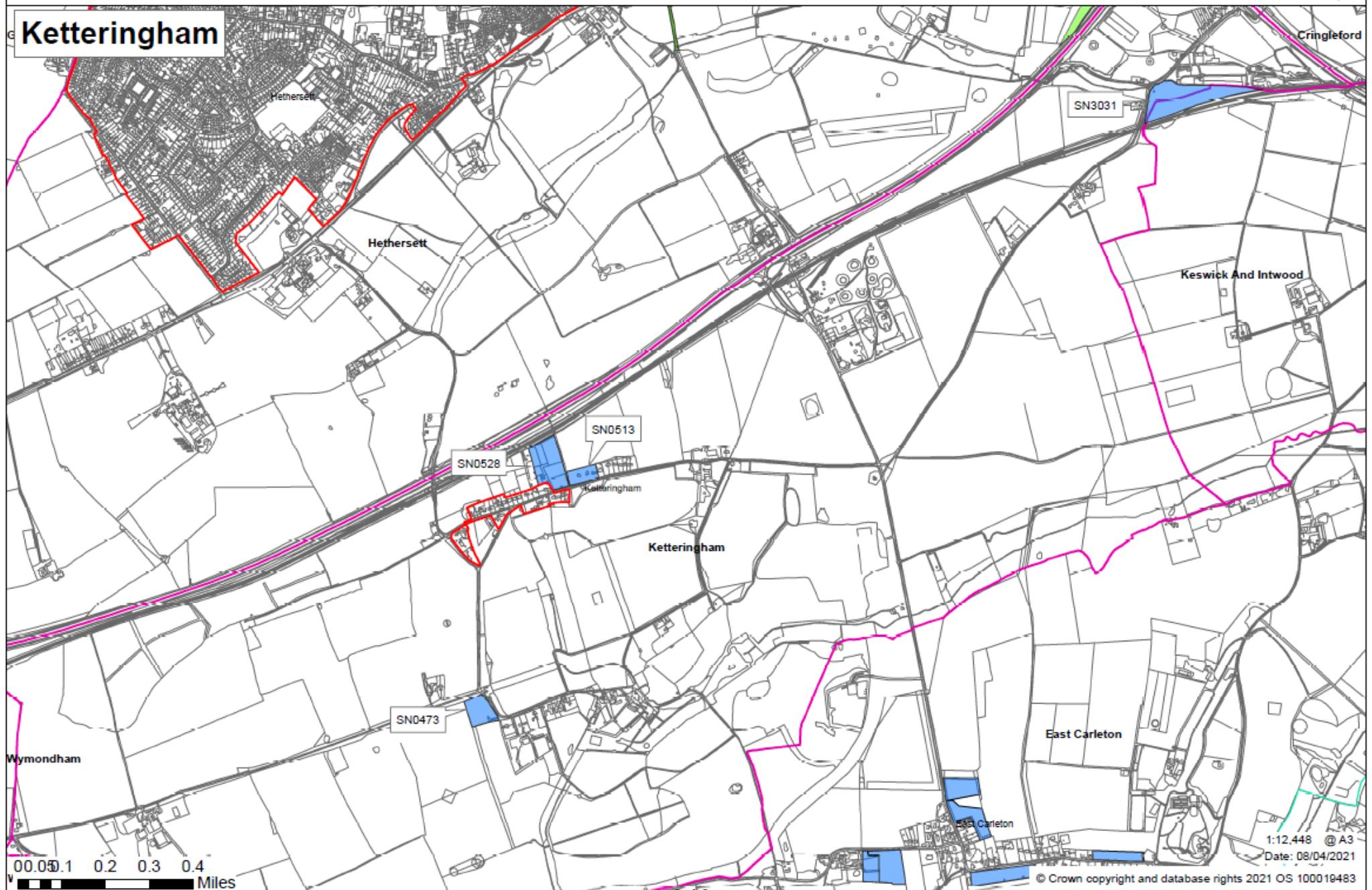
South Norfolk Village Clusters Housing Allocations Plan



Keswick and Intwood



South Norfolk Village Clusters Housing Allocations Plan



Kirby Cane & Ellingham

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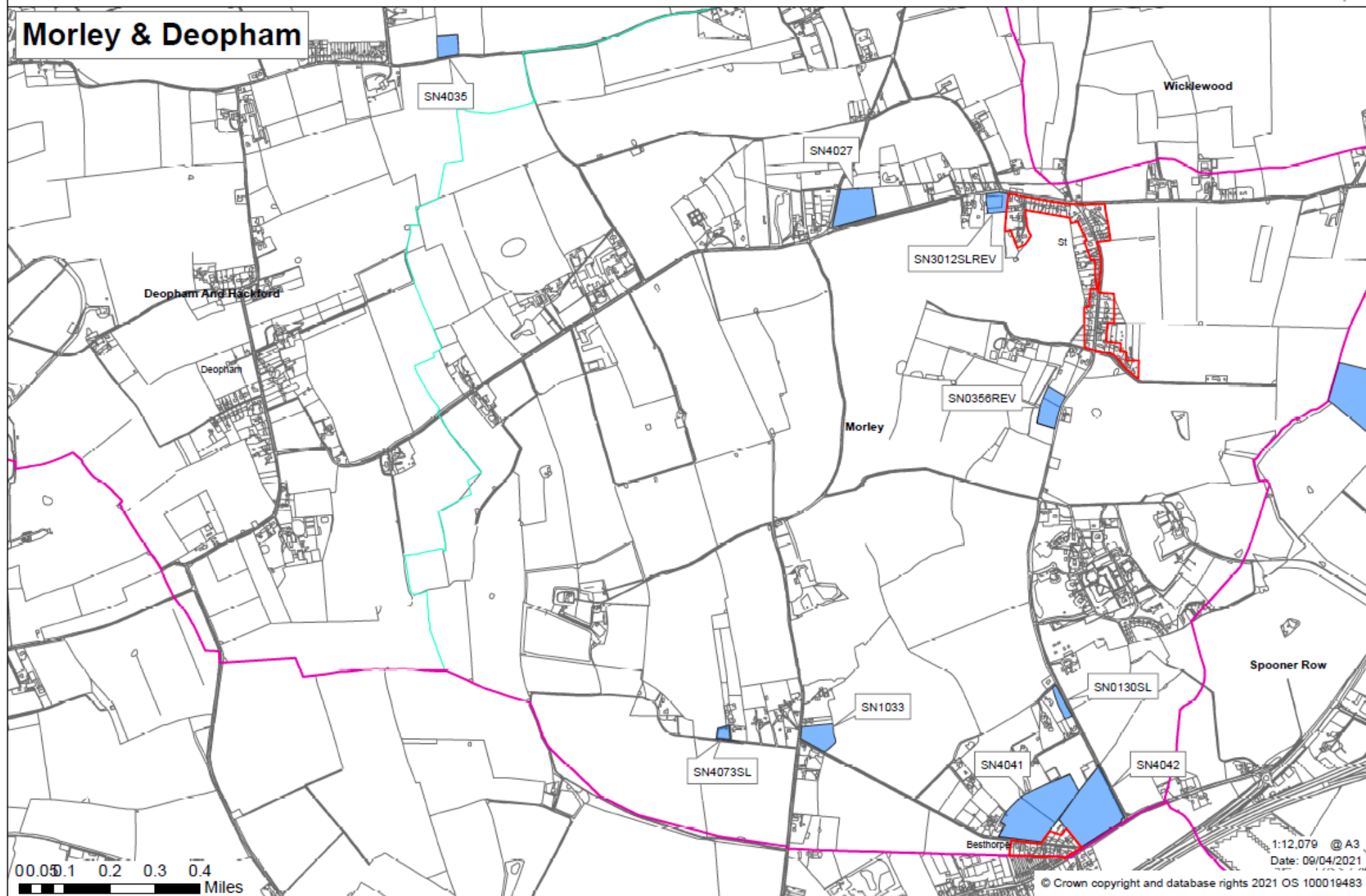
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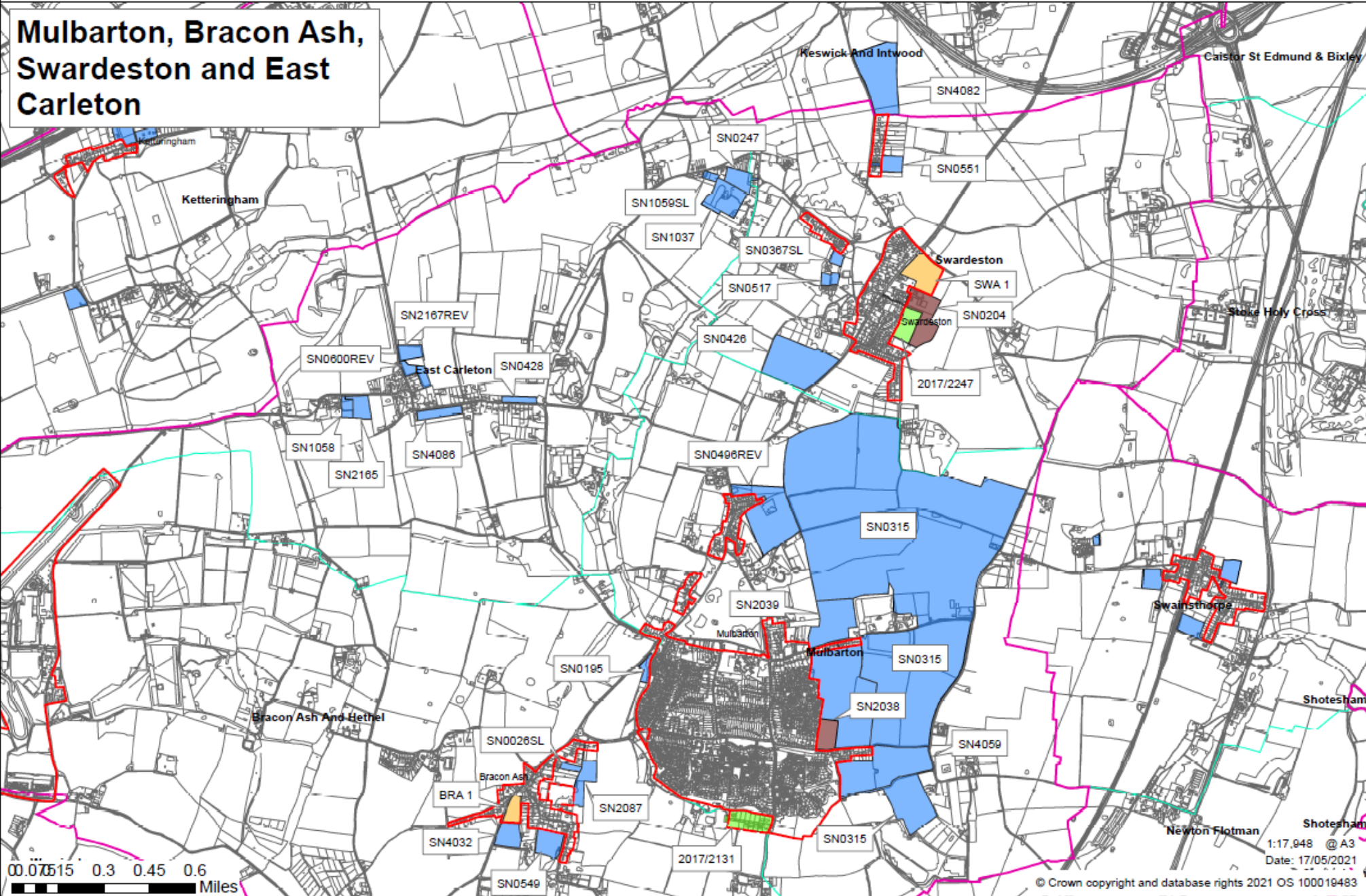
South Norfolk Village Clusters Housing Allocations Plan



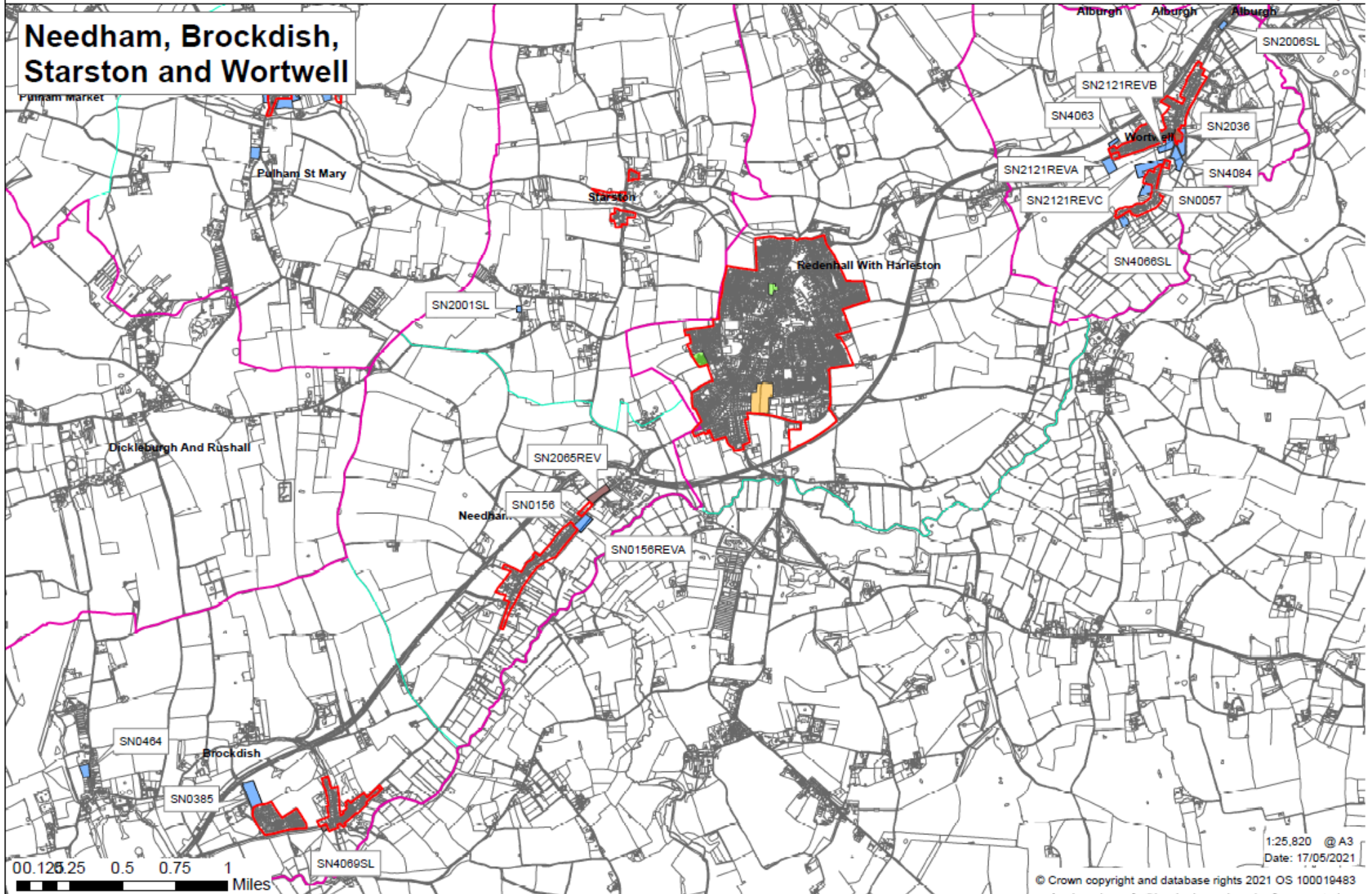
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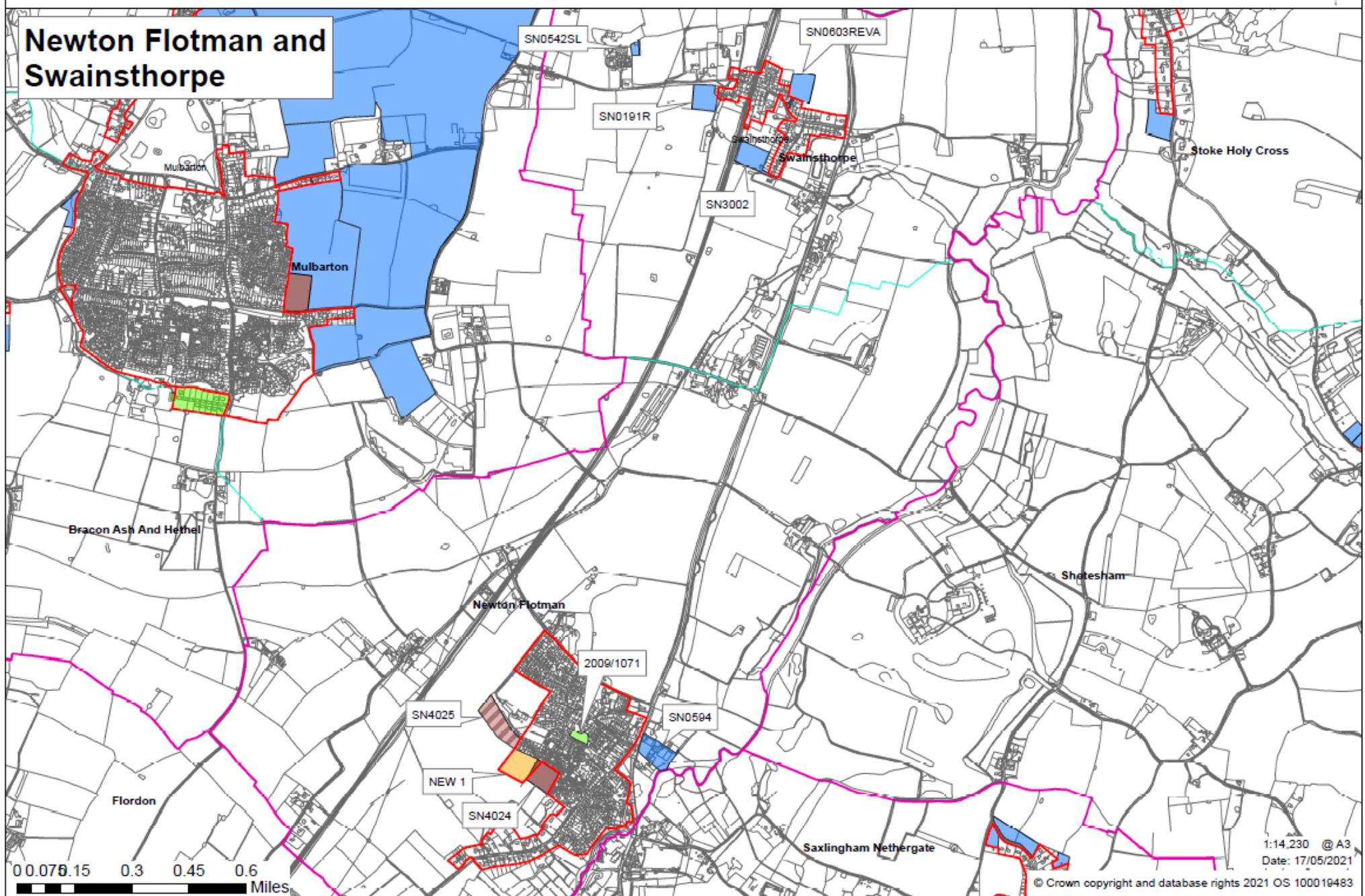
**Mulbarton, Bracon Ash,
Swardeston and East
Carleton**

















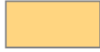

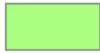














South Norfolk Village Clusters Housing Allocations Plan



South Norfolk Village Clusters Housing Allocations Plan



South Norfolk Village Clusters Allocation - Legend

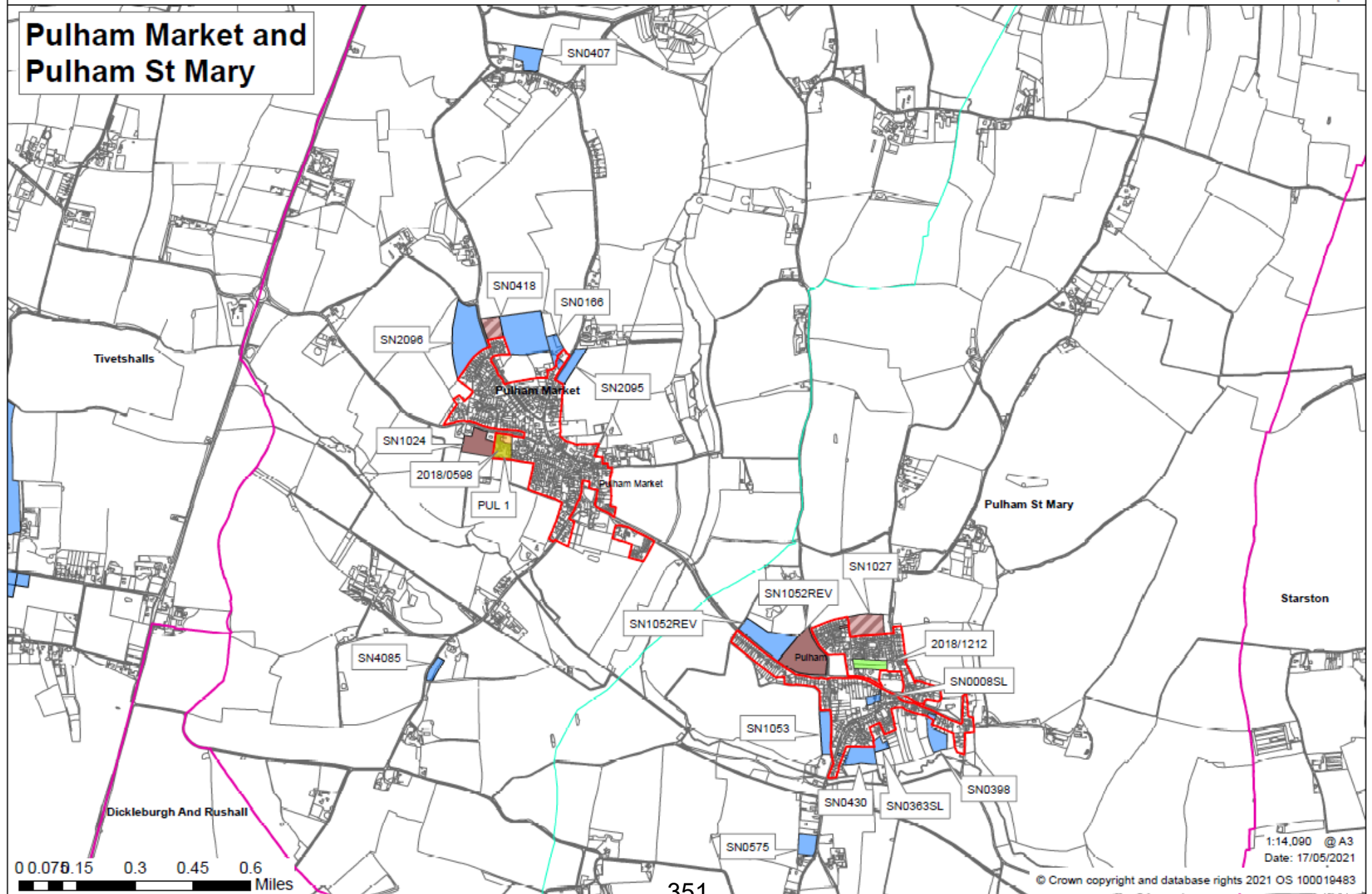
	Existing Settlement Limit		Ancient Woodlands
	Proposed Changes to Settlement Limit		Broads Authority Area
	Preferred Site		County Wildlife Sites
	Preferred Site - Boundary to be Determined		Ramsar Sites
	Shortlisted Site		SSSI
	Shortlisted Site - Boundary to be Determined		Conservation Areas
	Rejected Site		Special Areas of Conservation
	Existing Allocations Carried Forward		Special Protection Areas
	Existing Unimplemented Permissions at 1 April 2020*		Norwich Southern Bypass Protection Zone
	Existing Unimplemented Permissions at 1 April 2020 on an Existing Allocation*		River Valley Landscape
	Cluster Boundary		Flood Zone 2
	Parish Boundary		Flood Zone 3
	Infant, Junior and Primary Schools		Surface Water Flood Depth 1-30
	Secondary Schools		Surface Water Flood Depth 1-100
	GP Practices		Surface Water Flood Depth 1-1000
			Surface Water Flood Hazard 1-30

* Unimplemented Permissions at 1 April 2020 only showing sites of 6 or more dwellings

South Norfolk Village Clusters Housing Allocations Plan



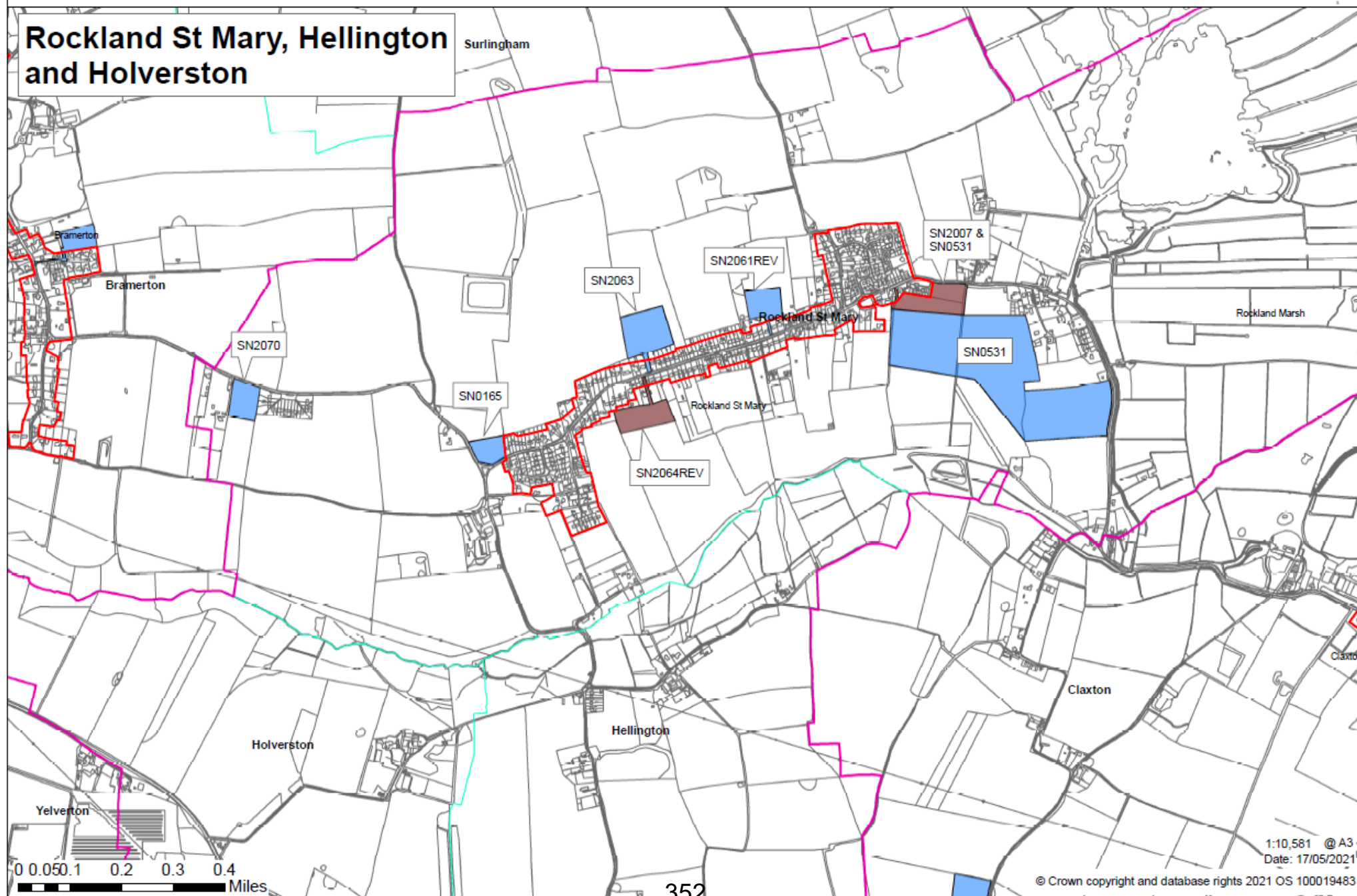
Pulham Market and Pulham St Mary



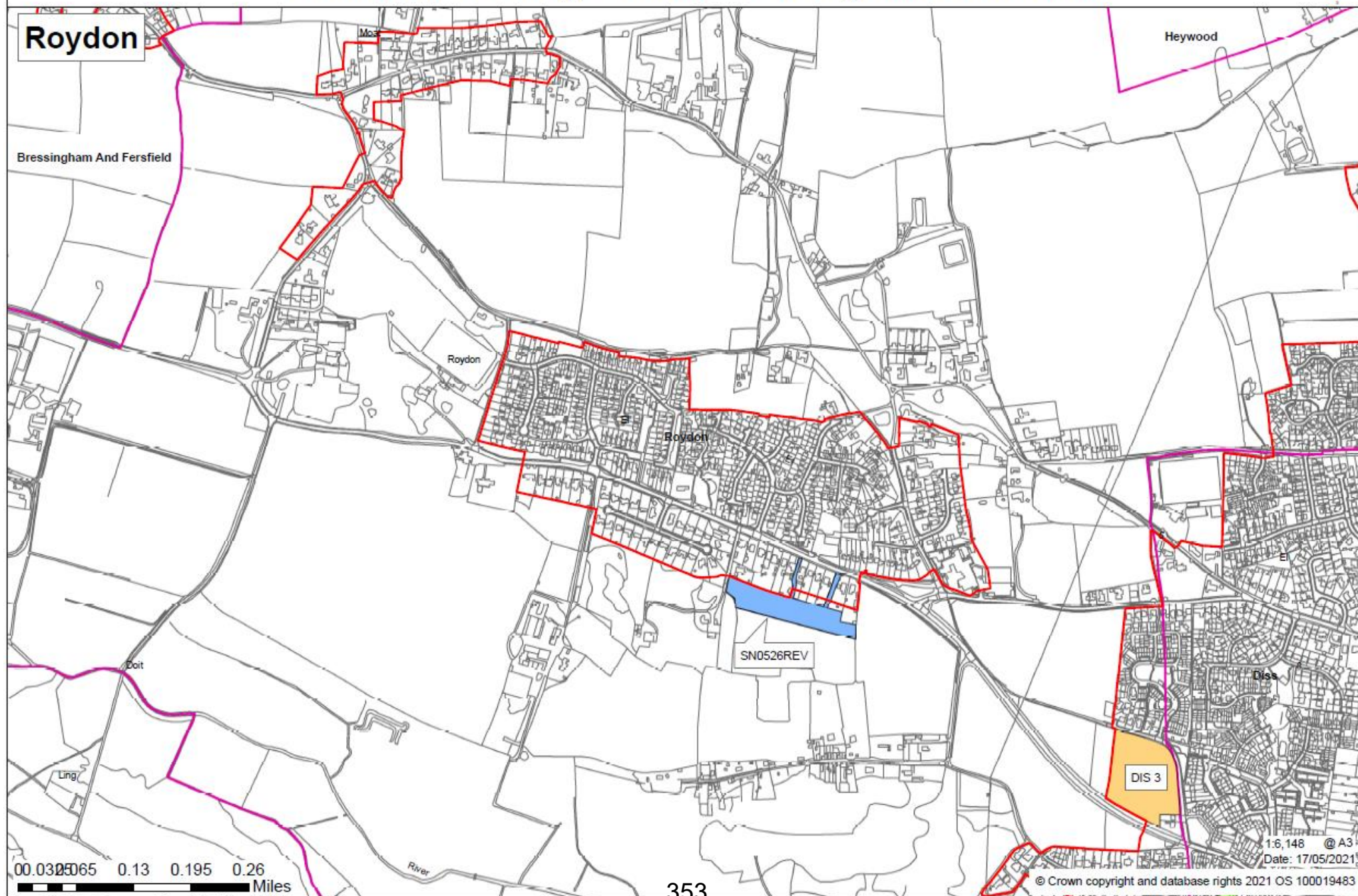
South Norfolk Village Clusters Housing Allocations Plan



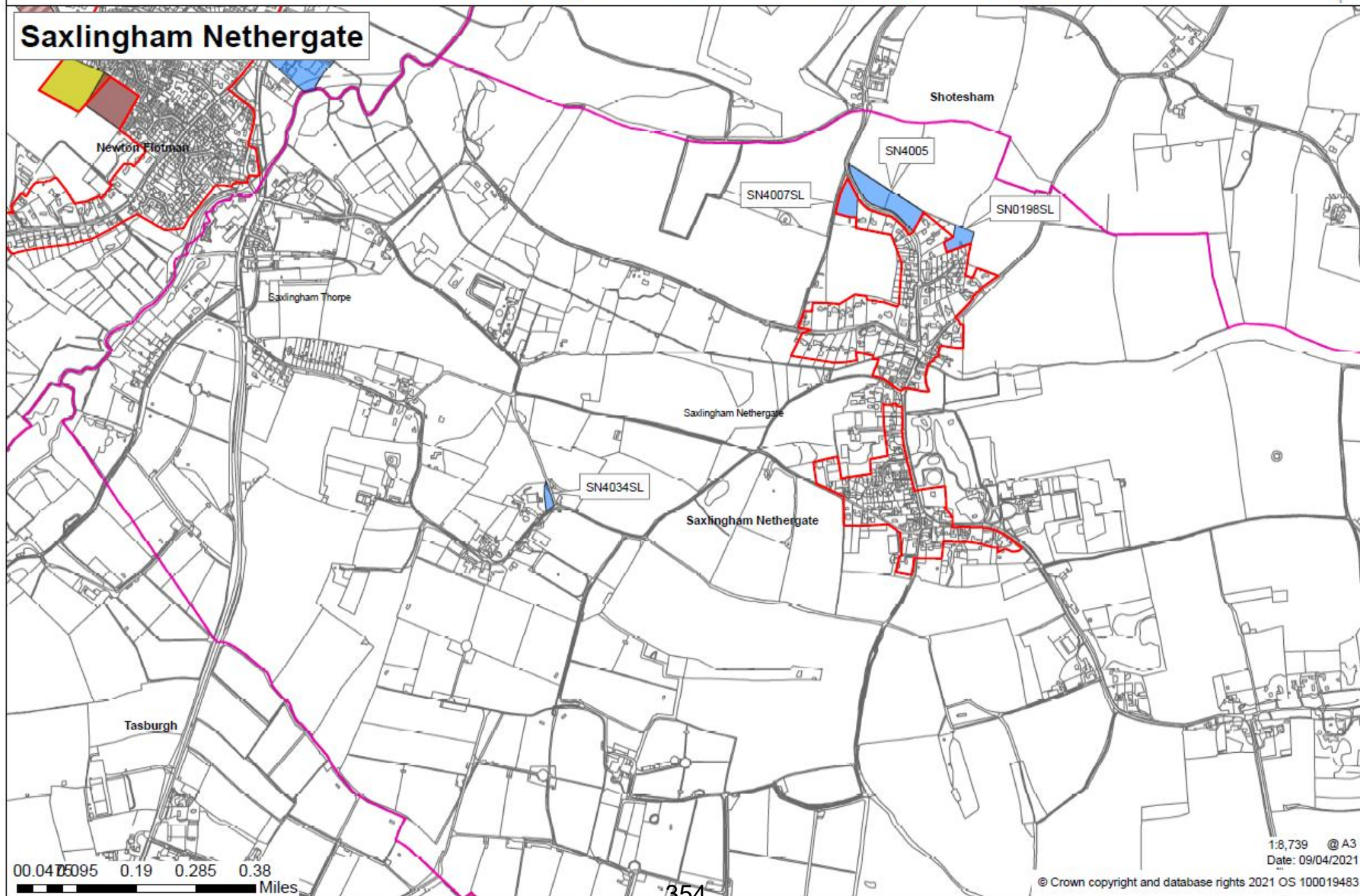
Rockland St Mary, Hellington and Holverston



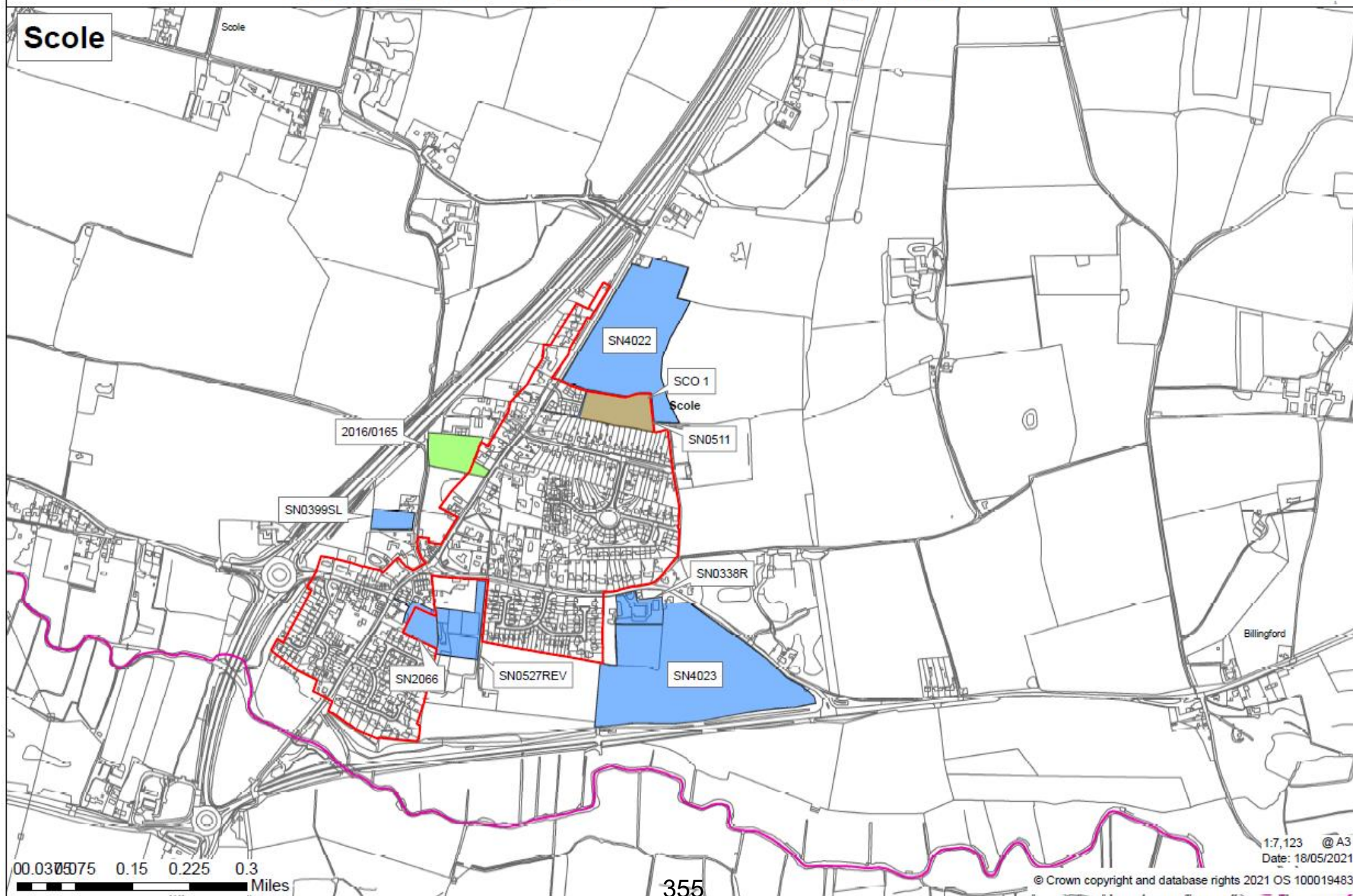
South Norfolk Village Clusters Housing Allocations Plan



South Norfolk Village Clusters Housing Allocations Plan



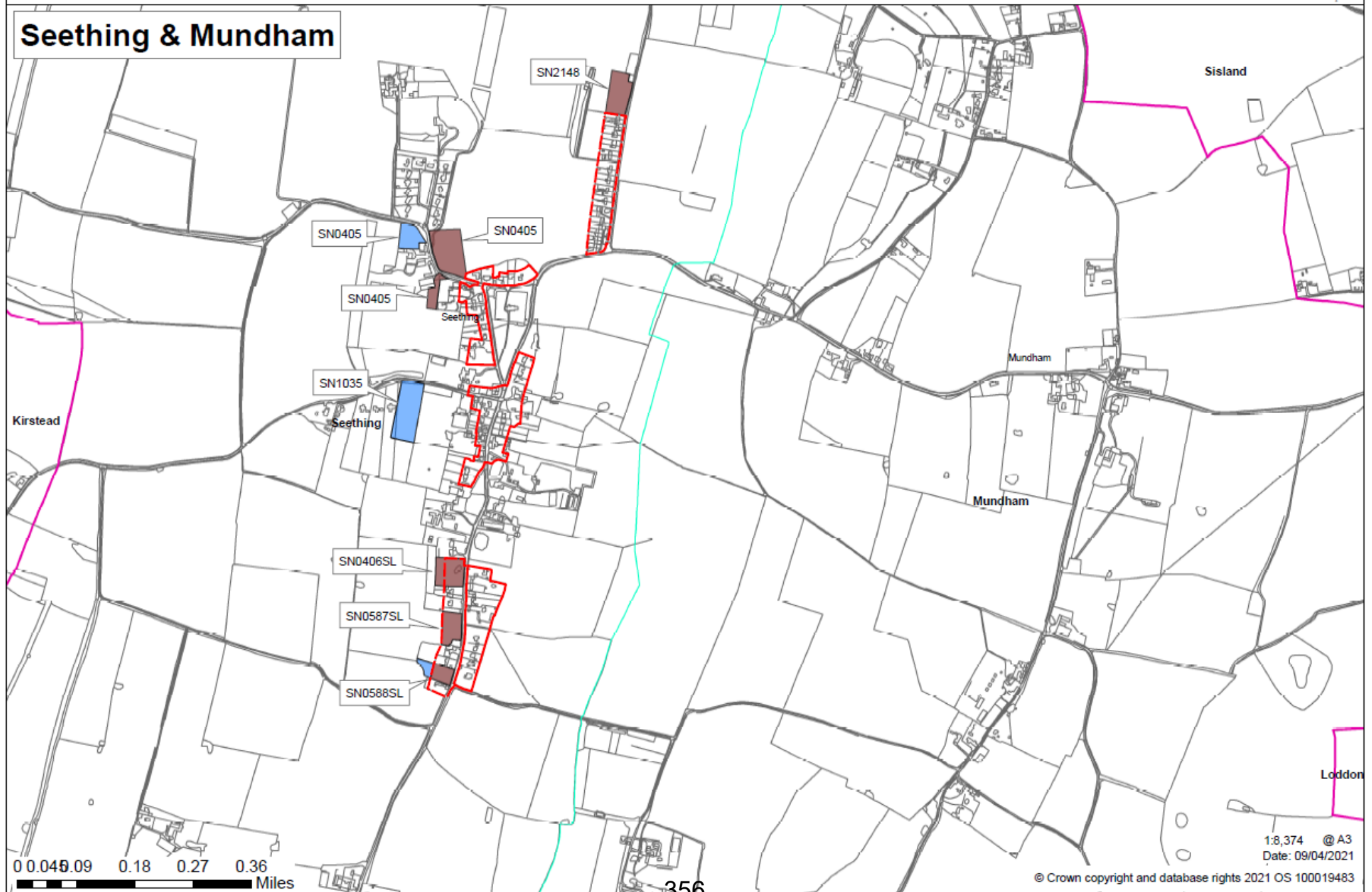
South Norfolk Village Clusters Housing Allocations Plan



South Norfolk Village Clusters Housing Allocations Plan



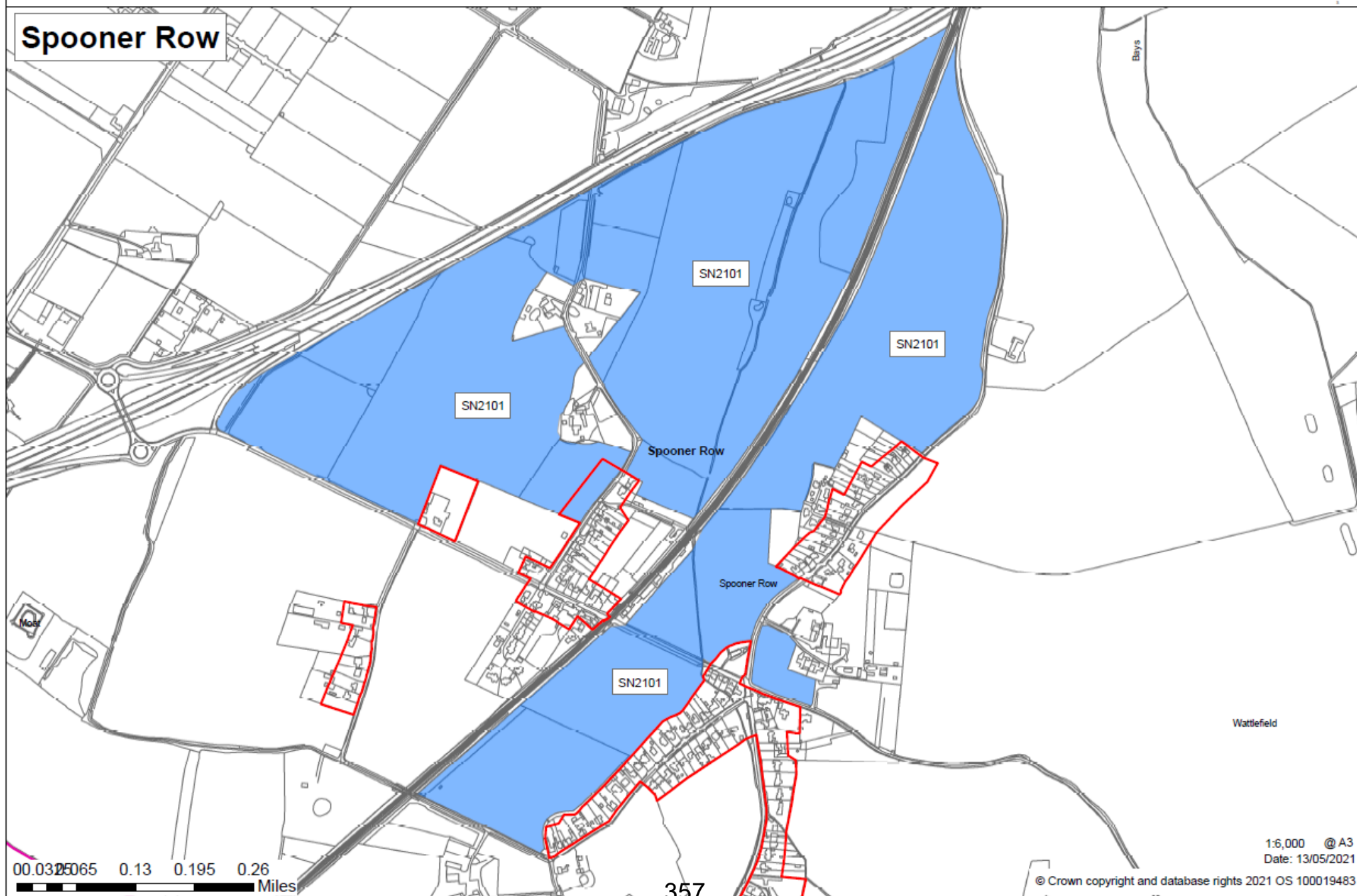
Seething & Mundham



South Norfolk Village Clusters Housing Allocations Plan



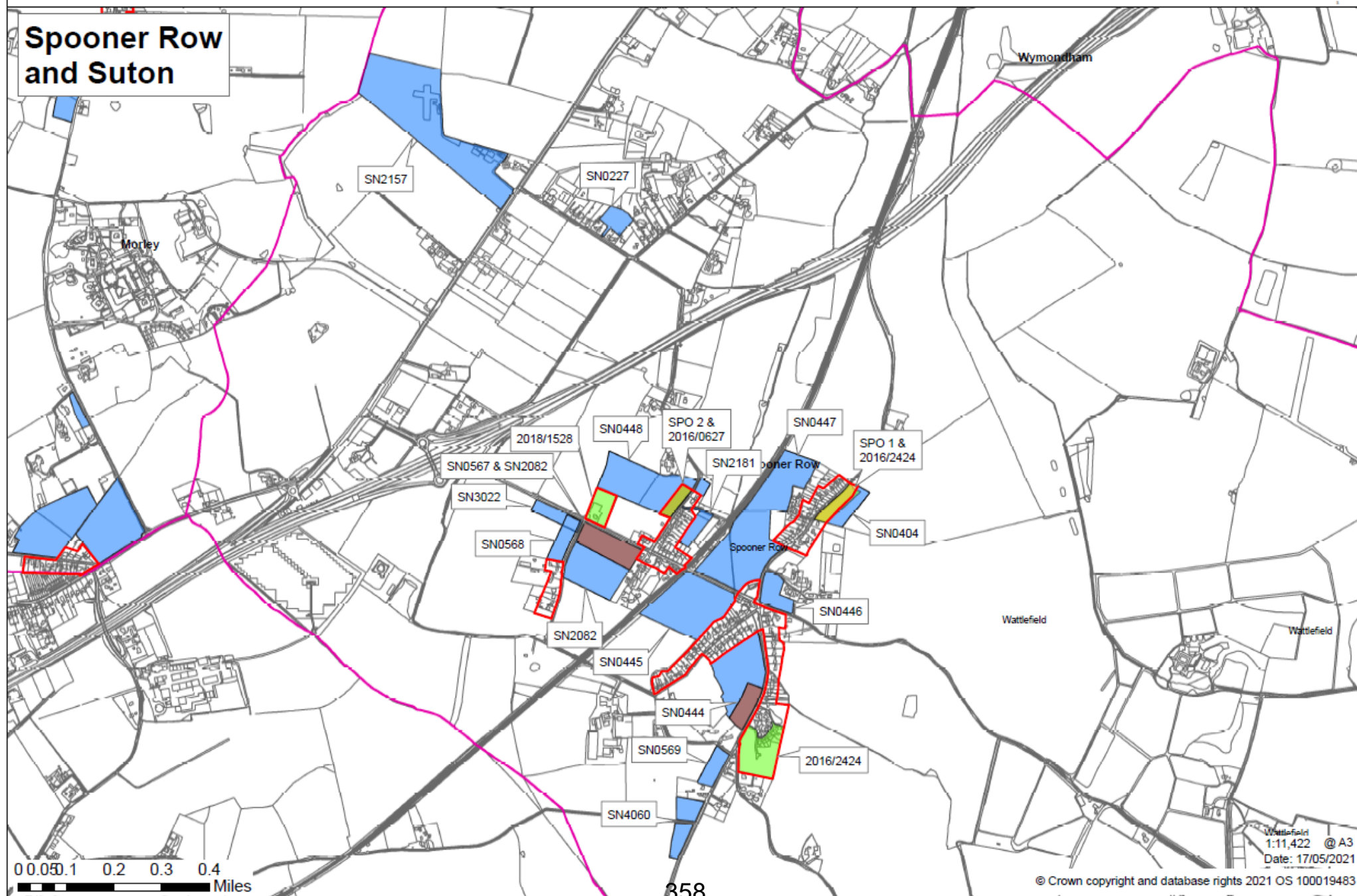
Spooner Row



South Norfolk Village Clusters Housing Allocations Plan



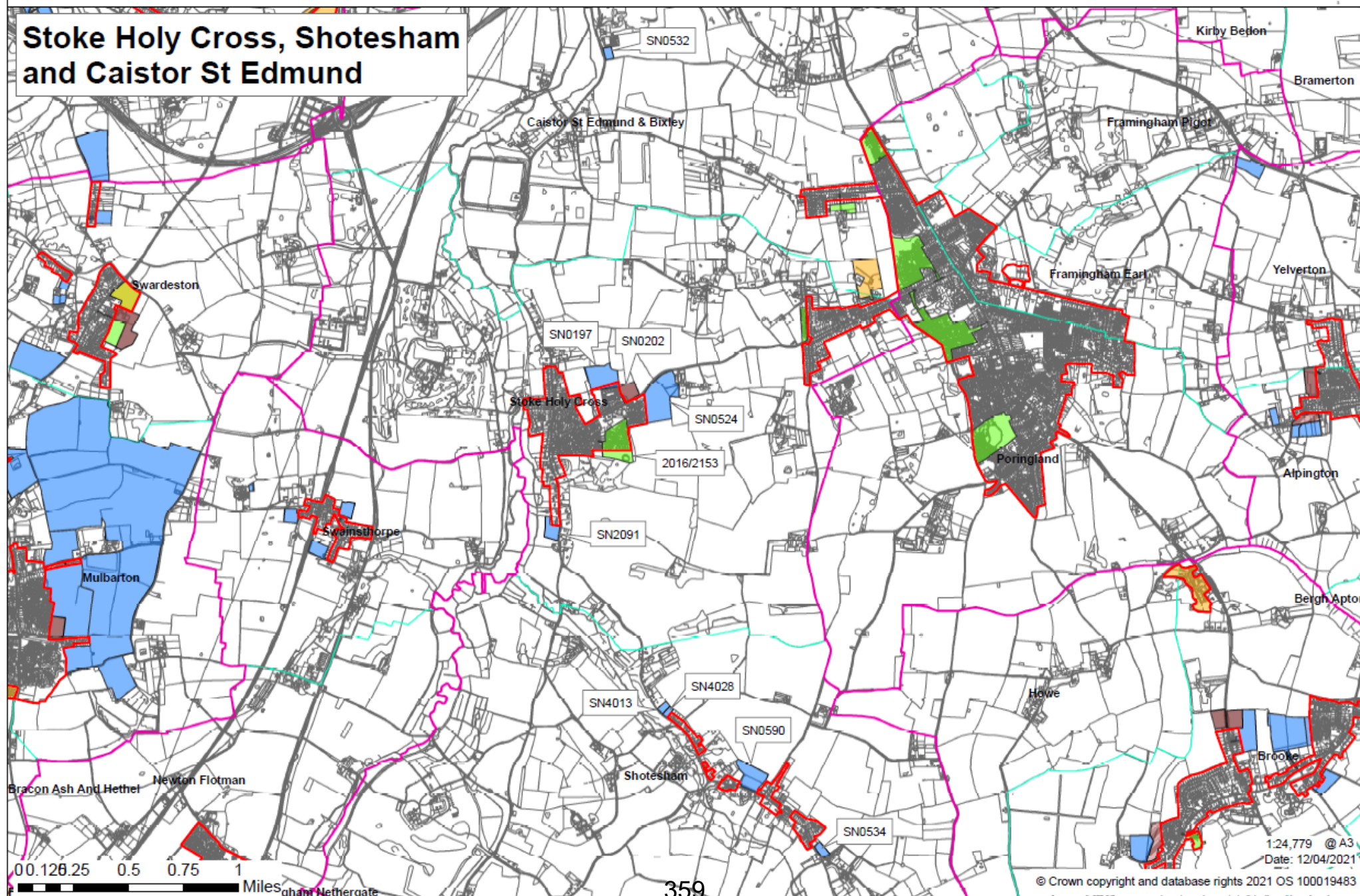
Spooner Row and Sutton



South Norfolk Village Clusters Housing Allocations Plan



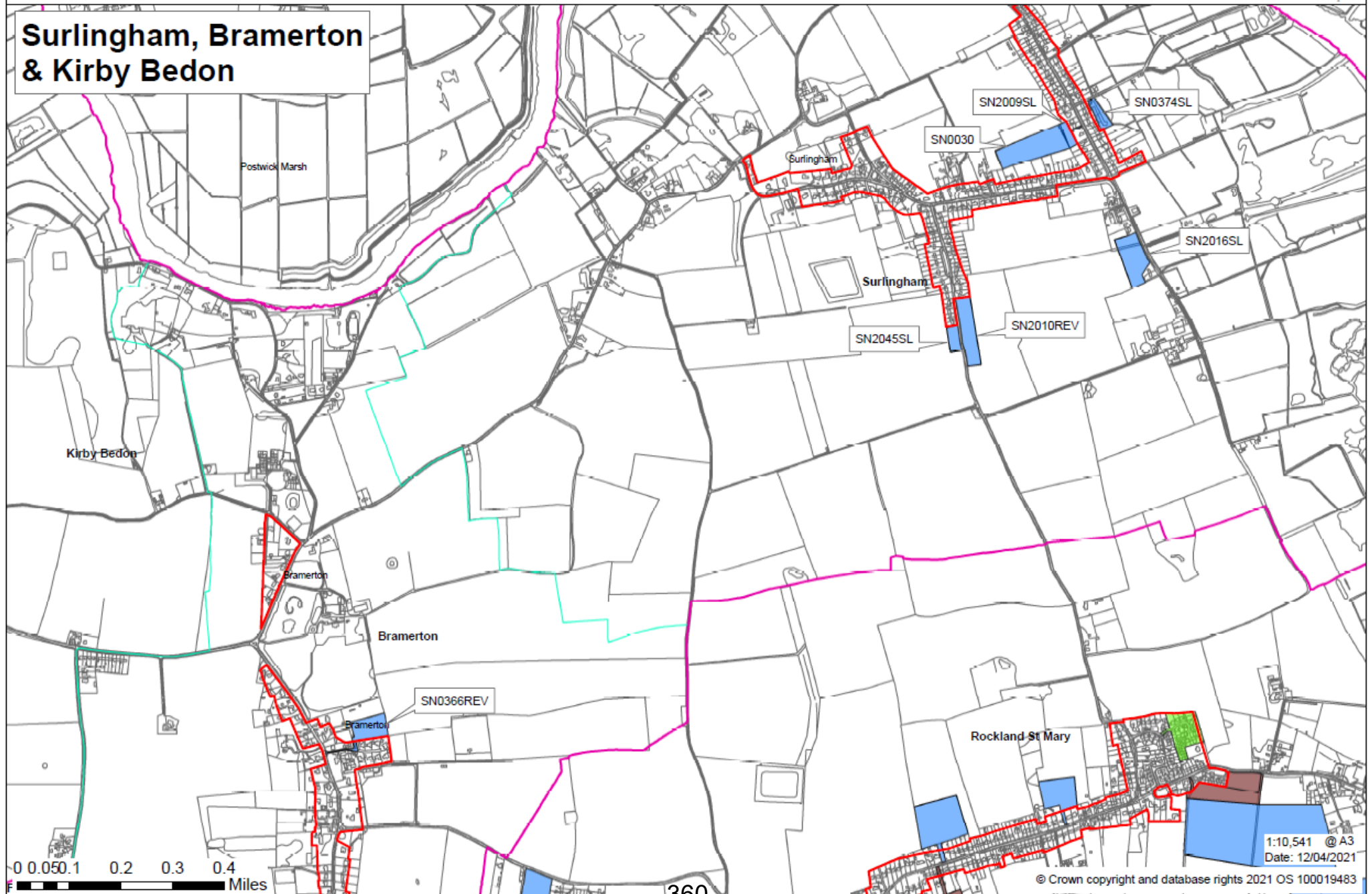
Stoke Holy Cross, Shotesham and Caistor St Edmund



South Norfolk Village Clusters Housing Allocations Plan



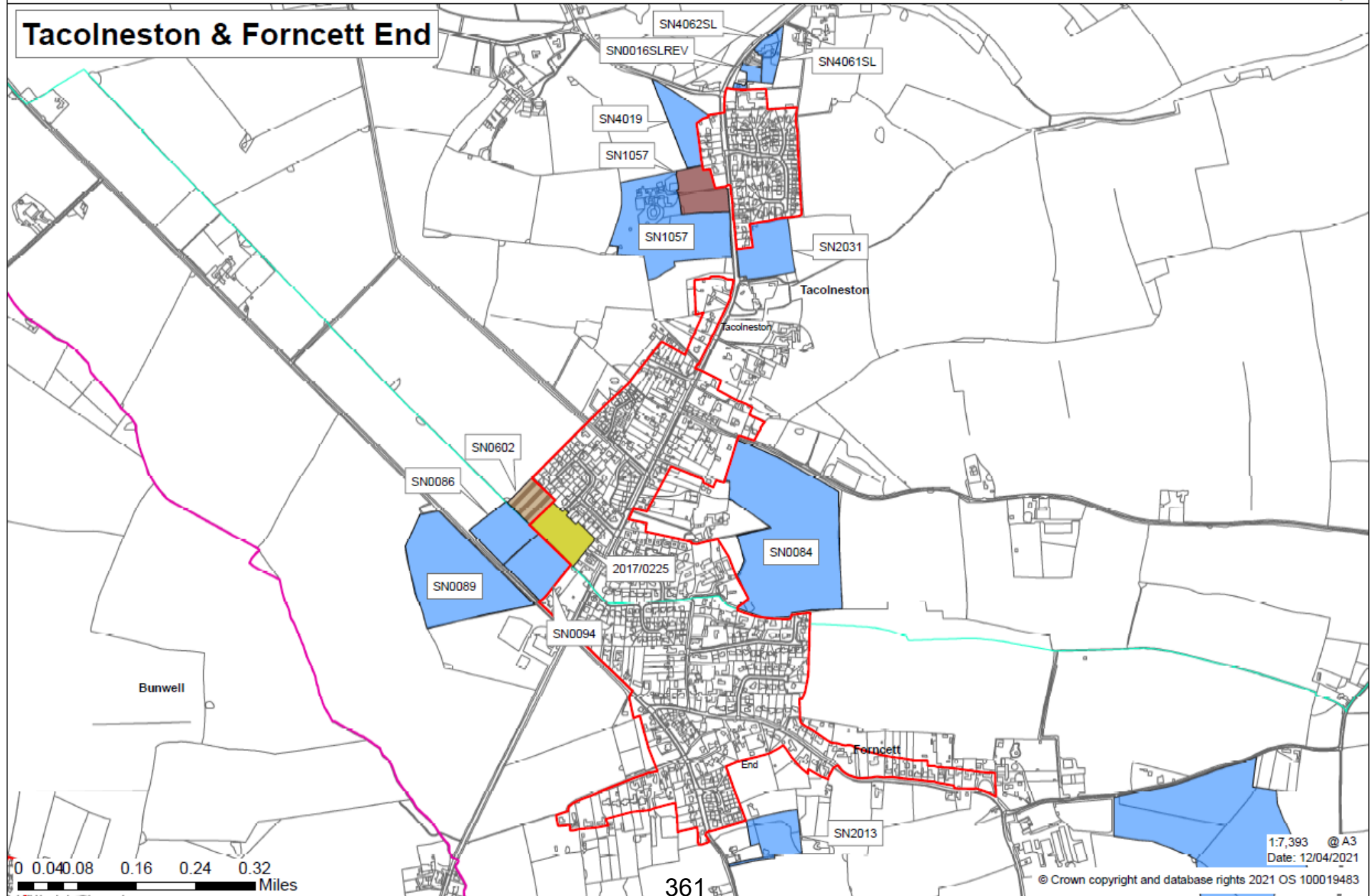
Surlingham, Bramerton & Kirby Bedon



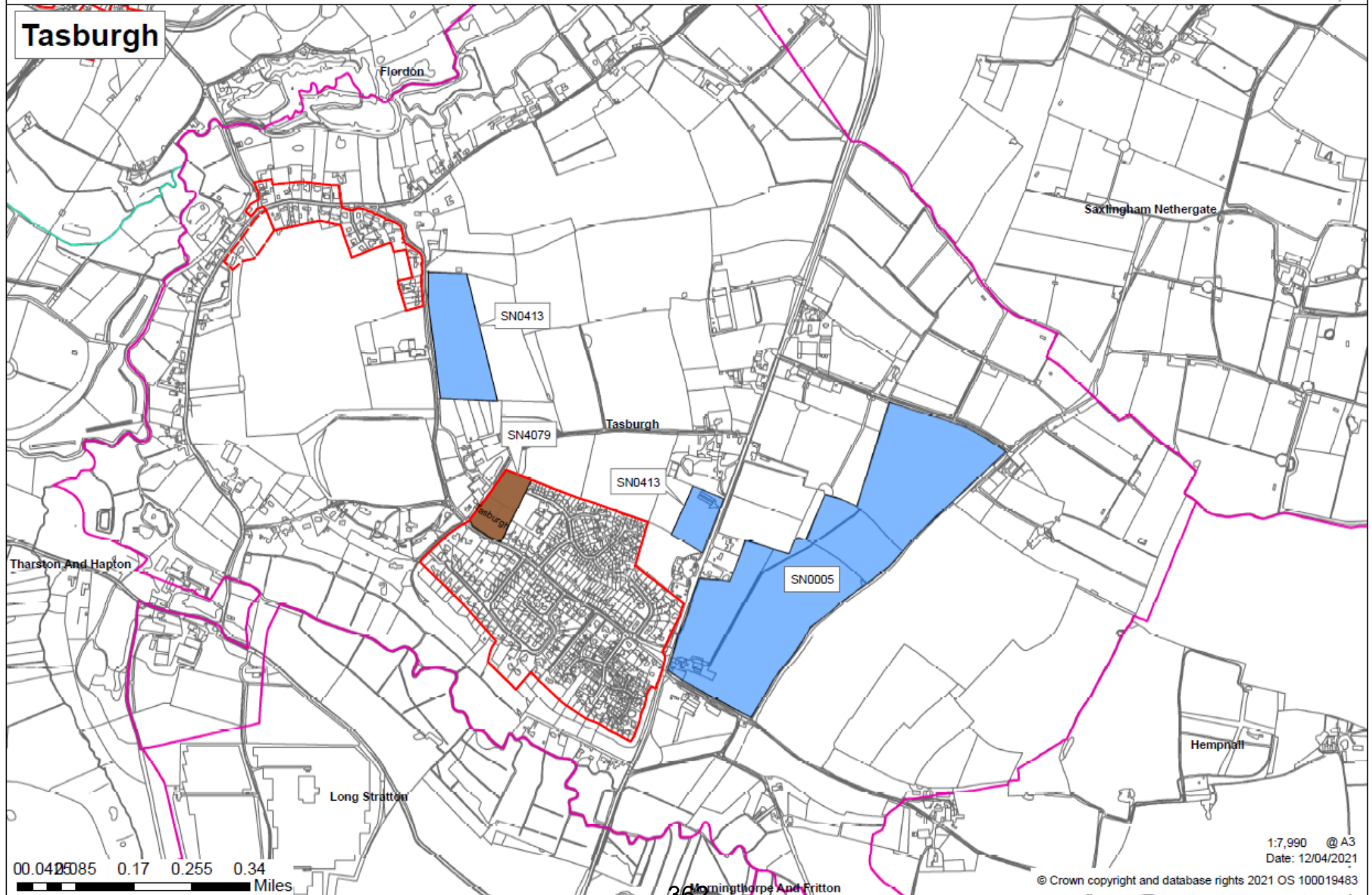
South Norfolk Village Clusters Housing Allocations Plan



Tacolneston & Forncett End



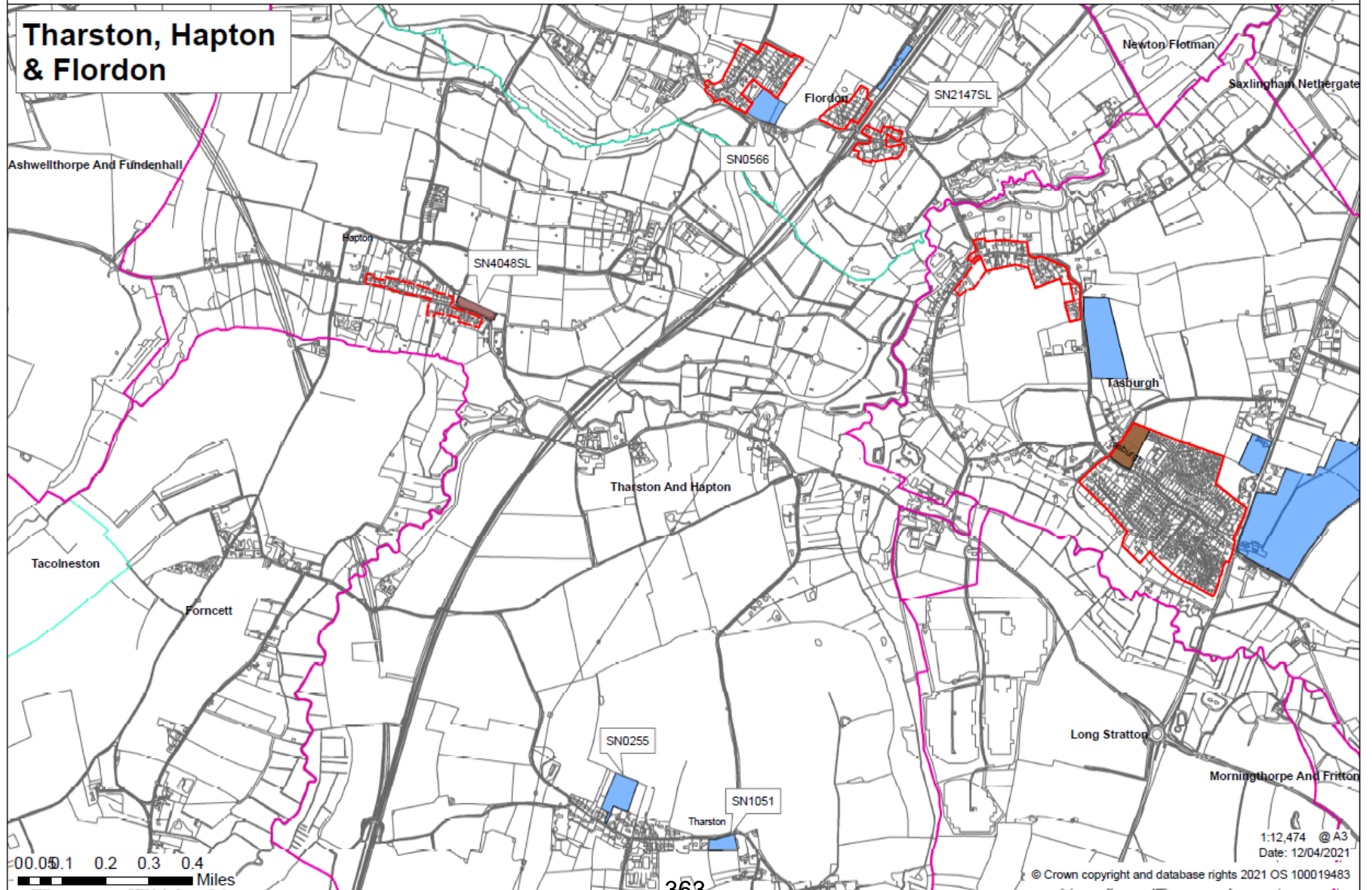
South Norfolk Village Clusters Housing Allocations Plan



South Norfolk Village Clusters Housing Allocations Plan

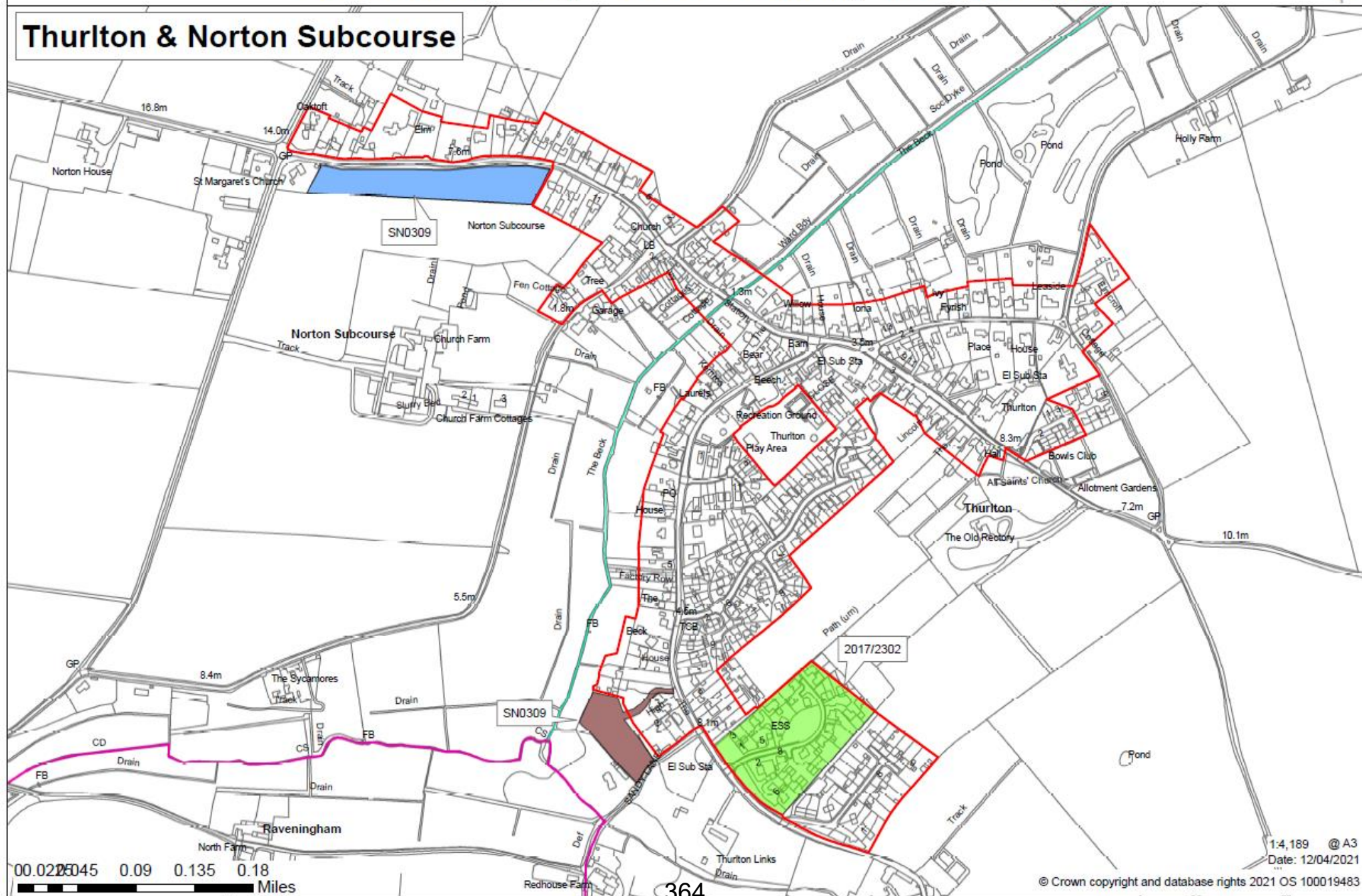


Tharston, Hapton & Flordon



South Norfolk Village Clusters Housing Allocations Plan

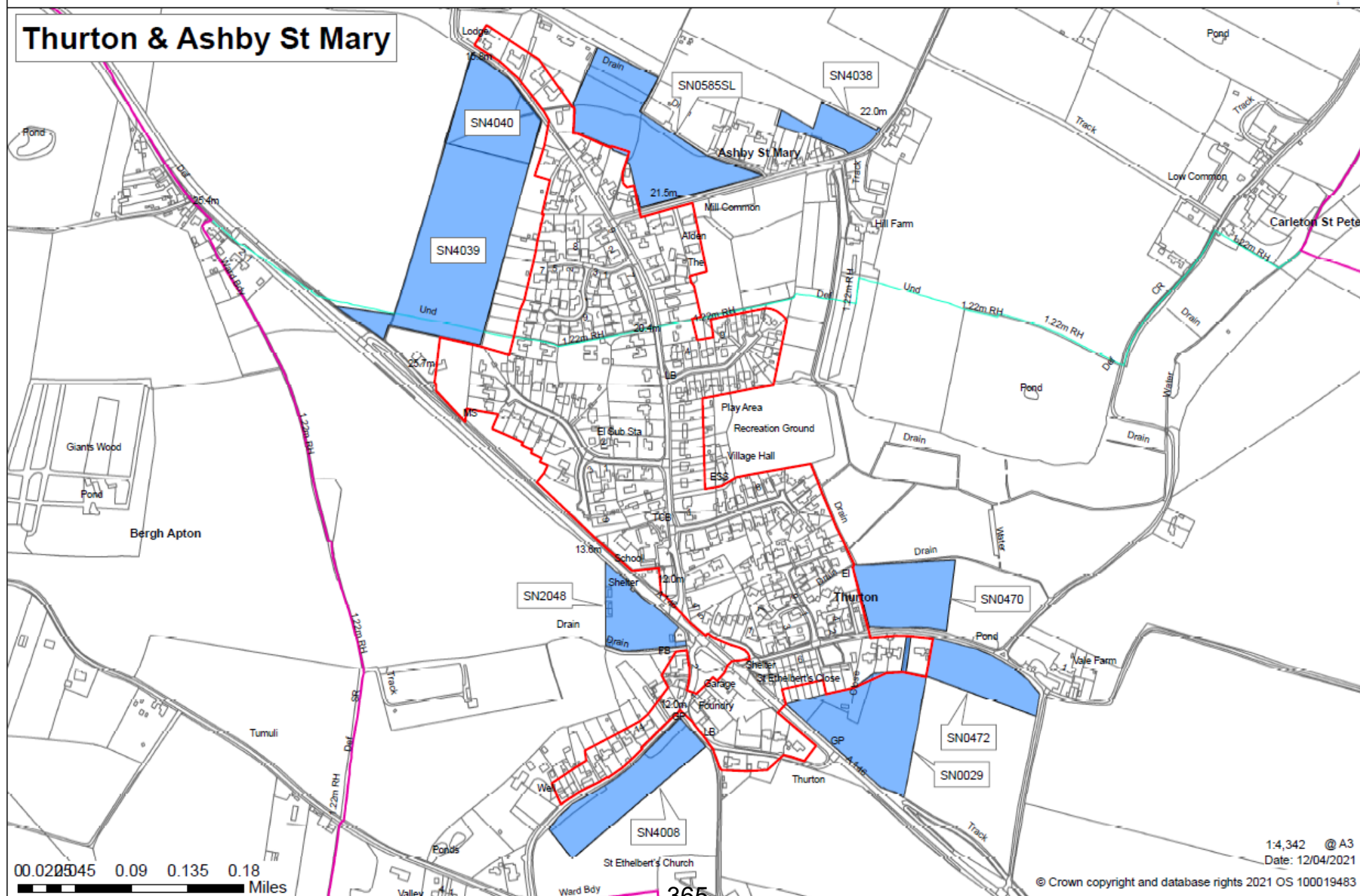
Thurilton & Norton Subcourse



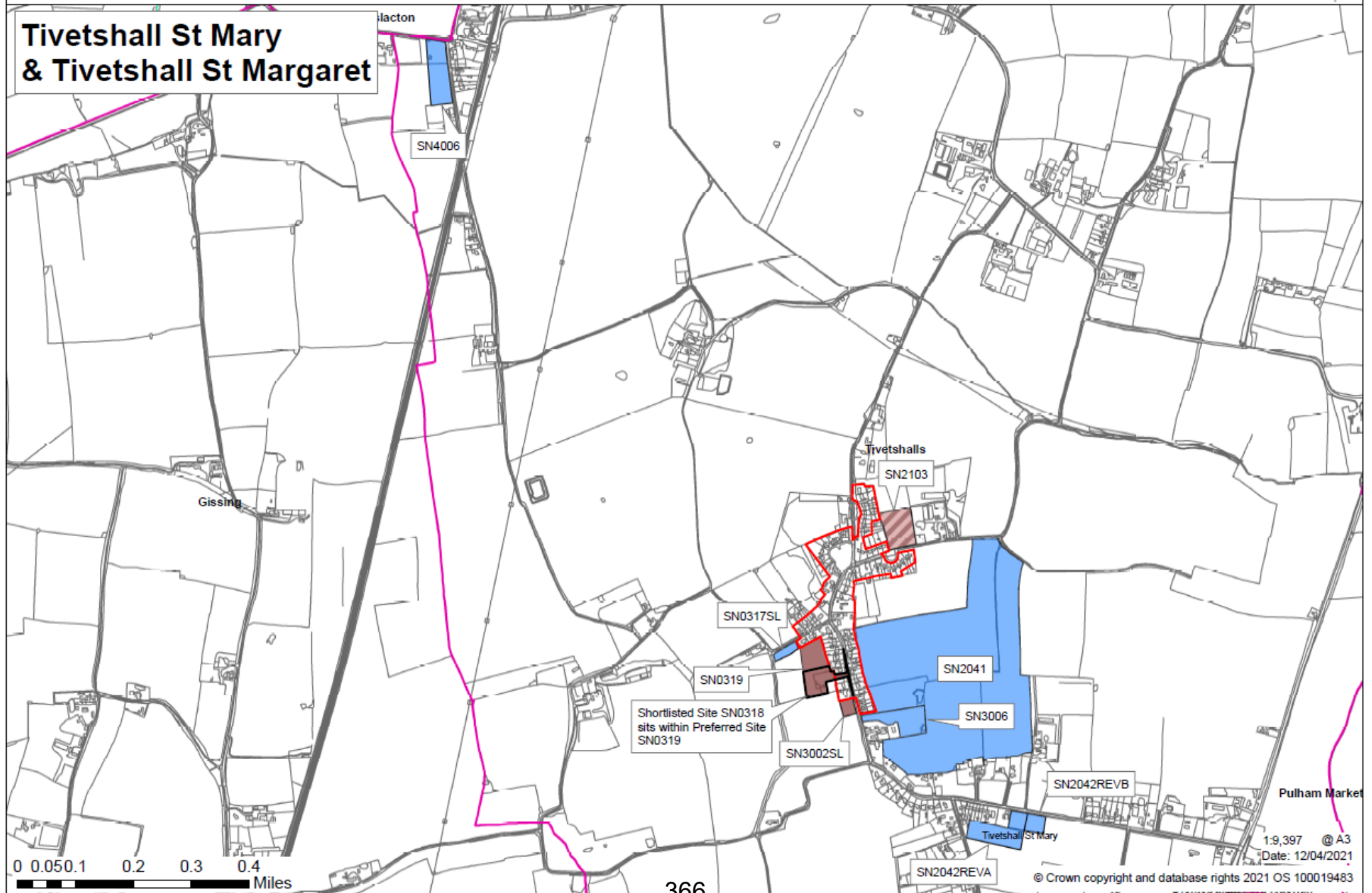
South Norfolk Village Clusters Housing Allocations Plan



Thurton & Ashby St Mary



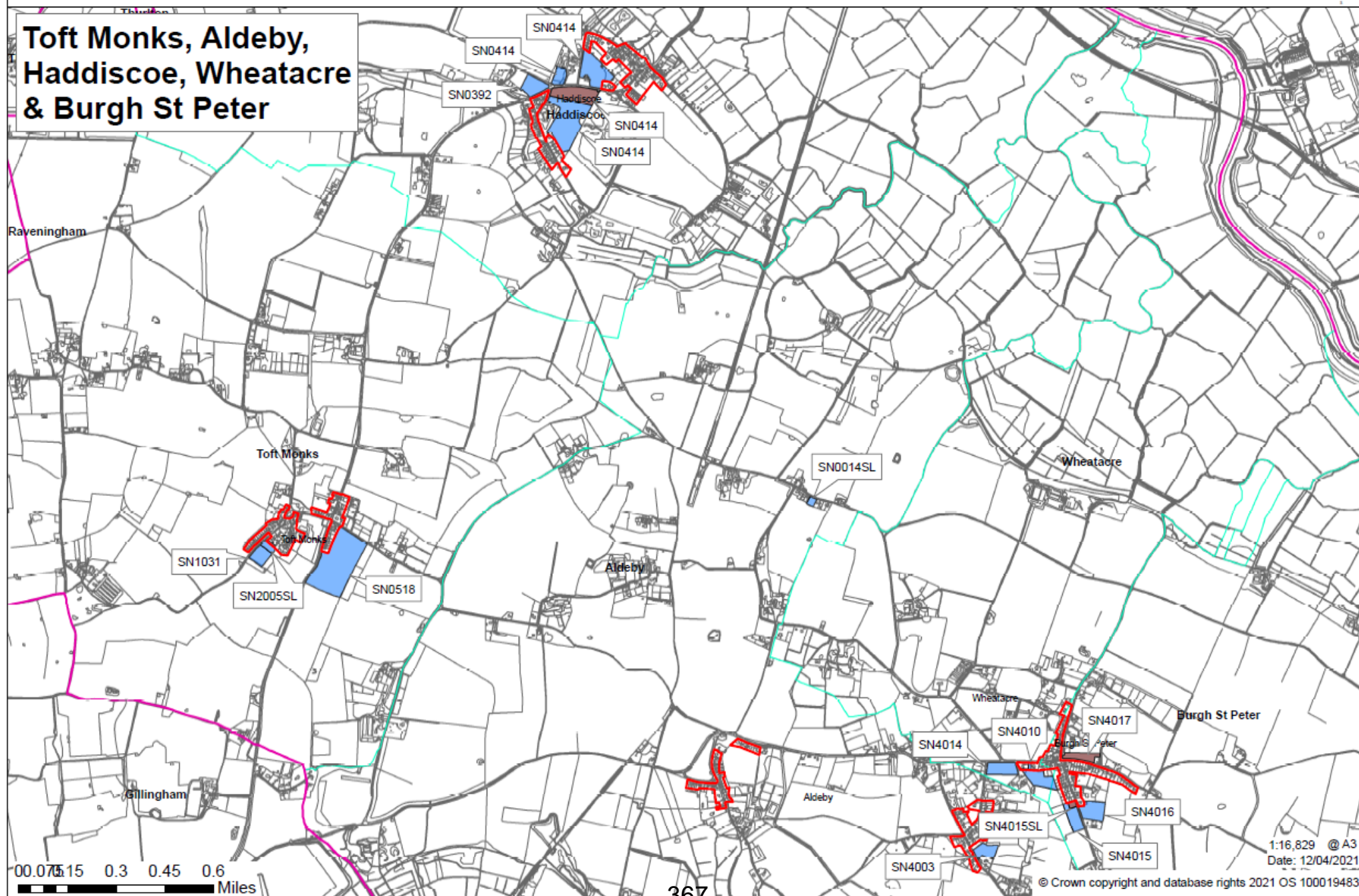
South Norfolk Village Clusters Housing Allocations Plan



South Norfolk Village Clusters Housing Allocations Plan



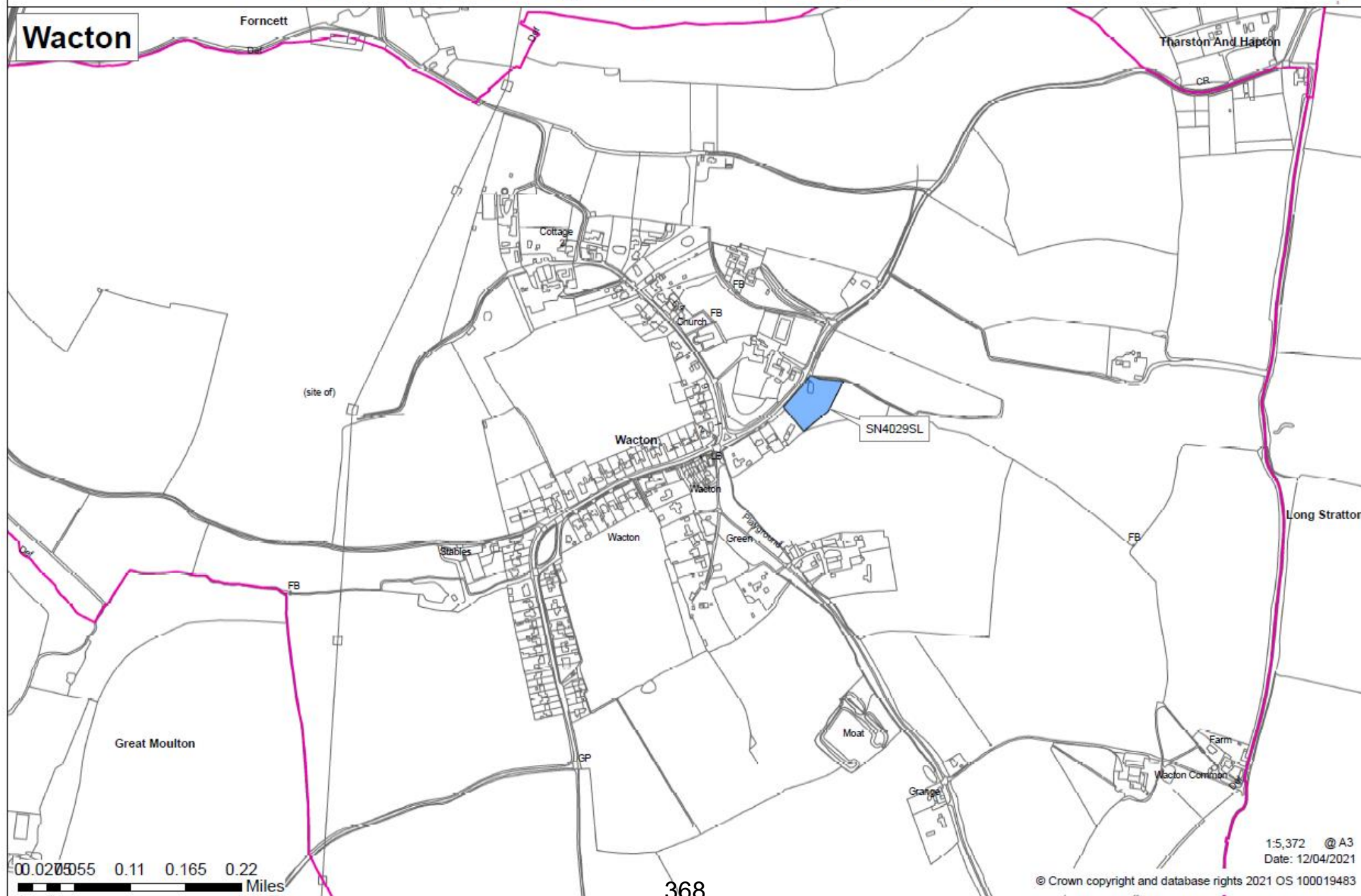
**Toft Monks, Aldeby,
Haddiscoe, Wheatacre
& Burgh St Peter**



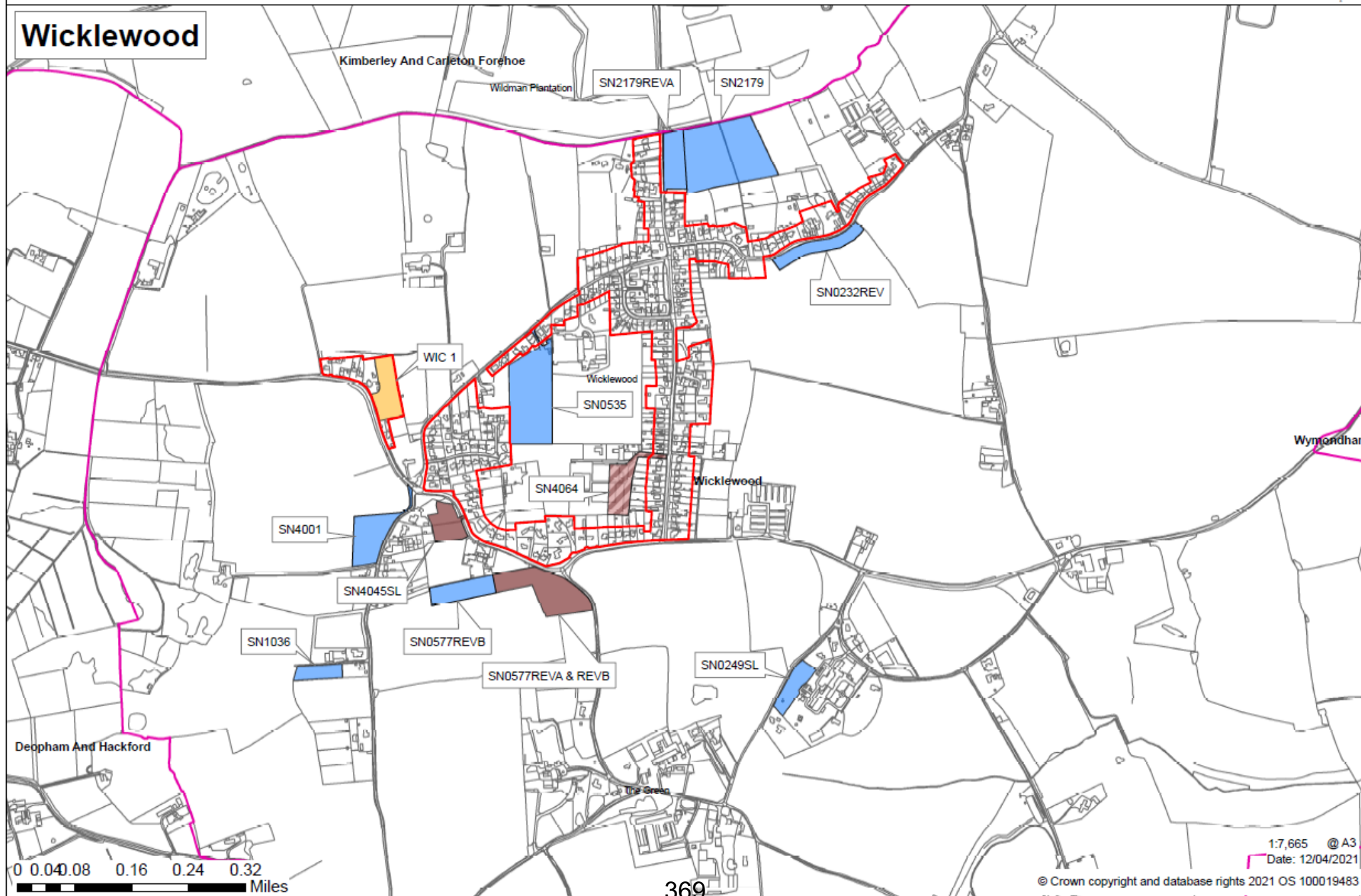
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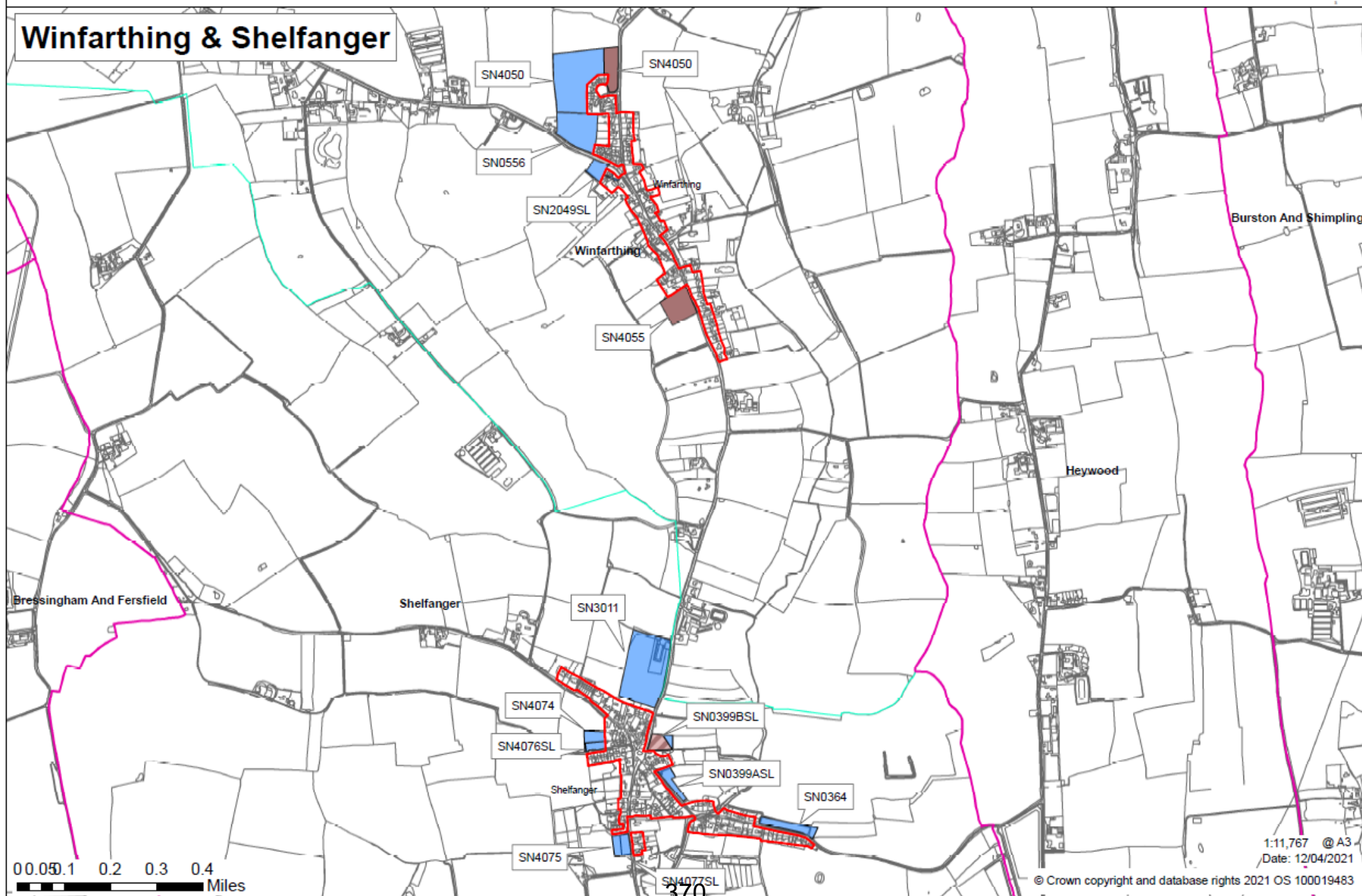
South Norfolk Village Clusters Housing Allocations Plan



South Norfolk Village Clusters Housing Allocations Plan



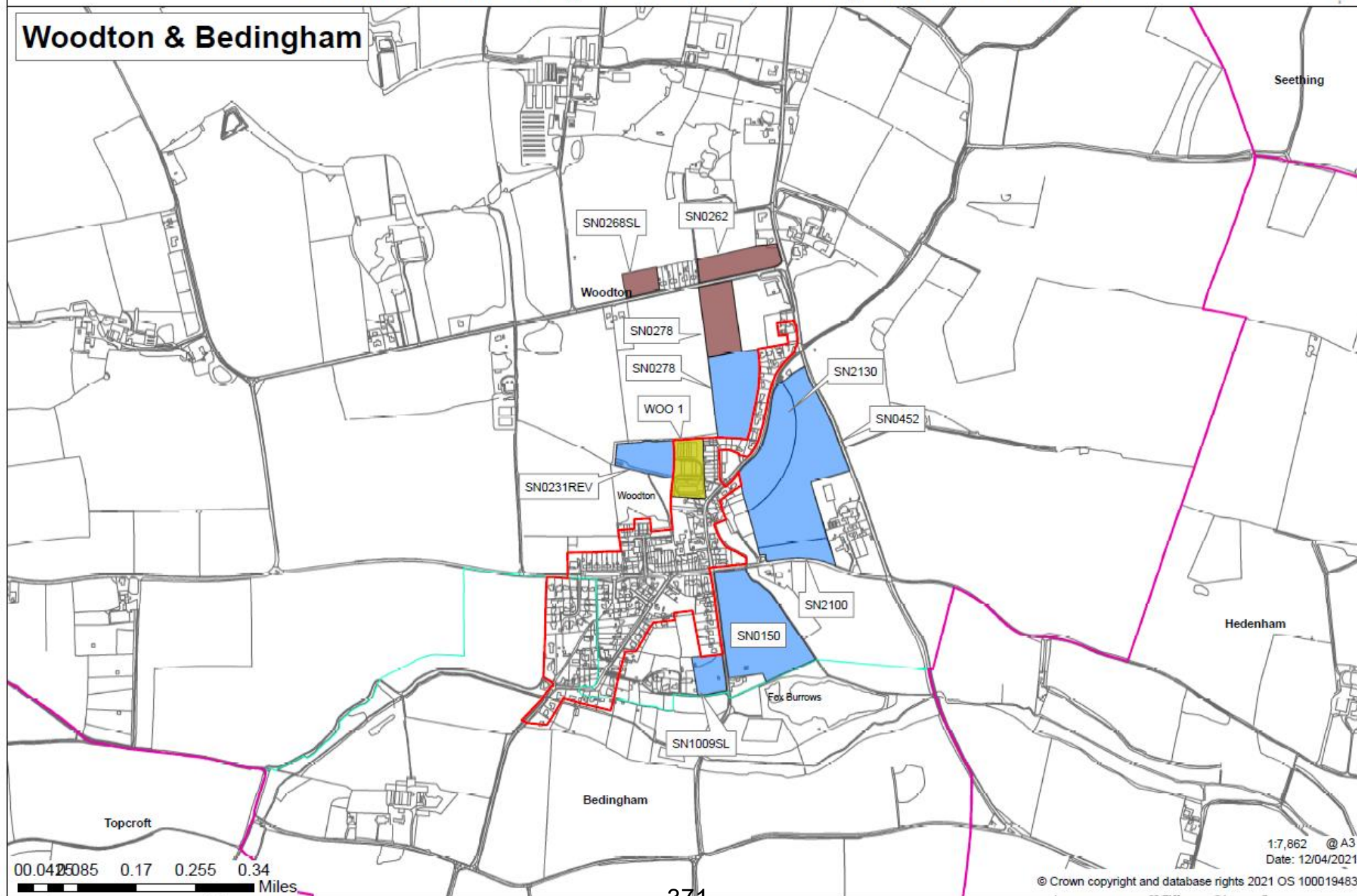
Winfarthing & Shelfanger



South Norfolk Village Clusters Housing Allocations Plan



Woodton & Bedingham



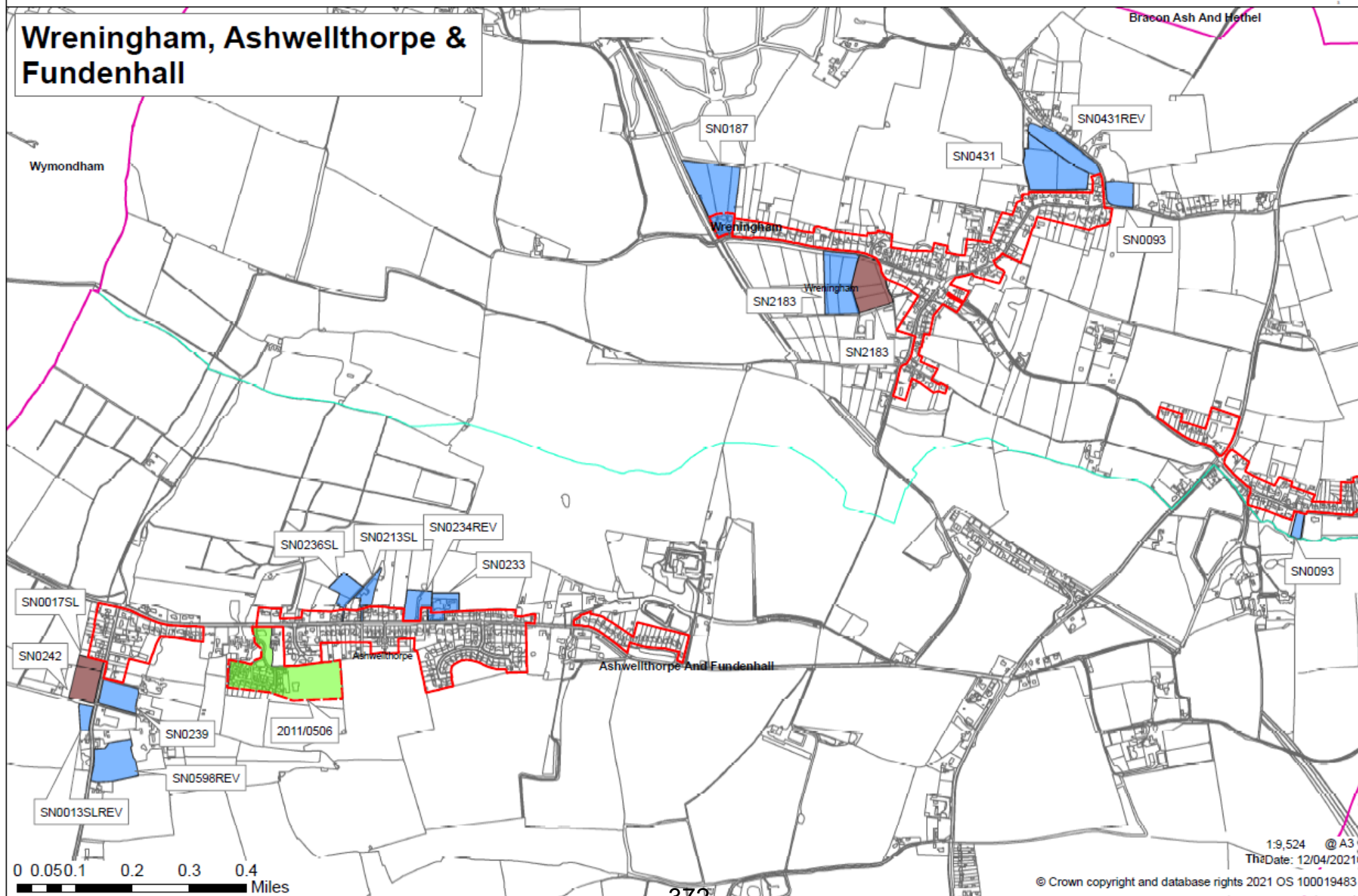
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South Norfolk Village Clusters Housing Allocations Plan



Wrenningham, Ashwellthorpe & Fundenhall



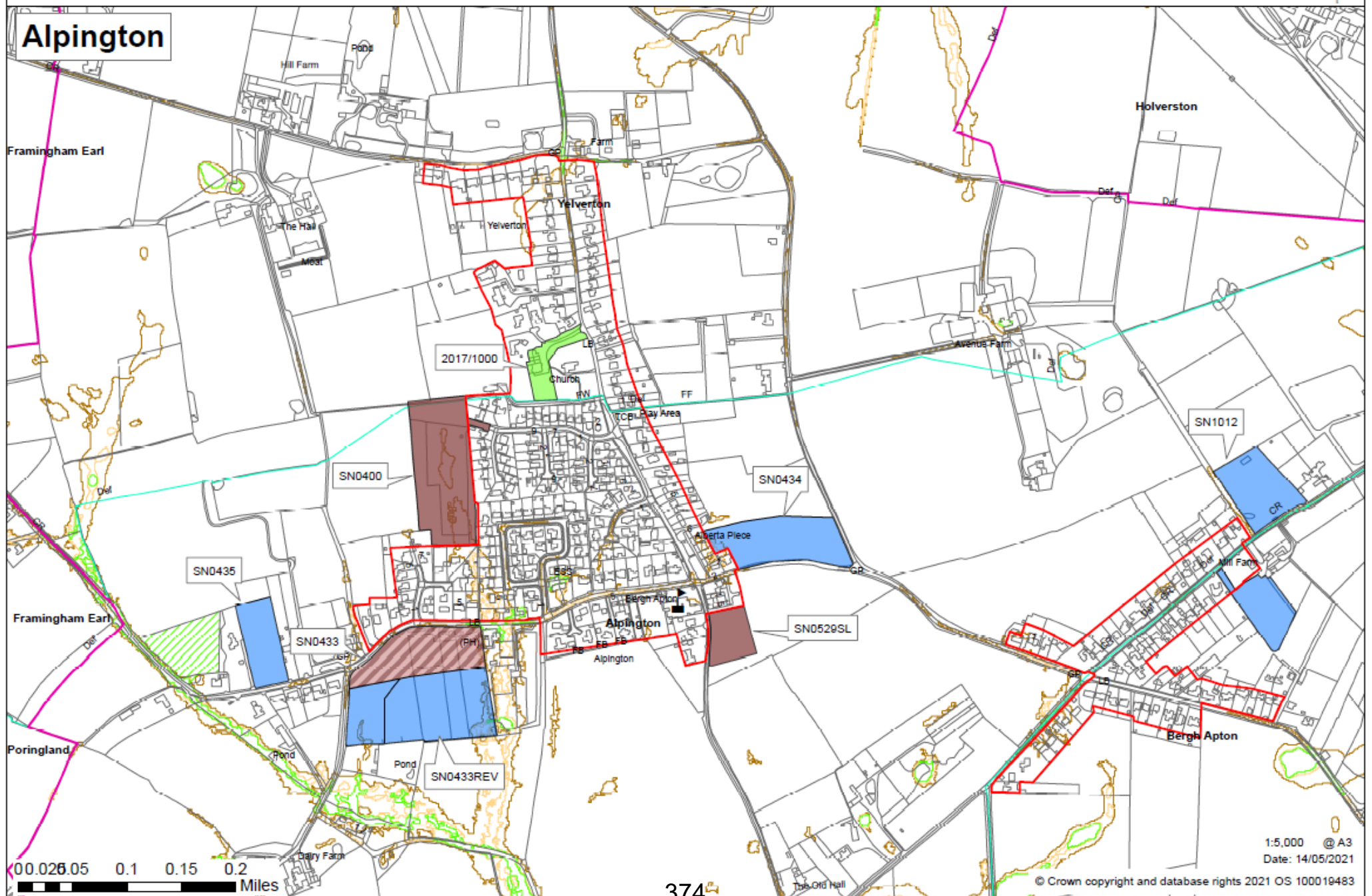
This map displays the planning areas for Alington, Yelverton, and Bergh Apton. The map includes various planning codes such as SN2006, SN0400, SN0434, SN1012, SN0430, SN2117, SN0122SL, SN0533, SN0412REV, SN0203, SN2015SL, SN0007SL, SN0210, SN2023SL, SN0222SL, SN0433, SN0435, SN0528SL, SN0433REV, SN0403, SN0436, SN0437, SN0438, SN0439, SN0440, SN0441, SN0442, SN0443, SN0444, SN0445, SN0446, SN0447, SN0448, SN0449, SN0450, SN0451, SN0452, SN0453, SN0454, SN0455, SN0456, SN0457, SN0458, SN0459, SN0460, SN0461, SN0462, SN0463, SN0464, SN0465, SN0466, SN0467, SN0468, SN0469, SN0470, SN0471, SN0472, SN0473, SN0474, SN0475, SN0476, SN0477, SN0478, SN0479, SN0480, SN0481, SN0482, SN0483, SN0484, SN0485, SN0486, SN0487, SN0488, SN0489, SN0490, SN0491, SN0492, SN0493, SN0494, SN0495, SN0496, SN0497, SN0498, SN0499, SN0500, SN0501, SN0502, SN0503, SN0504, SN0505, SN0506, SN0507, SN0508, SN0509, SN0510, SN0511, SN0512, SN0513, SN0514, SN0515, SN0516, SN0517, SN0518, SN0519, SN0520, SN0521, SN0522, SN0523, SN0524, SN0525, SN0526, SN0527, SN0528, SN0529, SN0530, SN0531, SN0532, SN0533, SN0534, SN0535, SN0536, SN0537, SN0538, SN0539, SN0540, SN0541, SN0542, SN0543, SN0544, SN0545, SN0546, SN0547, SN0548, SN0549, SN0550, SN0551, SN0552, SN0553, SN0554, SN0555, SN0556, SN0557, SN0558, SN0559, SN0560, SN0561, SN0562, SN0563, SN0564, SN0565, SN0566, SN0567, SN0568, SN0569, SN0570, SN0571, SN0572, SN0573, SN0574, SN0575, SN0576, SN0577, SN0578, SN0579, SN0580, SN0581, SN0582, SN0583, SN0584, SN0585, SN0586, SN0587, SN0588, SN0589, SN0590, SN0591, SN0592, SN0593, SN0594, SN0595, SN0596, SN0597, SN0598, SN0599, SN0600, SN0601, SN0602, SN0603, SN0604, SN0605, SN0606, SN0607, SN0608, SN0609, SN0610, SN0611, SN0612, SN0613, SN0614, SN0615, SN0616, SN0617, SN0618, SN0619, SN0620, SN0621, SN0622, SN0623, SN0624, SN0625, SN0626, SN0627, SN0628, SN0629, SN0630, SN0631, SN0632, SN0633, SN0634, SN0635, SN0636, SN0637, SN0638, SN0639, SN0640, SN0641, SN0642, SN0643, SN0644, SN0645, SN0646, SN0647, SN0648, SN0649, SN0650, SN0651, SN0652, SN0653, SN0654, SN0655, SN0656, SN0657, SN0658, SN0659, SN0660, SN0661, SN0662, SN0663, SN0664, SN0665, SN0666, SN0667, SN0668, SN0669, SN0670, SN0671, SN0672, SN0673, SN0674, SN0675, SN0676, SN0677, SN0678, SN0679, SN0680, SN0681, SN0682, SN0683, SN0684, SN0685, SN0686, SN0687, SN0688, SN0689, SN0690, SN0691, SN0692, SN0693, SN0694, SN0695, SN0696, SN0697, SN0698, SN0699, SN0700, SN0701, SN0702, SN0703, SN0704, SN0705, SN0706, SN0707, SN0708, SN0709, SN0710, SN0711, SN0712, SN0713, SN0714, SN0715, SN0716, SN0717, SN0718, SN0719, SN0720, SN0721, SN0722, SN0723, SN0724, SN0725, SN0726, SN0727, SN0728, SN0729, SN0730, SN0731, SN0732, SN0733, SN0734, SN0735, SN0736, SN0737, SN0738, SN0739, SN0740, SN0741, SN0742, SN0743, SN0744, SN0745, SN0746, SN0747, SN0748, SN0749, SN0750, SN0751, SN0752, SN0753, SN0754, SN0755, SN0756, SN0757, SN0758, SN0759, SN0760, SN0761, SN0762, SN0763, SN0764, SN0765, SN0766, SN0767, SN0768, SN0769, SN0770, SN0771, SN0772, SN0773, SN0774, SN0775, SN0776, SN0777, SN0778, SN0779, SN0780, SN0781, SN0782, SN0783, SN0784, SN0785, SN0786, SN0787, SN0788, SN0789, SN0790, SN0791, SN0792, SN0793, SN0794, SN0795, SN0796, SN0797, SN0798, SN0799, SN0800, SN0801, SN0802, SN0803, SN0804, SN0805, SN0806, SN0807, SN0808, SN0809, SN0810, SN0811, SN0812, SN0813, SN0814, SN0815, SN0816, SN0817, SN0818, SN0819, SN0820, SN0821, SN0822, SN0823, SN0824, SN0825, SN0826, SN0827, SN0828, SN0829, SN0830, SN0831, SN0832, SN0833, SN0834, SN0835, SN0836, SN0837, SN0838, SN0839, SN0840, SN0841, SN0842, SN0843, SN0844, SN0845, SN0846, SN0847, SN0848, SN0849, SN0850, SN0851, SN0852, SN0853, SN0854, SN0855, SN0856, SN0857, SN0858, SN0859, SN0860, SN0861, SN0862, SN0863, SN0864, SN0865, SN0866, SN0867, SN0868, SN0869, SN0870, SN0871, SN0872, SN0873, SN0874, SN0875, SN0876, SN0877, SN0878, SN0879, SN0880, SN0881, SN0882, SN0883, SN0884, SN0885, SN0886, SN0887, SN0888, SN0889, SN0890, SN0891, SN0892, SN0893, SN0894, SN0895, SN0896, SN0897, SN0898, SN0899, SN0900, SN0901, SN0902, SN0903, SN0904, SN0905, SN0906, SN0907, SN0908, SN0909, SN0910, SN0911, SN0912, SN0913, SN0914, SN0915, SN0916, SN0917, SN0918, SN0919, SN0920, SN0921, SN0922, SN0923, SN0924, SN0925, SN0926, SN0927, SN0928, SN0929, SN0930, SN0931, SN0932, SN0933, SN0934, SN0935, SN0936, SN0937, SN0938, SN0939, SN0940, SN0941, SN0942, SN0943, SN0944, SN0945, SN0946, SN0947, SN0948, SN0949, SN0950, SN0951, SN0952, SN0953, SN0954, SN0955, SN0956, SN0957, SN0958, SN0959, SN0960, SN0961, SN0962, SN0963, SN0964, SN0965, SN0966, SN0967, SN0968, SN0969, SN0970, SN0971, SN0972, SN0973, SN0974, SN0975, SN0976, SN0977, SN0978, SN0979, SN0980, SN0981, SN0982, SN0983, SN0984, SN0985, SN0986, SN0987, SN0988, SN0989, SN0990, SN0991, SN0992, SN0993, SN0994, SN0995, SN0996, SN0997, SN0998, SN0999, SN1000.

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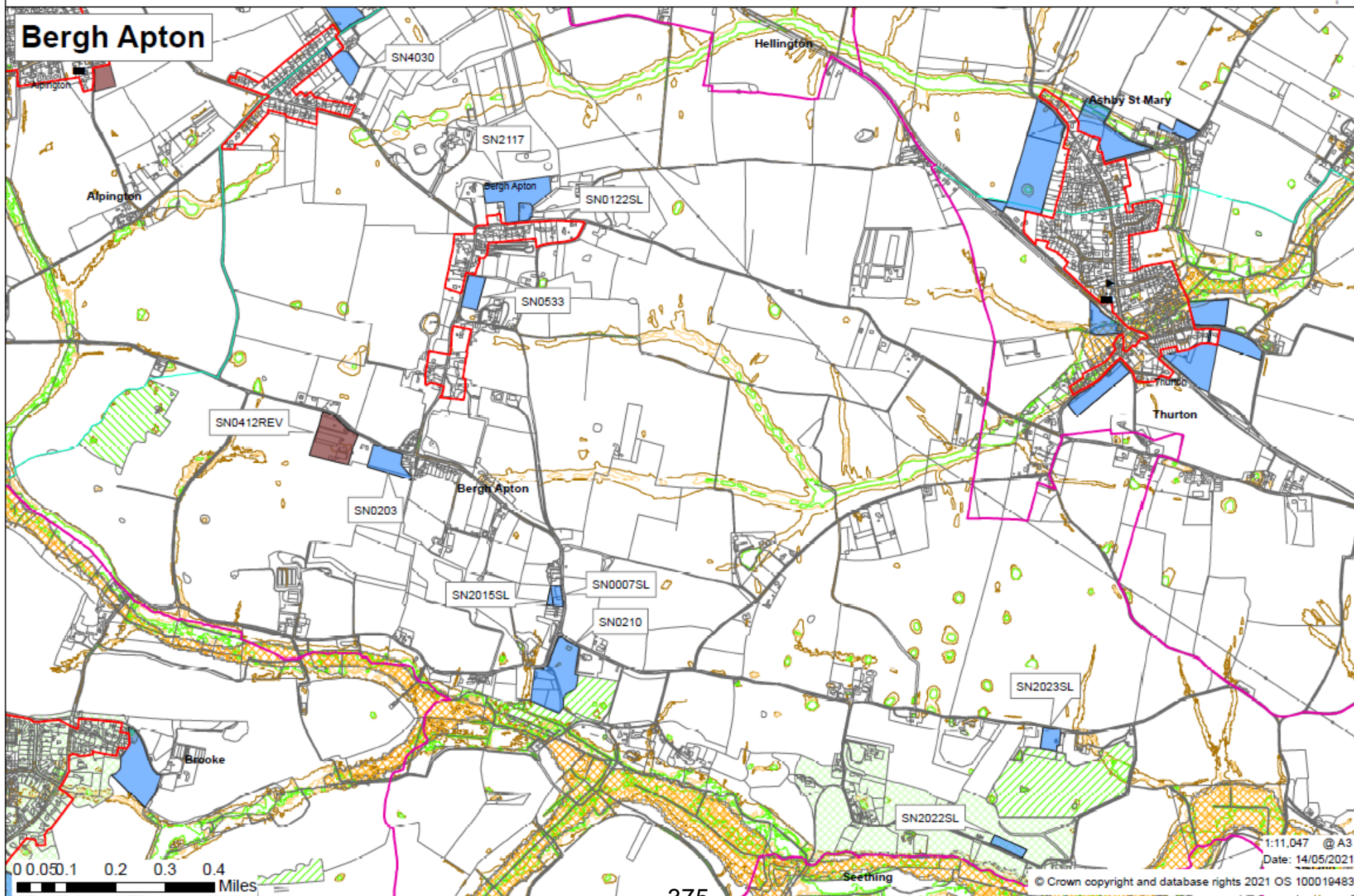
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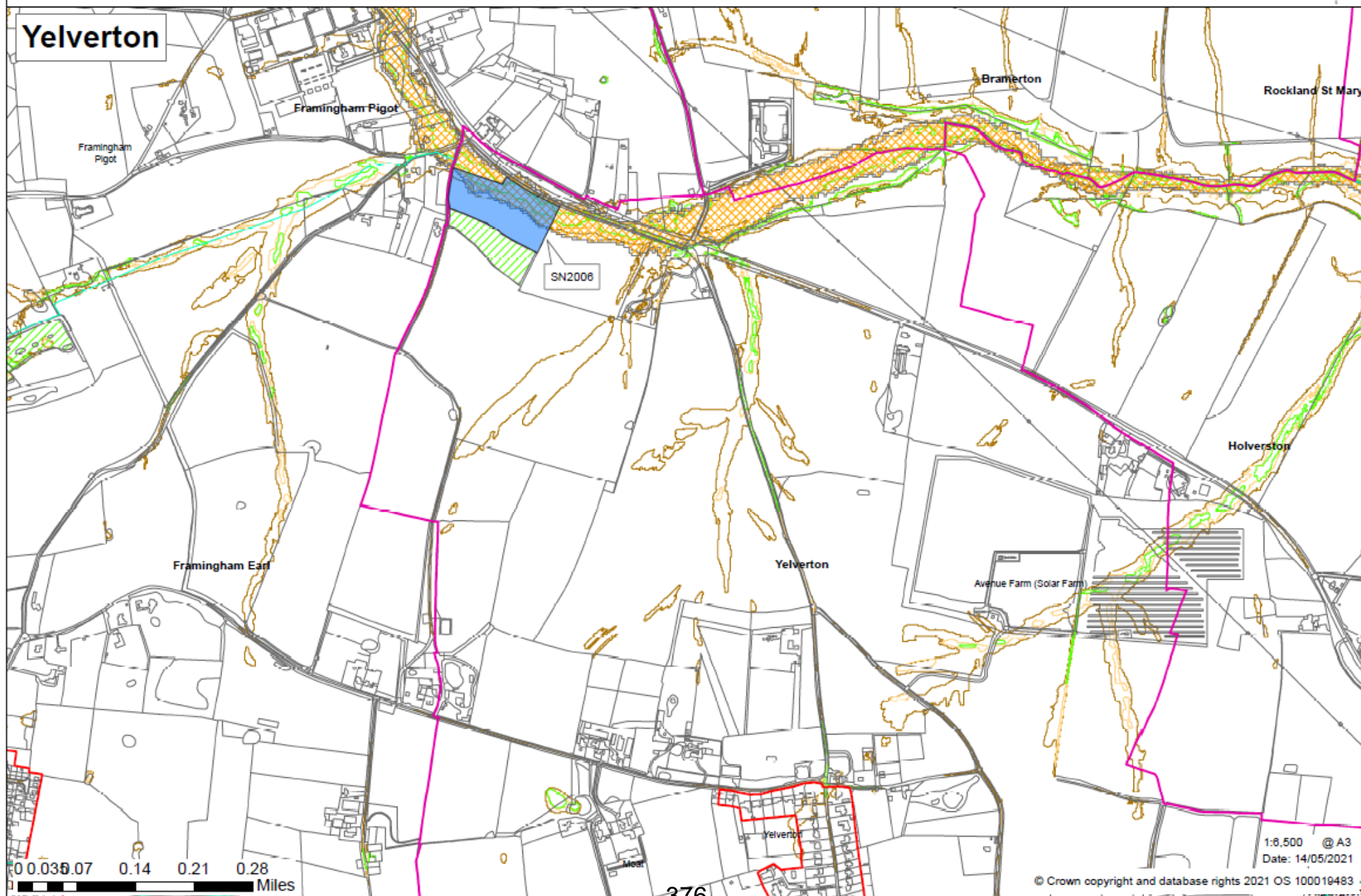
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South Norfolk Village Clusters Housing Allocations Plan



South Norfolk Village Clusters Housing Allocations Plan



Appendix 3: Equalities Profile for South Norfolk District

Population by gender

This dataset shows the resident population by gender as in 2011

Persons	count	%
All usual residents	124,012	100.0
Males	60,515	48.8
Females	63,497	51.2
Lives in a household	122,219	98.6
Lives in a communal establishment	1,793	1.4

Source 2011 Census ONS Crown Copyright Reserved [from Nomis 26 April 2021]

Population projections for all persons by year

The projections below take population estimates as their starting point.

	South Norfolk	Norfolk	England
2018	135,900	902,800	55,997,700
2019	137,400	908,300	56,357,500
2020	138,900	913,600	56,704,700
2021	140,400	918,800	57,030,500
2026	147,200	944,100	58,505,600
2031	152,400	966,400	59,789,800
2036	156,800	985,200	60,905,500
2041	160,600	1,002,300	61,952,100

Source 2011 Census ONS Crown Copyright Reserved [from NorfolkInsight 26 April 2021]

Age structure

This dataset shows the resident population by broad age groups as in 2011

Persons	count	%
All usual residents	124,012	100.0
Age 0 to 4	6,816	5.5
Age 5 to 7	3,865	3.1
Age 8 to 9	2,512	2.0
Age 10 to 14	7,557	6.1
Age 15	1,545	1.2
Age 16 to 17	3,202	2.6
Age 18 to 19	2,518	2.0
Age 20 to 24	5,357	4.3
Age 25 to 29	5,740	4.6
Age 30 to 44	22,839	18.4
Age 45 to 59	25,965	20.9
Age 60 to 64	9,573	7.7
Age 65 to 74	14,143	11.4
Age 75 to 84	8,888	7.2
Age 85 to 89	2,381	1.9
Age 90 and over	1,111	0.9

Source 2011 Census ONS Crown Copyright Reserved [from Nomis 26 April 2021]

Sexual orientation and gender reassignment

Data on sexual orientation and gender reassignment is not available at a District Level. In 2016, just over 1 million (2.0%) of the UK population aged 16 and over identified themselves as lesbian, gay or bisexual (LGB) (Source: Office for National Statistics).

Marital and civil partnership status

Population by marital and civil partnership status in 2011

This dataset shows the Marital and civil partnership status as in 2011

Persons	count	%
All usual residents aged 16+	101,717	100.0
Single (never married or never registered a same-sex civil partnership)	25,795	25.4
Married	56,458	55.5
In a registered same-sex civil partnership	257	0.3
Separated (but still legally married or still legally in a same-sex civil partnership)	2,223	2.2
Divorced or formerly in a same-sex civil partnership which is now legally dissolved	9,528	9.4
Widowed or surviving partner from a same-sex civil partnership	7,456	7.3

Source 2011 Census ONS Crown Copyright Reserved [from Nomis 26 April 2021]

Ethnic group

Population by ethnic group in 2011. This dataset shows the percentage of population by ethnic groups from the 2011

Persons	count	%
All usual residents	124,012	100.0
White	120,981	97.6
English/Welsh/Scottish/Northern Irish/British	117,998	95.2
Irish	455	0.4
Gypsy or Irish Traveller	183	0.1
Other White	2,345	1.9
Mixed/multiple ethnic groups	1,214	1.0
White and Black Caribbean	313	0.3
White and Black African	179	0.1
White and Asian	422	0.3
Other Mixed	300	0.2
Asian/Asian British	1,270	1.0
Indian	433	0.3
Pakistani	64	0.1
Bangladeshi	60	0.0
Chinese	325	0.3
Other Asian	388	0.3
Black/African/Caribbean/Black British	378	0.3
African	259	0.2
Caribbean	68	0.1
Other Black	51	0.0
Other ethnic group	169	0.1
Arab	70	0.1
Any other ethnic group	99	0.1

2011 Census ONS Crown Copyright Reserved [from Nomis 26 April 2021]

Religion

Population by religion in 2011

This dataset shows the percentage of the population by religion from 2011 Census.

Persons	count	%
All usual residents	124,012	100.0
Has religion	78,904	63.6
Christian	77,234	62.3
Buddhist	364	0.3
Hindu	235	0.2
Jewish	126	0.1
Muslim	403	0.3
Sikh	49	0.0
Other religion	493	0.4
No religion	35,601	28.7
Religion not stated	9,507	7.7

Source: 2011 Census ONS Crown Copyright Reserved [from Nomis 26 April 2021]

Health and provision of unpaid Care

This dataset shows the percentage of people (2011) that have a limiting long-term illness, number of people who provide unpaid care for others and the number of hours provided and persons health rating.

Persons	count	%
All usual residents	124,012	100.0
Day-to-day activities limited a lot	9,238	7.4
Day-to-day activities limited a little	13,002	10.5
Day-to-day activities not limited	101,772	82.1
Day-to-day activities limited a lot: Age 16 to 64	3,324	2.7
Day-to-day activities limited a little: Age 16 to 64	5,404	4.4
Day-to-day activities not limited: Age 16 to 64	66,466	53.6
Very good health	57,480	46.4
Good health	44,400	35.8
Fair health	16,575	13.4
Bad health	4,297	3.5
Very bad health	1,260	1.0
Provides no unpaid care	110,192	88.9
Provides 1 to 19 hours unpaid care a week	9,604	7.7
Provides 20 to 49 hours unpaid care a week	1,482	1.2
Provides 50 or more hours unpaid care a week	2,734	2.2

Source 2011 Census ONS Crown Copyright Reserved [from Nomis 26 April 2021]

Earnings by place of residence

Gross Weekly Pay	South Norfolk (Pounds)	East (Pounds)	Great Britain (Pounds)
Full-Time Workers	586.5	604.8	587.1
Male Full-Time Workers	624.0	646.4	622.9
Female Full-Time Workers	532.7	550.5	544.3
Hourly Pay - Excluding Overtime	South Norfolk (Pounds)	East (Pounds)	Great Britain (Pounds)
Full-Time Workers	15.02	15.38	15.18

The South Norfolk Village Clusters Housing Allocations Plan
Equalities Impact Assessment, May 2021

Gross Weekly Pay	South Norfolk (Pounds)	East (Pounds)	Great Britain (Pounds)
Male Full-Time Workers	15.44	16.01	15.64
Female Full-Time Workers	13.96	14.65	14.42

Source: ONS annual survey of hours and earnings - resident analysis 2011 Census ONS
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Notes: Median earnings in pounds for employees living in the area.

Out-Of-Work Benefits

Under Universal Credit a broader span of claimants are required to look for work than under Jobseeker's Allowance. As Universal Credit Full Service is rolled out in particular areas, the number of people recorded as being on the Claimant Count is therefore likely to rise.

Claimant count by sex - not seasonally adjusted (March 2021)

Population	South Norfolk (Numbers)	South Norfolk (%)	East (%)	Great Britain (%)
All People	3,030	3.7	5.6	6.5
Males	1,680	4.2	6.5	7.7
Females	1,350	3.2	4.7	5.

Source 2011 Census ONS Crown Copyright Reserved [from Nomis 28 April 2021]

Household deprivation

South Norfolk	Not deprived on any dimension	Deprived on 1 dimension	Deprived on 2 dimensions	Deprived on 3 dimensions	Deprived on all 4 dimensions
Urban	3,075	4,009	2,626	595	52
Rural	11,754	13,947	8,615	1,786	141
Less Sparse	11,754	13,947	8,615	1,786	141
Town	4,379	5,640	3,685	679	52
Village	5,281	6,032	3,749	832	61
Dispersed	2,094	2,275	1,181	275	28

Source 2011 Census ONS Crown Copyright Reserved [from Nomis 28 April 2021]

East of England	Not deprived on any dimension	Deprived on 1 or more dimensions
Urban	503,710	1,045,520
Rural	234,574	448,212
Less Sparse	225,574	419,404
Town	104,454	201,479
Village	91,914	166,962
Dispersed	29,439	50,963

Source 2011 Census ONS Crown Copyright Reserved [from Nomis 28 April 2021]

Rurality

Location	Male Population	Female Population	Total Population
Urban	11,475	12,203	23,678
Rural	42,378	44,654	87,032
Less Sparse	42,378	44,654	87,032
Town	15,716	17,122	32,838
Village	19,201	19,943	39,144
Dispersed	7,461	7,589	15,050
Total	53,853	56,857	110,710
Percentage Rural	78.7	78.5	78.6

Source 2011 Census ONS Crown Copyright Reserved [from Nomis 28 April 2021]

Equality Impact Assessment (EqulA)

Assessing the impact of the South Norfolk Village Clusters Housing Allocations Plan (The Village Clusters Plan) upon different sections of the community.

Introduction

This EqulA reviews the first stage of The Village Clusters Plan preparation (the Regulation 18 Notification) in order to assess any potential impact on equalities of the Objectives for the Village Clusters Plan and the Core Policies being proposed to be included in the plan and from the methods of consultation.

The South Norfolk Village Clusters Housing Allocations Plan (The Village Clusters Plan) aims to deliver sustainable growth within the more rural parts of South Norfolk. The Village Clusters Plan is being developed alongside the Greater Norwich Local Plan (GNLP) and in accordance with Government's national planning policies and guidance (the GNLP has prepared their own EqulA). The main aim of the Plan is to allocate a series of smaller sites, currently in the range of 12 to 50 homes, across the 48 Village Clusters in South Norfolk, to accommodate at least 1,200 new homes in total. The Plan also defines the Settlement Limits for the villages within these clusters, making provision for further, smaller sites of up to 11 dwellings, although typically much smaller.

This consultation draft sets out the proposed Objectives for the Village Clusters Plan as well as a set of Core Policies that would apply to all the Preferred allocation sites. It is proposed that those Core Policies would cover the issues of standard requirements to deliver sustainable development, housing mix on the Preferred sites, and design standards.

The aim of a Regulation 18 Notification is to consult the specific and general consultation bodies as listed in the Local Planning regulations (2012) and other interested parties on the proposed subjects of the local plan and to provide opportunity for those bodies to comment on the themes and sites proposed. This should ensure that the emerging Local Plan covers all subjects considered to be necessary to provide for the appropriate development in the district.

In accordance with the Local Planning Regulations (2012), the Council will notify anyone who they considered had an interest, and the specific and general consultees as listed in the Regulations, including:

- people who live in, work in and visit South Norfolk;
- individuals, organisations, landowners and development companies needing to make planning applications to the Council, and the professional planning agents and architects who represent them;
- public sector organisations (e.g. Norfolk Constabulary, Norfolk County Council);

- housing associations, registered social landlords and other organisations in the voluntary sector;
- general consultees (e.g. local interest groups such as those representing different racial, ethnic or national groups, different religious groups, disabled persons, Gypsies, Travellers and Travelling Showpeople and older or younger people);
- statutory bodies (e.g. the Environment Agency, Natural England, Historic England) and;
- neighbouring local authorities.

Whilst this stage of the process only looks at the broad themes and objectives proposed to be included, it is important to recognise that the needs of different equalities groups are considered throughout the process. The consequences of not recognising and addressing the different needs of different groups, could result in discrimination or a failure to promote the equality of opportunity for everyone. As a result, all of the protected characteristics under the PSED are considered within this report as part of a screening exercise.

Legal Context

Local authorities are specifically required to undertake an EqlA under The Equality Act 2010. The requirement to undertake an EqlA stems from the duty placed on local authorities to eliminate unlawful discrimination in carrying out its functions, and to promote equality of opportunity.

The Equality Act 2010 requires local authorities to ensure that their plans and policies do not adversely impact upon any group with 'protected characteristics', and furthermore should encourage greater equality between different groups. The following characteristics are protected characteristics under the Public Sector Equality Duty (PSED):

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex; and
- sexual orientation

In addition to the protected characteristic groups set out above, it has also been considered appropriate to include other Community Impacts (Health, Place inc. Rurality and Low Income and Poverty) groups as part of the assessment to ensure a robust assessment has taken place. Therefore, in this EqlA of The Village Cluster Plan, these additional groups will be assessed together with the protected characteristics defined by the Equality Act 2010.

Methodology

In producing the EqIA, various sources of information have been gathered in order to determine whether The Village Clusters Plan is likely to have an adverse impact on or discriminate against different groups within the community. Such sources of information include Census data, along with national and local statistics.

The report will identify any protected groups that may be impacted (either positively or negatively) by each Objective and Core Policy in turn. If an objective or policy would have no impact on a particular group, the result is recorded as 'not applicable'.

Where the screening exercise identifies that The Village Clusters Plan has an impact upon one or more group, this is explained. If any negative impact exists, the policy has been subject to further consideration. The requirement for a full Equality Impact Assessment is considered with the aim of avoiding negative impact upon the identified group or groups, and to take steps to meet the needs of people from protected groups where these are different from the needs of other people.

The Equalities Profile of South Norfolk

An 'Equalities Profile' for South Norfolk can be found at Appendix 1, while Table 1 (below) sums up the baseline information of the different protected characteristics, which are focussed upon as part of the assessment. The characteristics are in accordance with the list set out above;

Table 1: Summary of baseline information of protected characteristics

Protected Characteristic	South Norfolk
Age	<p>The 2011 Census population figure for South Norfolk District is 124,012 persons in some 122,219 households.</p> <p>The Census shows that 20% of the total population are aged between 45 to 59, with an additional 18% aged 30 to 44, this potentially correlates with the spike in person ages between 0-4 and 10-14 years, as off-spring of this low middle-aged group.</p> <p>However, a total of 21.4%, which is over 1/5, of the South Norfolk area is of retirement age (based on 65+ plus years) which has potential implications for health and social care, and potentially access to services.</p>
Disability	<p>Census respondents were asked to assess whether their health was very good, good, fair, bad or very bad. South Norfolk has a high percentage of persons with very good and good health, with only 4.5% with bad or very bad health.</p>

Protected Characteristic	South Norfolk
	Another Census question asked whether residents had a long-term (12 months +) health problem or disability which limited their day-to-day activities. The results, as shown in Appendix 1 show that 7.4% of South Norfolk residents have a severely limiting health condition.
Gender reassignment	There is no known data relating to gender reassignment in the South Norfolk District population
Marriage and civil partnership	The 2011 census identifies that out of all the usual residents aged 16+, 55.5% were indented as married and 25.4% were identified as being single. 7.7% of people are widowed, likely reflecting the older age profile of the district.
Pregnancy and maternity	In 2016 data for South Norfolk of the Live Birth Rate (CBR) was at 10,100 persons and the General Fertility Rate (GFR) of all live births per 1,000 women aged 15 to 44 was 62.1%
Race	The majority (97.6%) of South Norfolk residents' class themselves as white. Within this group, 0.1% identified themselves as a Gypsy or Traveller. Romany Gypsies and Irish Travellers are recognised as having a protected characteristic under the Equality Act 2010. Of the 2.4% identifying as other than white, there is a wide variety of ethnic backgrounds represented, as can be seen in Appendix There is no evidence to suggest a spatial variation within the District with regard to race.
Religion or belief	In the 2011 Census, 63.6% of South Norfolk residents identified themselves as having a religion, 28.7% identifying as having no religion with 7.7% having not stated. The 2011 Census shows that the majority of the South Norfolk District population see themselves as Christian (63.6%). The Census did not ask about religious activities or practices, only about respondents' identities. There is no evidence to suggest a spatial variation within the District with regard to religion or belief.
Sex	The 2011 Census identifies that within the District there are more females (51.2%; 63,497 people) compared to males (48.8%; 60,515 people). This reflects the regional and national position.
Sexual orientation	There is very limited data relating to sexual orientation in South Norfolk population. Sexual orientation data is not captured by the Census 2011. However, the 2011 Census data identifies that within the district, 0.3% of the population are in a registered same-sex civil partnership. There is no evidence to suggest a spatial variation within the district with regard to sexual orientation.

Protected Characteristic	South Norfolk
Health	Census respondents were asked to assess whether their health was very good, good, fair, bad or very bad. South Norfolk has a high percentage of persons with very good and food health, with only 4.5% with bad or very bad health.
Place inc. Rurality	<p>In South Norfolk 78.6% of people live in rural areas, compared with 31% in the Government Office Region. Within the rural areas all people live in less sparse areas.</p> <p>23,678 persons live in urban parts of South Norfolk, with 87,032 people living in rural areas (less sparse). Of that 87,032, 32,838 persons live in towns, 39,144 live in villages and 15,050 persons with dispersed areas.</p>
Low Income and Poverty	<p>The classification of household deprivation on the Census is independent of the English Indices of Multiple Deprivation published by the Office of the Deputy Prime Minister. Four dimensions from the Census returns have been identified as giving an indication of household deprivation.</p> <p>A household is deprived in a dimension if they meet one or more of the following conditions:</p> <ul style="list-style-type: none"> • Employment: Where any member of a household, who is not a full-time student, is either unemployed or long-term sick. • Education: No person in the household has at least Level 2 education (see highest level of qualification), and no person aged 16 to 18 is a full-time student. • Health and disability: Any person in the household has general health that is 'bad' or 'very bad' or has a long-term health problem. • Housing: The household's accommodation is either overcrowded, with an occupancy rating -1 or less, or is in a shared dwelling, or has no central heating. <p>Within South Norfolk:</p> <ul style="list-style-type: none"> • 193 people identify as being deprived on all 4 dimensions • 2,381 people identify as being deprived on all 3 dimensions • 11,241 people identify as being deprived on all 2 dimensions • 17, 956 people identify as being deprived on all 1 dimension: and • 14,829 people identify as being not deprived on any dimension.

Source: 2011 Census ONS Crown Copyright Reserved [from Nomis on 26 April 2021]

The Equality Impact Assessment

The following table (table 3) illustrates the screening process for the three Objectives which The Village Clusters is aiming to achieve through the allocation of appropriate sites, the amendment of Settlement Limits and the Core Policies to guide development.

Any negative impact identified on a protected group will result in further consideration of the policy and depending on the outcome the policy may be subject to full Equalities Impact Assessment.

The table below identifies with a tick (✓) any protected groups which may be impacted positively, and with a cross (X), any protected groups which may be impacted negatively. Potential impacts identified are described in the next section, and any actions needed are explored in the conclusion.

Table 2: Screening the Equality Impacts of The Village Cluster Plan– Objectives, Core Policies and Settlement Limit review) - Scoring

	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion	Sex	Sexual orientation	Health	Place inc. Rurality	Low Income and Poverty
SNVC Objective 1 Meeting House needs	✓	✓	N/A	N/A	✓	N/A	N/A	N/A	N/A	✓	✓	✓
SNVC Objective 2 Protecting village communities and support rural services and facilities	✓	✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✓	✓	N/A
SNVC Objective 3 Protect the character of	✓	✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✓	N/A

	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion	Sex	Sexual orientation	Health	Place inc. Rurality	Low Income and Poverty
villages and their settings												
Core Policy: Standard requirements	✓	✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✓	N/A	✓
Core Policy: Design	✓	✓	N/A	N/A	✓	N/A	N/A	N/A	N/A	✓	N/A	✓
Core Policy: Housing Mix	✓	✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✓	✓	✓
Amendment of Settlement Limits	✓	✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✓	✓	✓

Potential Impacts

This section assesses the impact of the Objectives and Core Policies contained within The Village Cluster Plan on the identified protected characteristics.

Objective Policies' Impacts

1. Meeting Housing Needs – this objective seeks to provide new housing development to meet housing needs and is considered to have a positive impact; this objective ensures that allocated sites provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of their life cycle e.g. first-time buyers, affordable housing, upsizing/downsizing etc. This will benefit young and old people, persons with reduced mobility, low-income households, people with a physical disability or older residents. This will benefit pregnant women and those with poor health. One effect of this objective is likely to be to focus development within settlements

and therefore within walking distance of key services. This will benefit low income groups, who are less likely to have access to a private car.

2. Protecting village communities and support rural services and facilities- this objective seeks to provide opportunities for new housing development to support local services and facilities, meeting the needs of a range of occupiers with the potential to support different local services and facilities. This objective will benefit all sections of the community as it promotes development with services and facilities as well as helping to meet local housing need. The co-location of housing with services will benefit people with reduced mobility, such as those with poor health, a physical disability or older residents. One effect of this policy is likely to be to focus development within walking distance of key services. This will benefit more rural areas, less mobile and low-income groups, who are less likely to have access to a private car.
3. Protect the character of villages and their settings- this objective seeks to ensure that the scale, location and density of housing is well related to the form and character of existing villages and ensure appropriate landscaping measures are delivered as part of new development. The impact on protected characteristics is neutral.

Core Policies' Impacts

Policy SNVC1 - Standard requirements

This policy ensures that all site allocations are assessed using the same 'standard requirement' in order to avoid repetition in each of the individual site policies and to ensure consistency across the plan.

Policy SNVC2 – Design

The policy aims to ensure that development and design considers the needs of all residents and users in the design of new development. In particular, developments being accessible to all as well as being legible and adaptable and takes account of residential amenity, inclusivity and access for all, thus having a positive impact on a number of characteristic groups. In particular, the policy also is considered that it is positive in relation to the needs of some characteristic groups, for example the elderly and disabled.

Policy SNVC3 – Housing Mix

This policy reflects appropriate housing mix in all new developments and is considered to have a positive impact on certain protected characteristic groups due to the provision of a range of housing types to suit all sectors of the community. Promoting affordable housing will contribute towards a mix of housing provision to cater for all groups and will benefit income deprivation. In addition, a mix of housing could help foster good relations between those who share a relevant protected characteristic and those who do not.

Whole Plan Impacts

Having considered the above Objective and Core Policies within the plan, it is important to address the draft Village Clusters Plan holistically, to assess any adverse impact upon any group with 'protected characteristics', and establish whether the plan encourages greater equality between different groups.

Many of the Policies and Objectives within the Plan will benefit the wider community across South Norfolk and not specifically those with protected characteristics. However, some will have the potential for some direct or indirect impact on different groups.

Applying the Public Sector Equality Duty to the entire Draft Village Clusters Plan, is there any impact (positive or negative) on any particular group related to:

Age

The Village Clusters Plan appears to have a positive overall effect on younger and older persons. Young children require schools to be closely located to their homes. Also, for adults in older age groups and less mobile access to services becomes more important. These age-related issues have been considered as part of the plan where access to services and facilities have been taken into account as part of the site assessment process. It is acknowledged that not all village clusters will benefit from the same range of services, this is largely due to the rurality of South Norfolk and smaller scale of many villages. It is therefore common for residents to rely on either having a car and/or public transport to travel short distances to nearest local service centre. In addition, supporting the ongoing vitality of rural services, through the provision of housing with these cluster has some age-related benefits; schools for younger people but also other provision for different ages where local business will be supported.

The Village Cluster Plan will seek to achieve a housing mix that is in line with needs identified through the Strategic Housing Market Assessment (SHMA), which can reasonably be expected to help ensure that age-based needs are met across Plan. Population projections will require housing development to keep pace with anticipated growth in demand. Demand for certain types of accommodation may change for example housing for elderly persons as numbers are increasing and development proposals and development proposals will need to take account of this. This will benefit and promote the equality of opportunity and promote good relations in the community in respect of age. This is something that will need to be considered throughout the planning process, where the detail of specific housing mix will be identified.

Disability

The conclusions within the site assessments have been formed within the context of the village clusters, where inherently some clusters have a more limited range of services than larger villages and towns. It is also acknowledge that whilst The Village Cluster Plan has sought to ensure footpath access to those services and facilities that exist wherever possible, there are some locations where this is not possible. However, consideration has been given to the safety of the highway for walking, including the availability of places to step off the highway (where verges

may be present). Whilst it is recognised this would lead to some negative impacts in isolation, in particular for those with limited mobility. The Village Cluster Plan appears to have a positive overall effect on people with disabilities. This is because wherever possible, sites have been preferred that are within walking distance of key services (albeit that some village clusters are better serviced than others, which presents an inherent limitation to the plan).

In addition, housing design standards similarly benefit people with disabilities. There is an overarching approach to accessible design that has been set out in the emerging GNLP. The GNLP includes a range of policies that aim to improve access to services for all residents, seeks a percentage of adaptive homes, encourages use of Building for a Healthy Life, and requires a Health Impact Assessment for some schemes. Any housing that is put forward in the Village Clusters Plan would need to be in accordance with this emerging policy (subject to the outcome of the forthcoming examination on the GNLP).

Gender reassignment

There are no discernible impacts, either positive or negative, in relation to gender reassignment.

Marriage and civil partnership

There are no discernible impacts, either positive or negative, in relation to marriage and civil partnership.

Pregnancy and Maternity

Village Clusters are based around Primary School catchments, and that access to a Primary School has been a significant consideration, the Council also recognises that many other facilities are important to local communities and has also undertaken an audit of other facilities and services within the clusters, to inform the Site Assessment process. This includes considering access to healthcare provision, albeit that from a number of clusters residents will need to travel to access healthcare.

Notwithstanding the above, the plan appears to have a positive overall effect. Preferred sites prioritise locations in walking distance of key services (as noted above, wherever possible), benefitting groups who may be less mobile, including incidences where this relates to pregnancy and maternity.

Race

The Objectives and Core policies within the Village Cluster Plan are regarded as being generally positive for all and as having no differential impact on this group.

Religion or Belief

There is no provision places of worship or cultural development related to faith or race within the Village Cluster Plan. Therefore, while these elements are not included, this is considered to have a neutral impact on religion or belief.

Sex

There are no discernible impacts, either positive or negative, by sex. Fear of crime may have a disproportionate relationship to sex. In this context, it is worth highlighting that all sites policies will be informed by the overarching design quality which would emphasises 'Secured by Design'. However, it is recognised that there would be limited street lighting in certain areas due to the rurality of the clusters. Overall however, the Objectives and Core policies within the Village Cluster Plan are considered to have a neutral impact on sex.

Sexual orientation

The Objectives and Core policies within the Village Cluster Plan are regarded as being generally positive for all and as having no differential impact on this group.

Impact Analysis of Health, Place and Low Income and Poverty

Although Health, Place and Low Income and Poverty are not one of the defined protected characteristics as defined under The Equality Act 2010, it has been considered prudent to assess the impact of the Plan's objectives and policies on these additional indicators. The assessment of the impact of the policies on Health, Place and Low Income and Poverty supports that the Plan has been written in a positive way with the aim of benefiting all of those in society.

Health

The Village Cluster Plan has considered accessibility to health provision as part of the site assessment process. However, as previously noted the judgements made within the site assessments have been formed within the context of the village clusters, that inherently have a more limited range of services than larger villages and towns. Whilst this may have a minor negative impact, on balance, the increasing housing stock and in particular the stock of affordable housing is considered to be beneficial in housing terms. The delivery of housing scheme may also result in the provision of open space.

The Village Cluster Plan appears to have a positive overall effect on people with low to bad health.

Place. Inc Rurality

Over 75% of South Norfolk's population live in rural areas where meeting the needs of these people effectively is vital. Whilst communities in rural and urban areas face many similar challenges from housing to healthcare, from education to employment, rurality can increase the acuteness with which certain challenges are felt and the practical ways needed to address them. The Village Cluster Plan is considered to have a neutral impact on protected groups but could benefit those working in rural areas in accessing local housing, or existing residents who are looking to up/downsize but remain local to their area (families, job etc). This also seeks to protect local services and facilities, which are particularly important for older and younger residents who may be less able to travel to meet their day-to-day needs.

Low Income and Poverty

The Objectives and Core policies within the Village Cluster Plan are regarded as being generally positive. A focus on ensuring sites are promoting the provision of affordable housing and sites that seek to focus development within walking distance of local services will benefit those on a low income and who may be disproportionately affected by travel costs. The provision of housing in rural areas also has a role in supporting the ongoing viability and vitality of local services and facilities. However, it is also recognised inherently there will be a greater need to travel from rural locations than larger villages and towns, where access to a car/own transport may negatively impact on low income households.

Summary of Impacts

The Village Clusters Plan has the opportunity to promote the equality of opportunity and promote good relations in the community in regard to age, disability, pregnancy and maternity, gender, Health, Place and Low Income and Poverty characteristic. Where possible, development will be preferred in areas where there is good accessibility to the local services and facilities within particular villages, which will benefit those with limited mobility, including the elderly, those in poor health. In particular, the plan will have a positive impact on young parents and children due to the Primary School catchment for each cluster being a proxy for social sustainability. The Village Cluster Plan will also have a positive impact on certain characteristics though meeting identified housing needs within South Norfolk, which will also aim to provide sufficient homes in line with the projected population growth. This will also provide the opportunity to create well designed homes, which in some cases will help to promote good health. In addition, the requirement to provide affordable housing across some sites will not only benefit those of low income and poverty but also young parents/families. A mix of housing will also advance the equality of opportunity between persons who share a relevant protected characteristic and persons who do not, fostering good relationships between those characteristics. Where any tensions have been identified within the Plan i.e. accepting that not all village clusters will benefit from the same range of services due to rurality of some of the clusters, the plan will aim to seek to achieve wherever possible good walking links to services and facilities. However, there will be some inherent tensions linked to the relative accessibility of a range of higher order services and goods in several locations compared to others. In these instances, there will be a balancing of factors to determine whether any perceived harm will outweigh the benefit of providing sufficient housing to meet an identified need and supporting local services that are present in rural areas.

Conclusion

This EqIA has examined whether the Village Cluster Plan has an adverse impact on or discriminated against different groups in the community. The assessment identified that the Objectives and Core Policies are likely to have either a positive impact or no differential impact on the different protected characteristics. Any issues raised in this EqIA will be taken into consideration in the development of policies and in the preparation of consultations on future stages of The Village Cluster Plan production.

This EqIA will be reviewed prior to the finalisation of the Regulations 19 Pre-Submission Publication version of the plan.

Update to Local Development Scheme

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Portfolio: The Economy and External Affairs

Ward(s) Affected: All

Purpose of the Report:

Amendments to the current Local Development Scheme to reflect changes to the timetable for the South Norfolk Village Clusters Housing Allocations Document

Recommendations:

1. Cabinet to recommend that Council approves the proposed amendments to the current Local Development Scheme

1. Summary

- 1.1 The Local Development Scheme (LDS) sets out the timetable for preparing new local plans and summarises what they are to contain. This report sets out amendments to the timetable for the production of the South Norfolk Village Clusters Housing Allocations document.
- 1.2 It is anticipated that the South Norfolk Village Clusters Housing Allocations document will be adopted in April 2023.

2. Background

- 2.1 It is a legislative requirement for the Council to publish a Local Development Scheme and to keep this up to date under section 15 of the Planning and Compulsory Purchase Act, as amended by the Localism Act. The last update to the LDS was agreed in February 2021. This can be viewed at: <https://www.south-norfolk.gov.uk/residents/planning-and-building/planning-policy/local-development-scheme>.

3. Current position/findings

- 3.1 The adopted LDS projected a regulation 18 consultation on the South Norfolk Village Clusters Housing Allocation Document being begun in April, May or June 2021, publication of the proposed submission version of the document under regulation 19 in November/December 2021 and Submission of the document for Independent examination in March/April 2022.
- 3.2 The plan is due to be published for consultation under regulation 18 in June 2021. This is in line with the end of the timetable in the current LDS. However, reflecting that consultation is to be begun at the end of the specified period and to allow sufficient time to prepare the pre-submission version of the plan for publication following the end of consultation further amendments to the timetable are proposed. The update to LDS also allows for the document to be regularised reflecting the regulation 18 consultation continuing through July and into the start of August.
- 3.3 The new timetable for the Village Clusters document projects publication of a Regulation 19 consultation in March 2022 and Submission to the Secretary of State for independent examination in by the end of July 2022. Subject to any further consultation on Inspector's main modifications, this would allow for adoption of the document in April 2023.

4. Proposed action

- 4.1 To ensure that the latest timetable for the production of the South Norfolk Village Cluster Housing Allocation Document is properly reflected in the LDS, it is recommended that the document be updated in accordance with the current timetable for production.

5. Other options

- 5.1 Failure to update the LDS may result in non-compliance with the Localism Act, with implications for the soundness and legal compliance of the Local Plan document.

6. Issues and risks

- 6.1 **Resource Implications** –production of the South Norfolk Village Clusters Housing Allocation Document is being undertaken within existing officer resources, supported by input from technical consultees. A dedicated budget has been made available for the Village Clusters document for 2020/21 and 2021/22, this is being utilised to provide necessary external support including the production of technical reports and the procurement of an online consultation platform. It is likely that elements of this dedicated budget will need to be rolled forwards into 2022/23 to reflect the revised timetable for the production of the plan.
- 6.2 **Legal Implications** – Not having an up-to-date LDS would conflict with the Localism Act (2011) and result in emerging Local Plan documents not being ‘sound’ and legally compliant.
- 6.3 **Equality Implications** – the LDS is not a policy, but is the document that sets out the timetable for the production of Development Plan Documents. As such, it does not itself impact on equalities. The timetable allows sufficient time for community engagement, as required under the Council’s Statement of Community Involvement (SCI). The Development Plan Documents will themselves be subject to equalities impact assessment.
- 6.4 **Environmental Impact** – none.
- 6.5 **Crime and Disorder** – none.
- 6.6 **Risks** – In addition to those risks identified above, it is possible that significant additional technical/planning issues are identified through the regulation 18 consultation. It is also possible that a very high volume of representations may be received. Both of these outcomes present a risk to the current timetable. Further changes to the timetable, would necessitate further changes to the LDS.

7. Conclusion

- 7.1 During the process of preparing the South Norfolk Village Clusters Housing Allocation Plan it has become evident that amendments are needed to the timetable for its production and consequently also to the LDS.

8. Recommendations

- 8.1 Cabinet to recommend that Council approves the proposed amendments to the current Local Development Scheme

Background papers

None.

DRAFT Local Development Scheme for South Norfolk

May 2021



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1. Introduction

- 1.1 The Council is required to prepare a *Local Development Scheme* (LDS) under the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011). The LDS is essentially a project plan which identifies, amongst other matters, the Development Plan Documents which, when prepared, will make up the Local Plan for the area. It must be made publicly available and kept up-to-date. This enables the public and stakeholders to find out about emerging planning policies in their area, the status of those policies, what the documents will contain, and the timescales for their production.
- 1.2 In addition to providing information about the development plan documents in preparation, this LDS also provides detail about the preparation of Supplementary Planning Documents (SPDs), and adopted local development documents, to provide a full account of the planning policies operating in South Norfolk. This document also refers to key documents supporting the production of the Local Plan.
- 1.3 The South Norfolk LDS does not cover the Broads Authority areas within South Norfolk, as the Broads Authority is a Local Planning Authority in its own right and produces its own LDS.

2. The Adopted Local Plan

Development Plan Documents (DPDs)

- 2.1 Development Plan Documents or DPDs, now more usually called 'Local Plans', are the formal policy documents which make up the statutory development plan for South Norfolk. Once adopted, these have full legal weight in decision making. The Council's decisions to approve or refuse any development which needs planning permission must be made in accordance with the policies in the development plan, unless material considerations indicate otherwise.
- 2.2 The currently adopted development plan for South Norfolk comprises the following documents:
- *Joint Core Strategy for Broadland, Norwich and South Norfolk* (the JCS), adopted in March 2011, with amendments adopted January 2014;
 - *South Norfolk Site Specific Allocations and Policies Document*, adopted October 2015;
 - *South Norfolk Development Management Policies Document*, adopted October 2015;
 - *Wymondham Area Action Plan*, adopted October 2015;
 - *Long Stratton Area Action Plan*, adopted May 2016;
 - *Cringleford Neighbourhood Plan*, made February 2014;
 - *Mulbarton Neighbourhood Plan*, made February 2016; and
 - *Easton Neighbourhood Plan*, made December 2017;

Further details on the above can be found in Appendix 2.

- 2.3 Each document (apart from Neighbourhood Development Plans) must be prepared in accordance with a nationally prescribed procedure set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended. At key stages of plan-making there is an opportunity for the public to comment on emerging planning policies and proposals in the documents. At the end of the process, development plan documents must be submitted to the Secretary of State and be independently examined by a government appointed inspector to assess their soundness and legal compliance before they can be adopted by the Council and come into force.
- 2.4 Certain other documents must be published alongside each Development Plan Document, including:
- a *sustainability appraisal (SA) report* of the DPD at each stage (a *sustainability appraisal scoping report* is prepared and consulted on at the start of the process to set out what sustainability issues and objectives the SA should cover and what evidence it will

- use);
- a *policies map*, setting out the DPD's policies and proposals on a map base (if relevant);
- a *statement of consultation* summarising public representations made to the plan and how they have been addressed (called the "Regulation 22(c) statement");
- copies of any representations made;
- any other supporting documents considered by the council to be relevant in preparing the plan;
- an *adoption statement* and *environmental statement* (when the plan is adopted).

Supplementary planning documents (SPDs)

- 2.5 Supplementary planning documents (SPDs) help to support and explain in more detail how the Council will implement particular policies and proposals in the local plan. SPD can also take the form of masterplans or detailed design briefs for sites allocated in the Local Plan. SPDs can be reviewed frequently and relatively straightforwardly to respond to change.
- 2.6 The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) state that SPDs should be used '*where they can help applicants make successful applications or aid infrastructure delivery*', and should not be used to add unnecessarily to the financial burdens on development. SPDs should clarify and amplify existing policy, not introduce new policy or include excessively detailed guidance.
- 2.7 Current SPDs adopted by the Council are:
 - *South Norfolk Place-Shaping Guide SPD (September 2012);*
 - *Guidance for the delivery of a Food and Agriculture Hub for Broadland and South Norfolk SPD (July 2014); and*
 - *Guidelines for Recreation Provision in New Residential Developments SPD (September 2018)*

3. The LDS Programme

- 3.1 With an adopted Local Plan for the whole of South Norfolk's planning authority area, the focus is now on maintaining an up to date Plan in accordance with Government requirements. The focus of this work is on the replacement of the oldest part of the Local Plan, the JCS, with a new Greater Norwich Local Plan (GNLP). As well as replacing the JCS the GNLP will also allocate the sites to deliver future growth, replacing sections of the South Norfolk Site Specific Policies and Allocations Document, and potentially some elements of the Wymondham and Long Stratton Area Action Plans, The South Norfolk Development Management Policies Document and some Neighbourhood Plan.
- 3.2 The LDS also reflects the production of the South Norfolk Village Clusters Housing Allocations (VCHAP) Document. During production of the Regulation 18 draft GNLP it became apparent that the choice of sites available in the village clusters across South Norfolk was not producing the potential options that would successfully address the requirements in those settlements. Some parishes had few sites submitted, often detached from the settlement or with other issues raised via the initial Housing and Economic Land Availability Assessment (HELAA), consequently leading to a potentially greater concentration of development in other settlements. With its more extensive rural area, significantly larger number of small settlements/parishes, and consequently larger requirement for village cluster allocations than Broadland, the work to address the Village Clusters in South Norfolk is now being undertaken in a separate document. The overall strategic requirements, including the total number of new dwellings to be allocated in the Village Clusters, will continue to be set out in the GNLP
- 3.3 The profiles and timetables for the GNLP and VCHAP are set out in Section 4 below.

4. Local Development Document Profiles

Document Title	Greater Norwich Local Plan (GNLP)
Role and content	<p>To provide the strategic vision, objectives and strategy for future development of the Greater Norwich area, to accommodate objectively assessed needs for growth and to identify specific sites for development in the period to 2038.</p> <p>The areas to which the policies apply will be shown on the Policies Map.</p> <p>The GNLP provides the strategic context for the preparation of any lower level policy documents prepared by the three constituent district planning authorities, such as Development Management Policies or Area Action Plans.</p>
Status	Development Plan Document/Local Plan
Conformity	The document must conform with the National Planning Policy Framework (NPPF) and should also accord with standing advice in national the Planning Practice Guidance (PPG) and other Government Policy Statements.
Geographical coverage	The three districts of Broadland, Norwich and South Norfolk, excluding the parts of those districts falling within the Broads Authority Executive Area.
Joint working arrangements (if any)	The plan will be prepared jointly with Broadland District and Norwich City councils, working with Norfolk County Council.
Relationship with adopted local plan(s)	<p>The GNLP will supersede</p> <ul style="list-style-type: none"> a) the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk (adopted March 2011, amendments adopted 2014); and b) elements of the South Norfolk Site Specific Allocations and Policies Document (October 2015); and c) those other documents identified in the LDSs for Norwich City and Broadland District Councils <p>The Wymondham Area Action Plan (October 2015), the Long Stratton Area Action Plan (October 2015) and the South Norfolk Development Management Policies Document</p>

	<p>(October 2015) will not be superseded, although there may be elements of the GNLP that add to, amend or replace parts of those documents.</p> <p>The GNLP will be a component of the overall South Norfolk Development Plan, in conjunction with the retained documents and any 'made' Neighbourhood Plans.</p>
<p>Evidence required <i>May include selective reviews of the evidence base already in place for the adopted Local Plan and new or updated studies where necessary.</i></p>	<p>Includes (but may not be limited to):</p> <ul style="list-style-type: none"> • Strategic Housing Market Assessment (SHMA); • Housing and Economic Land Availability Assessment (HELAA); • New Settlement Topic Paper • Employment, Town Centre and Retail Study; • Viability Study • Infrastructure study; • Health Impact Assessment; • Strategic flood risk assessment (SFRA); • Water Cycle Study; • Landscape Character Assessment; • Green infrastructure study; and • Sport and recreation study. <p>The plan must be accompanied by a Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA) which will draw on, and themselves be part of, the evidence base</p>
<p>Production milestones (Timetable consistent with that for Norwich City and Broadland District Councils)</p>	
Commence document production.	December 2015
Call for sites – invitation to put forward specific development sites for inclusion in the GNLP.	May-July 2017
Commission, prepare and publish evidence studies required to support the GNLP.	March 2016 – January 2019
Publish initial Growth Options and Site Proposals (Regulation 18) for consultation.	January-March 2018
Publish the New, Amended and Small Sites (Regulation	October – December 2018

18) for consultation.	
Publish Draft Plan (Regulation 18) for consultation.	January – March 2020
Publish Pre-Submission Plan (Regulation 19)	February – March 2021
Formal submission of GNLP to Secretary of State (Regulation 22).	July 2021
Public Hearings start	November - December 2021
Adoption of the Greater Norwich Local Plan.	September 2022
Arrangements for Production and Review	
South Norfolk Governance	<p>Led by Place Making</p> <p>Agreement at each stage through Cabinet and Full Council approval at Regulation 22 and adoption.</p>
How will stakeholders and the community be involved?	The Council will accord with the approved Statement of Community Involvement (SCI)
How will the document be reviewed?	<p>The document will be monitored and reviewed as part of the Annual Monitoring Report process.</p> <p>In accordance with the NPPF, Local Plans should be reviewed every 5 years. Such a review will need to determine whether any significant matters have arisen, for example through changes to national policy or the identification of additional development needs, that mean the Plan needs to be updated or replaced.</p> <p>The current timetable proposes adoption of the GNLP in September 2022, approximately 5 years from commencement of plan production. Consequently, the first review is scheduled for late 2027.</p>

Document Title	South Norfolk Village Clusters Housing Allocations document
Role and content	To allocate housing sites in the South Norfolk village cluster settlements, sufficient to meet the minimum requirements set out in the Greater Norwich Local Plan (GNLP).
Status	Development Plan Document/Local Plan
Conformity	The document must conform with the National Planning Policy Framework (NPPF) and the GNLP and should also accord with standing advice in national the Planning Practice Guidance (PPG) and other Government Policy Statements.
Geographical coverage	<p>Village Cluster parishes in South Norfolk Council, excluding the parts of those parishes falling within the Broads Authority Executive Area.</p> <p>Village Cluster parishes are all parishes, except: Chedgrave; Colney; Costessey; Cringleford; Diss; Easton; Framingham Earl; Framingham Pigot; Hethersett; Hingham; Loddon; Long Stratton; Poringland; Redenhall w Harleston; Trowse w Newton; and Wymondham. The document also excludes housing sites in: parts of Roydon and Heywood that relate to the settlement of Diss; parts of Tharston & Hapton that relate to the settlement of Long Stratton; and parts of Caistor St Edmund & Bixley and Stoke Holy Cross that relate to the settlement of Poringland/Framingham Earl.</p>
Joint working arrangements (if any)	None.
Relationship with adopted local plan(s)	The South Norfolk Village Clusters Housing Allocations document will supersede elements of the South Norfolk Site Specific Allocations and Policies Document (October 2015).
Evidence required <i>May include selective reviews of the evidence base already in place for the adopted Local Plan and new or updated studies where necessary.</i>	<p>Will include:</p> <ul style="list-style-type: none"> • Housing and Economic Land Availability Assessment (HELAA) <p>The document will draw largely on the evidence base that supports the strategic policies in the GNLP but will in certain instances require specific updates/additional work. This includes (but may not be limited to):</p> <ul style="list-style-type: none"> • Strategic Housing Market Assessment (SHMA); • Viability Study; • Infrastructure study; • Health Impact Assessment; • Strategic flood risk assessment (SFRA); • Water Cycle Study; • Landscape Character Assessment;

	<ul style="list-style-type: none"> • Green infrastructure study; and • Sport and recreation study. <p>The plan must be accompanied by a Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA) which will draw on, and themselves be part of, the evidence base</p>
Production milestones	
Commence document production.	January 2020
Call for sites – invitation to put forward specific development sites for inclusion as part GNLP Regulation 18.	January to April 2020
Publish Draft Plan (Regulation 18) for consultation.	June 2021
Publish Pre-Submission Plan (Regulation 19)	March 2022
Formal submission of GNLP to Secretary of State (Regulation 22).	June/July 2022
Public Hearings start	November 2022
Adoption of the South Norfolk Village Clusters Housing Allocations Plan.	April 2023
Arrangements for Production and Review	
South Norfolk Governance	<p>Led by Place Making</p> <p>Agreement at each stage through Cabinet and Full Council approval at Regulation 22 and adoption.</p>
How will stakeholders and the community be involved?	The Council will accord with the approved Statement of Community Involvement (SCI)
How will the document be reviewed?	<p>The document will be monitored and reviewed as part of the Annual Monitoring Report process.</p> <p>In accordance with the NPPF, Local Plans should be reviewed every 5 years. Such a review will need to determine whether any significant matters have arisen, for example through changes to national policy or the identification of additional development needs, that mean the Plan needs to be updated or replaced.</p>

5. Other documents related to the Development Plan Documents

- 5.1 Various other documents are required alongside the local plan, but do not form part of it. A **Statement of Community Involvement (SCI)** shows how the council intends to involve the community in plan preparation and planning decision making. The South Norfolk SCI was updated in June 2019 to reflect changes to national legislation and will be kept under regular review.
- 5.2 To ensure that plans and policies are effective, an **Annual Monitoring Report (AMR)** must also be prepared to record progress on implementing the local plan and whether local plan targets are being met. From 2011, the AMR for South Norfolk has been incorporated within a combined monitoring report for the Joint Core Strategy prepared jointly by the Greater Norwich authorities.
- 5.3 The **Norfolk Strategic Planning Framework (NSPF)** is a non-statutory strategic policy statement which sets broad targets and priorities for the next round of statutory Local Plans for individual districts and wider areas in Norfolk, facilitating joint working across district boundaries and helping to fulfil the statutory Duty to Co-operate. Consultation on the initial NSPF took place from July-September 2017, and the document was subsequently endorsed by all of the Norfolk authorities. During 2019 it was updated to reflect the requirements of the revised NPPF, in particular (a) so that it fulfils the remit of a 'Statement of Common Ground' and (b) so that it reflects the new 'standard' housing methodology and Version 2 was endorsed by all of the authorities in late 2019. In order to keep the document relevant and up to date, Version 3 of the NSPF has been prepared and is currently in the process of being individually endorsed by all relevant partner organisations.
- 5.4 Local Planning Authorities must to publish and maintain a statutory **Brownfield Land Register**. The register is intended to include details of any previously developed land suitable for housing, which is capable of accommodating five or more dwellings. The first Register was prepared for December 2017 and will be reviewed annually thereafter. The Brownfield Register is prepared jointly by the Greater Norwich authorities.

Appendix 1: South Norfolk Local Development Scheme Timetable – May 2021

South Norfolk Local Development Scheme Timetable - May 2021

	2020												2021												2022												2023			
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A
Greater Norwich Local Plan																																								
South Norfolk Village Clusters Housing Allocations Document																																								
Policies Map - Update																																								

- Legend
- Preparation of document/evidence gathering to inform Reg.18 consultation
 - Regulation 18 (or equivalent for SPD) Consultation
 - Pre-Submission Publication of Plan (Regulation 19)
 - Submission to Secretary of State for Independent Examination (Regulation 22)
 - Examination
 - Adoption of Plan

□

Appendix 2: The Adopted Local Plan and Neighborhood Plans

Several planning documents are already in place to guide the council's decisions on planning applications: together these form the existing adopted Local Plan for South Norfolk. As these documents are already in use, they are not part of the formal LDS schedule set out in Appendix 1.

The documents making up the Local Plan must conform to national planning policy in the National Planning Policy Framework (NPPF), supported by national Planning Practice Guidance (PPG).

The Local Plan documents fit into a hierarchy with broad, strategic policies at the top and more detailed policies interpreting the strategic approach at a district or smaller area level.

For the Greater Norwich area (which includes South Norfolk), the adopted ***Joint Core Strategy for Broadland, Norwich and South Norfolk*** (JCS) is at the top of the hierarchy. The JCS was adopted in March 2011, with amendments adopted in January 2014. It is a strategic planning document prepared jointly by the three constituent districts in Greater Norwich and provides a long-term vision, objectives and spatial strategy for development of the area to 2026.

The ***Site Specific Allocations and Policies Document*** identifies and sets out policies for site allocations in South Norfolk indicating where development is expected to occur between now and 2026. Alongside the Wymondham Area Action Plan, the Cringleford Neighbourhood Plan and the Long Stratton Area Action Plan, it responds to the requirement of the JCS to identify additional sites for approximately 16,000 new homes in the district by 2026, over and above existing housing commitments at the JCS base date of April 2008. It also identifies opportunities to accommodate the overall levels of growth in jobs and services anticipated over that period and to ensure that these can be delivered and located sustainably. It will also help to deliver the community facilities and green infrastructure and elements of the sustainable transport network required to support new development as it occurs, in accordance with the JCS.

The ***Development Management Policies Document*** sets out a range of more detailed policies applying throughout South Norfolk which will be used in the council's assessment of development proposals and to guide future council decisions on applications for planning permission. Policies cover a range of topics, building on the national policy principles for sustainable development set out in NPPF and the strategic policies and objectives of the JCS. In certain cases, the policies also set out local criteria and standards for different kinds of development.

The ***Wymondham Area Action Plan*** guides development in the town up to 2026. The plan provides for at least 2,200 new homes and 20 hectares of employment land, in the context of: protecting and enhancing a 'Kett's Country Landscape' to strengthen the role of the Tiffney Valley; maintaining the strategic

separation between Wymondham and Hethersett; protecting the landscape setting of the town and abbey; and creating connections and linkages between green infrastructure.

The **Long Stratton Area Action Plan** will deliver at least 1,800 new dwellings, additional employment land, alongside the long- sought Long Stratton bypass to reduce congestion and pollution through the village in peak hours and improve connectivity along the A140 corridor.

The Localism Act 2011 allows for community led **Neighbourhood Development Plans** to be brought forward to complement the adopted Local Plan. There are existing Neighbourhood Plans for Cringleford, Mulbarton and Easton. The Poringland Neighbourhood Plan is proceeding to community referendum. The Long Stratton Neighbourhood Plan is proceeding to independent examination. Neighbourhood Areas, the first stage of developing a Neighbourhood Plan, have been formally agreed for the following: Dickleburgh; Diss & District (Diss, Burston & Shimpling, Roydon, Scole, and three parishes in Mid-Suffolk); Starston; Trowse w Newton; Tasburgh; Tivetshall and Wymondham.

Covid-19 Recovery Plan 2021 - 2022

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Ward(s) Affected: All

Purpose of the Report:

To:

- Provide an update on the proposed actions contained within the new Covid-19 Recovery Plan 2021-2022.
- Provide the details of the source and amount of funding required to support an effective recovery for our communities, our businesses and the Council.

Recommendations:

1. To consider and approve the proposed actions as set out in the attached Covid-19 Recovery Plan 2021-2022.
2. To approve the indicative sums set out in Appendix A and the table at 4.4 to provide further support to the Covid-19 recovery, and to delegate to the relevant Director, in consultation with the appropriate Portfolio Holder in order to utilise the funding flexibly and to ensure the greatest impact.

1. Summary

- 1.1 Building upon *Our Plan for Recovery from the Covid-19 Crisis* as received by Cabinet in July 2020, this report sets out how the Council will allocate Covid funding for 2021-2022.
- 1.2 The Covid-19 Recovery Plan for 2021-2022 as attached at Appendix A, sets out how the Council will address key factors of the Pandemic, the ongoing work to protect and enable recovery for individuals and businesses, and seeks approval for the balance of the funding that is required to deliver against the Councils priorities for recovery.

2. Background

- 2.1 The Covid-19 Pandemic is the biggest challenge the UK has faced in generations. Its impact on people's health, wellbeing and the economy continues to be substantial both locally and globally, and it is likely that the ramifications will be felt for many years to come.
- 2.2 To date there have been a number of reports to Cabinet and Full Council detailing the impacts of Covid-19 on Communities, Businesses and the Council itself. Each of those reports has provided in great detail the Councils significant response to Covid-19.
- 2.3 In July 2020 Cabinet approved adoption of *Our Plan for Recovery from the Covid-19 Crisis*. At that time the Country was slowly coming out of the first national lockdown and there was a strong sense that the worst had passed. However that initial optimism proved to be misplaced and in fact there have been two further national lockdowns.
- 2.4 In April 2021 Cabinet received a report that encompassed
 - An update on the impacts of Covid on the district and the Councils ongoing response
 - An update on progress made against *Our Plan for Recovery from the Covid-19 Crisis* (as agreed by Council in July 2020), and
 - A summary of Covid funding sources, allocation and spend to support the Councils response and enable the recovery, including indicative allocations of the Containing Outbreak Management Fund (COMF) received by the Council
- 2.5 The report demonstrated that significant progress had been made against the priorities for recovery set by the Council in 2020 and recognised the need to renew the Recovery Plan for 2021-2022 on the basis of the ongoing impacts of the two subsequent national lockdowns.

- 2.6 As the nation moves through the Governments Roadmap for lifting the third lockdown it is appropriate to re-focus on the priority areas the Council will seek to address in moving forward in our second phase of recovery. For this reason a new Recovery Plan has been developed which sets out the direction for the Council over the coming year.

3. Plan for Recovery 2021-2022

- 3.1 This report and the attached Appendix A draws together the themes and key priorities on which the Council has based its Recovery Plan for 2021-2022.
- 3.2 The Plan has been developed utilising the learning from the 2020 Recovery Plan combined with an analysis of the known impacts of the pandemic. Those impacts were reported to Cabinet in April 2021 as was an analysis of the Council performance against the 2020 Recovery Plan. It was also noted that outstanding actions from the 2020 Recovery Plan have been subsumed into the Councils Delivery Plan 2021-2022 that was agreed by Council in February 2021.
- 3.3 The key themes from the 2020 Recovery Plan have been carried forward into the new Recovery Plan and refined priority areas identified. The themes and priority areas are:

COMMUNITIES

- Housing and Hardship
- Improved Community Cohesion

ECONOMY

- Helping People into Jobs
- Grow our Economy by Supporting Businesses

ORGANISATION AND GOVERNANCE

- Secure our Finances through Transformation and Commercialisation
- Reimagine our Service Delivery and Ways of Working

- 3.4 The Recovery Plan for 2021-2022 draws together all of the activities that will deliver the recovery, some of which are already in train and for which there is funding in place and approval for how that funding will be expended.
- 3.5 The attached Recovery Plan identifies the actions for which there is as yet no approved funding, however the Council has significant resource available to allocate to those actions should it choose to do so.
- 3.6 It is proposed that monitoring delivery against the Covid-19 Recovery Plan 2021-2022 will be aligned with, and form part of the pre-existing Delivery Plan reporting process.

4. Overview of Covid Funding

4.1 Since the start of the pandemic there have been various funding streams to support the Council's response. The main funding streams are:

- General Un-ringfenced Covid monies to support our services
- Funding to support our towns and villages
- Track and Trace (Isolation Support Payment) funding
- Enforcement/Contain Outbreak Management Funding (COMF)
- Support for Homelessness
- Hardship support
- Funding to support our Clinically Extremely Vulnerable residents
- Business Grants

4.2 The report to Cabinet in April 2021 identified the income received during 2020/21 and for 2021/22 and how some of it had been allocated. The report also summarised the remaining Covid budget available for recovery work.

The table below replicates what has been previously reported, plus additional COMF funding received subsequent to the publication of the April Cabinet report.

	BDC £'000	BDC £'000	SNC £'000	SNC £'000
General Covid Monies				
2020/21 Covid Monies				
- Grant Allocation	1,625		1,852	
- Less Spend	-779		-1,177	
- Less Committed	-585	261	-754	-79
2021/22 Covid Monies				
- Grant Allocation	662		794	
- Less Spend	-		-	
- Less Committed	-32	630	-25	769
Available		891		690
Additional COMF Monies				
Direct 2021/22 Allocation to BDC / SNC (April 2021)		141		163
Additional Surge Funding 2021/22 from NCC		86		86

- 4.3 A proportion of the additional COMF funding made available to the councils has been allocated, under discretion made available to officers in consultation with portfolio holders, as annotated on Appendix A and in accordance with the indicative spends at Cabinet in April 2021. This has seen an increased investment in mental health support for younger people and increased licensing team capacity.
- 4.4 The new Recovery Plan for 2021-2022 sets out all of the actions the Council will undertake to enable a speedy and effective recovery. The Plan at Appendix A makes it clear where activities have financial approval and those that seek funding to proceed. The Actions requiring funding approval are summarised in the Table below:-

Action	Allocation Un-ringfenced	
	BDC £'000	SNC £'000
Communities		
Set aside funds to cover the loss of DHP	71	92
Augment additional capacity in Housing and Benefits Team	72	72
Invest in and enhanced Debt and Welfare Rights Service	17	17
Additional 0.5FTE to assist with HMO Licensing	25	25
KickStart Programme, Choices and Work4All	35	35
Skills and Training Programme – Project management capacity for 18 months	75	75
Graduate, Apprenticeships and Summer Placements Scheme	15	15
Support to business to engage with the public sector in bidding for work	25	25
Develop and deliver a comprehensive Economic Growth Strategy	25	25
DFG Recovery Project	35	35
Augment Leisure recovery through provision of a development pot	-	50
New Ways of Working Phase 2 – Future Office Accommodation Programme	100	100
Development of Hybrid meetings to mitigate need for large public meetings	12	12
Customer Experience and Insight Lead to assist in transformation	45	45
Implementation and training of Business Intelligence software	25	25
Additional HR capacity	28	28
Total Additional Allocation Requested	605	676

- 4.5 Subject to the approval of the allocation requested at 4.3 above this will result in the following contingency un-ringfenced grant and COMF. Officers will continue to work with portfolio holders to look at how COMF money can be best utilised, under discretion offered in the April 2021 cabinet report.

	Un-ringfenced £'000	COMF £'000
BDC	286	95
SNC	14	117

5. Issues and risks

- 5.1 The primary risk associated with this report is that of a further outbreak of Covid-19 and the discovery of new and more transmissible variants that could drive a third wave of infections. The success of the ongoing vaccination programme is clearly mitigating the likelihood of a further outbreak, however an increase in infections has been identified as a significant risk by the government's scientific advisors.
- 5.2 The Council response to the Pandemic has been partially stepped down to reflect the current low levels of infection, however measures are in place to ensure a rapid response should that situation change. In addition the Council continues to have a statutory responsibility to support those who have been asked to isolate. This work is ongoing as are other measures contained within Appendix A.
- 5.3 **Resource Implications** – A detailed summary of the Covid budget position was presented to Cabinet in April 2021. That report identified significant resources are available to the Council to continue its programme of actions for recovery should it choose to do so.
- 5.4 **Legal Implications** – There are no direct legal implications arising from this report.
- 5.5 **Equality Implications** – The impact of Covid varies across different groups in the community and has clearly impacted disproportionately upon the most vulnerable. Older people and those from BAME groups are more likely to suffer serious health impacts, whilst in general, younger people are more likely to suffer serious economic impacts. The Council's Recovery Plan for 2021-2022 recognises those differences and seeks to address them in order to support those most in need.
- 5.6 **Environmental Impact** – There are no direct detrimental environmental impacts arising from this report.
- 5.7 **Crime and Disorder** – There has been an attributable increase in anti-social behaviour during the last year. The Recovery Plan for 2021-2022 acknowledges the impact on officer caseloads and makes provision to address this.
- 5.8 **Risks** – Measures identified in the Council's Recovery Plan mitigate and actively address the risks identified. The proposed approach therefore serves a dual role of both protecting our communities whilst also facilitating the recovery.

6. Conclusion

- 6.1 The Covid-19 Recovery Plan for 2021-2022 articulates the Council's ambition for protecting our communities whilst also facilitating the delivery of an effective recovery from the impacts of the Pandemic.

7. Recommendations

1. To consider and approve the proposed actions as set out in the attached Covid-19 Recovery Plan 2021-2022.
2. To approve the indicative sums set out in Appendix A and the table at 4.4 to provide further support to the Covid-19 recovery, and to delegate to the relevant Director, in consultation with the appropriate Portfolio Holder in order to utilise the funding flexibly and to ensure the greatest impact.

Background papers

Covid Recovery Report - Cabinet April 2021

Covid-19 Update Report – Cabinet February 2021

Covid-19 Update Report – Cabinet and Full Council December 2020

Our Plan for Recovery from the Covid-19 Crisis – Cabinet July 2020

APPENDIX A

BROADLAND AND SOUTH NORFOLK COVID-19 RECOVERY PLAN 2021-2022

THEME	PRIORITY AREA	IMPACTS	WHAT DOES SUCCESS LOOK LIKE?	ACTIONS	RESOURCE (per authority)			COMMENT
					COMF £'000	UNR £'000	OTH £'000	
COMMUNITIES	Housing and Hardship	<ul style="list-style-type: none"> Increased numbers of homelessness cases caused by economic downturn and the end of furlough, and pent up demand from the embargo on court evictions Rising debt including rent and mortgage arrears Increased numbers of working age population claiming benefits Long term health impacts of Covid/Long Covid 	<p>Create resilience in the Council's ability to continue managing the ongoing and anticipated additional demand for housing and benefits teams</p> <p>Helping to prevent homelessness through increased preventative services</p>	Improve access to appropriate funding to support clients and prevent homelessness, including <ul style="list-style-type: none"> A Hardship Grant for essentials for residents in crisis (established - £25K) Develop a 'Whatever it Takes' Grant – to be used for wider homelessness avoidance – (£25K – COMF) Set aside funds to cover loss of DHP (£92K SNC/£71K BDC) 	25	25		Hardship Fund approved by Cabinet in 03/21 Whatever it Takes Grant approved by Cabinet in 04/21 New Funding Request
				Augment the additional capacity in the Housing Team & Benefits Team (6 additional roles in place, extend by up to 12 months)		72		New Funding Request
				Invest in an enhanced Debt and Welfare Rights Service (1FTE) additional capacity, building on the existing service offer.		17		New Funding Request
				Continue to administer and deploy the Isolation Support Payment payments to those required to isolate and are eligible. Admin costs			53	Pre-approved
	Improved Community Cohesion	<ul style="list-style-type: none"> Reduced Covid compliance and an increase in Anti-Social Behaviour Increased Mental and Physical Health issues, particularly amongst the young Increased and unequal vulnerability in our communities Ongoing enhanced demand on the Help Hub & Community Volunteers 	<p>An ongoing physical presence in the community that helps to maintain the low level infection rate. Combining where needed, robust challenge with support for those self-isolating or demonstrating vaccine hesitancy</p> <p>Help to manage community support and cohesion and the increase in low level nuisance/ASB demand</p> <p>Ensure the long term sustainability of Community Groups</p>	Re-focus the Community based regulatory and support offer, ensuring Covid compliance is maintained where possible, including <ul style="list-style-type: none"> Extend the Covid Support Advisors contracts to March 2022 and improve analytics capacity to identify how best to deploy this resource Invest in enhanced regulatory capacity to help manage increased ASB and nuisance demand manifesting from social restrictions 	144			Approved by Cabinet in 04/21
					60			Approved by Cabinet in 04/21
				Build on existing partnerships to commission Young Person Mental Health Support, in order to support up to an additional 120 young people per authority per year for two years	94			Allocated as per agreement at Cabinet in 04/21 with increased funding
				Increase our exercise referral scheme by 1 FTE per district for 24 months, creating additional throughput of approximately 250 per year, per authority	50			Allocated as per agreement at Cabinet in 04/21
				Employ Engagement Officers to help build bridges and community resilience with hard to Reach Groups identified through Covid	30			Approved by Cabinet in 04/21
				Employ Community Connectors to help develop- and navigate community capacity in Broadland	BDC 60			Approved by BDC Cabinet in 04/21
				Improved the infrastructure and support to Mutual Aid Groups	10			Approved by Cabinet in 04/21
				Implement additional 24 month 0.5 FTE to assist with investigation and licensing of new HMOs found through Covid		25		New Funding Request
	Helping People Into Jobs	<ul style="list-style-type: none"> Higher levels of unemployment and higher claimants of benefits amongst the working age population Lack of opportunity for those new to the jobs market Skills and training opportunities have reduced Young & low skilled workers from specific sectors have been disproportionately impacted, creating greater inequality 	<p>Develop and redesign pathways into employment to better support those most greatly affected by Covid</p> <p>Maintain a lower unemployment rate and help to reduce the numbers of the working age population in receipt of benefits</p>	Increased capacity to support more young people into the workplace, and older working age people to retrain and redeploy into the economy, including: <ul style="list-style-type: none"> Roll out and facilitate our KickStart Programme Cover the costs of an expanded and better directed Choices programme, trainer costs, administration and venue hire Increase the capacity of the DWP partnership project Work4All 		35	13	Pre-approved New Funding Request
				Create and deliver a BDC & SNC Skills and Training Programme – Project Management capacity 18 months		75		New Funding Request
				Design and implement a graduate, apprenticeships and summer placements scheme. Cost of an additional HR Business Partner		15		New Funding Request

	PRIORITY AREA	IMPACTS	WHAT DOES SUCCESS LOOK LIKE	ACTIONS	RESOURCE (per authority)			
					COMF £'000	UNR £'000	OTH £'000	
	Grow our Economy by Supporting Businesses	<ul style="list-style-type: none">The UK and local Economy has shrunk during the Pandemic, however both BDC and SNC have been identified as in the top 5% areas most likely to bounce back.Potential drop in high-street footfall.Loss of income for businesses mandated and not mandated to close.Significant impact on Tourism and Hospitality sectors.Potential reduction in demand on the land development/construction sector	<p>The Economy grows</p> <p>Businesses remain viable and able, in time, to grow</p> <p>Number of new start-ups increases</p> <p>More local businesses successfully bidding for public sector contracts</p>	Development of a comprehensive Economic Growth Strategy		25		New Funding Request
				Undertake a comprehensive, commercially focused investigation of key stalled sites			29	Consultant appointed
				Re-opening the High Street awareness campaign – <i>Pleased to See You!</i> and Clickit Local	25		BDC 232 SNC 252	COMF approved by Cabinet in 04/21. RHSS Welcome Back Fund
				Harleston Public Realm Improvements			SNC 428	Norfolk Strategic Fund. Also a further £65K match funding
				Business Support and Enterprise Development Grants			BDC 428	BDC allocation of Norfolk Strategic Fund
				Increased Licensing Team capacity and backfill to manage additional Covid related demand and to facilitate service Policy Review	55			Allocated as per agreement at Cabinet in 04/21 with increased funding
				BDC & SNC Covid-19 Safe Business Certification	10			Approved by Cabinet in 04/21
				Ongoing distribution of Government funded Business Grants Includes:- <ul style="list-style-type: none">Hospitality Restart Adaptations GrantsSupporting businesses to enhance their online offer – Go Digital (£22K – funded from ARG Phase 1)			BDC 49.89M SNC 57.65M	When as yet unclaimed ARG Phase 3 is included BDC - 50.72M SNC - 58.66M
				Support local businesses to engage with the public sector in bidding for work through promoting a common set of Contract Standing Orders and procurement processes in Norfolk and offering training and support to businesses on how to complete these		25		New Funding Request
				Enhanced Business Support. Employ a specialist consultant to support businesses through the Pandemic.			BDC - 45 SNC - 55	Approved By Cabinet in 12/20 but not yet committed
ORGANISATION AND GOVERNANCE	Secure our Finances through Transformation and Commercialisation	<ul style="list-style-type: none">Significant backlog in some service areas such as Disabled Facility Grants (DFG)Council Tax Collection rate has reduced	<p>Ensure critical services have dealt with their backlog caused by Covid and social restrictions</p> <p>Debt collection rate increases</p>	DFG Recovery Project – additional case management capacity to help speed up recovery against the 2021-2122 budget which has been carried forward		35		New Funding Request
				Increased Council Tax and Recovery Team Resource		61.6		Approved by Cabinet on 04/21
				Development and Call Down from COVID Staff Bank	28			£28K approved by Cabinet in 04/21
	Reimagining our Service Delivery and Ways of Working	<ul style="list-style-type: none">Loss of incomeSignificant changes to the way we work, accelerated by COVID can be embedded to provide a more productive environment and improved customer experienceStaff have been impacted by Covid	<p>Income maximised</p> <p>Reduction in office accommodation to reduce overheads and an enhanced offering to our customers</p> <p>Increased transparency of decision making as residents can observe committee meetings online as well as attend in person</p> <p>Improved customer engagement and transformation of service</p> <p>Use of business intelligence to shape our services and delivery</p> <p>Staff are positively supported and resilience improved</p>	Augment Leisure recovery through provision of a development pot, allowing the New Business Development Manager to invest in new services and products.		SNC 50		New Funding Request
				New Ways of Working – Phase 2 Accommodation – Develop and implement proposals for the use of our office accommodation, considering a ‘hub and spoke’ model (subject to Business Case and Project Management)		100		New Funding Request Subject to Business Case, further resources may be needed
				Development of hybrid meetings to mitigate the need for larger public facing democratic meetings and external venue hire		12		New Funding Request
				Initial appointment of Customer Experience and Insight Lead to develop customer insight to assist in transformation of services and prove the benefits of the role		45		New Funding Request
				Implementation and training of Business Intelligence Software		25		New Funding Request
				Additional HR capacity to deal directly with employee relations		28		New Funding Request
						BDC 605 SNC 676		
ADDITIONAL ALLOCATION REQUESTED								

COMF = Contain Outbreak Management Fund UNR = Un-ringfenced Funding OTH = Other Sources of Covid Related Funding

Reopening the High Streets Safely & Welcome Back Funds

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Portfolio: Stronger Economy

Ward(s) Affected: All

Purpose of the Report:

We are seeking Cabinet's approval to accept a Grant Funding Agreement enabling South Norfolk working with Broadland District Council to draw down the funding allocated from the Reopening the High Streets Safely Fund (£246,044) and Welcome Back Fund (£242,044).

Without entering into this grant funding agreement and securing the allocated funding from the funds, it will not be possible to deliver the full range of temporary interventions to support safe and successful high street reopening, as we continue to respond to the economic impacts of Covid-19.

Recommendations:

1. Cabinet agree to accept grant funding from the Secretary of State for Housing, Communities and Local Government for the Reopening the High Street Safely Funding and Welcome Back Fund, for the amounts of £246,044 and £242,044 respectively
2. Cabinet agree to accept the funding agreement terms and conditions, as set out by the Secretary of State for Housing, Communities and Local Government for the Reopening High Street Safely Fund.
3. Cabinet to agree to delegate to the Director of Place in consultation with the Portfolio Holders for Stronger Economy and Finance, to incur expenditure which support activities consistent with the scope of the funding.

1. Summary

- 1.1 This report sets out the Reopening High Streets Safely and Welcome Back Fund grant funding allocation for South Norfolk and Broadland District Councils. It seeks approval to enter into a grant funding agreement for the total funding allocation of £488,088 and for the use of funding to enable safe and successful high street reopening in line with the Councils' Covid-19 Recovery Plan.

2. Background

- 2.1 The Reopening High Streets Safely (RHSS) fund provides £50 million to councils across England from the European Regional Development Fund (ERDF). It was made available to councils in June 2020 to support the safe reopening of high streets, town centres and other commercial areas in response to the ongoing economic impacts of Covid-19.
- 2.2 Councils were able to submit proposals for work plans which included the ability to reclaim eligible expenditure already incurred, as well as future support packages. The RHSS fund guidance provides details of the activities that can be supported within the scope of the funding under four themes:
 - 2.2.1 Support to develop an action plan for how the local authority may begin to safely reopen their local economies.
 - 2.2.2 Communications and public information activity to ensure that reopening of local economies can be managed successfully and safely.
 - 2.2.3 Business facing awareness raising activities to ensure that reopening of local economies can be managed successfully and safely.
 - 2.2.4 Temporary public realm changes to ensure that reopening of local economies can be managed successfully and safely.
- 2.3 Activities not supported through the fund include those that provide no additionality to what was already being delivered by local authorities, capital expenditure (some temporary changes to the physical environment can be supported) and direct business grants.
- 2.4 The Council must enter into a funding agreement which confirms grant allocations and detail about the agreed delivery. Once a funding agreement is signed, funded expenditure can be claimed back in arrears.
- 2.5 Detailed requirements are set out in the fund guidance about eligibility criteria, project records, and regulatory requirements related to publicity, procurement, state aid, monitoring and additional reporting.

3. Current position/findings

- 3.1 Due to One Team serving both South Norfolk and Broadland District Councils and to gain benefits from joint functions and costs, a proposal was submitted on behalf

- of both districts with South Norfolk as the lead authority. A service level agreement was supplied enabling Broadland to be a delivery partner.
- 3.2 Through the RHSS, the Councils have been allocated a total of £246,044 to provide highstreets and town centres across South Norfolk and Broadland District Council areas with safe measures and business support in which to re-open under the national restrictions and guidelines as per the advice of Central Government.
 - 3.3 The allocation is £125,889 for South Norfolk and £116,155 for Broadland. Our allocation also includes £4,000 to Breckland Council for eligible expenditure incurred as part of the 'Confidence' Campaign.
 - 3.4 Full details of the proposed work plan are included in Appendix 1 – Grant Action Plan (GAP). Summary of proposed work plan:
 - 3.4.1 Support to develop an action plan for how the local authority may begin to safely reopen their local economies – Research Manager, action plan consultant, footfall counters
 - 3.4.2 Communications and public information activity to ensure that reopening of local economies can be managed successfully and safely – Communications campaign, dedicated communications officer
 - 3.4.3 Business facing awareness raising activities to ensure that reopening of local economies can be managed successfully and safely – Portal, business support advisors, business support sessions
 - 3.4.4 Temporary public realm changes to ensure that reopening of local economies can be managed successfully and safely – Confidence campaign expenditure and additional hand sanitiser
 - 3.5 Acceptance allows South Norfolk & Broadland District Councils to recover costs already incurred from June 2020 onwards for providing support and activity on the districts' high streets as part of the Council's 'Confidence' and 'Pleased to See You' campaigns.
 - 3.6 A further £56m of ERDF funding has been allocated through the Welcome Back Fund (WBF). This builds on the RHSSF to support the return to high streets and help 'build back better' from the pandemic. This funding has increased the allocation to the Councils to a total of £488,088.
 - 3.7 The Welcome Back Fund builds on the four strands of eligible activity explained in 2.2 with the addition of two new strands; support to promote a safe public environment for a local area's visitor economy and support local authorities to develop plans for responding to the medium-term impact of Covid-19 including trialling new ideas particularly where these relate to the high street.
 - 3.8 MHCLG expects local authorities to engage with stakeholders including local businesses, Business Improvement Districts (BIDs), Destination Management Organisations (DMO), town and parish councils.
 - 3.9 The delivery mechanism is a variation to the RHSS grant funding agreement. MHCLG expects local authorities to first agree plans with MHCLG prior to

incurring costs. Expenditure may be incurred prior to agreeing the terms of the Welcome Back Fund grant with MHCLG, but this expenditure is at risk.

- 3.10 The timeframe for delivery of the RHSS was initially 31st March 2021, this was extended to 30th June 2021. WBF has been extended this further to allow expenditure for both RHSS and WBF to be incurred through to 31st March 2022.

4. Proposed action

- 4.1 This proposal is to accept the £246,044 funding grant from the RHSS fund and £242,044 from WBF, by entering into a funding agreement with the Ministry of Housing, Communities and Local Government. This funding will support temporary activities to support safe and successful business and high street reopening in South Norfolk and Broadland.
- 4.2 This funding will support the delivery of a range of activities supporting business and high street recovery in response to the economic challenges being faced as a result of Covid-19.

5. Other options

- 5.1 Without entering into this grant funding agreement and securing the allocated funding from the RHSS and WBF, it will not be possible to deliver the full range of temporary interventions to support safe and successful high street reopening, as we continue to respond to the economic impacts of Covid-19. There are therefore no proposed alternative options to be considered as part of this paper.

6. Issues and risks

- 6.1 **Resource Implications** – The project plan shown in 3.4 highlights the additional resource which will be funded through this project. Included within the Council's allocation is a 4% reimbursement of the total grant value for costs associated with administering the grant. This 4% is taken directly from the grant itself, with no additional funding provided to cover administrative costs.
- 6.2 **Legal Implications** – The grant funding agreement needs formal approval so that it can be signed, MHCLG stipulate no variation to the agreement is possible. See Appendix 2 for Grant Funding Agreement.
- 6.3 **Equality Implications** – Equalities, diversity and inclusion principles are at the heart of the High Streets Recovery programme and its focus on supporting safe and successful high street reopening which provide for local communities across the districts. All spend will deliver positive support for residents and business in being able to use high streets as they reopen and recover from the economic impacts of Covid-19.
- 6.4 **Environmental Impact** – none identified

6.5 **Crime and Disorder** – none identified

6.6 **Risks** – The potential risks associated with securing and spending the Council's allocation are identified below. A risk register will be maintained as part of the project.

6.6.1 All spend and activity is not secured by the deadline – Budgeting and delivery of compliant activity is already underway. Guidance on claims and been received and reviewed in preparation for claim submission. The flexibility built into the GAP means we can vary budgets and grant funded activities to ensure full spend and activities are completed on time.

6.6.2 Changing requirements for spend – The need to change planned activities to meet business need and the wider grant funding priorities is accommodated for within the GAP.

6.6.3 Spend is not eligible to be claimed back – Officer resource has been committed to review all guidance in relation to the funding to ensure that activities we are claiming against are eligible. Evidence gathering and monitoring of spend activity will be undertaken to ensure this remains the case and we are submitting compliant claims.

7. **Conclusion**

7.1 Without entering into this grant funding agreement and securing the allocated funding from the RHSS and WBF, it will not be possible to deliver the full range of temporary interventions to support safe and successful high street reopening, as we continue to respond to the economic impacts of Covid-19.

8. **Recommendations**

8.1 Cabinet agree to accept grant funding from the Secretary of State for Housing, Communities and Local Government for the Reopening the High Street Safely Funding and Welcome Back Fund, for the amounts of £246,044 and £242,044 respectively.

8.2 Cabinet agree to accept the funding agreement terms and conditions, as set out by the Secretary of State for Housing, Communities and Local Government for the Reopening High Street Safely Fund.

8.3 Cabinet to agree to delegate to the Director of Place in consultation with the Portfolio Holders for Stronger Economy and Finance, to incur expenditure which support activities consistent with the scope of the funding.



HM Government

**European Union**European Regional
Development Fund

Reopening High Streets Safely Fund

Grant Action Plan

South Norfolk Council	Local Authority Name	Name of Lead Contact	Tig Armstrong
		Telephone Number	07790 563 554
		Email Address	Tig.armstrong@broadland.gov.uk
		Name of Deputy Contact	Chloe Griffin
		Telephone Number	01603430496
		Email Address	Chloe.griffin@broadland.gov.uk

1. Proposed Activity:

A) Please complete the table below to reflect the activities you propose to use the RHSS Fund for.

No.	Area of Scope	Using bullet points briefly set out the specific activities you will undertake	Briefly set out how the activity does not duplicate existing activity	Total Indicative Budget £ per item Gross
1	Support to develop an action plan for how the local authority may begin to safely reopen their local economies.	<ul style="list-style-type: none"> • Undertaking research to inform the action plan by procuring a consultant to look at the High Street/ Neighbourhood Shopping Area (NSA) and recommend ways to make it Covid secure. • This will be temporarily managed by a research manager internally. • Footfall counters to measure a baseline and end footfall count in our main high streets. 	<p>This specific work will be to gather research that informs our action plan and understanding of the high streets specifically in relation to the impact of Covid-19 and reacting to this.</p> <p>No one currently has a role to manage this research.</p> <p>We do not currently own any footfall counters.</p>	<p>£4000</p> <p>£8871</p> <p>£24354</p>
2	Communications and public information activity to ensure that reopening of local economies can be managed successfully and safely	<p>Phase one & Phase two: a campaign has been run to promote the safety measures that have been put in place for reopening the high streets, and to remind the public of the key safety messages. This has been done via:</p> <ul style="list-style-type: none"> • Digital campaigns including social media • Posters, pavement stickers and banners in key locations • Communications officer to run campaigns 	<p>These are new campaigns that have not been previously delivered before Covid-19.</p> <p>There is no one currently in post to run these campaigns.</p>	<p>£40000</p> <p>£8325</p>

3	Business-facing awareness raising activities to ensure that reopening of local economies can be managed successfully and safely.	<ul style="list-style-type: none"> Phase one: Communication with businesses in key locations surrounding information on temporary changes to the high streets. Phase two: Business support portal with video content and template documents to support businesses to reopen. Employment of two Covid-19 business advice officers Business support package delivered by external partners to specifically offer individual advice for Covid-19 recovery 	<p>The communications provided to business were specifically on the subject of measures needed due to Covid-19 and reopening/growing following being closed.</p> <p>We do not currently own a portal such as the one proposed.</p> <p>These roles will specifically promote and guide businesses with information on the other support elements available here.</p> <p>We are not currently offering one to one advice and talks on the subject of recovery.</p>	<p>£60,000</p> <p>£13000</p> <p>£24500</p>
4	Temporary public realm changes to ensure that reopening of local economies can be managed successfully and safely.	<p>Phase one:</p> <ul style="list-style-type: none"> Hand Sanitizer dispensers and sanitizer refill Posters, signage and barriers <p>Phase two:</p> <ul style="list-style-type: none"> Further sanitizer refill 	<p>The items bought are specifically to provide social distancing and additional hygiene in crowded locations.</p> <p>This refill is needed for the various sanitizers that have been purchased.</p>	<p>(at risk below below)</p> <p>£4000</p>

B) At Risk Expenditure

Indicative amount of eligible expenditure you intend to incur between 01/06/20 and the date of the Funding Agreement with CLGU	
£30,703.11	
Please lists the costs you are incurring at risk before the signing of the Funding Agreement	

08/06/2020	£ 41.60	Cubicle stickers
08/06/2020	£ 569.25	Lamppost Signs
08/06/2020	£ 120.18	Lamppost Signs
08/06/2020	£ 418.42	A2 Posters
08/06/2020	£ 25.30	Cable ties
30/06/2020	£ 189.95	Refill Of Sanitiser
30/06/2020	£1,196.00	A2 Boards - SNC Only
15/07/2020	£ 942.00	Outdoor Banner
26/08/2020	£ 379.90	Refill Of Sanitiser
26/08/2020	£ 75.98	Refill Of Sanitiser
14/08/2020	£ 303.92	Refill Of Sanitiser
09/09/2020	£ 379.90	Refill Of Sanitiser
29/07/2020	£ 379.90	Refill Of Sanitiser
29/07/2020	£ 379.90	Refill Of Sanitiser
18/06/2020	£ 835.78	Refill Of Sanitiser
21/07/2020	£1,670.60	10 units
30/09/2020	£ 379.90	Refill Of Sanitiser
16/09/2020	£ 379.90	Refill Of Sanitiser
31/08/2020	£ 379.90	Refill Of Sanitiser
21/10/2020	£ 379.90	Refill Of Sanitiser
10/11/2020	£ 379.90	Refill Of Sanitiser
16/06/2020	£2,398.85	Sanitiser
26/08/2020	£2,511.00	Sanitiser
02/09/2020	£2,231.45	Sanitiser
12/08/2020	£3,064.20	Sanitiser
09/09/2020	£ 669.60	Sanitiser
05/08/2020	£5,316.90	Sanitiser stations x31 and installation charge
14/10/2020	£2,059.80	Sanitiser station
11/11/2020	£1,201.55	Sanitiser stations, installation, fixing bolts and refill

11/11/2020	£ 996.67	For 200 Foamex Broadland A3 signs and cable ties	
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C) Alignment with COVID-19 Plans

Please describe how the above planned activity contributes to a national, regional or local COVID-19 plan and provide a copy of the plan.

Our activities within this project correlate with the regions Covid-19 plan, 'Norfolk & Suffolk Unlimited – Covid-19 Economic Recovery Restart Plan'. This plan lays out key activities that must take place in order to restart the local economy, including advice and support to businesses, transforming skills, and reimagining high streets. We set out within this plan our intention to launch the 'confidence' campaign driving public confidence to visit their market towns and providing safety measures to back this. We also set out our intention to provide business support and a single point of contact for this, which will be delivered through our business advice officer role and our business support portal.

These are also in line with our own local authority level Covid-19 Recovery plan which is under development at the moment.

D) Locations of activity

Please list the High Street (and Neighbourhood Shopping Area) locations that you intend to support with this activity and give details of which strand of activity will be implemented at each location. *Insert more rows if required.*

Type	Name of location	Postcode(s)
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High Street / Neighbourhood Shopping Area		
High Street	Diss	IP22 4AB
High Street	Harleston	IP20 9AZ
High Street	Wymondham	NR18 0NS
High Street	Aylsham	NR11 6EH
High Street	Reepham	NR10 4JJ
High Street	Acle	NR13 3DY
Neighbourhood Shopping Area	Alpington & Yelverton	NR14 7NU
Neighbourhood Shopping Area	Bergh Apton	NR15 1AA
Neighbourhood Shopping Area	Brooke	NR15 1AB
Neighbourhood Shopping Area	Chedgrave	NR14 6HG
Neighbourhood Shopping Area	Ellingham	NR35 2PH
Neighbourhood Shopping Area	Hales	NR14 6SX
Neighbourhood Shopping Area	Hethersett	NR9 3AB
Neighbourhood Shopping Area	Framingham Earl	NR14 7TQ
Neighbourhood Shopping Area	Hingham	NR9 4AF
Neighbourhood Shopping Area	Little Melton	NR9 3AD
Neighbourhood Shopping Area	Loddon	NR14 6ET
Neighbourhood Shopping Area	Long Stratton	NR15 2XJ
Neighbourhood Shopping Area	Poringland	NR14 7RP
Neighbourhood Shopping Area	Pulham Market	IP21 4SU
Neighbourhood Shopping Area	Rockland – St. Mary	NR14 7HQ
Neighbourhood Shopping Area	Surlingham	NR14 7DH

Neighbourhood Shopping Area	Toft Monks	NR34 0ER
Neighbourhood Shopping Area	Seething	NR15 1AL
Neighbourhood Shopping Area	Pulham St Mary	IP21 4QT
Neighbourhood Shopping Area	Stoke Holy Cross	NR14 8NX
Neighbourhood Shopping Area	Blofield	NR13 4AA
Neighbourhood Shopping Area	Brundall	NR13 5AA
Neighbourhood Shopping Area	Cawston	NR10 4AE
Neighbourhood Shopping Area	Coltishall	NR12 7DW
Neighbourhood Shopping Area	Drayton	NR8 6PW
Neighbourhood Shopping Area	Freethorpe	NR13 3LY
Neighbourhood Shopping Area	Hellesdon	NR6 5QA
Neighbourhood Shopping Area	Lingwood	NR13 4AZ
Neighbourhood Shopping Area	Little Plumstead & Thorpe End	NR13 5HP, NR13 5AJ
Neighbourhood Shopping Area	Old Catton	NR6 7QA
Neighbourhood Shopping Area	Rackheath	NR13 6LT
Neighbourhood Shopping Area	Reepham	NR10 4JJ
Neighbourhood Shopping Area	Salhouse	NR13 6RW
Neighbourhood Shopping Area	South Walsham	NR13 6DQ
Neighbourhood Shopping Area	Spixworth	NR10 3AF
Neighbourhood Shopping Area	Strumpshaw	NR13 4NT
Neighbourhood Shopping Area	Taverham	NR8 6AD
Neighbourhood Shopping Area	Thorpe St Andrew	NR7 OJG
Neighbourhood Shopping Area	Upton	NR13 6BT

E) Permissions

Please confirm that you will have all the necessary permissions in order to carry out the temporary public realm changes and that you will be able to evidence this upon request. Tick to confirm: ☒

2. Stakeholder Engagement

Briefly set out how you have engaged with business organisations, Local Highway and Transport Authorities, lower tier authorities such as parish councils, and other relevant stakeholders when considering how to use the RHSS funding.

A) Please list which organisations and sectors you have engaged with?
Business organisations within the selected locations
Local Highways and Transport Authorities
Local town and parish councils
Local town team groups (including residents, business owners, and local community groups)
Public transport companies impacted
Private land owners (where permission has been required)
B) Please provide details of the engagement activities these stakeholders have been involved with?
<p>The above organisations have been engaged with through our public campaign, or through direct communication.</p> <p>Direct communication has come in the form of one of the following:</p> <ul style="list-style-type: none"> • Written letter or email correspondence • Telephone conversations with a project staff member • Virtual meeting • Physical meeting with social distancing in place

C) Delivery Partners

See Grant Action Plan Guidance for details on the role of Delivery Partners and their associated requirements.

- i. Do you intend to include any other tier of local government as a Delivery Partner(s)? Yes / No
- ii. If yes, please complete the following table:

Name of Delivery Partner (please insert rows as required)	What RHSS project activity will they deliver?	Why are they the most appropriate body to deliver the activity?
Broadland District Council	Phase one activity & phase two activity	Delivery of the phase one and phase two activity within their own district area as the contact there, whilst South Norfolk Council has been the lead for procurement of the items.

iii. For each Delivery Partner you are required to secure a Service Level Agreement for their RHSS Fund activity.

Name of Delivery Partner (please insert rows as required)	Please confirm that you have a signed SLA with each Delivery Partner	
	Yes – Submit with Grant Action Plan	No – provide date when SLA will be submitted
Broadland District Council	Yes	

3. Outputs

Please indicate the volume for each output your activity will address.

	Output	Number of outputs
P14	Number of CV-19 Action Plan	1
P15	Number of CV-19 Public Information Campaigns	2

P16	Number of CV-19 Business Facing Campaigns	2
P17	Number of CV-19 Communication Officers	1
P18	Number of High Streets with Temporary CV-19 Adaptations	6+
P19	Number of Neighbourhood Shopping Areas with Temporary CV-19 Adaptations	39+

4. Claims

- i. Please complete the table with the start and end date for the expenditure associated with the RHSS Fund activity.

Start Date	1/6/2020
End Date	31/3/2021

- ii. Please select the claim quarter(s) in which you plan to submit a grant claim and insert a forecast value for each claim.

Claim	Claim Submission Period	Tick to indicate a claim submission in this period	Claim Forecast Value £ (Gross)
20Q3	July 2020 – September 2020	n/a	
20Q4	October 2020 – December 2020		

21Q1	January 2021 – March 2021		
21Q2	March 2021 – May 2021	X	£227,435.12

- iii. Please indicate whether you plan to claim the 4% Management and Admin from within your grant allocation

Yes	Yes
No	

- iv. If you propose to claim staff costs in line with the RHSS Fund Guidance, please complete the table below

Area of Scope	Role Title	Salary	Cost to be Claimed
2. Communications and public information activity to ensure that reopening of local economies can be managed successfully and safely	Communication officer	49950	8325
3. Business-facing awareness raising activities to ensure that reopening of local economies can be managed successfully and safely.	Business advice officer x 2	52000	13000
1. Support to develop an action plan for how the local authority may begin to safely reopen their local economies.	Research manager	35485	8871

5. Monitoring and Evaluation: Please indicate all of the monitoring methods you will utilise to demonstrate the impact of the project activities.

Monitoring Method	Tick to confirm	Brief description
Footfall counts	yes	Increased footfall across 6 High Streets
Businesses reopening	yes	We will measure the number of businesses with a rateable premises that were open and trading before Covid-19, had to close during the spring lockdown and were then able to reopen again following our high street activities and the lockdown ending.

Businesses closed	yes	We will measure the percentage of empty rateable premises in our high street locations before covid-19 and compare with at the end of the project in March/April.
Other		

6. Financial Management and Control

i.

Describe the financial management and control procedures for the project; including the process for compiling, authorising and ensuring only eligible and defrayed expenditure is included in RHSS claims
A project team was established to identify installations and services that would enable the reopening of the high streets, and fit within the RHSSF criteria. An officer was then tasked to obtain quotes for the appropriate items, working with the fund representative. The Assistant Director of Economic Development has then made the decision on which items to include.
Please describe the document management system for the project and how the audit trail will be maintained and accessible for the period required under the terms of the Funding Agreement, this includes retrieving original invoices and ensuring evidence of costs incurred is available.
The documents relating to this project will be stored on a secure drive within the council server, and the financial evidence such as invoices will be kept additionally on the council's finance system for six years, in accordance with our data retention policy.

- ii. Please indicate whether or not the RHSS funded activities will result in any **Fixed and or Major Assets** NO
- iii. If Yes you are required to list the potential assets, and describe the system(s) in place to record asset details in compliance with ERDF Guidance

The assets we have purchased through this funding are under the threshold in value for what the council would consider listing as a fixed asset.

- iv. **VAT** – Please advise whether or not the project budget includes any VAT you cannot recover from HMRC (recoverable VAT).
Note we may need confirmation of this by way of a letter from the council's finance department.? NO
- v. **VAT** – If irrecoverable VAT will be claimed, please describe how this is captured through the claims procedure and how your financial processes will ensure that it is not being claimed as part of the normal VAT return.

N/A

7. Procurement: Please provide details of all the procurements you have and/or will undertake in relation to RHSS eligible expenditure.

Applicants should note that procurements will be tested in detail in the lifetime of a project and by different independent bodies. In the event of non - compliance/irregularity financial penalty will be imposed in line with EU guidance. This can be up to 100% of the procurement expenditure.

It remains the responsibility of the Local Authority to ensure all procurements are compliant.

Anticipated value of the contract	Brief description of works, supplies or services that will be provided under the contract	What procurement process do you anticipate using to select the supplier? (Please tick)	Procurement status (Please tick)
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		OJEU	Advertised	Three Quotes	Direct Award	Procurement in progress/ to be started	Procurement completed
£2400 (anticipated but we had to spend more five months later taking this figure up to £3367)	Posters/Signage etc				X		X
Initially thought to be £5000, we had to buy extra over several months taking this to £21,124. Enclosed is a cross border interest form with justification.	Hand Sanitizer Stations				X		X
£8825	Hand Sanitizer chemical solution			X			X
£1390	Banners				X		X
£60,000	Business Support Portal		X			X	
£40,000	Business campaign (digital marketing costs)		X			X	
£24500	Business support sessions			X		X	
£4000	Action plan research consultancy contract			X		X	
£24354	Footfall counters			X		X	

8. State Aid: This section MUST be completed in conjunction with section 8 of the accompanying Grant Action Plan Guidance.

CLGU has conducted its own analysis of the State Aid position of the RHSS project and concluded that there is no State Aid due to the nature of the RHSS eligible activities. This position has been set out in Annex A of the accompanying Grant Action Plan Guidance.

However it is the responsibility of each Local Authority in receipt of RHSS funding to ensure that they are compliant with State Aid law.

- i. Have you read and understood CLGU's State Aid position as set out in Annex A of the Grant Action Plan Guidance? YES
- ii. Have you completed your own State Aid analysis? YES
- iii. Does your State Aid analysis agree with CLGU's position that there is no State Aid associated with RHSS funded activity? YES

- iv. If yes, and you will deliver the project such that there is no State Aid:

Describe how you will ensure that there is no State Aid

All items will be procured in accordance with EU state aid regulations.

- v. If you have conducted your own State Aid analysis and concluded that there *would be* State Aid, you must complete **Annex A State Aid Analysis** below.

9. Policies and Documents

- i. It remains the responsibility of the Council to ensure that the policies are fit for purpose. RHSS Fund will not provide formal approval of policies.

Policies and Documents Required	Tick to confirm you have attached	Policies and Documents Required	Tick to confirm you have attached
Counter Fraud Policy	yes	Sustainable Development	Yes
Conflict of Interest Policy and Register	Yes	Document Retention	Yes
Equal Opportunities	yes	Risk Register	Yes

- ii. Please confirm that you have read and understood the ERDF Guidance including but not limited to Eligibility, State Aid, Branding and Publicity and Procurement and that you will deliver the project in compliance with the requirements.

Select to confirm: ☒

Declaration & Signature

I declare that I have the authority to represent *South Norfolk Council* in submitting the Grant Action Plan.

I understand that RHSS Fund acceptance of this Grant Action Plan does not in any way signify that the proposed activity described above is eligible and compliant with the requirements of the RHSS Fund.

On behalf of South Norfolk Council and having carried out full and proper inquiry, I confirm to the RHSS Fund:

- That the information provided in this application is accurate.
- I am not aware of any relevant information, which has not been included in the application, but which if included is likely to affect the eligibility and compliance of the activity.


I confirm to the RHSS Fund:

- That I shall inform the RHSS Fund if, prior to any RHSS funding being legally committed to South Norfolk Council, I become aware of any further information which might reasonably be considered as material to the RHSS Fund in deciding whether to enter into a Funding Agreement.

- I am aware that if the information given in this application turns out to be false or misleading, the Reopening High Streets Safely Fund may demand the repayment of funding and/or terminate the RHSS funding agreement.

I confirm that I am aware that checks can be made to the relevant authorities to verify this declaration and any person who knowingly or recklessly makes any false statement for the purpose of obtaining grant or for the purpose of assisting any person to obtain grant is liable to be prosecuted. A false or misleading statement will also mean that approval may be revoked, and any grant may be withheld or recovered with interest.

Local Authorities should be aware that any expenditure incurred before the signing of an RHSS Grant Funding Agreement is entirely at their own risk and may render the project ineligible for support.

Signed		Name (print)	Tig Armstrong
Position	Assistant Director of Economic Development	Date	13/01/21

Annex A – State Aid Analysis

State Aid Law	
i.	Please list all the organisations (if known) which may benefit from the funding of the project. If they are not known, list the types of organisations that might benefit from the funding.
N/A	
ii.	For each organisation or type of organisation that may benefit from the project, (including the Local Authority and any Delivery Partners) identify whether they meet the State Aid test. If you believe an organisation or type/ group of organisations is outside the scope of State Aid, please provide the reasons. Local Authorities may wish to refer to the European Commission’s “Notion of State Aid” guidance and the Ministry of Housing, Communities and Local Government’s European Regional Development Fund guidance on State Aid law available at https://www.gov.uk/government/publications/european-structural-and-investment-funds-state-aid-documents .
N/A	

<p>iii. For each beneficiary and or type of beneficiary that the Local Authority regards as being in receipt of State Aid, identify which exemption(s) they will be using to provide the aid in accordance with State Aid law¹.</p>		
Name of beneficiary or type of beneficiaries	Name of Exemption	Scheme reference number

Where a project is funded under an exemption based on the General Block Exemption Regulations (651/2014), the Local Authority is required to either (a) confirm that the project falls within the scope of Regulation 6(5) or (b) to submit a separate document to demonstrate incentive effect in line with Regulation 6(2) containing the following information:

(a) the applicant undertaking's name and size

(b) a brief description of the project, including start and end dates

(c) the location of the project

¹ For notified schemes the answer should include the full name of the scheme and the Commission reference number.

(d) a full list of the project costs used to determine the allowable level of funding
(e) the form of the aid
(f) the amount of public money needed for the project.
N/A
iv. If you intend to use exemption(s) to deliver the Project, have you read the terms of the scheme and meet all the relevant terms.
Yes or No
v. If you intend to use De Minimis, please outline what work has been undertaken to ensure that this is the most appropriate mechanism.
vi. Are you subject to an outstanding recovery order in respect of State Aid?
Yes or No
vii. Describe the system in place for collecting and recording the required information for audits and returns?
N/A



FUNDING AGREEMENT

BETWEEN

**THE SECRETARY OF STATE FOR HOUSING, COMMUNITIES AND
LOCAL GOVERNMENT**

AND

SOUTH NORFOLK DISTRICT COUNCIL

PROJECT NAME: REOPENING HIGH STREETS SAFELY FUND

PROJECT NUMBER: EE35

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SCHEDULE 2 REOPENING HIGH STREETS SAFELY FUND GUIDANCE

SCHEDULE 3 GRANT PLAN FORM

SCHEDULE 4 UNDERPERFORMANCE METHODOLOGY

PARTIES

1. **THE SECRETARY OF STATE FOR HOUSING, COMMUNITIES AND LOCAL GOVERNMENT** acting through the Cities and Local Growth Unit whose principal address is 2 Marsham Street, London SW1P 4DF (**the Secretary of State**); and
2. South Norfolk District Council of South Norfolk House, Cygnet Court, Long Stratton Norwich, NR15 2XE (**Grant Recipient**).

BACKGROUND

- A. The Commission of the European Union ('European Commission') has adopted the Operational Programme for England, setting out its contribution to the Union strategy for smart, sustainable and inclusive growth and the achievement of economic, social and territorial cohesion;
- B. The Secretary of State acting through the Cities and Local Growth Unit wishes to offer the Grant and the Grant Recipient agrees to accept the Grant on the terms and conditions of this Funding Agreement for the purposes set out herein and which are to contribute to the plan to Reopen the High Street Safely
- C. As the Grant Recipient will be a beneficiary of European Regional Development Fund funding this Funding Agreement serves as the document described in Article 125(3)(c) of Regulation 1303, setting out the conditions for support for the operation concerned and the specific requirements concerning the products or services to be delivered under the operation, the financing plan and the time-limit for execution.

IT IS AGREED THAT:**1. DEFINITIONS**

In this Funding Agreement the following words and phrases shall have the following meanings:

"Agreed Activity End Date" means the date specified as such in the Project Specific Conditions and being the date that all of the Project Activities shall be finished and complete including the Works.

"Agreed Financial Completion Date" means the date specified as such in the Project Specific Conditions and being the date that all of the expenditure will have been defrayed.

"Agreed Project Practical Completion Date" means the date specified as such in the Project Specific Conditions and being the date by which the Targets shall be achieved.

"Application" means the information contained within the Grant Action Plan Form (and any annexures thereto) which is contained in Schedule 3

"Approved Use" means use of an Asset as set out in the Project Specific Conditions.

"Asset" means an asset which may be either a Fixed Asset or a Major Asset as appropriate in the relevant context and "Assets" shall be construed accordingly.

"Asset Register Template" means the asset register template notified to the Grant Recipient.

"Audit" means an audit/monitoring verification carried out pursuant to Articles 125 and 127 of Regulation 1303 by the Secretary of State in its role as 'managing authority' or the Government Internal Audit Agency in its role as 'audit authority', or any audit by the European Commission, European Court of Auditors or, where relevant, the National Audit Office.

"Capital Contribution Rate" means the percentage rate in respect of Eligible Capital Expenditure and is specified in the Project Specific Conditions.

"Capital Maximum Sum" means the maximum amount of Grant payable in respect of Eligible Capital Expenditure and is specified in the Project Specific Conditions.

"Change" means in relation to the Project as defined in the Application any of the following changes (in accordance with clause 9):-

- (a) a change in the Ownership, Control and Nature of Business of the Grant Recipient;
- (b) a change in the nature or purpose of the Project or in the delivery of the Project, as set out in the Application;
- (c) any change to the Eligible Expenditure;
- (d) any change to the Expenditure Profile;
- (e) any change to any of the Key Milestone Dates;
- (f) any change to any of the Targets;
- (g) any material change to the Project Specifications (that is, more than merely trivial and inconsequential in its consequences).

"Completion" means completion of the Project Activities to the satisfaction of the Secretary of State.

"Completed Project" means a Project that has been physically completed or fully implemented and in respect of which all related payments have been made by the Grant Recipient and the corresponding public contribution has been paid to the Grant Recipient.

"Conditions" means the terms and conditions upon which the Grant is payable as contained in clauses 1 to 27 of the main body of this Funding Agreement and the Project Specific Conditions at Schedule 1.

"Confidential Information" means all Personal Data and any information, however it is conveyed, that relates to the business, affairs, developments, trade secrets, know-how, personnel, and suppliers of the owner of the Confidential Information, including all intellectual property rights, together with all information derived from any of the above, and any other information clearly designated as being confidential (whether or not it is marked "confidential") or which ought reasonably be considered to be confidential.

"Contracting Authority" means any contracting authority as defined in Regulation 3 of the Public Contracts Regulations 2006 or Regulation 2 of the Public Contracts Regulations 2015 (as amended) other than the Secretary of State.

"Contribution Rate" means the percentage rate of Eligible Expenditure at which Grant is paid as contained in the Project Specific Conditions and may be the Capital Contribution Rate and/or the Revenue Contribution Rate.

"Correction" means an amount to be repaid or withheld from the Grant payable as determined following the finding of an Irregularity and calculated, where relevant, by reference to the published guidelines on flat-rate corrections, for example as set out in the National European Structural and Investment Fund Procurement Requirements and the Guidelines for Determining Financial Corrections.

"Crown Body" means any Secretary of State, office or agency of the Crown.

"Data" means

- (a) the data, text, drawings, diagrams, images or sounds (together with any database made up of any of these) which are embodied in any electronic, magnetic, optical or tangible media, and which are:
 - (i) supplied to the Grant Recipient by or on behalf of the Secretary of State; or
 - (ii) which the Grant Recipient is required to generate, process, store or transmit pursuant to this Funding Agreement; or
- (b) any Personal Data for which the Secretary of State or the Grant Recipient is the Data Controller.

"Data Controller" shall have the same meaning as set out in the Data Protection Legislation

"Data Loss Event" means any event that results, or may result, in unauthorised access to Personal Data held by the Processor under this Agreement, and/or actual or potential loss and/or destruction of Personal Data in breach of this Agreement, including any Personal Data Breach.

"Data Protection Legislation" means:

- (a) the General Data Protection Regulation (Regulation (EU) 2016/679), the Law Enforcement Directive (Directive (EU) 2016/680) and any applicable national implementing Laws as amended from time to time
- (b) the Data Protection Act 2018 to the extent that it relates to processing of personal data and privacy;
- (c) all applicable Law about the processing of personal data and privacy including where applicable the guidance and codes of practice issued by the Information Commissioner as may be in force from time to time.

"Data Protection Impact Assessment" means: an assessment by the Controller of the impact of the envisaged processing on the protection of Personal Data.

"Data Subject" shall have the same meaning as set out in the Data Protection Legislation

"Data Subject Request" means a request made by, or on behalf of, a Data Subject in accordance with rights granted pursuant to the Data Protection Legislation to access their Personal Data.

"Delivery Partner" means a third party that (in collaboration with the Grant Recipient) shall deliver the Project, itself defray expenditure to be claimed and carry out the Project Activities in accordance with clause 4 and which third party is not intended by either party to be providing services or works under a contract for services or works.

“Disposal” means the disposal, sale, transfer or the grant of any estate or interest in any Asset and includes any contract for a disposal and **“Dispose”** shall be construed accordingly.

"Eligibility Rules" means the rules governing eligibility of expenditure for payment of European Regional Development Fund contained in:

- (a) Regulation 1301;
- (b) Regulation 1303; and
- (c) The National European Regional Development Fund Eligibility Rules.

"Eligible Expenditure" means expenditure in relation to this Project that complies in all respects with the Eligibility Rules.

"Eligible Revenue Expenditure" means the expenditure set out in the profile at Schedule 3.

"Environmental Information Regulations" means the Environmental Information Regulations 2004 (SI No 2004/3391) together with any guidance and/or codes of practice issued by the 'Information Commissioner' (as referred to therein) or relevant Government Department in relation to these regulations.

"Event of Default" means an event or circumstance as defined by clause 12.1.

"Expenditure" means either capital expenditure or revenue expenditure (as appropriate in the context).

"Expenditure Profile" means the information provided by the Grant Recipient detailing the spend forecast for the carrying out of the Project Activities and defrayal of expenditure including the Start Date and the Agreed Financial Completion Date and which is contained in Schedule 3.

"Final Payment Date" means the date of the final payment of Grant to the Grant Recipient.

"Financial Year" means the calendar year.

“Fixed Asset” means any Asset which consists of land and/or buildings, plant, machinery or other thing that is, or is to be, fixed to any land and which is to be acquired, developed, enhanced, constructed and/or installed as part of the Project.

"Funding Agreement" means this agreement including the Schedules.

"Grant" means the grant of European Regional Development Fund payable pursuant to this Funding Agreement up to the Maximum Sum as set out in the Project Specific Conditions.

"Grant Claim" means a claim for Grant using the Secretary of State System on line facility.

"Grant Recipient Equipment" means the hardware, computer and telecoms devices and equipment made available by the Grant Recipient or its sub-contractors (but not hired, leased or loaned from the Secretary of State) for the provision of the Project Activities.

"Grant Recipient Personnel" means all employees, agents, consultants and contractors of the Grant Recipient and/or of any sub-contractor.

"Grant Recipient Software" means software which is owned by or licensed to the Grant Recipient, including software which is or will be used by the Grant Recipient for the purposes of complying with its obligations pursuant to this Funding Agreement.

"Grant Recipient System" means the information and communications technology system used by the Grant Recipient in performing its obligations under this Funding Agreement

including the Grant Recipient Software, Grant Recipient Equipment and related cabling (but excluding the Secretary of State System).

"Guidelines for Determining Financial Corrections" means the Guidelines for determining financial corrections to be made to expenditure co financed by the Structural and Investment Funds from time to time in force and notified to the Grant Recipient by the Secretary of State and which (those subsisting on the date of this Funding Agreement) is Commission Decision C(2019) 3452 of 14.05.2019 laying down the guidelines for financial corrections to be made to expenditure financed by the Union for non-compliance with the rules on public procurement.

"Information Communications and Technology Environment" means the Secretary of State System and the Grant Recipient System.

"Information" has the meaning given in the Freedom of Information Act 2000.

"Information Commissioner" has the meaning given in the Freedom of Information Act 2000.

"Instalment Period" means the period referred to in the Project Specific Conditions.

"Intellectual Property Right" means all patents, know-how, registered trademarks, registered designs, utility models, applications and rights to apply for any of the foregoing unregistered design rights, unregistered trademarks, rights to prevent passing off for unfair competition and copyright, database rights, topography rights and any other rights in any invention discovery or process in each case in the United Kingdom and all other countries in the world and together with all renewals and extensions.

"Interpretative Communication" means the Commission Interpretative Communication on the Community law applicable to contract awards not or not fully subject to the provisions of the Public Procurement Directives (2006/C 179/02)

"Irregularity" means any breach of European Union law, or of national law relating to its application resulting from an act or omission by a Grant Recipient or a Delivery Partner (and/or its agents and subcontractors), which has, or would have, the effect of prejudicing the budget of the European Union by charging an unjustified item of expenditure to the budget of the European Union.

"Key Milestone Dates" means those milestones to achieve the Project which are contained in the Project Specific Conditions.

"Law" means any applicable law, statute, bye-law, regulation, order, regulatory policy, guidance or industry code, rule of court or directives or requirements of any Regulatory Body, delegated or subordinate legislation or notice of any Regulatory Body.

"Losses" means all costs, charges, fees, expenses, fines and losses (including, loss of profit, loss of reputation) and all interest penalties and legal and other professional costs and expenses.

"Major Asset" means an Asset which is not a Fixed Asset but has a value as at the date of this Funding Agreement (or date of acquisition if the acquisition is funded (in whole or in part) by this Grant) of at least £5,000.00 (five thousand pounds).

"Malicious Software" means any software program or code intended to destroy, interfere with, corrupt, or cause undesired effects on program files, data or other information, executable code or application software macros, whether or not its operation is immediate or delayed, and whether the malicious software is introduced wilfully, negligently or without knowledge of its existence.

"Material Breach" means a breach of this Funding Agreement (including an anticipatory breach) which is not minimal or trivial in its consequences as further set out in clause 12.

"Maximum Sum" means the maximum amount of Grant to be provided by the Secretary of State for the support of the Project and includes the Capital Maximum Sum and the Revenue Maximum Sum.

"More Developed Region" means the geographical areas as defined under Regulation (EU) No 1303/2013 Article 90 and comprising of the areas identified in the Glossary published by the Secretary of State and contained on the Website being the Glossary for 2014-2020 European Structural and Investment Funds. The areas within the More Developed Region covered by this specific Grant Funding Agreement are set out in Schedule 3.

"National European Regional Development Fund Document Retention Guidance" means the guidance published from time to time by the Secretary of State and contained on the Website, the version subsisting at the date of this Funding Agreement being ESIF-GN-1-008 ERDF Document Retention Guidance v1 (published February 2016).

"National European Regional Development Fund Eligibility Rules" means the National Eligibility Rules published from time to time by the Secretary of State and contained on the Website, the version subsisting at the date of this Funding Agreement being ESIF-GN-1-012 National ERDF Eligibility Rules v1 (published 20 March 2015).

"National European Regional Development Fund Publicity Guidance" means the guidance on publicity and the branding guidelines for European Regional Development Fund published from time to time by the Secretary of State on the Website, the version subsisting at the date of this Funding Agreement being ESIF-GN-1-005 ESIF Branding and Publicity Requirements v8 (published 1 August 2019).

"National European Regional Development Fund State Aid Law Guidance" means the guidance published from time to time by the Secretary of State and contained on the Website, the version subsisting at the date of this Funding Agreement being ESIF-GN-1-006 ERDF State Aid Law Guidance v2 (published 7 January 2016).

"National European Structural and Investment Funds Procurement Requirements" means the requirements published from time to time by the Secretary of State and contained on the Website, the version subsisting at the date of this Funding Agreement being ESIF-GN-1-001 ESIF national Procurement Requirements v6 (published 16 August 2019)

"National Rules" means the national rules set out in chapter 6 of the National European Structural and Investment Funds Procurement Requirements as published from time to time.

"Not Eligible" means expenditure that is not Eligible Expenditure.

"Ownership, Control and Nature of Business" shall be construed in accordance with section 840 of the Income and Corporation Taxes Act 1988 and section 1162 of the Companies Act 2006 and for the avoidance of doubt shall include an evaluation of dominant influence and shadow directorships in the Grant Recipient from time to time.

"Parties" means the Secretary of State and the Grant Recipient.

"Personal Data" shall have the same meaning as set out in the Data Protection Legislation

"Process" has the meaning given to it under the Data Protection Legislation

"Procurement Law" includes, but is not restricted to EC Directives 2004/18/EC, 2004/17/EC and 2007/66/EC, the Public Contracts Regulations 2006 (SI No 5/2006), as amended, Directive 2014/24/EU the Public Contracts Regulations 2015 and the Utilities Contracts Regulations 2006 (SI No 6/2006), as amended, and includes the Interpretative

Communication , the Consolidated Versions of the Treaty on European Union and the Treaty on the Functioning of the European Union'.

"Project" means the project fully described in the Application.

"Project Activities" means all activities to be carried out in implementing the Project and includes any Works to be carried out in relation to any Fixed Assets.

"Project Specifications" means the drawings and specifications describing the Works which are contained in Schedule 7 and which have been approved by the Secretary of State in writing, or such revised drawings and specifications as the Secretary of State may from time to time approve in accordance with the provisions of this Funding Agreement.

"Project Specific Conditions" means those conditions which are specific to the Project and are contained in Schedule 1.

"Project Specific Eligible Expenditure" means Eligible Expenditure which is specific to this Project and is contained in Schedule 2.

"Project Change Request Form" means the prescribed form for the purpose of requesting consent to a Change determined from time to time by the Secretary of State.

"Public Sector Financial Assistance" includes all funding received or receivable by the Grant Recipient from public sector bodies including for this purpose funding from the European Commission, government bodies (whether national or local) or bodies in receipt of lottery funds from the National Lottery Distribution Fund pursuant to the National Lotteries Acts 1993 and 1998.

"Regulation 480" means Commission Delegated Regulation (EU) No 480/2014 of 3 March 2014 supplementing Regulation 1303.

"Regulation 821" means Commission Implementing Regulation (EU) No 821/2014 of 28 July 2014 supplementing Regulation 1303.

"Regulation 1301" means Regulation (EU) No 1301/2013 of the European Parliament and of the Council of 17 December 2013, on the European Regional Development Fund and on specific provisions concerning the Investment for growth and jobs goal, as amended.

"Regulation 1303" means Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17 December 2013 which sets out common provisions on the Structural and Investment Funds, as amended.

"Regulatory Bodies" means those government departments and regulatory, statutory and other entities, committees and bodies which, whether under statute, rules, regulations, codes of practice or otherwise, are entitled to regulate, investigate, or influence the matters dealt with in this Funding Agreement or any other affairs of the Secretary of State and "Regulatory Body" shall be construed accordingly.

"Revenue Contribution Rate" means the percentage rate in respect of Eligible Revenue Expenditure as is specified the Project Specific Conditions at Schedule 1.

"Revenue Maximum Sum" means the maximum amount of Grant payable in respect of Eligible Revenue Expenditure as is specified in the Project Specific Conditions.

"Revenue Maximum Sum for the More Developed Region" means the maximum amount of Grant payable in respect of Eligible Revenue Expenditure for the More Developed Category of Region and is specified in the Project Specific Conditions.

"Secretary of State System" means the Secretary of State's computing environment (consisting of hardware, software and/or telecommunications networks or equipment) used by

the Secretary of State or the Grant Recipient in connection with this Funding Agreement which is owned by or licensed to the Secretary of State by a third party and which interfaces with the Grant Recipient System or which is necessary for the Secretary of State to comply with the terms of this Funding Agreement.

"Small to Medium Sized Enterprise" or "SME" means a small to medium sized enterprise as set out in the 'General Block Exemption Regulation' (Commission Regulation (EU) No 651/2014).

"Start Date" means the date specified as such in the Project Specific Conditions being the earliest date that expenditure incurred by the Grant Recipient in relation to the Project that can be Eligible Expenditure.

"State Aid Law" means the law embodied in Articles 107 -109 of Section 2, Title VII, of the Common Rules on Competition, Taxation and Approximation of Laws- Consolidated Versions of the Treaty on European Union and the Treaty on the Functioning of the European Union'.

"Structural and Investment Funds" means together the European Regional Development Fund (ERDF) and the European Social Fund (ESF).

"Structural and Investment Funds Regulations" means Regulation 1301, Regulation 1303 and any delegated acts or implementing acts adopted under those Regulations.

"Sub-processor" means any third Party appointed to process Personal Data related to this Agreement on behalf of the Grant Recipient

"Targets" means the outputs and results identified and detailed in the milestone table contained in the Project Specific Conditions and those specified in Schedule 3 as defined in the Reopening High Streets Safely Fund Guidance.

"Third Party Software" means software which is owned or licensed by any third party which is or will be used by the Grant Recipient for the purposes of this Funding Agreement.

"Transaction List" means the transaction checklist relevant to a particular Grant Claim as determined by the Secretary of State.

"Useful Economic Life" means the period of years following the Agreed Financial Completion Date that any Asset shall be used for the Approved Use as set out in Schedule 1.

"Website" means the national website for the European Regional Development Fund Programme in England: <https://www.gov.uk/european-growth-funding>.

"Working Day" means any day from Monday to Friday (inclusive) which is not Christmas Day, Good Friday or a statutory bank holiday in England.

2. INTERPRETATION

In this Funding Agreement:

- 2.1.** reference to any statute or legislation shall include any statutory extension or modification, amendment or re-enactment of such statutes and include all instruments, orders, bye-laws and regulations for the time being made, issued or given thereunder or deriving validity therefrom, and all other legislation of the European Union that is directly applicable to the United Kingdom;
- 2.2.** reference to any clause, sub-clause, paragraph, sub-paragraph or schedule without further designation shall be construed as a reference to the clause, sub-clause, paragraph, sub-paragraph or schedule to this Funding Agreement so numbered;

- 2.3. reference to 'this Funding Agreement' includes any variations made from time to time pursuant to these terms;
- 2.4. reference to "Published" by the Secretary of State shall include an electronic version contained on the Website;
- 2.5. reference to "including" shall be construed so as not to limit the generality of any words or expressions in connection with which it is used;
- 2.6. reference to "determined" or "determine" means, unless the contrary is indicated a determination made at the discretion of the person making it;
- 2.7. where the consent approval or agreement of the Secretary of State required pursuant to the terms of this Funding Agreement, it shall not be construed as having been given unless provided in writing;
- 2.8. words importing one gender shall include both genders and the singular shall include the plural and vice versa;
- 2.9. the Guidelines for Determining Financial Corrections and the National European Regional Development Fund Eligibility Rules shall have the same force and effect as if expressly set out in the body of this Funding Agreement;
- 2.10. the headings in this Funding Agreement shall not affect its interpretation;
- 2.11. In the event of a conflict between the following elements comprising this Funding Agreement the priority shall prevail in the following descending order:
 - (a) The conditions set out at Schedule 1 ("Project Specific Conditions")
 - (b) The conditions set out in the main body of this Funding Agreement
 - (c) The Reopening High Streets Safely Fund Guidance (Schedule 2)
 - (d) The Grant Action Plan Form (Schedule 3)

3. GRANT

- 3.1. In consideration of the Parties' respective obligations contained in this Funding Agreement the Secretary of State offers the Grant and the Grant Recipient accepts the Grant up to the Maximum Sum on the terms and conditions of this Funding Agreement.
- 3.2. Grant will only be paid in respect of Eligible Expenditure.
- 3.3. Eligible Expenditure excludes:-
 - (a) payments made by the Grant Recipient (or Delivery Partners) that are Not Eligible;
 - (b) payments that are the subject of an Irregularity or a suspected Irregularity.
- 3.4. Subject to entering into this Funding Agreement Eligible Expenditure that has been defrayed on or after the Start Date may be claimed pursuant to this Funding Agreement. For the avoidance of doubt the reference to Grant and the provisions of this Funding Agreement shall apply to all claims and Expenditure beginning on the

Start Date. If the Funding Agreement is not entered into for any reason there shall be no expectation of Grant and any expenditure incurred in that case shall be entirely for the account and at the risk of the applicant.

4. THE APPLICATION AND ACCEPTANCE OF GRANT TERMS

- 4.1.** The Grant Recipient warrants to the Secretary of State that the Application is accurate in all respects having made proper and full enquiry in relation to the same. The Secretary of State has based its decision to offer and pay the Grant (and has relied) upon the representations made by the Grant Recipient in the Application and in all documents and information provided as part of the Grant Action Plan review process. No disclaimer or other statement that precludes the right of any person to rely upon the Application or any other document that forms part of the Application, or has a similar effect, shall apply with respect to the Secretary of State or affect the Secretary of State's right to enforce any provision of the Funding Agreement.
- 4.2.** For the avoidance of doubt, clause 4.1 is intended to ensure that:-
- (a) no disclaimer of liability for the contents of the Application affects the Secretary of State's right to recover any sum under this Funding Agreement; and
 - (b) there is reserved to the Secretary of State (notwithstanding clause 27.12) any rights of action or remedies for any mistake, negligent misstatement, misrepresentation or error of judgment made in the Application upon which the Secretary of State has relied in agreeing to provide Grant to the Grant Recipient.
- 4.3.** The Grant Recipient accepts and agrees to all of the terms having made full and proper enquiry before giving the warranties contained in this Funding Agreement.
- 4.4.** The Grant Recipient acknowledges that the Grant has been offered to it to carry out the Project Activities specified within the Application and achieve the Targets within the time limits set out in this Funding Agreement and the Key Milestone Dates set out in the table contained in the Project Specific Conditions.
- 4.5.** The Grant Recipient may with the consent of the Secretary of State task a Delivery Partner to carry out certain of the Project Activities provided that such shall not in any way reduce any of the obligations or liability of the Grant Recipient under this Funding Agreement. If Consent is given the Delivery Partner shall be named in the Project Specific Conditions.
- 4.6.** For the avoidance of doubt the Grant Recipient shall be liable for the acts of its Delivery Partner including any Corrections resulting therefrom.

5. GRANT CLAIMS

- 5.1.** Amount of Grant payable
- (a) The total amount of Grant payable in respect of Eligible Revenue Expenditure will be either the Revenue Maximum Sum, or an amount calculated by applying the Revenue Contribution Rate to the actual Eligible Revenue Expenditure, whichever is the lower.

- (b) The total amount of Grant paid to the Grant Recipient shall not exceed the Maximum Sum.
- (c) The total amount of Grant payable in respect of Eligible Revenue Expenditure of the More Developed Region shall not exceed the Revenue Maximum Sum for the More Developed Region.

5.2. Conditions Precedent to the payment of Grant

The Secretary of State will not make the first payment of Grant and/or any subsequent payment of Grant unless all of the following preconditions have been complied with:-

- (a) the relevant Grant Claim is made on the Secretary of State System on line facility;
- (b) the expenditure is Eligible Expenditure;
- (c) that Eligible Expenditure has been defrayed (that is that Eligible Expenditure has been incurred and that payment has been made by the Grant Recipient or a Delivery Partner) in respect of any Eligible Expenditure to which a Grant Claim relates;
- (d) any Security required as set out in the project Specific Conditions is in place to the extent stated; and
- (e) the Conditions have been fully complied with provided that the Secretary of State may waive in whole or in part any Condition/s without prejudicing the Secretary of State's right to require subsequent fulfilment of such Condition/s

provided always that the payment of a Grant Claim shall not operate as a waiver of any of the obligations in this clause 5.2 or exclude the right for the Secretary of State to exercise any of its rights under this Funding Agreement.

5.3. Grant Claims Procedure

- (a) the Grant Recipient shall make all Grant Claims in arrears, for each Instalment Period.
- (b) The Grant Recipient shall provide a forecast of the amount of Grant to be claimed for an Instalment Period in accordance with paragraph (c) by the 7th Working Day of the month following the end of the Instalment Period for which the Grant Claim will be made.
- (c) Except for the final Grant Claim, each Grant Claim is to be submitted by the 20th Working Day of the month following the end of the Instalment Period for which the Grant Claim is made.
- (d) The first Grant Claim made at the end of the first Instalment Period shall relate to all Eligible Expenditure incurred and paid by the Grant Recipient from the Start Date. Subsequent Grant Claims shall relate to all Eligible Expenditure incurred and paid by the Grant Recipient in an Instalment Period.
- (e) Each Grant Claim is to be submitted using the Secretary of State System on line facility. Each Grant Claim shall include accounting documents of verifiable value (which shall include the Transaction List) in such format and detail as may be acceptable to the Secretary of State relating to the amount claimed in such Grant Claim.

- (f) The Secretary of State will normally pay a Grant Claim within 40 Working Days of receipt, but this is subject to:
 - (i) The Grant Recipient submitting a forecast in accordance with paragraph (b) above;
 - (ii) The Grant Claim being submitted by the deadline referred to in paragraph (c) above; and
 - (iii) the Grant Recipient satisfactorily meeting any request for further particulars about the Eligible Expenditure specified in the Grant Claim or any other details provided for in the Grant Claim.
- (g) the time for payment of the Grant Claim shall not be of the essence. The Secretary of State shall have no liability to the Grant Recipient for any Losses caused by a delay in the payment of a Grant Claim howsoever arising.
- (h) The Grant Recipient must notify the Secretary of State promptly if at any time it becomes aware that it is unable to make a Grant Claim in accordance with the Expenditure Profile.
- (i) A progress report in respect of the Project must be submitted with each Grant Claim, and at such other times as the Secretary of State may notify to the Grant Recipient.
- (j) By submitting a Grant Claim the Grant Recipient warrants to the Secretary of State that there is no Event of Default or Material Breach subsisting by reference to the facts and circumstances existing on each such date.

6. THE EXPENDITURE PROFILE

- 6.1.** If in any Financial Year ("the relevant year") there is a shortfall in the amount of Eligible Expenditure by reference to the amount planned in the Expenditure Profile, the Secretary of State will be under no obligation to pay Grant for any additional Eligible Expenditure in the following year or any later Financial Year.
- 6.2.** If in any Financial Year (the "relevant year") there is an overspend in the amount of Eligible Expenditure by reference to the amount planned in the Expenditure Profile, the Secretary of State will be under no obligation to pay Grant in the following year or any later Financial Year which was overspent in any relevant year.

7. DECOMMITMENT OF EUROPEAN REGIONAL DEVELOPMENT FUND RESOURCES

- 7.1.** The Grant Recipient acknowledges that the financial consequences that flow from a departure from the Expenditure Profile in any financial year could include the loss of European Regional Development Fund resources allocated for the Operational Programme (if in that year there is under-spending for the Operational Programme as a whole).
- 7.2.** If during any Financial Year of the Operational Programme the Secretary of State is reasonably satisfied that there will be a shortfall in Eligible Expenditure and that the Grant Recipient will be unable to make up that shortfall then, the Secretary of State may reduce the Grant allocated for the Project and use the amount of the reduction for any other purpose of the Operational Programme. The amount to be re-allocated

under these circumstances is determinable by the Secretary of State, but may not exceed the amount of the anticipated shortfall in Eligible Expenditure.

- 7.3.** Where the right reserved in clause 7.2 arises under circumstances that also entitle the Secretary of State to exercise the rights reserved in clause 12, the right reserved to the Secretary of State in clause 7.2 is exercisable in addition and without prejudice to the exercise of the rights reserved to the Secretary of State in clause 12.

8. PROVISIONS RELATING TO ANY ASSETS

8.1. Inventory of the Assets

Using the Asset Register Template the Grant Recipient must establish and maintain an inventory of all of the Assets. The provisions of clause 14.5 shall apply to all Assets.

8.2. Change of use of any Asset

- (a) The Grant Recipient covenants with the Secretary of State that it will not use any Asset for any purpose other than the Approved Use throughout the Useful Economic Life of the Asset.
- (b) During the Useful Economic Life of each Asset, the Grant Recipient shall not cease to use the Fixed Asset or the Major Asset, or any part of the Asset for the Approved Use without the prior written consent of the Secretary of State. If consent is given, it may be subject to any conditions which the Secretary of State may wish to impose. Such conditions may include repayment by the Grant Recipient to the Secretary of State of all or part of the Grant paid to the Grant Recipient under this Funding Agreement.

8.3. Disposal of any Asset

- (a) During the Useful Economic Life of an Asset the Grant Recipient must not dispose of any interest in such Asset without the prior written consent of the Secretary of State. If the Secretary of State grants consent to a Disposal, such consent may be subject to satisfaction of certain conditions, to be determined by the Secretary of State.
- (b) Where the Grant Recipient disposes of any interest in any Asset without the prior written consent of the Secretary of State, then the proceeds of the Disposal (limited to the total amount paid by the Secretary of State to the Grant Recipient under this Funding Agreement) shall be held on trust by the Grant Recipient for the benefit of the Secretary of State.
- (c) The liability under clause 8.3(b) is separate from the liability to comply with any decision of the Secretary of State under clause 12 to require repayment of the whole or any part of the amount paid of the Grant, to the Grant Recipient (but subject to clause 27.12 below).
- (d) The Grant Recipient shall provide to the Secretary of State as part of the progress report referred to in clause 5.4(i) information in relation to any Disposals which it either intends to make or has made with the prior written consent of the Secretary of State at the date of such progress report.

8.4. Charging of any Asset

During the Useful Economic Life of each Asset the Grant Recipient shall not create any charge, legal mortgage, debenture, or lien over any Asset without the prior written

consent of the Secretary of State (except for Security contemplated by the Project Specific Conditions).

9. CHANGES TO THE PROJECT

- 9.1.** All Changes must be approved by the Secretary of State prior to the relevant Change being deemed to be effective. The Grant Recipient shall request the Change on a RHSS Project Change Request Form. The Secretary of State shall either agree to the change request or reject the change request within 60 days of the date of the Project Change Request Form.
- 9.2.** Until such time as a Change is made in accordance with this clause, the parties shall, unless otherwise agreed in writing, continue to perform this Funding Agreement in compliance with its terms before such Change.

10. LEGISLATION, ESIF PROCUREMENT REQUIREMENTS, AND STATE AID LAW

10.1. General

- (a) The Grant Recipient must comply and secure compliance with the Structural and Investment Funds Regulations and the Grant Recipient hereby warrants that it shall not act or omit to act in any way that may cause the Grant Recipient, a Delivery Partner or the Secretary of State to breach the Structural and Investment Funds Regulations.
- (b) Further to clause 10.1(a) the Grant Recipient shall ensure that in accordance with Article 6 of Regulation 1303, the Project complies with applicable European Union law and the national law relating to its application.

10.2. State Aid Law

- (a) The Grant Recipient has undertaken its own independent assessment of the compatibility of the Project with State Aid Law and confirms to the Secretary of State that the Project is structured so it is compliant with State Aid Law. Where the Secretary of State has provided its views on any aspect of State Aid Law, the Grant Recipient confirms that it has considered this information alongside all other sources of State Aid Law available at the time of entering into this Funding Agreement (including regulations and decisions published on the European Commission website) in undertaking its own assessment of the Project's compliance. The Secretary of State has taken into account the Grant Recipient's representations on State Aid Law compliance in deciding to offer the Grant.
- (b) The Grant Recipient shall procure and maintain the necessary expertise and resources to deliver the Project in accordance with the State Aid Law for the full term of the Project. The Grant Recipient agrees to maintain appropriate records of compliance with the State Aid Law and agrees to take all reasonable steps to assist the Secretary of State to comply with State Aid Law requirements and respond to any investigation(s) instigated by the European Commission into the Project or by the European Court of Auditors.

- (c) A finding of State Aid non-compliance in respect of the Project by the European Commission or a Court of competent jurisdiction may lead to Grant Recipient being ordered to repay the Grant with interest in accordance with the European Commission's reference rates.

10.3. ESIF Procurement Requirements

- (a) The Grant Recipient warrants that it has provided full details of all contracts for goods, works or services which will form part of the Project and for which it will claim reimbursement.
- (b) Where the Grant Recipient is a 'contracting authority' within the meaning of Procurement Law the Grant Recipient warrants that:
 - (i) In relation to any contracts listed in section 7 of the Grant Action Plan form, it has complied with, and where relevant, has secured that its Delivery Partners have complied with all applicable Procurement Law in force at the date the procurement was commenced in relation to the Project; and
 - (ii) In relation to any contracts listed in section 7 of the Grant Action Plan form, it shall comply with, and where relevant, shall secure that its Delivery Partners shall comply with, all applicable Procurement Law in force at the date of commencement of the procurement process in relation to the Project.

Provided that where, having regard to the Interpretative Communication, the contract awards do not have a sufficient connection with the functioning of the Internal Market, the Grant Recipient warrants that it has complied with or shall comply with clause 10.4 below.

10.4. National Rules

Where:

- (a) the Grant Recipient is not a 'contracting authority' subject to Procurement Law in relation to the Project; or
- (b) it is a contracting authority and the contract award does not have a sufficient connection to the 'Internal Market'

the Grant Recipient warrants that:

- (i) In relation to any contracts listed in section 7 of the Grant Action Plan form, it has ensured that its processes met, and where relevant, has secured that its Delivery Partners have ensured that their processes met, with the National Rules published at the date of the Application; and
- (ii) In relation to any contracts listed in section 7 of the Grant Action Plan form, it shall comply with, and where relevant, shall secure that its Delivery Partners shall comply with the relevant version of the National Rules published at the date of commencement of the procurement process.

It is the Grant Recipient's sole responsibility to ensure compliance with the Regulations.

11. PUBLICITY

- 11.1.** The Grant Recipient shall, and shall procure that its Delivery Partners and sub-contractors at all times comply with:-
- (a) Articles 115 and Annex XII of Regulation 1303; and
 - (b) Chapter II and Annex II of Regulation 821.
- 11.2.** The Grant Recipient shall and shall ensure that its Delivery Partners and sub-contractors at all times also apply the HM Government brand, in all circumstances where ERDF publicity is required under the Regulations and as set out in the National European Regional Development Fund Publicity Guidance. The Grant Recipient shall also adhere the Branding and Publicity requirements as set out in the RHSS Fund Guidance and associated FAQs.
- 11.3.** It is the Grant Recipient's sole responsibility to ensure compliance with the Regulations and domestic branding requirements.
- 11.4.** The obligations in this clause shall continue after this Funding Agreement is terminated.
- 11.5.** The Grant Recipient hereby gives consent to the Secretary of State to publicise in the press or any other medium the Grant and the details of the project using any information gathered from the Application or the monitoring of the Project Activities.

12. EVENTS OF DEFAULT, MATERIAL BREACH AND RIGHTS RESERVED FOR BREACH OF THE FUNDING AGREEMENT

12.1. Events of Default

An Event of Default is the occurrence of any of the following:-

- (a) the Grant Recipient fails to comply with the Conditions;
- (b) the Project Activities are not commenced by the date which is 3 months after the Start Date;
- (c) the expenditure is not claimed in line with the Expenditure Profile.
- (d) Completion of the Project Activities has not been achieved by the Agreed Activity End Date;
- (e) a Change is made to the Project without the prior written approval of the Secretary of State, as required by clause 9;
- (f) the Approved Use of any Asset has ceased without the prior written consent of the Secretary of State;
- (g) the European Commission or a European Court requires any Grant paid to be recovered by reason of a breach of State Aid Law;
- (h) the Grant Recipient fails to comply with the provisions of the exemption or scheme (referred to in the Project Specific Conditions) under State Aid Law that applies to the Project and the Grant;

- (i) any report or certificate made by the Grant Recipient's auditor or reporting accountant is unsatisfactory (where, for example, the report or certificate refers to a fundamental uncertainty or disagreement, or contains a material qualification, or states that the auditor or accountant is unable to form an opinion about any item, or reports that any amount is not correctly stated in the accounts or records examined);
- (j) the Grant Recipient owes any sum to the Secretary of State under an agreement for the financial support of any other project or activities;
- (k) if the ultimate Grant Recipient is a Small to Medium-sized Enterprise, but it ceases to be a Small to Medium-sized Enterprise, and it is a requirement arising out of State Aid Law that the grant recipient remains as a Small to Medium-sized Enterprise;
- (l) an encumbrancer takes possession or a receiver or administrative receiver or manager or sequestrator is appointed of the whole or any part of the undertaking assets rights or revenues of the Grant Recipient or a distress or other process is levied or enforced upon any of the assets rights or revenues of the Grant Recipient and any such action is not lifted or discharged within 10 Working Days;
- (m) a petition is presented (other than a petition which, in the opinion of the Secretary of State, is frivolous or vexatious and which is withdrawn or stayed within 10 Working Days) to, or any order is made by, any competent court for the appointment of an administrator in relation to the Grant Recipient;
- (n) the Grant Recipient is, or is adjudicated or found to be, insolvent or stops or suspends payment of its debts or is (or is deemed to be) unable to or admits inability to pay its debts as they fall due or proposes or enters into any composition or other arrangement for the benefit of its creditors generally or proceedings are commenced in relation to the Grant Recipient under any law regulation or procedure relating to reconstruction or adjustment of debts;
- (o) any petition is presented by any person (other than a petition which, in the opinion of the Secretary of State, is frivolous or vexatious and which is withdrawn or stayed within 10 Working Days) or any order is made by any competent court or any resolution is passed by the Grant Recipient for its winding-up or dissolution or for the appointment of a liquidator of the Grant Recipient.
- (p) any Irregularity on the part of the Grant Recipient has been identified in connection with the Project, or the European Commission or any other Regulatory Body otherwise requires the Secretary of State to recover any amount paid under this Funding Agreement."

12.2. Material Breach

A Material Breach is a breach of this Funding Agreement as defined in clause 1 above including but not limited to the occurrence of any of the following:-

- (a) any information given or representation made in the Application or in any correspondence, report or other document submitted to the Secretary of State relating to this Project or under this Funding Agreement is found to be incorrect or incomplete to an extent which the Secretary of State considers to be material;

- (b) any fraud has been committed by the Grant Recipient and/or its employees in connection with the Project;
- (c) a breach of the warranties by the Grant Recipient contained in and given pursuant to this Funding Agreement.
- (d) the Grant Recipient in breach of clause 8.3 makes a Disposal of any Asset without the prior written consent of the Secretary of State;
- (e) the Grant Recipient fails to materially comply with the Conditions;
- (f) the activities carried out by the Grant Recipient are distinct or different from the description set out in the Application having regard also to the intended function of the Project Activities and the end beneficiaries of the Project.

12.3. Rights reserved for the Secretary of State in relation to an Event of Default

Where, the Secretary of State determines that an Event of Default or a Material Breach has or may have occurred, the Secretary of State may by written notice to the Grant Recipient take any one or more of the following actions:

- (a) suspend the payment of Grant for such period as the Secretary of State shall determine; and/or
- (b) reduce the Maximum Sum in which case the payment of Grant shall thereafter be made in accordance with the reduction and notified to the Grant Recipient; and/or
- (c) cease to make payments of Grant to the Grant Recipient under this Funding Agreement and (in addition) require the Grant Recipient to repay to the Secretary of State the whole or any part of the amount of Grant previously paid to the Grant Recipient; and/or
- (d) terminate this Funding Agreement.

12.4. Opportunity for the Grant Recipient to remedy an Event of Default

- (a) If the Secretary of State gives written notice to the Grant Recipient pursuant to clause 12.3(a) to suspend payment of Grant, such notice shall specify the relevant Event of Default and give the Grant Recipient an opportunity to rectify the relevant Event of Default within such period as the Secretary of State shall determine to be reasonable and as shall be set out in such written notice (or such extended period as the Secretary of State shall thereafter determine).
- (b) The written notice referred to in clause 12.4(a) above may include a requirement for the Grant Recipient to provide specified information to the Secretary of State to assist him to determine whether the default has been rectified to his satisfaction.
- (c) Where the rectification of the default requires a Change the procedure under clause 9 shall be followed.
- (d) The Secretary of State shall not by reason of the occurrence of an Event of Default which is, in the opinion of the Secretary of State, capable of remedy, exercise its rights under either clause 12.3(c) or clause 12.3(d) unless the Grant Recipient has failed to rectify the default pursuant to clause 12.4(a) within such period referred to in clause 12.4(a) to the satisfaction of the Secretary of State.

12.5. Continued rights of actions or remedies of the Secretary of State

The exercise by the Secretary of State of its rights under clause 12.3 shall be without prejudice to any other right of action or remedy of the Secretary of State in respect of any breach by the Grant Recipient of the provisions of this Funding Agreement.

12.6. Cessation of entitlement to Grant

If the Secretary of State exercises its right under clause 12.3(c) the Secretary of State shall give written notice to the Grant Recipient that the Secretary of State is ceasing to make payment of Grant and from the date of such notice the Secretary of State shall cease to be under any obligation to pay any amount of Grant to the Grant Recipient under the Funding Agreement.

12.7. Liability to meet demand for repayment of Grant and Covenant to Pay

- (a) Where the Secretary of State requires the Grant Recipient to repay any amount of Grant, the Grant Recipient shall repay the amount concerned within 20 Working Days of receiving the demand for repayment. The liability to meet such a demand shall be enforceable as a contractual debt.
- (b) Where the Secretary of State makes a determination to recover any amount of Grant, it may recover the amount concerned by withholding or deducting the amount from any sum due from the Secretary of State to the Grant Recipient under this Funding Agreement or under any funding agreement for the support of any other project or activities by the European Regional Development Fund, or under any other agreement with the Secretary of State.
- (c) The Secretary of State may require interest to be paid on any amount repayable by the Grant Recipient in accordance with the rates published in the Official Journal of the European Union from time to time.

12.8. Reduction in grant for underperformance

- (a) This clause applies where the Secretary of State determines that the Grant Recipient has underperformed against the Targets specified in Schedule 3 to such degree that in a reduction in Grant may be made in accordance with the underperformance weightings and methodology set out in Schedule 4.
- (b) Where this clause applies, the Secretary of State shall give written notice to the Grant Recipient specifying the Targets it has underperformed against and giving the Grant Recipient an opportunity to rectify that underperformance within such period as the Secretary of State shall determine to be reasonable and as shall be set out in such written notice (or such extended period as the Secretary of State shall thereafter determine).
- (c) The written notice referred to in the paragraph above may include a requirement for the Grant Recipient to provide specified information to the Secretary of State to assist him to determine whether that underperformance has been rectified to his satisfaction.
- (d) Where the rectification of the underperformance requires a Change the procedure under clause 9 shall be followed.

- (e) Where the Grant Recipient fails to rectify the underperformance to the Secretary of State's satisfaction within the specified time period, the Secretary of State may by written notice to the Grant Recipient, reduce the amount of Grant allocated to the Project by an amount calculated in accordance with the underperformance weightings and methodology set out in Schedule 4.
- (f) Where the amount of Grant is reduced under this clause, the Secretary of State shall either require the Grant Recipient to repay to the Secretary of State the whole or any part of the amount of Grant previously paid to the Grant Recipient and/or shall offset it from a future Grant Claim, as appropriate.

12.9. Corrections

- (a) Notwithstanding any other provision in this Funding Agreement the Secretary of State may impose a Correction. If a Correction is imposed a notice will be sent to the Grant Recipient setting out the Irregularity that the Secretary of State considers has occurred together with the level of Correction imposed having regard to any applicable guidelines and/or the value of the Grant Claim to the extent that the Irregularity applies to it.
- (b) If a Correction is imposed the Grant Recipient shall either pay the amount or agree to the Correction being offset from a future Grant Claim as the case may be. The Secretary of State shall be at liberty to offset an amount of Grant in anticipation of a Correction pending the final outcome of any discussions or representations made by the Secretary of State and/or the Grant Recipient in respect of the Correction.
- (c) The Grant Recipient shall be at liberty to make representations in writing to the Secretary of State setting out the reasons it considers that the Correction should be adjusted together with evidence in sufficient detail to enable the Secretary of State to reconsider the requirement for the Correction provided always that the Secretary of State's decision shall be final and binding.

12.10. Exclusion of Liability

- (a) Neither party shall be liable to the other party (so far as permitted by law) for indirect special or consequential loss or damage in connection with this Funding Agreement which shall include, without limitation, any loss of or damage to profit, revenue, contracts, anticipated savings, goodwill or business opportunities whether direct or indirect.
- (b) Each party shall at all times take all reasonable steps to minimise and mitigate any loss or damage for which the relevant party is entitled to bring a claim against the other party pursuant to this Funding Agreement.
- (c) With respect to other claims so far as permitted by law the Secretary of State shall under no circumstances whatever be liable to the Grant Recipient whether in contract, tort (including negligence), breach of statutory duty, or otherwise for any Losses arising under or in connection with this Funding Agreement that would exceed the amount of the Maximum Sum less any amount of Grant Paid.
- (d) Any clause limiting the Grant Recipient's liability does not apply in relation to a Correction that is applied in accordance with the terms of this Funding Agreement.

13. ASSIGNMENT OR CHARGING OF THE FUNDING AGREEMENT

- 13.1.** The Grant Recipient may not, without the prior written consent of the Secretary of State, assign its rights under the Funding Agreement or charge the benefit of the Funding Agreement or novate the rights and liabilities of the Funding Agreement to a third party.
- 13.2.** If the Grant Recipient wishes to assign, charge or novate its rights and liabilities under the Funding Agreement, it will give as much notice as possible of its proposals to the Secretary of State and will provide a full account of relevant circumstances and such further particulars as the Secretary of State shall request concerning the party to which the Funding Agreement is proposed to be assigned, novated or charged.
- 13.3.** The Secretary of State shall determine as to whether or not to give consent to an assignment or novation or charging of the Funding Agreement or as to any conditions to be imposed.
- 13.4.** If the Secretary of State consents to an assignment, charge or novation, then the Secretary of State may notify the Grant Recipient that the documentation giving effect to the assignment, charge or novation is to be approved by the Secretary of State and copies of all completed documents supplied to the Secretary of State upon completion of the same.

14. MONITORING PROGRESS AND REPORTING/ NOTIFICATIONS

14.1. Submission of progress reports

- (a) The Grant Recipient must send to the Secretary of State, at such intervals as the Secretary of State shall notify in writing to the Grant Recipient, a report on progress made towards the achievement of the Targets. Without prejudice to any provision of any of this Funding Agreement conferring a remedy for failure to achieve any of the Targets, this obligation shall subsist until the Targets have been achieved or, if earlier, until the end of the Useful Economic Life of the Assets.
- (b) The Grant Recipient must provide such additional information in such format as the Secretary of State may at any time require. This includes information about the progress of the Project Activities, the achievement of the Targets and any other information required to enable the Secretary of State to meet its reporting obligations and other obligations under State Aid Law and the Structural and Investment Funds Regulations.
- (c) The Grant Recipient warrants the accuracy of the reports and information it gives pursuant to this clause 14 and further warrants that it has diligently made full and proper enquiry of the subject matter pertaining to the reports and information given.

14.2. Notification by the Grant Recipient

The Grant Recipient shall notify the Secretary of State in writing:-

- (a) as soon as practicable thereafter firstly in the event of any Change in the information on costs (whether actual or estimated) of carrying out the Project Activities contained in the Application and secondly of any event which materially affects the continued accuracy of such information;
- (b) as soon as practicable thereafter, in the event of the receipt of any other public sector financial assistance or guarantees of other public sector financial Assistance or other funding obtained by the Grant Recipient in relation to the Project, or an offer of the same, in respect of any aspect of the Project or the Project Activities (or any part of it or them);
- (c) as soon as practicable thereafter, of any event which might adversely affect the carrying out and/or Completion of the Project Activities or any part of them;
- (d) prior to any proposed Disposal or any charging of any Asset during its Useful Economic Life;
- (e) prior to any change of use of any Asset from the Approved Use during its Useful Economic Life;
- (f) as soon as practicable thereafter, of any event which might adversely affect the delivery of the Project by the Agreed Activity End Date;
- (g) within 5 Working Days of any Disposal, details of that Disposal of the whole or any part of the Assets up to that date, together with details and evidence of the consideration obtained and (if required by the Secretary of State) together with copies of all relevant documentation; and
- (h) forthwith, on the occurrence of an Event of Default.

14.3. Records

- (a) The Grant Recipient shall provide the Secretary of State with such information and documentation as the Secretary of State may require in connection with the Project from the date of the Funding Agreement to the date on which the Grant Recipient has fulfilled all its obligations under this Funding Agreement.
- (b) The Grant Recipient shall comply with and assist the Secretary of State to comply with the requirements for an audit trail under the Structural and Investment Funds Regulations including (but not limited to) the detailed minimum requirements under Article 25 of Regulation 480.
- (c) This Grant Recipient shall keep a record of all Eligible Expenditure, all quotes, tenders and procurement practices, all financial contributions made towards the Project and all income generated by the Project.
- (d) The Grant Recipient will provide to the Secretary of State such information as is available as to the number of persons employed in connection with the Project and such other information as may be requested by the Secretary of State as to the benefits derived from the provision of funding for the Project.
- (e) The Grant Recipient must comply with the requirements of the Secretary of State regarding the keeping of records available on the Secretary of State Website.

14.4. Retention of documents

- (a) Without prejudice to any other provision of this Funding Agreement and the Grant Recipient's obligations pursuant to State Aid Law, the Grant Recipient will ensure that all documents relating to the Project and its implementation and financing are retained for a two year period from 31 December following the submission of the accounts to the European Commission in which the final expenditure for the Completed Project is included, in order that these may be made available to the European Commission and European Court of Auditors upon request in accordance with Article 140 of Regulation 1303.
- (b) The Secretary of State shall notify the Grant Recipient of the start date of the two year period referred to in the paragraph above.
- (c) In addition to the obligation under paragraph (a) above, the Grant Recipient shall ensure that all documents relating to the Project and its implementation and financing are retained as necessary in order to demonstrate compliance with any applicable State Aid law, the Structural and Investment Funds Regulations and the obligations under this Funding Agreement. The Secretary of State has published the National European Development Fund Document Retention Guidance in order to assist the Grant Recipient to determine how long documents should be retained for in order to demonstrate compliance.
- (d) The Grant Recipient will make available the documents relating to the Project and its implementation and financing if and when required to do so by the Secretary of State, the European Court of Auditors, the European Commission auditors, the National Audit Office (and also their respective auditors).
- (e) The documents referred to in this clause shall be kept and made available either in the form of the originals or certified true copies of the originals or on commonly accepted data carriers including electronic versions of original documents or documents existing in electronic version only. The National European Development Fund Document Retention Guidance provides guidance on commonly accepted data carriers and the procedure for certifying conformity with original documents.
- (f) Where documents exist in electronic form only, the computer systems used shall meet accepted security standards which ensure that the documents held meet with national legal requirements and can be relied upon for audit purposes. The equipment and software used to store the documents shall be retained and kept functional for a two year period from 31 December following the submission of the accounts in which the final expenditure for the Completed Project is included.

14.5. Conflicts of interest and financial irregularities

- (a) The Grant Recipient, any Delivery Partner and all officers, employees and other persons engaged or consulted by the Grant Recipient in connection with the Project shall not be in a position where there is a conflict of interest. The Grant Recipient is required to have formal procedures obliging all such persons to declare any actual or potential personal or financial interest in any matter concerning the Project, and to be excluded from any discussion or decision-making relating to the matter concerned. Any such conflicts must be reported to the Secretary of State in writing.

- (b) If the Grant Recipient has any grounds for suspecting any financial impropriety in the use of any amount paid under the Funding Agreement, it must notify the Secretary of State immediately, explain what steps are being taken to investigate the suspicion, and keep the Secretary of State informed about the progress of the investigation. For these purposes “financial impropriety” includes fraud or other impropriety; mismanagement; use of Grant for improper purposes; and failure to comply with requirements in the Structural and Investment Funds Regulations relating to the control and propriety of project expenditure.
- (c) The Secretary of State shall be entitled to interview employees of the Grant Recipient if fraud or other financial irregularity is suspected by the Secretary of State on the part of the Grant Recipient, its employees or agents in connection with the Project.

15. ACCOUNTING RECORDS AND SUPPORTING EVIDENCE AND AUDIT

- 15.1.** The Grant Recipient shall and shall procure that a Delivery Partner shall maintain full and accurate accounts and documentary evidence for the Project on an open book basis and the Grant Recipient will and shall Procure that a Delivery Partner will permit the Secretary of State and persons authorised by the Secretary of State to inspect audit and take copies of all reports books accounting records and vouchers which the Secretary of State properly considers relevant to the Project.
- 15.2.** The Grant Recipient shall and shall procure that a Delivery Partner shall maintain either a separate accounting system or an adequate accounting code for all transactions relating to the operation without prejudice to national accounting rules.
- 15.3.** The Grant Recipient shall and shall procure that a Delivery Partner shall comply with the Secretary of State’s audit monitoring and reporting requirements for grant recipients.
- 15.4.** The Grant Recipient shall and shall procure that a Delivery Partner shall provide the Secretary of State with such other information as the Secretary of State may require in connection with the Project and the Project Activities.
- 15.5.** The Grant Recipient shall and shall procure that a Delivery Partner shall cooperate fully and promptly with an Audit.
- 15.6.** Where the Project has been selected for Audit and the Secretary of State requires information from the Grant Recipient in order to respond to findings made in the draft Audit report, the Secretary of State shall write to the Grant Recipient with a list of requested information.
- 15.7.** The Grant Recipient shall provide the Secretary of State with the requested information within 14 days of receiving the request unless permission for an extension of time is granted in writing by the Secretary of State.
- 15.8.** The Grant Recipient acknowledges that failure to provide the requested information within the timeframe specified in clause 15.7 above may result in an Irregularity being found in relation to the Project which requires reimbursement to the budget of the European Union.

- 15.9.** Without prejudice to any other provision of this Funding Agreement, where the Grant Recipient has been notified that the Project has been selected for Audit and
- (a) The Grant Recipient has previously failed to comply fully and promptly with an Audit; or
 - (b) an Irregularity has previously been found in relation to the Project,
- the Secretary of State may, at his discretion, withhold payment of Grant until a subsequent Audit has been completed to the Secretary of State's satisfaction.

16. CONFIDENTIALITY

- 16.1.** Except to the extent set out in this clause 16 or where disclosure is expressly permitted elsewhere in this Funding Agreement, each party shall:-
- (a) treat the other party's Confidential Information as confidential and safeguard it accordingly; and
 - (b) not disclose the other party's Confidential Information to any other person without the owner's prior written consent.
- 16.2.** Clause 16.1 shall not apply to the extent that:
- (a) such disclosure is a requirement of Law placed upon the party making the disclosure, including any requirements for disclosure under the Freedom of Information Act 2000, 'Code of Practice on Access to Government Information' or the Environmental Information Regulations;
 - (b) such information was in the possession of the party making the disclosure without obligation of confidentiality prior to its disclosure by the information owner;
 - (c) such information was obtained from a third party without obligation of confidentiality;
 - (d) such information was already in the public domain at the time of disclosure otherwise than by a breach of this Funding Agreement; or
 - (e) it is independently developed without access to the other party's Confidential Information.
- 16.3.** The Grant Recipient may only disclose the Secretary of State's Confidential Information to the Grant Recipient Personnel who are directly involved in the Project and who need to know the information, and shall ensure that such Grant Recipient Personnel are aware of and shall comply with these obligations as to confidentiality.
- 16.4.** The Grant Recipient shall not, and shall procure that the Grant Recipient Personnel do not, use any of the Secretary of State's Confidential Information received otherwise than for the purposes of this Funding Agreement.
- 16.5.** Nothing in this Funding Agreement shall prevent the Secretary of State from disclosing the Grant Recipient's Confidential Information:

- (a) to any Crown body or any other Contracting Authority. All Crown Bodies or Contracting Authorities receiving such Confidential Information shall be entitled to further disclose the Confidential Information to other Crown Bodies or other Contracting Authorities on the basis that the information is confidential and is not to be disclosed to a third party which is not part of any Crown body or any Contracting Authority;
 - (b) to any consultant, contractor or other person engaged by the Secretary of State;
 - (c) (where such Confidential Information is contained in the Application, any Grant Claim or any progress report submitted in respect of the Project), to any member of a Local Enterprise Partnership European Structural and Investment Fund Sub-Committee for the purpose of monitoring and evaluating the Project, subject to clause 16.7.
 - (d) to a person receiving technical assistance in accordance with Regulation 1303 for the purpose of monitoring and evaluating the Project.
 - (e) to enable the Secretary of State to meet its reporting obligations and other obligations under State Aid Law and the Structural and Investment Funds Regulations for the purpose of clause 14.1(b) of this Funding Agreement;
 - (f) for the purpose of any Audit pursuant to clause 15 of this Funding Agreement;
 - (g) for the purpose of the examination and certification of the Secretary of State's accounts; or
 - (h) for any examination pursuant to Section 6(1) or Section 7ZA of the National Audit Act 1983 of the economy, efficiency and effectiveness with which the Secretary of State has used its resources.
- 16.6.** The Secretary of State shall use all reasonable endeavours to ensure that any Crown Body, government department, Contracting Authority, external auditor, employee, third party or Sub-contractor to whom the Grant Recipient's Confidential Information is disclosed pursuant to clause 16.5 is made aware of the Secretary of State's obligations of confidentiality.
- 16.7.** The Secretary of State may agree not to disclose specified Confidential Information contained in the Application, any Grant Claim or progress report to a member of the Local Enterprise Partnership European and Structural Investment Sub-Committee where the Grant Recipient has requested in writing that such information be withheld, including where it is considered to be commercially sensitive.
- 16.8.** Notwithstanding the foregoing the Grant Recipient hereby consents to the Secretary of State using and disclosing (including to the press) any techniques, ideas or know-how gained during the performance of the Project Activities and/or Funding Agreement. The Grant Recipient warrants to the Secretary of State that neither the Intellectual Property Rights nor any publication by the Secretary of State of the project related know-how will infringe, in whole or in part, any Intellectual Property Right of any other person and agrees to indemnify and hold the Secretary of State harmless against any and all claims, demands and proceedings arising directly or indirectly out of the Secretary of State's publication or use of the Project Related Know-how where this gives rise to or is alleged to give rise to an infringement of third party Intellectual Property Rights.

17. THE SECRETARY OF STATE DATA

- 17.1.** The Grant Recipient shall not delete or remove any proprietary notices contained within or relating to the Secretary of State Data.
- 17.2.** The Grant Recipient shall not store, copy, disclose, or use the Secretary of State Data except as necessary for the performance by the Grant Recipient of its obligations under this Funding Agreement or as otherwise expressly authorised in writing by the Secretary of State.
- 17.3.** The Grant Recipient shall take responsibility for preserving the integrity of the Secretary of State Data and preventing the corruption or loss of the Secretary of State Data.
- 17.4.** If at any time the Grant Recipient suspects or has reason to believe that the Secretary of State Data has or may become corrupted, lost or sufficiently degraded in any way for any reason, then the Grant Recipient shall notify the Secretary of State immediately and inform the Secretary of State of the remedial action the Grant Recipient proposes to take.

18. DATA PROTECTION

- 18.1.** With respect to the parties' rights and obligations under this Funding Agreement, the parties agree that both the Secretary of State and the Grant Recipient are Data Controllers with independently determined purposes and means of processing Personal Data. The parties shall use the Personal Data for the following independent purposes:
 - (a) The Secretary of State shall use the Personal Data for the purpose of assessing the Grant Recipient's compliance with its obligations under this Funding Agreement; and
 - (b) The Grant Recipient shall use the Personal Data for purpose of complying with its obligations under this Funding Agreement.
- 18.2.** The Grant Recipient and the Secretary of State shall comply at all times with the Data Protection Legislation.
- 18.3.** The Grant Recipient shall comply at all times with the Data Protection Legislation and shall not perform its obligations under this Funding Agreement in such a way as to cause the Secretary of State to breach any of its applicable obligations under the Data Protection Legislation.

19. SECURITY REQUIREMENTS

- 19.1.** The Grant Recipient shall, as an enduring obligation throughout the term of this Funding Agreement, use the latest versions of anti-virus definitions available from an industry accepted anti-virus software vendor to check for and delete Malicious Software from the Information Communications and Technology Environment.
- 19.2.** Notwithstanding clause 19.1, if Malicious Software is found, the parties shall co-operate to reduce the effect of the Malicious Software and, particularly if Malicious

Software causes loss of operational efficiency or loss or corruption of the Secretary of State Data, assist each other to mitigate any losses and to restore the Project Activities to their desired operating efficiency.

19.3. Any cost arising out of the actions of the parties taken in compliance with the provisions of clause 19.2 shall be borne by the parties as follows:

- (a) by the Grant Recipient where the Malicious Software originates from the Grant Recipient Software, the Third Party Software or the Secretary of State Data (whilst the Secretary of State Data was under the control of the Grant Recipient); and
- (b) by the Secretary of State if the Malicious Software originates from the Secretary of State Software or the Secretary of State Data (whilst the Secretary of State Data was under the control of the Secretary of State).

20. GRANT RECIPIENT WARRANTIES

The Grant Recipient warrants, represents and undertakes for the duration of the term of this Funding Agreement that:-

- (a) it has and will continue to hold all necessary (if any) regulatory approvals from the Regulatory Bodies necessary to perform the Grant Recipient's obligations under this Funding Agreement;
- (b) it has and will continue to have all necessary rights in and to the Grant Recipient Software or any Third Party Software and/or the Intellectual Property Rights, or any other materials made available by the Grant Recipient and/or the sub-contractors to the Secretary of State necessary to perform the Grant Recipient's obligations under this Funding Agreement;
- (c) in performing its obligations under this Funding Agreement, all Software used by or on behalf of the Grant Recipient will:
 - (i) be currently supported versions of that Software; and
 - (ii) perform in all material respects in accordance with its specification,
- (d) as at the Start Date all statements and representations in the Grant Recipient's Application are to the best of its knowledge, information and belief, true and accurate and that it will advise the Secretary of State of any fact, matter or circumstance of which it may become aware which would render any such statement, representation to be false or misleading; and
- (e) it shall at all times comply with Law in carrying out its obligations under this Funding Agreement;
- (f) It has the power and authority to execute, deliver and perform its obligations under this Funding Agreement and no limit on its powers will be exceeded as a result of the acceptance of the Funding or any of the terms pursuant to this Funding Agreement;
- (g) there has been no adverse change in the Grant Recipient's business, assets or financial condition since the submission of the Application to the Secretary of State and that the Application is true in all respects on the date of this Funding Agreement;

- (h) no regulatory investigation by any United Kingdom or European Union authorities has been commenced or is pending in respect of the Project or the Grant Recipient, or if there has been a regulatory investigation, it has been concluded to the satisfaction of the Secretary of State.

21. NOTICES

- 21.1.** Any notice demand or communication to be given or served under this Funding Agreement shall be in writing.
- 21.2.** Subject to any other term of this Funding Agreement, any notice demand or communication to be given or served under this Funding Agreement upon the Secretary of State shall be given or served:
 - (a) by personal delivery or by sending it by pre-paid recorded postal delivery to the address specified in the Funding Agreement for the attention of the Reopening High Streets Safely Fund, Ministry of Housing, Communities and Local Government, 2 Marsham Street, London SW1P 4DF or to such other address as may from time to time be notified by the Secretary of State;
 - (b) by e-mail to the e-mail address specified in the Project Specific Conditions or such other address as may from time to time be notified by the Secretary of State; or
 - (c) where directed to do so by the Secretary of State, using the Secretary of State's System on line facility, in accordance with the terms of use of that facility.
- 21.3.** Any notice demand or communication to be served upon the Grant Recipient, shall be given or served:
 - (a) by personal delivery or by sending it by pre-paid recorded postal delivery to the address specified in this Funding Agreement or such other address as may from time to time be notified by the Grant Recipient to the Secretary of State;
 - (b) by e-mail to the e-mail address specified in the Project Specific Conditions or to such other address as may from time to time be notified by the Secretary of State; or
 - (c) using the Secretary of State's System on line facility.
- 21.4.** Any such notice shall (where sent by post) be deemed to have been served and received on the second working day following the day of posting and where delivered personally be deemed to have been given when delivery is made. An email or notice given using the Secretary of State's on line facility shall be deemed delivered when sent unless an error message is received.
- 21.5.** If the Grant Recipient shall comprise more than one person the service of any notice demand request or other communication on any one of such persons shall constitute good service on all of them.

22. VALUE ADDED TAX

- 22.1.** The payment of the Grant by the Secretary of State under the Funding Agreement is believed to be outside the scope of Value Added Tax but if any Value Added Tax shall

become chargeable all payments shall be deemed to be inclusive of all Value Added Tax and the Secretary of State shall not be obliged to pay any additional amount by way of Value Added Tax.

- 22.2.** All sums or other consideration payable to or provided by the Grant Recipient to the Secretary of State at any time shall be deemed to be exclusive of all Value Added Tax payable and where any such sums become payable or due or other consideration is provided the Grant Recipient shall at the same time or as the case may be on demand by the Secretary of State in addition to such sums or other consideration pay to the Secretary of State all the Value Added Tax so payable upon the receipt of a valid Value Added Tax invoice.

23. GOOD FAITH AND COOPERATION

The Grant Recipient covenants with the Secretary of State that:-

- (a) it shall at all times act with the utmost good faith towards the Secretary of State and will at all times co-operate fully with the Secretary of State;
- (b) it will comply with all the Secretary of State's reasonable requirements in relation to the Project from time to time; and
- (c) it will not do anything which will put the Secretary of State in breach of any of its obligations in relation to the Operational Programme.

24. INSURANCE

- 24.1.** The Grant Recipient covenants with the Secretary of State that it will ensure that it maintains at all times adequate insurance cover with an insurer of good repute to cover all claims and liabilities under this Funding Agreement and any other claims or demands which may be brought or made against it by any person suffering any injury damage or loss in connection with the Project.

25. CONTRACTS (RIGHTS OF THIRD PARTIES) ACT 1999

- 25.1.** A person who is not party to this Funding Agreement shall not have any right under the Contracts (Rights of Third Parties) Act 1999 to enforce any term of this Funding Agreement.

26. JURISDICTION

- 26.1.** This Funding Agreement shall be governed by and construed in accordance with the law of England and each party submits to the exclusive jurisdiction of the English Courts.

27. MISCELLANEOUS

- 27.1.** Nothing in this Funding Agreement shall constitute a partnership or joint venture between the parties to this Funding Agreement or constitute the Grant Recipient as

the agent of the Secretary of State for any purpose whatsoever, and the Grant Recipient shall ensure that any Delivery Partner is made aware of this.

- 27.2.** A certificate by the Secretary of State as to any sum payable under this Funding Agreement to the Grant Recipient shall be (save in the case of manifest error) conclusive evidence of the matter to which it relates and shall contain reasonable details of the basis of determination.
- 27.3.** If at any time any of the provisions of this Funding Agreement become illegal, invalid or unenforceable in any respect under any law or regulation of any jurisdiction, neither the legality validity nor enforceability of the remaining provisions of this Funding Agreement shall be in any way affected or impaired as a result.
- 27.4.** No failure or delay on the part of the Secretary of State in exercising any right or power and no course of dealing between the parties to this Funding Agreement shall operate as a waiver nor shall any single or partial exercise of any right power or remedy of the Secretary of State prevent any other or further or other exercise of it or the exercise of any other right power or remedy of the Secretary of State. The rights and remedies available to the Secretary of State under this Funding Agreement are cumulative and are in addition to and not in substitution for any other rights or remedies which the Secretary of State would otherwise have, however arising.
- 27.5.** Nothing contained in or done under this Funding Agreement and no consents given by the Secretary of State shall prejudice the Secretary of State's rights, powers or duties and/or obligations in the exercise of its functions or under any statutes, bye-laws, instruments orders or regulations.
- 27.6.** Nothing in this Funding Agreement nor any other document shall impose any obligation or liability on the Secretary of State with respect to any actions of or obligations or liabilities assumed or incurred by the Grant Recipient or its agents, contractors or employees whether under contract, statute or otherwise.
- 27.7.** Any approval by the Secretary of State or any person on behalf of the Secretary of State pursuant to this Funding Agreement of any matter submitted by the Grant Recipient for approval shall not be deemed to be an Acknowledgment by the Secretary of State of the correctness or suitability of the contents of the subject of the approval or consent.
- 27.8.** The fact that the Secretary of State or its representatives have supplied or received any documents or information or attended any meeting shall not in itself imply approval of any matters raised in any such document, information or meeting or relieve the Grant Recipient of any obligation or liability in respect of the Project Activities or otherwise.
- 27.9.** Nothing in this Funding Agreement shall affect the coming into force or the continuance in force of any provision of this Funding Agreement which is expressly or by implication to come into force or continue in force upon termination or expiry of this Funding Agreement.
- 27.10.** This Funding Agreement contains all the terms which the Secretary of State has agreed in relation to the subject matter of this Funding Agreement and supersedes any prior written or oral agreements representations or understandings between the Secretary of State and the Grant Recipient.

27.11. No term of this Funding Agreement is intended to confer a benefit on, or to be enforceable by, any person who is not a party to this Funding Agreement

27.12. Notwithstanding any other provisions of this Funding Agreement, the Secretary of State shall not be entitled to be reimbursed or to recover any monies that it has paid under this Funding Agreement to the extent that it has already been compensated or reimbursed in respect of that same amount pursuant to this Funding Agreement.

ACCEPTANCE

This Funding Agreement has been entered into on the date stated at the beginning of it.

Signed for and behalf of

**THE SECRETARY OF STATE FOR HOUSING,
COMMUNITIES AND LOCAL GOVERNMENT**

Authorised Signatory: _____

Print Name: _____

Signed for and on behalf of

South Norfolk District Council

Authorised Signatory: _____

Print Name: _____

SCHEDULE 1 THE PROJECT SPECIFIC CONDITIONS

1. CONTRIBUTION RATES

1.1. The amount of Grant payable shall not exceed the maximum sum of £246,044.00 amount (two hundred forty-six thousand forty-four) and has been determined as follows:

- (a) 100% (being the Revenue Contribution Rate) of the Eligible Revenue Expenditure up to the Revenue Maximum Sum of £246,044.00 .

1.2. Contribution Rates by Category of Region

- (a) For the More Developed Region, the Revenue Maximum Sum is £246,044.00 payable at the Revenue Contribution Rate of 100%.

2. CONTACT

The principal contact for this Project in the Ministry of Housing, Communities and Local Government is Kamila Szewczyk on 0303 4446654 or kamila.szewczyk@cummunities.gov.uk. All correspondence, including any notices served pursuant to clause 21.2 in the main body of this Funding Agreement should be sent to the following address Reopening High Streets Safely Fund, Ministry of Housing, Communities and Local Government, 2 Marsham Street, London SW1P 4DF or by email to RHSSFund@communities.gov.uk. In the event that the Grant Recipient raises a complaint that arises in connection with this agreement, that complaint shall be dealt with according to the procedures set out in the Ministry of Housing, Communities and Local Governments' complaints procedure as published on gov.uk. In any correspondence please quote the Project reference number found on the front page of this Funding Agreement.

3. INSTALMENT PERIODS

The Instalment Period will be quarterly ending on 31 December. The first Instalment Period will start following the date on which the correctly executed Funding Agreement is received by the principal contact named above.

4. MILESTONE TABLE

	Milestone	Date
a)	Start Date	01/06/2020
b)	Agreed Financial Completion Date	31/03/2021
c)	Agreed Activity End Date	31/03/2021
d)	Agreed Project Practical Completion Date	31/03/2021
e)	The date of the submission of the first Grant Claim.	29/01/2021
f)	The date of the submission of the final Grant Claim.	29/04/2021

h)	Longstop date for legal agreement with Delivery Partners (see clause 7 below)	Within 30 days of the date of executing this Funding Agreement
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5. MATCH FUNDING

Not applicable. There is no match funding.

6. USEFUL ECONOMIC LIFE

6.1. Not applicable, the Grant will not be used for any Assets.

7. DELIVERY PARTNERS

7.1. The Grant Recipient is acting as the lead beneficiary for a consortium where the Grant Recipient and the following delivery partners will be making use of the Grant:

Broadland District Council

Thorpe Lodge, 1 Yarmouth Road, Norwich, NR7 0DU

“the Delivery Partners”

7.2. The Grant Recipient shall, within 30 days of the date of executing this Funding Agreement, enter into a legally binding agreement with [the][each] Delivery Partner[s] upon materially similar terms to this Funding Agreement comprising provisions guaranteeing the sound financial management of the Grant including (without limitation):

- (a) clauses enabling the Grant Recipient to verify that expenditure presented by the Delivery Partner has been incurred and corresponds to that portion of the Project Activities actually being delivered by the Delivery Partner;
- (b) clauses imposing liability upon the Delivery Partner in the event of any irregularity in the expenditure declared by such Delivery Partner; and
- (c) clauses enabling the Grant Recipient to recover any amounts unduly paid.

7.3. Without prejudice to clause 7.2 of these Project Specific Conditions above, the Grant Recipient shall be solely responsible for ensuring the successful implementation of the Project and the achievement of the Targets.

8. METHODOLOGY FOR DETERMINING ELIGIBLE EXPENDITURE

8.1. For the avoidance of doubt, the methodology for determining the Eligible Expenditure of the Project is set out in the Reopening High Streets Safely Guidance and Grant Claims shall be submitted in line with this methodology. For the avoidance of doubt, all Eligible Expenditure must also be compatible with that set out in the Eligibility Rules.

- 8.2.** Where the implementation of the Project gives rise to indirect costs, they are to be calculated at a flat rate of 15% of eligible direct staff costs in accordance with the Eligibility Rules.

9. INCOME GENERATION

- 9.1.** Not applicable

10. STATE AID

- 10.1.** [The Grant Recipient has undertaken an evaluation of the Project and concluded that the Grant for the Project Activities will not constitute State Aid (within the meaning set out in Article 107(1) of the TFEU and the relevant case law). The Grant Recipient has provided confirmation of this position within the Grant Action Plan Form.

The Grant Recipient shall use all reasonable endeavours to maintain the 'no aid' structure and shall promptly inform the Secretary of State where it has reason to believe that the Project is no longer operating under a 'no aid' structure.

SCHEDULE 2

REOPENING HIGH STREETS SAFELY FUND GUIDANCE



Ministry of Housing,
Communities &
Local Government



European Union

European Regional
Development Fund

Reopening High Streets Safely Fund

Guidance

Version 2 – 29 May 2020



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May 2020

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Introduction

Councils across England are to share £50m of additional funding to support the safe reopening of high streets and other commercial areas. The money will allow local authorities in England to put in place additional measures to establish a safe trading environment for businesses and customers, particularly in high streets, through measures that extend to the end of March 2021. This funding comes on top of the Government's comprehensive package of support for business and workers during the economic emergency.

Expenditure for reimbursement under this grant will be eligible from 1 June. The detail of the requirements of this ERDF grant will be covered in a Funding Agreement which we hope to have agreed with all local authorities by the end of June. Once this agreement is in place then claims for reimbursement for expenditure incurred from 1 June can begin to be made. The grant awards will be available to access up until the end of March 2021. Given the nature of the funding and size of the award we would encourage use of the funding by the end of this year to address immediate needs in 2020.

This guidance provides details of the activities that can be supported through the Fund and an overview of how it will be administered, as well as key contractual requirements. Our expectation is that funding should be managed at the lowest responsible tier of local government where it is possible and appropriate to do so. This information is designed to provide councils with the information they need now, in advance of the Funding Agreement being in place, to inform expenditure incurred from 1 June. Councils should refer to this guidance along with links to additional information. Any expenditure incurred that is not eligible cannot be reimbursed. If you do have any questions about this, please contact the department using the contact details below.

Scope of the fund

Activities covered by the Fund

The Fund will provide councils with additional funding to support their business communities with measures that enable safe trading in public places. The Fund will particularly focus on our high streets, as well as other public places that are at the heart of towns and cities gearing up to reopen as safe, welcoming spaces. The Fund will support 4 main strands of activity:

1. Support to develop an action plan for how the local authority may begin to safely reopen their local economies.

This plan may be one that is completely new or amends or builds on existing ones such as high street servicing and delivery plans. When developing your action plan you may wish to consider the High Streets Task Force's [COVID-19 Recovery Framework](#).

It is not essential that a local authority develops these plans but in considering how to use this funding, all local authorities are encouraged to engage businesses, business organisations, lower tier authorities such as parish councils, and other relevant stakeholders when considering how to use this award. In addition, where temporary changes to the public realm are being proposed the respective local authority should work in partnership with public sector landowners as appropriate.

2. Communications and public information activity to ensure that reopening of local economies can be managed successfully and safely:

The local authority will want to effectively communicate to its citizens their role in ensuring that the local economy can reopen safely. It will be for local authorities to decide the most appropriate communication channels for their areas.

Examples of communication activities include:

- online and digital;
- media and press activities; and
- print and publications such as posters and leafleting campaigns.

There is scope to pay the salaries of staff or consultants to develop this work, but it is important that the local authority can evidence that this is additional activity beyond what was already underway prior to the grant being received.

The local authority should also note the ERDF publicity requirements when developing their campaigns. Further details on this can be viewed in the Publicity section of this document.

In developing and delivering this campaign the local authority will want to ensure that it is engaging businesses, business organisations, lower tier authorities (such as parish councils) and other relevant stakeholders.

3. Business-facing awareness raising activities to ensure that reopening of local economies can be managed successfully and safely.

The principle of this activity is the same as for communications to citizens, but it is recognised that the messaging needs to be different and as such part of a separate campaign. For example, the local authority may want to communicate to retail businesses on how to make temporary adjustments to their business premises and good practice for social distancing.

The campaigns should be focussed on supporting SMEs. It is recognised that broad campaigns such as those online may be picked up by larger enterprises incidentally, but they should not be specifically targeted.

The advice being provided in these campaigns should be focussed on those businesses that operate alongside public spaces and have customers.

Whilst it is recognised that the local authority may already have a campaign in place covering these issues this funding can be used to expand the scope of that existing activity or increase its intensity.

There is scope through this Fund to support information officers to go directly to SMEs to provide them with advice, where those businesses serve the public and are adjacent to public spaces. These roles would have to be new posts, the Fund cannot be used as subsidy for existing provision.

In developing and delivering this campaign the local authority will want to ensure that it is engaging businesses, business organisations, lower tier authorities such as parish councils and other relevant stakeholders.

4. Temporary public realm changes to ensure that reopening of local economies can be managed successfully and safely.

To ensure that public spaces that are next to businesses are as safe as possible, temporary changes will need to be made to the physical environment. Local authorities will already be undertaking these changes in line with HMG's [Safer Public Places – Urban Centres and Green Spaces guidance](#). This funding can be used to enhance that existing offer to increase the level of safety measures, improve their attractiveness and ensure consistency of approach across individual and multiple public spaces including high streets. In doing so the respective local authority should work in partnership with public sector landowners as appropriate to enable works to be undertaken.

These changes can help improve consumer confidence and increase, safely, the number of active consumers.

The costs associated with administering this grant will also be eligible for reimbursement up to 4% of the total grant value. This 4% would be taken directly from the grant itself; no additional funding is being provided to cover these administrative costs.

Activities out of scope

There are three main categories where activities cannot be supported:

- **Activity that provides no additionality** - The Government recognises that local authorities will already be delivering activity to ensure the safe reopening of their economies. This funding is intended to be additional funding on top of that existing activity; it should not be replacing the source for already committed expenditure. For example, if there is already a communications officer on staff then this funding cannot be used to subsidise their salary, but it can support a new temporary role to support the implementation. Similarly, if the authority's own in-house public works department undertakes works (e.g. additional road markings) the staff costs associated with this activity would not be eligible, although additional materials purchased for this purpose would be eligible.
- **Capital expenditure** – This funding is intended to help local authorities address the short-term issue of re-opening their local economies. It can support some temporary changes to the physical environment, but those changes should not be anticipated to last beyond 12 months, or until no longer required for social distancing.
- **Grants to businesses** – Funding cannot provide direct financial support to businesses to make adaptations to premises, purchase PPE, purchase goods or equipment or offset wages or other operating costs.

Managing the Funding

Funding Agreement

Grants will be awarded to local authorities on the basis of population which will serve as a proxy for the footfall anticipated on the high streets and the degree of safeguarding required. A minimum grant value of £30k has been set.

Grant Funding Agreements will be put in place between the Cities and Local Growth Unit (CLGU) and each local authority. These will show the grant allocations, along with more detailed guidance about delivery.

The Funding Agreement will be tailored to local authorities and the specific activities covered by the Fund, which will take place over a shorter duration than a typical ERDF project. An example of a full Funding Agreement can be found on [GOV.UK](https://www.gov.uk) which local authorities should review before any spending takes place.

Claiming Expenditure

Local authorities will be able to spend money on eligible activities from 1 June 2020 and claim it back from CLGU in arrears. The default position is that claims will be paid quarterly. Any local authority that will need to make more regular claims to CLGU will need to discuss this with them. A single claim can be made for the entire grant allocation, for instance where expenditure is for a single item.

A standard claims template will be provided for local authorities and as a minimum all claims should contain the following information:

- a summary of expenditure;
- details of every transaction, irrespective of value, that is included in the project expenditure in the claim period;
- details of the outputs, as set out in Annex B, and results achieved in the claim period; and
- details of procurements included in the claim
- a progress report for the claim period – a progress report will be required even if no funding is being claimed.

Eligibility

For costs to be eligible to this project, local authorities will need to ensure that they can evidence how these costs are over and above any that they might otherwise incur.

Project records

Evidence must be retained to demonstrate that any project expenditure is eligible and that costs have been defrayed. These records will need to be retained through the life of the project and for the relevant retention period. Examples of evidence include:

- invoices/receipts, purchase orders/contracts, payroll records, bank statements and accounting records;
- employment and salary costs must be evidenced by job descriptions; contracts of employment, payroll records and bank statements;
- core documents for any procurement carried out; and
- copies of all publicity materials, including press releases, marketing activity and posters displayed in venues where activity takes place must be retained to demonstrate proactive activity and the correct use of the EU logo and required text.

Regulatory requirements

Publicity

The ERDF branding requirements will need to be followed by all local authorities. The use of the ERDF logo, which includes the emblem and reference to the Fund, and the requirements set on colour use, sizing, visibility and positioning must be followed. The HMG logo must be used alongside the ERDF logo.

The requirements to be considered and met include:

- display the ERDF logo on all electronic and print publication materials used for information and communications supported by the Fund including:
 - advertisements, job advertisements, job descriptions and notices
 - leaflets, brochures, flyers and newsletters
 - promotional items
 - project documentation – e.g. reports, papers and letterheads
 - procurement material
 - social media tools
 - posters (see below for more details)
- display the ERDF logo on the relevant website – established specifically for Fund activities or a broader website used by the beneficiary, ensuring:
 - use of the colour ERDF logo
 - logo is visible upon landing, in viewing area and without the need to scroll
 - inclusion of a short description of the activities to be supported with aims and results

- display of at least one poster of minimum A3 size, readily visible to the public (e.g. the entrance area of a public building) at the location of the activities being implemented and containing information on the work being delivered
- ensuring inclusion of a reference to ERDF, the logo and use of ERDF notes to editors in any media and press activities

The full branding and publicity requirements including details of logo use can be found on [GOV.UK](https://www.gov.uk).

Procurement

Local authorities will need to ensure that all procurements are awarded in line with the Public Procurement Regulations. Procurements should therefore be carried out in an open and transparent way and an audit trail of the routes followed and the process will need to be retained. Consideration should also be given to the latest CCS guidance notes in direct response to the COVID-19 crisis.

The full guidance on Procurement can be found on [GOV.UK](https://www.gov.uk)

State Aid

Local authorities will need to ensure that funding is managed in accordance with State Aid law.

Further State Aid guidance on can be found on [GOV.UK](https://www.gov.uk)

Monitoring

Monitoring of the local authority will take place by CLGU. This will include as a minimum some or all of the following measures:

- checks on LA systems and processes for retaining an audit trail; and
- spot checks on expenditure items included in claims.

Additional Reporting

Given the bespoke nature of this project there will be a need to provide some additional reporting requirements to evidence the outputs and outcomes of the investments being made. Before beginning to spend your grant, you should look to set baselines for future measurement in particular relating to the current footfall in your high streets.

The costs of incurring these baselines, assuming they are not already available, can be covered as part of the costs associated with developing an action plan.

Contacts

If you have questions regarding this guidance please send them to RHSSFund@communities.gov.uk.

Annex A

Allocations per Local Authority

Local Authority	Allocation of £50 Million
Adur	£56,721
Allerdale	£86,416
Amber Valley	£113,424
Arun	£143,718
Ashfield	£114,527
Ashford	£116,814
Babergh	£81,635
Barking And Dagenham	£189,384
Barnet	£352,546
Barnsley	£219,400
Barrow-in-Furness	£58,858
Basildon	£165,814
Basingstoke And Deane	£155,751
Bassetlaw	£104,654
Bath And North East Somerset	£172,615
Bedford	£154,129
Bexley	£220,176
Birmingham	£1,016,937
Blaby	£91,482
Blackburn with Darwen	£131,610
Blackpool	£122,772
Bolsover	£71,400
Bolton	£253,140
Boston	£62,811
Bournemouth, Christchurch and Poole	£351,322
Bracknell Forest	£108,686
Bradford	£477,170
Braintree	£134,417
Breckland	£125,275
Brent	£295,907
Brentwood	£67,382
Brighton And Hove	£259,269
Bristol	£415,785
Broadland	£116,155
Bromley	£295,177
Bromsgrove	£88,668
Broxbourne	£85,547
Broxtowe	£101,458
Buckinghamshire Council	£481,588
Burnley	£78,757
Bury	£169,235

Local Authority	Allocation of £50 Million
Calderdale	£186,099
Cambridge	£110,674
Camden	£239,768
Cannock Chase	£89,622
Canterbury	£146,699
Carlisle	£95,875
Castle Point	£79,835
Central Bedfordshire	£255,873
Charnwood	£165,450
Chelmsford	£159,001
Cheltenham	£103,577
Cherwell	£133,843
Cheshire East	£339,533
Cheshire West and Chester	£305,395
Chesterfield	£92,638
Chichester	£108,161
Chorley	£105,438
City of London	£30,000
Colchester	£174,002
Copeland	£59,919
Corby	£64,668
Cornwall	£509,639
Cotswold	£81,144
Coventry	£334,307
Craven	£50,436
Crawley	£100,152
Croydon	£341,995
Dacorum	£137,473
Darlington	£94,239
Dartford	£100,466
Daventry	£77,158
Derby	£228,224
Derbyshire Dales	£63,808
Doncaster	£276,789
Dorset Council	£335,426
Dover	£105,542
Dudley	£285,548
Durham	£469,256
Ealing	£300,759
East Cambridgeshire	£79,895
East Devon	£130,992
East Hampshire	£108,114
East Hertfordshire	£132,170
East Lindsey	£126,238
East Northamptonshire	£84,908

Local Authority	Allocation of £50 Million
East Riding of Yorkshire	£301,870
East Staffordshire	£106,046
East Suffolk	£222,198
Eastbourne	£91,624
Eastleigh	£118,435
Eden	£46,899
Elmbridge	£120,877
Enfield	£295,948
Epping Forest	£116,694
Epsom And Ewell	£71,062
Erewash	£102,534
Exeter	£116,632
Fareham	£103,270
Fenland	£91,408
Folkestone and Hythe	£100,751
Forest of Dean	£77,635
Fylde	£71,758
Gateshead	£178,928
Gedling	£105,213
Gloucester	£115,135
Gosport	£75,131
Gravesham	£94,146
Great Yarmouth	£88,301
Greenwich	£258,441
Guildford	£131,382
Hackney	£252,053
Halton	£114,260
Hambleton	£80,700
Hammersmith And Fulham	£166,896
Harborough	£83,483
Haringey	£239,933
Harlow	£77,121
Harrogate	£141,714
Harrow	£221,203
Hart	£86,003
Hartlepool	£82,445
Hastings	£82,026
Havant	£112,726
Havering	£231,057
Herefordshire	£172,188
Hertsmere	£92,495
High Peak	£81,981
Hillingdon	£272,855
Hinckley And Bosworth	£101,469
Horsham	£128,132

Local Authority	Allocation of £50 Million
Hounslow	£240,811
Huntingdonshire	£157,826
Hyndburn	£71,676
Ipswich	£120,858
Isle of Wight	£126,269
Isles of Scilly	£30,000
Islington	£215,682
Kensington And Chelsea	£137,830
Kettering	£91,436
King's Lynn And West Norfolk	£134,654
Kingston upon Hull	£230,406
Kingston upon Thames	£156,784
Kirklees	£389,715
Knowsley	£133,288
Lambeth	£290,782
Lancaster	£128,905
Leeds	£701,810
Leicester	£318,069
Lewes	£91,677
Lewisham	£272,218
Lichfield	£92,501
Lincoln	£87,816
Liverpool	£443,129
Luton	£187,988
Maidstone	£153,551
Maldon	£57,609
Malvern Hills	£70,271
Manchester	£488,628
Mansfield	£97,256
Medway	£246,396
Melton	£45,239
Mendip	£102,863
Merton	£182,103
Mid Devon	£73,686
Mid Suffolk	£91,892
Mid Sussex	£133,898
Middlesbrough	£123,875
Milton Keynes	£239,276
Mole Valley	£76,828
New Forest	£159,208
Newark And Sherwood	£108,976
Newcastle upon Tyne	£267,011
Newcastle-under-Lyme	£115,378
Newham	£316,668
North Devon	£86,191

Local Authority	Allocation of £50 Million
North East Derbyshire	£90,043
North East Lincolnshire	£141,143
North Hertfordshire	£118,251
North Kesteven	£104,404
North Lincolnshire	£152,741
North Norfolk	£93,332
North Somerset	£191,439
North Tyneside	£183,918
North Warwickshire	£58,610
North West Leicestershire	£93,217
Northampton	£199,987
Northumberland	£284,807
Norwich	£125,962
Nottingham	£294,601
Nuneaton And Bedworth	£115,040
Oadby And Wigston	£50,503
Oldham	£210,417
Oxford	£134,950
Pendle	£81,195
Peterborough	£181,516
Plymouth	£233,129
Portsmouth	£191,340
Preston	£125,813
Reading	£144,780
Redbridge	£269,587
Redcar And Cleveland	£121,632
Redditch	£75,088
Reigate And Banstead	£132,263
Ribble Valley	£53,771
Richmond upon Thames	£175,408
Richmondshire	£46,921
Rochdale	£197,050
Rochford	£77,836
Rossendale	£63,416
Rother	£85,837
Rotherham	£235,727
Rugby	£96,315
Runnymede	£78,590
Rushcliffe	£106,208
Rushmoor	£83,473
Rutland	£35,627
Ryedale	£49,266
Salford	£230,071
Sandwell	£292,628
Scarborough	£96,527

Local Authority	Allocation of £50 Million
Sedgemoor	£109,807
Sefton	£244,167
Selby	£80,408
Sevenoaks	£107,106
Sheffield	£520,216
Shropshire	£288,194
Slough	£132,636
Solihull	£192,058
Somerset West and Taunton	£138,806
South Cambridgeshire	£140,440
South Derbyshire	£95,419
South Gloucestershire	£255,356
South Hams	£77,370
South Holland	£84,587
South Kesteven	£126,454
South Lakeland	£92,936
South Norfolk	£125,889
South Northamptonshire	£83,723
South Oxfordshire	£125,160
South Ribble	£97,965
South Somerset	£149,354
South Staffordshire	£99,469
South Tyneside	£133,554
Southampton	£225,271
Southend-on-Sea	£163,096
Southwark	£285,961
Spelthorne	£88,049
St Albans	£130,464
St. Helens	£160,220
Stafford	£121,848
Staffordshire Moorlands	£87,090
Stevenage	£77,818
Stockport	£259,403
Stockton-on-Tees	£174,891
Stoke-on-Trent	£227,484
Stratford-on-Avon	£116,036
Stroud	£106,463
Sunderland	£244,835
Surrey Heath	£78,494
Sutton	£182,487
Swale	£134,057
Swindon	£198,797
Tameside	£200,741
Tamworth	£67,445
Tandridge	£77,880

Local Authority	Allocation of £50 Million
Teignbridge	£119,835
Telford And Wrekin	£160,347
Tendring	£131,110
Test Valley	£112,403
Tewkesbury	£84,931
Thanet	£126,456
Three Rivers	£82,174
Thurrock	£155,810
Tonbridge And Malling	£117,531
Torbay	£121,293
Torridge	£61,179
Tower Hamlets	£292,962
Trafford	£210,672
Tunbridge Wells	£104,842
Uttlesford	£80,809
Vale of White Horse	£121,938
Wakefield	£311,389
Walsall	£253,601
Waltham Forest	£247,283
Wandsworth	£292,844
Warrington	£185,805
Warwick	£127,085
Watford	£85,637
Waverley	£111,270
Wealden	£143,302
Wellingborough	£71,209
Welwyn Hatfield	£109,901
West Berkshire	£139,795
West Devon	£49,619
West Lancashire	£100,989
West Lindsey	£84,598
West Oxfordshire	£97,972
West Suffolk	£159,294
Westminster	£232,924
Wigan	£290,046
Wiltshire	£449,858
Winchester	£110,972
Windsor And Maidenhead	£133,672
Wirral	£286,292
Woking	£89,172
Wokingham	£151,819
Wolverhampton	£234,488
Worcester	£90,121
Worthing	£98,168
Wychavon	£115,925

Local Authority	Allocation of £50 Million
Wyre	£99,180
Wyre Forest	£90,196
York	£186,219

Annex B

Reopening High Streets Safely Fund Outputs

(P14) Number of CV-19 Action Plans	
Terms	Definitions
Unit of Measurement	Number of CV-19 Action Plans
Investment Priorities where this indicator is used	IP3d
Count Criteria: What can be recorded against this indicator?	<ul style="list-style-type: none"> The CV-19 action plan must be focussed on activities that help ensure that Small and Medium Sized Enterprises, including Social Enterprises (see Notes below) in the area covered by the plan are able to build their resilience and adaptability in the context of the economic impact of CV-19. For example, ensuring that they can trade safely whilst CV-19 nonpharmaceutical interventions (NPIs) are in place such as social distancing measures.
Count Threshold: What is the threshold or minimum requirement for recording (one count) of this indicator?	<ul style="list-style-type: none"> This CV-19 action plan may be one that either amends or adds to an existing plan or is completely new.
Count Exclusions: What activity cannot be counted against this indicator?	<ul style="list-style-type: none"> CV-19 action plans that do not include measures to build the resilience and adaptability of Small and Medium Sized Enterprises, including Social Enterprises (see Notes below) in the area covered by the plan are excluded.
Verification Evidence: What records need to be retained to count this indicator?	<ul style="list-style-type: none"> A copy of the CV-19 action plan should be made available.

(P14) Number of CV-19 Action Plans	
Terms	Definitions
Additional Information Required for Indicator	<ul style="list-style-type: none"> No additional data is required.
Relationship to other Indicators	<ul style="list-style-type: none"> There is no direct relationship to other indicators.
Notes	<p>Action plans will be targeted at domestic and foreign-owned Small and Medium Sized Enterprises, including Social Enterprises; however, given the broad nature of this activity it is likely that they may indirectly benefit large companies too.</p> <p>Business is the term commonly used in the UK; the EU Regulations use enterprise.</p>

(P15) Number of CV-19 Public Information Campaigns	
Terms	Definitions
Unit of Measurement	Number of CV-19 Public Information Campaigns
Investment Priorities where this indicator is used	IP3d
Count Criteria: What can be recorded against this indicator?	<ul style="list-style-type: none"> The CV-19 public information campaign must be focussed on activities that include <i>inter alia</i> promotion of local commercial areas, make the public aware of the precautions in place, enable the public to make informed travel choices on how best to visit commercial areas and enable the public to visit commercial areas safely whilst CV-19 nonpharmaceutical interventions (NPIs) are in place such as social distancing measures. Examples of communication activities include but are not limited to: <ul style="list-style-type: none"> online and digital; media and press activities; and print and publications such as posters and leafleting campaigns.
Count Threshold: What is the threshold or minimum requirement for recording (one count) of this indicator?	<ul style="list-style-type: none"> This CV-19 public information campaign can be one that either is completely new, amends or adds to an existing campaign.
Count Exclusions: What activity cannot be counted against this indicator?	<ul style="list-style-type: none"> CV-19 public information campaign that does not include measures to build the resilience and adaptability of local commercial areas in the area covered by the campaign are excluded.

(P15) Number of CV-19 Public Information Campaigns	
Terms	Definitions
Verification Evidence: What records need to be retained to count this indicator?	<ul style="list-style-type: none"> • A copy of the CV-19 public information campaign should be made available.
Additional Information Required for Indicator	<ul style="list-style-type: none"> • No additional data is required.
Relationship to other Indicators	<ul style="list-style-type: none"> • This indicator links to P16, number of CV-19 business facing campaigns. It is possible that a single campaign may be developed which covers both public and business facing elements. In those instances, then the campaign can be counted both under P15 and P16.
Notes	<p>Public campaigns will be targeted at supporting domestic and foreign-owned Small and Medium Sized Enterprises, including Social Enterprises; however, given the broad nature of this activity it is likely that they may indirectly benefit large companies too.</p> <p>Business is the term commonly used in the UK; the EU Regulations use enterprise.</p>

(P16) Number of CV-19 Business Facing Campaigns	
Terms	Definitions
Unit of Measurement	Number of CV-19 Business Facing Campaigns
Investment Priorities where this indicator is used	IP3d
Count Criteria: What can be recorded against this indicator?	<ul style="list-style-type: none"> • The CV-19 business facing campaign must be focussed on activities that help ensure that Small and Medium Sized Enterprises, including Social Enterprises (see Notes below) in the area covered by the campaign are able to build their resilience and adaptability in the context of the economic impact of CV-19. For example, ensuring that they are to trade safely whilst CV-19 nonpharmaceutical interventions (NPIs) are in place such as social distancing measures. • Examples of communication activities include but are not limited to: <ul style="list-style-type: none"> ○ online and digital; ○ media and press activities; and ○ print and publications such as posters and leafleting campaigns.
Count Threshold: What is the threshold or minimum requirement for recording (one count) of this indicator?	<ul style="list-style-type: none"> • This CV-19 business facing campaign can be one that either is completely new, amends or adds to an existing campaign.
Count Exclusions: What activity cannot be counted against this indicator?	<ul style="list-style-type: none"> • CV-19 business facing campaign that does not include measures to build the resilience and adaptability of Small and Medium Sized Enterprises, including Social Enterprises (see Notes below) in the area covered by the campaign are excluded.

(P16) Number of CV-19 Business Facing Campaigns	
Terms	Definitions
Verification Evidence: What records need to be retained to count this indicator?	<ul style="list-style-type: none"> • A copy of the CV-19 business facing campaign should be made available.
Additional Information Required for Indicator	<ul style="list-style-type: none"> • No additional data is required.
Relationship to other Indicators	<ul style="list-style-type: none"> • This indicator links to P15, number of CV-19 public facing campaigns. It is possible that a single campaign may be developed which covers both public and business facing elements. In those instances, then the campaign can be counted both under P15 and P16.
Notes	<p>Business facing campaigns will be targeted at supporting domestic and foreign-owned Small and Medium Sized Enterprises, including Social Enterprises; however, given the broad nature of this activity it is likely that they may indirectly benefit large companies too.</p> <p>Business is the term commonly used in the UK; the EU Regulations use enterprise.</p>

(P17) Number of CV-19 Communication Officers	
Terms	Definitions
Unit of Measurement	Number of CV-19 Communication Officers
Investment Priorities where this indicator is used	IP3d
Count Criteria: What can be recorded against this indicator?	<ul style="list-style-type: none"> The CV-19 communications officer must be focussed on activities that help ensure that Small and Medium Sized Enterprises, including Social Enterprises (see Notes below) to build their resilience and adaptability in the context of the economic impact of CV-19 in the area covered by the ERDF support. Activities may include but are not limited to development and/ or delivery of the public information and/or business facing campaigns.
Count Threshold: What is the threshold or minimum requirement for recording (one count) of this indicator?	<ul style="list-style-type: none"> A CV-19 communications officer must be a new, paid, full-time equivalent (FTE) job on a fixed term contract.
Count Exclusions: What activity cannot be counted against this indicator?	<ul style="list-style-type: none"> CV-19 communications officers' activity that is not directed to building the resilience and adaptability of Small and Medium Sized Enterprises, including Social Enterprises (see Notes below) in the area covered by the post are excluded.
Verification Evidence: What records need to be retained to count this indicator?	<ul style="list-style-type: none"> Written confirmation from a senior member of staff in the supported organisation confirming the post. This should include details of the job as advertised and start date, duration, and the number of hours per week.

(P17) Number of CV-19 Communication Officers	
Terms	Definitions
Additional Information Required for Indicator	<ul style="list-style-type: none"> No additional data is required.
Relationship to other Indicators	<ul style="list-style-type: none"> Where a communication officer is engaged in face to face engagement with businesses, either on a one to one basis or one to many, then there may be scope to count C1 (and relevant subsets) or P13 outputs. These are defined in the programmes output definition guidance which can be found here.
Notes	<p>Communication officer activity will be targeted at supporting domestic and foreign-owned Small and Medium Sized Enterprises, including Social Enterprises; however, given the broad nature of this activity it is likely that they may indirectly benefit large companies too.</p> <p>Business is the term commonly used in the UK; the EU Regulations use enterprise.</p>

(P18) Number of High Streets with CV-19 Adaptations	
Terms	Definitions
Unit of Measurement	Number of High Streets with Temporary CV-19 Adaptations
Investment Priorities where this indicator is used	IP3d
Count Criteria: What can be recorded against this indicator?	<ul style="list-style-type: none"> • Temporary CV-19 adaptations made to public spaces adjacent to commercial areas which help Small and Medium Sized Enterprises, including Social Enterprises (see Notes below) to build their resilience and adaptability in the context of the economic impact of CV-19 in the area covered by the ERDF support. • Adaptations can include but are not limited to signage, street markings, temporary barriers, changes to street furniture or parking arrangements.
Count Threshold: What is the threshold or minimum requirement for recording (one count) of this indicator?	<ul style="list-style-type: none"> • Public spaces are defined as those under the control of a public sector organisation. • A High Street is defined as a cluster of 15 or more retail addresses within 150 metres. • Temporary is defined as a change to the environment that lasts no more than 12 months.
Count Exclusions: What activity cannot be counted against this indicator?	<ul style="list-style-type: none"> • Temporary CV-19 adaptations made to public spaces adjacent to commercial areas are excluded where they do not: <ul style="list-style-type: none"> ○ meet the count threshold criteria; ○ help the public access commercial areas in a safe way; or ○ help Small and Medium Sized Enterprises, including Social Enterprises (see Notes below) to build their resilience and adaptability in the context of the economic impact of CV-19 in the area covered by the ERDF support.

(P18) Number of High Streets with CV-19 Adaptations	
Terms	Definitions
Verification Evidence: What records need to be retained to count this indicator?	<ul style="list-style-type: none"> • Invoices of expenditure incurred. • Where possible photographic evidence of the changes, ideally before and after.
Additional Information Required for Indicator	<ul style="list-style-type: none"> • No additional data is required.
Relationship to other Indicators	<ul style="list-style-type: none"> • There is no direct relationship to other indicators.
Notes	<p>Temporary CV-19 adaptations made to public spaces adjacent to commercial areas will be targeted at supporting domestic and foreign-owned Small and Medium Sized Enterprises, including Social Enterprises; however, given the broad nature of this activity it is likely that they may indirectly benefit large companies too.</p> <p>Where temporary changes to the public realm are undertaken the respective local authority should work in partnership with public sector landowners as appropriate.</p> <p>Business is the term commonly used in the UK; the EU Regulations use enterprise.</p>

(P19) Number of Neighbourhood Shopping Areas with CV-19 Adaptations	
Terms	Definitions
Unit of Measurement	Number of Neighbourhood Shopping Areas with Temporary CV-19 Adaptations
Investment Priorities where this indicator is used	IP3d
Count Criteria: What can be recorded against this indicator?	<ul style="list-style-type: none"> • Temporary CV-19 adaptations made to public spaces adjacent to commercial areas which help Small and Medium Sized Enterprises, including Social Enterprises (see Notes below) to build their resilience and adaptability in the context of the economic impact of CV-19 in the area covered by the ERDF support. • Adaptations can include but are not limited to signage, street markings, temporary barriers, changes to street furniture or parking arrangements.
Count Threshold: What is the threshold or minimum requirement for recording (one count) of this indicator?	<ul style="list-style-type: none"> • Public spaces are defined as those under the control of a public sector organisation. • A neighbourhood shopping area is defined as a cluster of 14 or less retail addresses within 150 metres. • Temporary is defined as a change to the environment that lasts no more than 12 months.
Count Exclusions: What activity cannot be counted against this indicator?	<ul style="list-style-type: none"> • Temporary CV-19 adaptations made to public spaces adjacent to commercial areas are excluded where they do not: <ul style="list-style-type: none"> ○ meet the count threshold criteria; ○ help the public access commercial areas in a safe way; or ○ help Small and Medium Sized Enterprises, including Social Enterprises (see Notes below) to build their resilience and adaptability in the context of the economic impact of CV-19 in the area covered by the ERDF support.

(P19) Number of Neighbourhood Shopping Areas with CV-19 Adaptations	
Terms	Definitions
Verification Evidence: What records need to be retained to count this indicator?	<ul style="list-style-type: none"> • Invoices of expenditure incurred. • Where possible photographic evidence of the changes, ideally before and after.
Additional Information Required for Indicator	<ul style="list-style-type: none"> • No additional data is required.
Relationship to other Indicators	<ul style="list-style-type: none"> • There is no direct relationship to other indicators.
Notes	<p>Temporary CV-19 adaptations made to public spaces adjacent to commercial areas will be targeted at supporting domestic and foreign-owned Small and Medium Sized Enterprises, including Social Enterprises; however, given the broad nature of this activity it is likely that they may indirectly benefit large companies too.</p> <p>Where temporary changes to the public realm are undertaken the respective local authority should work in partnership with public sector landowners as appropriate.</p> <p>Business is the term commonly used in the UK; the EU Regulations use enterprise.</p>

SCHEDULE 3

GRANT ACTION PLAN FORM



Reopening High Streets Safely Fund Grant Action Plan

Local Authority Name South Norfolk Council	Name of Lead Contact	Tig Armstrong
	Telephone Number	07790 563 554
	Email Address	Tig.armstrong@broadland.gov.uk
	Name of Deputy Contact	Chloe Griffin

	Telephone Number	01603430496
	Email Address	Chloe.griffin@broadland.gov.uk

1. Proposed Activity:

A. Please complete the table below to reflect the activities you propose to use the RHSS Fund for.

No.	Area of Scope	Using bullet points briefly set out the specific activities you will undertake	Briefly set out how the activity does not duplicate existing activity	Total Indicative Budget £ per item Gross
1	Support to develop an action plan for how the local authority may begin to safely reopen their local economies.	<ul style="list-style-type: none"> Undertaking research to inform the action plan by procuring a consultant to look at the High Street/ Neighbourhood Shopping Area (NSA) and recommend ways to make it Covid secure. This will be temporarily managed by a research manager internally. Footfall counters to measure a baseline and end footfall count in our main high streets. 	<p>This specific work will be to gather research that informs our action plan and understanding of the high streets specifically in relation to the impact of Covid-19 and reacting to this.</p> <p>No one currently has a role to manage this research.</p> <p>We do not currently own any footfall counters.</p>	<p>£4000</p> <p>£8871</p> <p>£24354</p>
2	Communications and public information activity to ensure that reopening of local economies can be managed successfully and safely	<p>Phase one & Phase two: a campaign has been run to promote the safety measures that have been put in place for reopening the high streets, and to remind the public of the key safety messages. This has been done via:</p> <ul style="list-style-type: none"> Digital campaigns including social media Posters, pavement stickers and banners in key locations Communications officer to run campaigns 	<p>These are new campaigns that have not been previously delivered before Covid-19.</p> <p>There is no one currently in post to run these campaigns.</p>	<p>£40000</p> <p>£8325</p>

3	Business-facing awareness raising activities to ensure that reopening of local economies can be managed successfully and safely.	<ul style="list-style-type: none"> Phase one: Communication with businesses in key locations surrounding information on temporary changes to the high streets. Phase two: Business support portal with video content and template documents to support businesses to reopen. Employment of two Covid-19 business advice officers Business support package delivered by external partners to specifically offer individual advice for Covid-19 recovery 	<p>The communications provided to business were specifically on the subject of measures needed due to Covid-19 and reopening/growing following being closed.</p> <p>We do not currently own a portal such as the one proposed. These roles will specifically promote and guide businesses with information on the other support elements available here.</p> <p>We are not currently offering one to one advice and talks on the subject of recovery.</p>	<p>£60,000</p> <p>£13000</p> <p>£24500</p>
4	Temporary public realm changes to ensure that reopening of local economies can be managed successfully and safely.	<p>Phase one:</p> <ul style="list-style-type: none"> Hand Sanitizer dispensers and sanitizer refill Posters, signage and barriers <p>Phase two:</p> <ul style="list-style-type: none"> Further sanitizer refill 	<p>The items bought are specifically to provide social distancing and additional hygiene in crowded locations.</p> <p>This refill is needed for the various sanitizers that have been purchased.</p>	<p>(at risk below below)</p> <p>£4000</p>

B. At Risk Expenditure

Indicative amount of eligible expenditure you intend to incur between 01/06/20 and the date of the Funding Agreement with CLGU	
£30,703.11	
Please lists the costs you are incurring at risk before the signing of the Funding Agreement	

08/06/2020	£ 41.60	Cubicle stickers
08/06/2020	£ 569.25	Lamppost Signs
08/06/2020	£ 120.18	Lamppost Signs
08/06/2020	£ 418.42	A2 Posters
08/06/2020	£ 25.30	Cable ties
30/06/2020	£ 189.95	Refill Of Sanitiser
30/06/2020	£1,196.00	A2 Boards - SNC Only
15/07/2020	£ 942.00	Outdoor Banner
26/08/2020	£ 379.90	Refill Of Sanitiser
26/08/2020	£ 75.98	Refill Of Sanitiser
14/08/2020	£ 303.92	Refill Of Sanitiser
09/09/2020	£ 379.90	Refill Of Sanitiser
29/07/2020	£ 379.90	Refill Of Sanitiser
29/07/2020	£ 379.90	Refill Of Sanitiser
18/06/2020	£ 835.78	Refill Of Sanitiser
21/07/2020	£1,670.60	10 units
30/09/2020	£ 379.90	Refill Of Sanitiser
16/09/2020	£ 379.90	Refill Of Sanitiser
31/08/2020	£ 379.90	Refill Of Sanitiser
21/10/2020	£ 379.90	Refill Of Sanitiser
10/11/2020	£ 379.90	Refill Of Sanitiser
16/06/2020	£2,398.85	Sanitiser
26/08/2020	£2,511.00	Sanitiser
02/09/2020	£2,231.45	Sanitiser
12/08/2020	£3,064.20	Sanitiser
09/09/2020	£ 669.60	Sanitiser
05/08/2020	£5,316.90	Sanitiser stations x31 and installation charge
14/10/2020	£2,059.80	Sanitiser station

11/11/2020	£1,201.55	Sanitiser stations, installation, fixing bolts and refill
11/11/2020	£ 996.67	For 200 Foamex Broadland A3 signs and cable ties

C. Alignment with COVID-19 Plans

Please describe how the above planned activity contributes to a national, regional or local COVID-19 plan and provide a copy of the plan.

Our activities within this project correlate with the regions Covid-19 plan, 'Norfolk & Suffolk Unlimited – Covid-19 Economic Recovery Restart Plan'. This plan lays out key activities that must take place in order to restart the local economy, including advice and support to businesses, transforming skills, and reimagining high streets. We set out within this plan our intention to launch the 'confidence' campaign driving public confidence to visit their market towns and providing safety measures to back this. We also set out our intention to provide business support and a single point of contact for this, which will be delivered through our business advice officer role and our business support portal.

These are also in line with our own local authority level Covid-19 Recovery plan which is under development at the moment.

D. Locations of activity

Please list the High Street (and Neighbourhood Shopping Area) locations that you intend to support with this activity and give details of which strand of activity will be implemented at each location. *Insert more rows if required.*

Type High Street / Neighbourhood Shopping Area	Name of location	Postcode(s)
High Street	Diss	IP22 4AB
High Street	Harleston	IP20 9AZ
High Street	Wymondham	NR18 0NS
High Street	Aylsham	NR11 6EH
High Street	Reepham	NR10 4JJ
High Street	Acle	NR13 3DY
Neighbourhood Shopping Area	Alpington & Yelverton	NR14 7NU
Neighbourhood Shopping Area	Bergh Apton	NR15 1AA
Neighbourhood Shopping Area	Brooke	NR15 1AB
Neighbourhood Shopping Area	Chedgrave	NR14 6HG
Neighbourhood Shopping Area	Ellingham	NR35 2PH
Neighbourhood Shopping Area	Hales	NR14 6SX
Neighbourhood Shopping Area	Hethersett	NR9 3AB
Neighbourhood Shopping Area	Framingham Earl	NR14 7TQ
Neighbourhood Shopping Area	Hingham	NR9 4AF
Neighbourhood Shopping Area	Little Melton	NR9 3AD
Neighbourhood Shopping Area	Loddon	NR14 6ET
Neighbourhood Shopping Area	Long Stratton	NR15 2XJ
Neighbourhood Shopping Area	Poringland	NR14 7RP
Neighbourhood Shopping Area	Pulham Market	IP21 4SU
Neighbourhood Shopping Area	Rockland – St. Mary	NR14 7HQ

Neighbourhood Shopping Area	Surlingham	NR14 7DH
Neighbourhood Shopping Area	Toft Monks	NR34 0ER
Neighbourhood Shopping Area	Seething	NR15 1AL
Neighbourhood Shopping Area	Pulham St Mary	IP21 4QT
Neighbourhood Shopping Area	Stoke Holy Cross	NR14 8NX
Neighbourhood Shopping Area	Blofield	NR13 4AA
Neighbourhood Shopping Area	Brundall	NR13 5AA
Neighbourhood Shopping Area	Cawston	NR10 4AE
Neighbourhood Shopping Area	Coltishall	NR12 7DW
Neighbourhood Shopping Area	Drayton	NR8 6PW
Neighbourhood Shopping Area	Freethorpe	NR13 3LY
Neighbourhood Shopping Area	Hellesdon	NR6 5QA
Neighbourhood Shopping Area	Lingwood	NR13 4AZ
Neighbourhood Shopping Area	Little Plumstead & Thorpe End	NR13 5HP, NR13 5AJ
Neighbourhood Shopping Area	Old Catton	NR6 7QA
Neighbourhood Shopping Area	Rackheath	NR13 6LT
Neighbourhood Shopping Area	Reepham	NR10 4JJ
Neighbourhood Shopping Area	Salhouse	NR13 6RW
Neighbourhood Shopping Area	South Walsham	NR13 6DQ
Neighbourhood Shopping Area	Spixworth	NR10 3AF
Neighbourhood Shopping Area	Strumpshaw	NR13 4NT
Neighbourhood Shopping Area	Taverham	NR8 6AD
Neighbourhood Shopping Area	Thorpe St Andrew	NR7 OJG
Neighbourhood Shopping Area	Upton	NR13 6BT

E. Permissions

Please confirm that you will have all the necessary permissions in order to carry out the temporary public realm changes and that you will be able to evidence this upon request. Tick to confirm: ☒

2. Stakeholder Engagement

Briefly set out how you have engaged with business organisations, Local Highway and Transport Authorities, lower tier authorities such as parish councils, and other relevant stakeholders when considering how to use the RHSS funding.

A. Please list which organisations and sectors you have engaged with?
Business organisations within the selected locations
Local Highways and Transport Authorities
Local town and parish councils
Local town team groups (including residents, business owners, and local community groups)
Public transport companies impacted
Private land owners (where permission has been required)
B. Please provide details of the engagement activities these stakeholders have been involved with?
<p>The above organisations have been engaged with through our public campaign, or through direct communication.</p> <p>Direct communication has come in the form of one of the following:</p> <ul style="list-style-type: none"> • Written letter or email correspondence • Telephone conversations with a project staff member • Virtual meeting • Physical meeting with social distancing in place

C. Delivery Partners

See Grant Action Plan Guidance for details on the role of Delivery Partners and their associated requirements.

i. Do you intend to include any other tier of local government as a Delivery Partner(s)? Yes / No

ii. If yes, please complete the following table:

Name of Delivery Partner (please insert rows as required)	What RHSS project activity will they deliver?	Why are they the most appropriate body to deliver the activity?
Broadland District Council	Phase one activity & phase two activity	Delivery of the phase one and phase two activity within their own district area as the contact there, whilst South Norfolk Council has been the lead for procurement of the items.

iii. For each Delivery Partner you are required to secure a Service Level Agreement for their RHSS Fund activity.

Name of Delivery Partner (please insert rows as required)	Please confirm that you have a signed SLA with each Delivery Partner	
	Yes – Submit with Grant Action Plan	No – provide date when SLA will be submitted
Broadland District Council	Yes	

3. Outputs

Please indicate the volume for each output your activity will address.

	Output	Number of outputs
P14	Number of CV-19 Action Plan	1
P15	Number of CV-19 Public Information Campaigns	2
P16	Number of CV-19 Business Facing Campaigns	2

P17	Number of CV-19 Communication Officers	1
P18	Number of High Streets with Temporary CV-19 Adaptations	6+
P19	Number of Neighbourhood Shopping Areas with Temporary CV-19 Adaptations	39+

4. Claims

i. Please complete the table with the start and end date for the expenditure associated with the RHSS Fund activity.

Start Date	1/6/2020
End Date	31/3/2021

ii. Please select the claim quarter(s) in which you plan to submit a grant claim and insert a forecast value for each claim.

Claim	Claim Submission Period	Tick to indicate a claim submission in this period	Claim Forecast Value £ (Gross)
20Q3	July 2020 – September 2020	n/a	
20Q4	October 2020 – December 2020		
21Q1	January 2021 – March 2021		
21Q2	March 2021 – May 2021	X	£227.435.12

Yes	Yes
No	

iii. Please indicate whether you plan to claim the 4% Management and Admin from within your grant allocation

iv. If you propose to claim staff costs in line with the RHSS Fund Guidance, please complete the table below

Area of Scope	Role Title	Salary	Cost to be Claimed
2. Communications and public information activity to ensure that reopening of local economies can be managed successfully and safely	Communication officer	49950	8325
3. Business-facing awareness raising activities to ensure that reopening of local economies can be managed successfully and safely.	Business advice officer x 2	52000	13000
1. Support to develop an action plan for how the local authority may begin to safely reopen their local economies.	Research manager	35485	8871

5. **Monitoring and Evaluation:** Please indicate all of the monitoring methods you will utilise to demonstrate the impact of the project activities.

Monitoring Method	Tick to confirm	Brief description
Footfall counts	yes	Increased footfall across 6 High Streets
Businesses reopening	yes	We will measure the number of businesses with a rateable premises that were open and trading before Covid-19, had to close during the spring lockdown and were then able to reopen again following our high street activities and the lockdown ending.
Businesses closed	yes	We will measure the percentage of empty rateable premises in our high street locations before covid-19 and compare with at the end of the project in March/April.

Other		
-------	--	--

6. Financial Management and Control

i.

Describe the financial management and control procedures for the project; including the process for compiling, authorising and ensuring only eligible and defrayed expenditure is included in RHSS claims
A project team was established to identify installations and services that would enable the reopening of the high streets, and fit within the RHSSF criteria. An officer was then tasked to obtain quotes for the appropriate items, working with the fund representative. The Assistant Director of Economic Development has then made the decision on which items to include.
Please describe the document management system for the project and how the audit trail will be maintained and accessible for the period required under the terms of the Funding Agreement, this includes retrieving original invoices and ensuring evidence of costs incurred is available.
The documents relating to this project will be stored on a secure drive within the council server, and the financial evidence such as invoices will be kept additionally on the council's finance system for six years, in accordance with our data retention policy.

ii. Please indicate whether or not the RHSS funded activities will result in any **Fixed and or Major Assets** NO

iii. If Yes you are required to list the potential assets, and describe the system(s) in place to record asset details in compliance with ERDF Guidance

The assets we have purchased through this funding are under the threshold in value for what the council would consider listing as a fixed asset.

iv. **VAT** – Please advise whether or not the project budget includes any VAT you cannot recover from HMRC (recoverable VAT). Note we may need confirmation of this by way of a letter from the council's finance department.? NO

v.**VAT** – If irrecoverable VAT will be claimed, please describe how this is captured through the claims procedure and how your financial processes will ensure that it is not being claimed as part of the normal VAT return.

N/A

7. **Procurement:** Please provide details of all the procurements you have and/or will undertake in relation to RHSS eligible expenditure. **Applicants should note that procurements will be tested in detail in the lifetime of a project and by different independent bodies. In the event of non - compliance/irregularity financial penalty will be imposed in line with EU guidance. This can be up to 100% of the procurement expenditure.**
It remains the responsibility of the Local Authority to ensure all procurements are compliant.

Anticipated value of the contract	Brief description of works, supplies or services that will be provided under the contract	What procurement process do you anticipate using to select the supplier? (Please tick)				Procurement status (Please tick)	
		OJEU	Advertised	Three Quotes	Direct Award	Procurement in progress/ to be started	Procurement completed
£2400 (anticipated but we had to spend more five months later taking this figure up to £3367)	Posters/Signage etc				X		X
Initially thought to be £5000, we had to buy extra over several months taking this to £21,124. Enclosed is a cross border interest	Hand Sanitizer Stations				X		X

form with justification.							
£8825	Hand Sanitizer chemical solution			X			X
£1390	Banners				X		X
£60,000	Business Support Portal		X			X	
£40,000	Business campaign (digital marketing costs)		X			X	
£24500	Business support sessions			X		X	
£4000	Action plan research consultancy contract			X		X	
£24354	Footfall counters			X		X	

8. **State Aid:** This section MUST be completed in conjunction with section 8 of the accompanying Grant Action Plan Guidance. CLGU has conducted its own analysis of the State Aid position of the RHSS project and concluded that there is no State Aid due to the nature of the RHSS eligible activities. This position has been set out in Annex A of the accompanying Grant Action Plan Guidance. However it is the responsibility of each Local Authority in receipt of RHSS funding to ensure that they are compliant with State Aid law.

- i. Have you read and understood CLGU's State Aid position as set out in Annex A of the Grant Action Plan Guidance? YES
- ii. Have you completed your own State Aid analysis? YES
- iii. Does your State Aid analysis agree with CLGU's position that there is no State Aid associated with RHSS funded activity? YES

iv. If yes, and you will deliver the project such that there is no State Aid:

Describe how you will ensure that there is no State Aid

All items will be procured in accordance with EU state aid regulations.

v.If you have conducted your own State Aid analysis and concluded that there *would be* State Aid, you must complete **Annex A State Aid Analysis** below.

9. Policies and Documents

i.It remains the responsibility of the Council to ensure that the policies are fit for purpose. RHSS Fund will not provide formal approval of policies.

Policies and Documents Required	Tick to confirm you have attached	Policies and Documents Required	Tick to confirm you have attached
Counter Fraud Policy	yes	Sustainable Development	Yes
Conflict of Interest Policy and Register	Yes	Document Retention	Yes
Equal Opportunities	yes	Risk Register	Yes

ii.**Please confirm that you have read and understood the ERDF Guidance including but not limited to Eligibility, State Aid, Branding and Publicity and Procurement and that you will deliver the project in compliance with the requirements.**

Select to confirm: ☒

Declaration & Signature

I declare that I have the authority to represent *South Norfolk Council* in submitting the Grant Action Plan.

I understand that RHSS Fund acceptance of this Grant Action Plan does not in any way signify that the proposed activity described above is eligible and compliant with the requirements of the RHSS Fund.

On behalf of South Norfolk Council and having carried out full and proper inquiry, I confirm to the RHSS Fund:


- That the information provided in this application is accurate.
- I am not aware of any relevant information, which has not been included in the application, but which if included is likely to affect the eligibility and compliance of the activity.

I confirm to the RHSS Fund:

- That I shall inform the RHSS Fund if, prior to any RHSS funding being legally committed to South Norfolk Council, I become aware of any further information which might reasonably be considered as material to the RHSS Fund in deciding whether to enter into a Funding Agreement.
- I am aware that if the information given in this application turns out to be false or misleading, the Reopening High Streets Safely Fund may demand the repayment of funding and/or terminate the RHSS funding agreement.

I confirm that I am aware that checks can be made to the relevant authorities to verify this declaration and any person who knowingly or recklessly makes any false statement for the purpose of obtaining grant or for the purpose of assisting any person to obtain grant is liable to be prosecuted. A false or misleading statement will also mean that approval may be revoked, and any grant may be withheld or recovered with interest.

Local Authorities should be aware that any expenditure incurred before the signing of an RHSS Grant Funding Agreement is entirely at their own risk and may render the project ineligible for support.

Signed		Name (print)	Tig Armstrong
Position	Assistant Director of Economic Development	Date	13/01/21

Annex A – State Aid Analysis

State Aid Law
i. Please list all the organisations (if known) which may benefit from the funding of the project. If they are not known, list the types of organisations that might benefit from the funding.
N/A
ii. For each organisation or type of organisation that may benefit from the project, (including the Local Authority and any Delivery Partners) identify whether they meet the State Aid test. If you believe an organisation or type/ group of organisations is outside the scope of State Aid, please provide the reasons.

Local Authorities may wish to refer to the European Commission's "Notion of State Aid" guidance and the Ministry of Housing, Communities and Local Government's European Regional Development Fund guidance on State Aid law available at <https://www.gov.uk/government/publications/european-structural-and-investment-funds-state-aid-documents>.

N/A

iii. For each beneficiary and or type of beneficiary that the Local Authority regards as being in receipt of State Aid, identify which exemption(s) they will be using to provide the aid in accordance with State Aid law¹.

Name of beneficiary or type of beneficiaries	Name of Exemption	Scheme reference number

Where a project is funded under an exemption based on the General Block Exemption Regulations (651/2014), the Local Authority is required to either (a) confirm that the project falls within the scope of Regulation 6(5) or (b) to submit a separate document to demonstrate incentive effect in line with Regulation 6(2) containing the following information:

- (a) the applicant undertaking's name and size
- (b) a brief description of the project, including start and end dates
- (c) the location of the project
- (d) a full list of the project costs used to determine the allowable level of funding
- (e) the form of the aid
- (f) the amount of public money needed for the project.

N/A

iv.If you intend to use exemption(s) to deliver the Project, have you read the terms of the scheme and meet all the relevant terms.

Yes or No

v.If you intend to use De Minimis, please outline what work has been undertaken to ensure that this is the most appropriate mechanism.

vi.Are you subject to an outstanding recovery order in respect of State Aid?

Yes or No

vii.Describe the system in place for collecting and recording the required information for audits and returns?

N/A

SCHEDULE 4 UNDERPERFORMANCE METHODOLOGY

Methodology for calculating penalty for operation underperformance						
Methodology						
	OUTPUTS TO BE INCLUDED IN THE CALCULATION (Up to 4 outputs to be selected according to Priority Axis and those contracted for this operation)		OUTPUT 1	OUTPUT 2	OUTPUT 3	OUTPUT 4
			Output reference / ID Output description / Indicator	Output reference / ID Output description / Indicator	Output reference / ID Output description / Indicator	Output reference / ID Output description / Indicator
			NB: will be Performance Framework output where contracted			
Basic Facts	Total Project Value (a)	£ value as per schedule 1 of FAL / details as per latest variation				
	Contracted Target (b)		Number contracted as per schedule 3 of FAL	Number contracted as per schedule 3 of FAL	Number contracted as per schedule 3 of FAL	Number contracted as per schedule 3 of FAL
	Evidenced / actual achievement (c)		Number actually achieved at time of calculation	Number actually achieved at time of calculation	Number actually achieved at time of calculation	Number actually achieved at time of calculation
Calculated Variance	Variance (number) (d)		(b) - (c)	(b) - (c)	(b) - (c)	(b) - (c)
	Variance (%) (e)		(d) / (b) x 100	(d) / (b) x 100	(d) / (b) x 100	(d) / (b) x 100
Weighting	Up to 15% below target = normally deal with via project change process 16% and 25% below a weighting of 5% would normally be applied 26% and 50% below a weighting of 10% would normally be applied Over 50% below would normally result in a weighting of at least 15% (f)	(f)	identify weighting as appropriate (see e). B: Where a project has overachieved the variance (e) will appear as a negative figure. The corresponding % as a negative (using the criteria here) should be added as the weighting against the indicator. This allows for the overachievement to be taken into account in the calculation of the penalty.	identify weighting as appropriate (see e). B: Where a project has overachieved the variance (e) will appear as a negative figure. The corresponding % as a negative (using the criteria here) should be added as the weighting against the indicator. This allows for the overachievement to be taken into account in the calculation of the penalty.	identify weighting as appropriate (see e). B: Where a project has overachieved the variance (e) will appear as a negative figure. The corresponding % as a negative (using the criteria here) should be added as the weighting against the indicator. This allows for the overachievement to be taken into account in the calculation of the penalty.	identify weighting as appropriate (see e). B: Where a project has overachieved the variance (e) will appear as a negative figure. The corresponding % as a negative (using the criteria here) should be added as the weighting against the indicator. This allows for the overachievement to be taken into account in the calculation of the penalty.
	Indicator Value (£) (g)		(a) * 0.55	(a) * 0.15	(a) * 0.15	(a) * 0.15
Establish the value of the variance for each indicator as a proportion of the value of the operation.						
Penalty	Underperformance value (£) (h)		(g) x (f)	(g) x (f)	(g) x (f)	(g) x (f)
	Potential Reduction Value (£) (i)	sum all (h)s				

EMPTY HOMES POLICY

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Portfolio: Better Lives

Ward(s) Affected: All

Purpose of the Report:

To present the draft Housing Standards Empty Homes Policy for Cabinet approval for adoption.

Recommendations:

1. Cabinet to approve adoption of the Empty Homes Policy.
2. Cabinet to agree proposal that Cabinet provides approval to seek to undertake Empty Dwelling Management Order (EDMO) and Compulsory Purchase Order (CPOs) processes on a case by case basis.
3. Cabinet to approve creation within the 2021/22 financial year of:
 - A reserve fund of £500,000 in order to undertake a voluntary offer of purchase as part of a Compulsory Purchase Order procedure
 - A Housing Standards formal enforcement budget of £50,000 per annum
 - A Housing Standards financial assistance offer budget of £30,000 per annum.

1. Summary

- 1.1 The Council's Environmental Strategy 2020-2025 sets out a clear five year vision to create the best place for everyone now and for future generations, with a key priority to protect our natural and built environment, such as open spaces, parks, homes and places of work and leisure, while maximising quality of life. One of the approaches to achieving this is through making sure our green spaces, streets and public places are clean, safe and attractive.
- 1.2 In addition, one of the Councils key functions is to ensure the quality of life of residents. This work is delegated across the Councils' various functions which includes, housing, planning, community services and environmental protection. Within the housing standards enforcement remit sits specific requirements around Houses in Multiple Occupation (HMOs) Empty Homes, Gypsy and Travellers and ensuring safe living conditions in the rental sector. The remits feed into, and works closely with, the wider enforcement functions of the Council under a broad regulatory framework.
- 1.3 The Council's enforcement policy to date has been one of education first, using enforcement powers when required. Enforcement activity can be split broadly into two areas, actions where the council has a statutory duty under legislation, and actions where we have a discretionary power. The Empty Homes Policy renews our approach of, when appropriate, we should use support and incentives to encourage compliance, but also to have the resources and skills in place to be able to take a more muscular approach to enforcement when we see non-compliance, particularly when vulnerable people are affected or it has a high community impact.
- 1.4 The Council's Housing Standards Enforcement Policy for **statutory** enforcement was agreed in November 2020. However, the Council also has a number of **discretionary activities and powers** that can be drawn upon through the housing standards team in relation to empty homes as a means bring homes back into use.
- 1.5 The Empty Homes Policy will be complementary to the existing Housing Standards Enforcement Policy. It clearly sets out the parameters in which discretionary activity will take place in relation to empty homes, in particular the assessment process for formal enforcement and the approval routes for funding costs to bring homes back into use.
- 1.6 The approach will be aimed at being clear and transparent to residents about the action we can take, and when we will take these actions, but also give confidence to our communities that the Council will take action to enforce when required. In addition it will provide clarity and alignment in the direction of the one Housing Standards team in addition to being part of a wider council response to maintain and improve our environment.

2. Background – Empty Homes

- 2.1 Council Tax base statistics published by the Ministry for Housing, Communities and Local Government (MHCLG) in November 2020 state there are a reported 268,385 long term empty properties in England. That is properties that have been empty for more than six months and equates to around 1% of dwellings in England.
- 2.2 Homes can be empty for a variety of reasons including:
- Financially prohibitive for owners to undertake repairs or property upkeep
 - Poor marketing or pricing of the property on the market
 - Difficulty identifying owners of property, for example tracking down heirs to a property or owner disputes.
 - Planning restrictions
 - Owners unwilling to sell, let or inhabit the property
- 2.3 For example, properties in Probate can add to numbers of empty homes and there are council tax exemptions and discounts that can be applied following the death of the owner. Due to the circumstances, a sensitive approach is recommended from the perspective of enforcement. However formal approaches can be taken, for example, if the property has been empty for some time and probate has not yet been granted or if following a long period of probate the property is still not either sold, transferred or occupied.
- 2.4 An empty home can have a negative impact on the property, the local community and, in some cases, the wellbeing of the owner. Empty homes can also raise multiple concerns for communities, including anti-social behaviour, nuisance, and unauthorised entry and for some adjoining properties, structural or disrepair issues. In this regard, bringing an empty home back into use can benefit everyone, owners can be better off financially as well as giving someone a much-needed new home. This also contributes to sustaining the local economy and local services while improving the outlook of the local community.
- 2.5 In addition, the New Homes Bonus rewards local authorities for net additional homes added to the Council Tax Base. The Bonus also applies in respect of long-term empty properties brought back into use. This feature of the bonus was to strengthen the incentive for local authorities to identify empty properties and work with property owners to find innovative solutions that allow these properties to be brought back into use. However, the Government has recently consulted on the future of the Bonus from 2022/23 onwards, although outcomes of the consultation are not yet known, there was a consideration for whether empty homes brought back into use should be part of the formula for determining the amount of Bonus awarded.

- 2.6 In terms of tackling empty homes, the Council has a series of powers it can call upon in order to take action against empty properties in their area under a comprehensive set of legislation. The two main legislative tools the Council can apply in order to enforce empty properties being brought back into use are the Compulsory Purchase Order (CPO) under the Housing Act 2004 and/or Town & Country Planning Act 1990 and the Empty Dwelling Management Order (EDMO) under the Housing Act 2004.

Compulsory Purchase Orders

- 2.7 As mentioned above a CPO is detailed in the Housing Act 2004 and/or Town & Country Planning Act 1990. The Planning legislation legitimises the process where the empty property is detrimental to the local environment. To use the housing legislation option, a demonstration of housing need is required. The use of both acts therefore, requires considerable back up work and analysis prior to the initiation of legal procedures. A CPO allows local authorities to acquire a property compulsorily which they can then place straight on to the open market, re-develop or restore for sale or alternative use. Although CPO's allow councils to take control of a property, to make necessary repairs and to ensure it would eventually provide a home or homes, they involve lengthy procedures, requiring a significant amount of officer time to engage with the owners and develop the evidence needed throughout the application.
- 2.8 Since 2016, following refusal of a CPO application by the Secretary of State, a change in best practice guidance recommends that for a local authority to demonstrate the CPO is a last resort action, they should make at least one offer of voluntary purchase to the owner. This must be prior to any commencement of the CPO process and the offer must be for a fair and reasonable purchase price. If the owner accepts, the local authority will again need to agree appropriate compensation with the owner as per 2.9 below, although further CPO action is averted. The local authority would then own the property outright as an asset and can choose to keep or resell. If the owner declines the offer, this then forms part of the evidence base for formal CPO action.
- 2.9 If a formal CPO action is approved by the Secretary of State, on completion of 'purchase' under a CPO, the Council is required under the legislation to pay the owner compensation to ensure they are 'brought back into an equivalent position'. This is in the form of an independently valued market rate for the property, usually the actual price achieved for the property from its sale once in the ownership of the Council. In addition to this there can be further financial considerations in the form of:
- Compensation to the owner for their legal fees and other costs
 - Reimbursement of surveyor's and the Council's legal fees including stamp duty and solicitors costs is required.
 - Potential costs for repairs and bringing the property up to a safe standard where necessary

- Marketing the property.

- 2.10 These considerations pose a financial risk to the Council which can be up to an estimated £25,000 and means that there is usually a cost to the Council that is non-recoverable. However, the Council may keep the money gained through the sale of a property if no compensation claim is received within seven years of the CPO.
- 2.11 It should also be noted that with a CPO there is a risk of an Upper Tier Tribunal regarding a compensation claim which could pose a very large financial risk if costs are awarded against the local authority. It constitutes best practice that every effort is made to ensure the claimant has every opportunity to seek a fair compensation in order to avoid this.
- 2.12 Table 1 below provides an example of CPO costs based on a sample of cases by a local authority. Costs to bring the property to sale include, any clearance, repairs and energy performance works and costs to secure the property. It also includes sale costs of stamp duty, marketing and surveyors fees in addition to costs of issuing the notices. As each case is highly individual, complex and lengthy it is difficult to provide an exact overview of predicted costs at the outset of a CPO process.

Example CPO Procedure – property valued at £250,000 Case Load - approx. 3 months Officer time. Case Length - 10 years +	Cost £
Property value at sale	£250,000
Compensation Costs to be paid to the owner (sale price)	£250,000
Additional agreed compensation costs paid	£4,500
Costs to bring property to sale est.	£25,000
Management Costs i.e. Council Tax	£2,000
Overall costs to the Council	£31,500

Empty Dwelling Management Orders (EDMO)

- 2.13 An EDMO allows local authorities to take over the management of unoccupied properties and use them as part of a housing offer, such as the provision of accommodation for those on the housing list. There are exemptions to which properties can have an EDMO applied and there is a staged process. An EDMO is a temporary arrangement for a Council which would require us to manage the property on the owner's behalf but does not provide a long-term solution to the problem.
- 2.14 An application for an Interim EDMO is the first stage and lasts for 12 months. During this time the property can be let and have repairs made to it organised by the local authority only if the owner provides consent. If consent is withheld, the local authority can make a further application for a final EDMO which can be in place for up to seven years.

- 2.15 Local Authorities can choose to apply a further final EDMO at the end of the seven years if they feel there is a strong case the property will fall empty again. Conversely, Councils are also bound to consider periodically during the life of an EDMO the effect of the EDMO and the necessity to continue with it. An owner can request revocation at any point of the EDMO, this is initially with the local authority and if refused, through an appeals tribunal. Consideration would also need to be given to any tenants of the property during this process.
- 2.16 The local authority can recoup any costs such as those outlaid in bringing the property to a decent standard or ongoing management costs through rental income received or a charge against the property. However, any money left over after deductions for expenditure must be paid to the owner, thus providing a form of income. In addition, the Council can choose whether to manage the property themselves or seek an external management agency.
- 2.17 Table 2 below provides a sample of costs to the local authority associated with an EDMO procedure.

Example EDMO Procedure	Costs £
Case Load - approx. 7-9 months Officer time Case Length 10 years +	
Costs to bring property to a decent standard	£27,000
Management Costs during period of EDMO	£1,500
Legal Costs awarded to Local Authority	£1,500
Rental Income during EDMO period	£29,000
Overall costs to the Council	£0

Table 2: Example of costs/time associated with EDMO procedure

- 2.18 In some instances, where informal engagement with owners has failed, the Council can raise the potential of formal enforcement action which can be an incentive to commence or re-establish contact by the owner. In practical terms however, CPOs and EDMOs can be complex, costly and lengthy and extremely resource intensive procedures with no guarantee they will be approved. To this end CPOs and EDMOs should only be used as a very last resort where all steps and options to engage with owners and bring the property back into use have been exhausted. Appendix A provides an overview of EDMO and CPO considerations.
- 2.19 As has also been noted above, particularly where there is complexity, working in partnership with other council departments and organisations is vital to, and can help to identify alternative regulatory options to tackling these issues. For example, the use of Community Protection Notices (CPNs) under the Anti-Social Behaviour, Crime and Policing Act 2014 can be an effective response where it can be argued that a person's conduct is continuing to unacceptably affect victims and the community. However, it should be noted that a CPN cannot enforce an owner to bring a property back into use.

3. Current position/findings

- 3.1 Data gathered by MHCLG as informed by the Council Tax Base shows that South Norfolk Council has the lowest rates of empty homes in actual terms and as a percentage of overall dwellings in the county. The rate is also below the England average.
- 3.2 The figures below are based on a snapshot of a particular day of properties that have been empty for more than six months and excludes those that are empty due to flooding or subject to a discount due to major works. The total number of empty homes will vary from day to day as properties become empty and others move back into use.

Area	Empty Homes 2019	Empty Homes 2020	No of dwellings (as at 2020)	% change*	Empty properties (2020) as % of dwellings*
Breckland	481	609	62357	27	1
Broadland	347	380	59178	10	0.6
GYBC	586	712	48381	22	1.5
KLWN	966	979	74157	1	1.3
Norwich	560	779	67745	39	1.1
NNDC	572	554	55390	3	1
South Norfolk	285	310	63420	9	0.5
Norfolk	3797	4323	430628	14	1
England		268385	24800000		1

Table 3: Empty Homes by Norfolk Local Authority Area. Source: Action on Empty Homes from MHCLG data November 2020 *Figures rounded

- 3.3 However, between 2019 and 2020 the numbers of empty homes have increased. This may be due to increased identification of properties following the introduction of the council tax premium applicable to long term empty properties. There may also be impacts as a result of the pandemic restricting opportunities for officers to undertake property visits and a slow turnover in the housing market during the initial lockdown period.
- 3.4 The Council currently takes a reactive approach to dealing with empty homes where empty properties are reported by members of the public or other departments/organisations. When this occurs, engagement is sought with the owner and advice and support is offered. A check is also made to ensure the property is on the correct council tax banding as per 3.7 below. Formal enforcement activity could be considered for very long-term empty properties or where conditions require a quicker response.
- 3.5 Following the changes to best practice guidance, we need to redefine our position on the pursuit of a CPO or EDMO, particularly around commitment to meeting the

costs to the Council in terms of property purchase, repairs or maintenance. This can be problematic when preparing a case for a CPO or EDMO application if work commences but is unable to progress.

- 3.6 In terms of measuring the impact of discretionary activity in relation to bringing empty properties back into use, successful outcomes from a CPO or EDMO provide an obvious indicator. In addition, statement of intention to commence a formal procedure may highlight some measure of success if the property subsequently comes back into use. However, where the majority of cases would consist of a support, advice and guidance offer, it would be difficult to determine where any properties brought back into use were the result of officer intervention or would have come back into use naturally.

Council Tax Premium for Empty Properties

- 3.7 In April 2019, changes were made to council tax charges as a result of legislation through the Local Government Finance Act 1992 amended by the Rating (Property in Common Occupation) and Council Tax (Empty Dwellings Act) 2018. This gave discretion to local authorities to place additional charges on long-term empty properties in order to incentivise owners to bring very long-term empty properties back into use. The additional charges adopted by the Council are the maximum amounts allowable and the dates of implementation are given below.

Time property has been empty	Additional charge from April 2019	Additional charge from April 2020	Additional charge from April 2021
Empty between two and five years	100%	100%	100%
Empty between five and ten years	100%	200%	200%
Empty over ten years	100%	200%	300%

Table 4: Scale of additional council tax charges for long term empty properties

- 3.8 As of March 2021, 58 properties in South Norfolk are subject to the additional premium having been empty for longer than two years. Of these 3 have been empty for longer than five years and 4 have been empty for longer than ten years. At present it is too early to know if the additional charges are having an impact in reducing the number of empty properties.

Best Practice Examples

- 3.9 In terms of best practice examples, Chichester District Council has one of the lowest rates of empty homes as a percentage of dwellings in the country at 0.2%. They have also reduced the numbers of empty homes in their district by 42% between 2019 and 2020. To achieve this they have been undertaking a review of empty homes in the district, writing to owners and asking them to respond to an online request for information. They provide detailed leaflets on their website and

can offer a grant of up to £10,000 over a five-year period to bring a property up to accreditation standards with the property being let through their Homefinder scheme for a minimum of five years.

- 3.10 Wyre Council have a rate of 0.18% as a ratio of empty properties compared to overall dwellings. They keep an ongoing list of empty properties and use a scoring process which takes into account matters such as length of time they have been empty, state of repair, maintenance of gardens, impact on the neighbourhood etc. to identify where further action needs to be taken. They also signpost owners to external sources of grant funding. As with Chichester, funding is caveated on the property being able to let through a specific service.
- 3.11 Locally, Breckland Council launched the Restore Grant in 2019. Providing up to £10,000 to help with the cost of bringing a long-term empty property back into use. The grant can also be used in conjunction with other funding, where applicable and owners agree as a funding condition to let the property for a minimum of 24 months to a household on their housing waiting list.
- 3.12 Broadland District Council currently has a financial assistance offer, including an interest free loan of up to £4,000 to bring a property up to the Decent Homes Standard. A further £1,000 can be made available for insulation of solid external walls only. Take up of the financial assistance offers are low but this is reflected in other best practice areas and highlights the individualised and complex nature of empty homes cases.
- 3.13 The examples above demonstrate that what seems to work best is a service that comprises information, support and guidance for the owner, an offer of incentives to bring the property back into use and for extreme cases a move towards formal action using powers available to the authority.

4. Proposed action

- 4.1 The model detailed in Empty Homes Policy provides a robust approach. It will respond to reports of empty homes, supplemented by an online offer to report and high-level assess empty properties with a clear timeline for action and staff resource to undertake formal action for prioritised cases.
- 4.2 It also allows the Council to bring in some new thinking in terms of our approach. For example, updating the online reporting form can help to undertake a high-level assessment of the property and the likely involvement of the officers. A diagnostic tool would provide some feedback on the steps officers are likely to take and this could be provided to the person making the report at the time to provide some clarity and transparency.
- 4.3 As stated in the best practice examples above, a financial assistance offer to the owner can provide a good incentive to bring an empty property back into use and evidence the Council's engagement work with owners. It is proposed that the Council adopts an interest free loan offer of £4,000 for renovation of empty

properties with a further £1,000 made available for insulation of solid external walls only. The loans are interest free and placed as a land charge against the property meaning they are repayable upon sale.

- 4.4 It is further proposed that a budget of £30,000 per annum is provided through the Individuals and Families budget for this purpose. This would align funds with the Broadland District Council offer and allow for a loan to be made available for 6-7 properties. As the loans are repayable upon sale, funds can be recycled back into the loan pot reducing further pull on budgets.
- 4.5 Another incentive will be an offer to the owner of a place on the Council's Private Sector Leasing Scheme through the Housing and Benefits team. Conditions would need to be met, such as, if the property is assessed as being in a good location, sufficient size and close to amenities in addition to requirements on rent levels set at Local Housing Allowance rates so as to be affordable and for length of time for the property to be made available to the council.
- 4.6 The model provides clarity on what kind of action may be taken and places emphasis on approach to initially engage and educate the owner, offering advice and support. It also allows for the commencement of up to four (two for BDC and two for SNC) formal enforcement procedures per year, this further reflects the council's commitment to an initially supportive, but muscular if no improvement, approach. This approach recognises that these can be very long and complex processes and also seeks to minimise any significant costs to taxpayers.
- 4.7 The enforcement procedure will be for high risk empty properties, using a robust Criteria for Action assessment that will give particular consideration to properties that have been empty for more than 5 years. It will also assess and score on property details, location, community impact and engagement with the owner. The final score will determine if a CPO or EDMO is an appropriate action to take. Where the Criteria for Action assessment provides an overall score of more than 700, this will indicate the threshold has been met for a CPO or EDMO process, scores below 700 will not be considered for enforcement. A template for the Criteria for Action Assessment can be found at Appendix B.
- 4.8 Where the threshold has been met for a CPO or EDMO process, it is proposed that approval is given for a further Financial Assessment to be completed by the Community Enforcement Officer. For an EDMO this will determine that the Council can reasonably recoup any initial costs to bring the property to a useable standard and ongoing management costs.
- 4.9 For a CPO, the financial assessment will concentrate on an evaluation of property value, in addition to allowing for indicative costs to bring the property back into use and additional compensation to be negotiated with the owner. The financial assessment will need to demonstrate that it is unlikely that there would be any significant cost to taxpayers from pursuing a CPO and/or making a voluntary offer of purchase as part of a CPO process. For example, demonstrating that the

Council would be able to recoup the vast majority of the compensation costs either from an onward sale, or from ongoing rental income.

- 4.10 The offer price of the property will be based on a surveyor's assessment based on providing a realistic quick sale price for the property. We will offer a price based on this assessment to reduce the potential cost to the Council. Whilst there will always be risk to purchasing a property, this will reduce the likely impact on the Council budget.
- 4.11 Additional expenditure to be assessed will include all indicative costs to bring a property back into use, either to a lettable standard or to make safe for resale. For an EDMO procedure, consideration will need to be given to the potential for the Council to recoup these costs through rental income. However in relation to a CPO, these costs are likely to be unrecoverable and will need to be met from budget.
- 4.12 Where more than 4 properties reach the 700 threshold, prioritisation will take place, taking into account the length of time empty, community impact and the highest scoring properties above the 700 points mark in consultation with the Assistant Director Individuals and Families and the Portfolio Holder Better Lives
- 4.13 It is further proposed that final approval to seek to undertake an EDMO or CPO process is granted by Cabinet upon presentation of the particulars of each case, including outcomes from the Criteria for Action and Financial Assessments.
- 4.14 To facilitate the Council's formal enforcement approach it is requested that the Council set aside a reserve fund of £500,000, equal to the total cost of two properties at £250,000 each, which is just under the average cost of a property in the district of £286,094¹. It should be noted that this fund would only be drawn upon should a voluntary offer of purchase be accepted and the Council is required to pay compensation to the owner prior to any further sale. Where the property is sold on, or compensation not claimed after seven years, proceeds would be returned to the reserve for further use.
- 4.15 Where a full CPO process is undertaken and approved, it is unlikely the reserve fund will be required as compensation is generally paid to the owner once the property sale has been completed.
- 4.16 In addition, it is proposed that a Housing Standards budget of £50,000 is created to bring an empty property back into use. As above the £50,000 figure is reflective of example costs for two properties and will include spend on items as outlined in 2.2.1 of the draft Empty Homes Policy. Where a CPO process is undertaken, it is highly unlikely these costs will be recoverable. However, where a property is under EDMO, it is expected that the Council will be able to recoup those costs and they will be recycled back into the budget.
- 4.17 Adopting this approach will provide clarity on the Council's commitment to tackling empty homes to officers and our residents and the process in which we will do it. It

¹ Land Registry Data March 2021

provides officers with the tools to start to take action and to work with owners through the provision of advice, support and guidance.

- 4.18 Setting approval to commence CPOs and EDMOs through a Cabinet decision provides a transparent and robust accountability framework in addition to serving as a further motivational tool to encourage owners to seek to bring their property back into use. It also evidences that while this formal enforcement is undertaken as a last resort, the Council will take a muscular approach where necessary.

5. Other options

- 5.1 Cabinet may consider an alternative approval process for commencement of CPO or EDMO procedures.
- 5.2 Cabinet may choose to consider alternative approaches to empty homes activity and enforcement. For example through greater monitoring of empty homes and a commitment to undertake a larger number of formal enforcement processes. Although this may have the potential to bring more empty properties back into use, Cabinet would need to be mindful of the necessity for a corresponding increase in staffing resource and commitment to costs.
- 5.3 Conversely, Cabinet may choose to consider reactive or less intensive approaches for example, a 'no formal enforcement' approach. However this would mean the Council would be making a clear statement on no CPO or EDMO activity. As above, this will need to be balanced against the ambitions set out in the Delivery Plan and Environmental Strategy for consistent delivery of a comprehensive housing standards enforcement service across both districts in addition to making sure our green spaces, streets and public places are clean, safe and attractive.

6. Issues and risks

6.1 Resource Implications –

- **Staffing** – Staff resource for the empty homes approach will be met within existing capacity.
- **Costs of CPO and EDMO enforcement** – Limiting consideration of formal enforcement to two properties per year seeks to minimise risk to the Council. In addition, any properties assessed as being suitable for possible EDMO or CPO action would be subject to a separate financial assessment for indicative costs. Due to the highly complex, lengthy and individual nature of CPO/EDMO action, it is difficult to provide exact costs for action at the outset. This is particularly relevant in relation to potential legal action against the Council by property owners and the final agreement of compensation to an owner through a CPO process.

- It is proposed to review the Criteria for Action and Financial Assessments every 12 months in order to reflect current costs of stamp duty etc. It will also reflect changes to legislation and best practice in addition to our own learning from undertaking these processes in order to predict as accurately as possible indicative costs. This will help to ensure that it is unlikely that there would be any significant cost to taxpayers.
- As has been stated above, this report is proposing an approval mechanism, reserve fund and costs budget to undertake EDMOs and CPOs as part of the Council's draft Empty Homes Policy. This provides clarity to officers from the outset that where assessed appropriately, an EDMO or CPO can commence following Cabinet approval, this includes at least one voluntary offer of purchase if a CPO is found to be the best course of action. If the owner accepts a voluntary offer, the reserve fund will ensure that the Council can meet that offer. The Council would then be in possession of an asset it can choose to sell, develop or manage.
- **Financial Incentives to bring properties to a decent standard/back into use -** South Norfolk does not have a budget and funding would need to be put in place through the Individuals and Families budget. It is suggested that £30,000 per annum could be made available for this purpose and will align the offer with Broadland's. Any unspent budget can be carried forward into the next financial year and topped up to the £30,000. It should also be noted that the proposed loan scheme requires that a charge is placed on the property and the loan is repaid at sale meaning that payments can be recycled into the loan pot. Costs of such schemes would need to be considered in line with the benefits of bringing a property back to a decent standard and/or into use.
- **Interdependencies with other departments –** A joined up approach to discretionary activity and enforcement in relation to empty homes will be crucial to the success of activity across the Council. There will be links into and out of other departments in order to provide a multi-agency approach is taken when tackling housing issues. It will also ensure that where needs for an individual or family are identified, these needs can be assessed and met appropriately. These links within the Council include, Environmental Protection, Planning, Housing & Benefits, the Help Hub, Council Tax and the Communications Team.

6.2 **Legal Implications** – The report presents the proposed policy direction for discretionary activity and enforcement within the Housing Standards team specifically regarding empty homes and relates to powers within legislation the Council may wish to utilise to form an additional clear and holistic approach to fulfilling its statutory duties. It also ensures that the Council can meet the requirements needed to apply for an EDMO or CPO. The policy will form part of the Councils' wider regulatory framework.

6.3 **Equality Implications** – Options contained within the report are designed to have a positive impact, including for those with one or more of the protected characteristics.

- 6.4 **Environmental Impact** – Complementary to the Housing Standards Enforcement policy, agreed options for discretionary activity and enforcement in relation to empty homes will seek to address any adverse environmental impacts that may arise as a result of a property being empty.
- 6.5 **Crime and Disorder** – The Empty Homes Policy forms part of the overall remit of the Housing Standards team. This will include reducing the potential for criminal and anti-social behaviour within and surrounding empty properties.

7. Conclusion

- 7.1 This report is presenting the Empty Homes Policy for Cabinet approval to adopt. In particular, approval is sought for the model to tackle empty homes including approach and costs of formal enforcement through a CPO or EDMO procedure. This is particularly vital for CPO procedures not only in relation to best practice guidance that the Council make at least one offer of a fair and reasonable purchase price for an empty property prior to commencing a CPO but also the unrecoverable costs that may arise from the process.
- 7.2 In addition, the one Housing Standards team has been in place for 18 months and with the Statutory Enforcement Policy approved in November 2020, there is a crucial need for an additional Empty Homes Policy. Adoption of the policy will make the best use of the staffing resource available to deliver the ambition of the Housing Standards team. In addition, agreement on approach to specific enforcement through CPOs and EDMOs will provide consistency and confidence to residents and officers.
- 7.3 The Empty Homes Policy will form part of the discretionary enforcement activity undertaken by the Housing Standards team. However it will also contribute to an overall regulatory response to enable the Council to demonstrate a holistic and muscular approach to; tackling housing issues and support our work with residents, including those who are vulnerable. An Empty Homes Policy will also feed into further strategic ambitions to ensure the quality of life for our residents and support the vision of the Environmental Strategy.

8. Recommendations

- 8.1 Cabinet to approve adoption of the Empty Homes Policy.
- 8.2 Cabinet to agree proposal that Cabinet provides approval to seek to undertake Empty Dwelling Management Order (EDMO) and Compulsory Purchase Order (CPOs) processes on a case by case basis.
- 8.3 Cabinet to approve creation within the 2021/22 financial year of:

- A reserve fund of £500,000 in order to undertake a voluntary offer of purchase as part of a Compulsory Purchase Order procedure
- A Housing Standards formal enforcement budget of £50,000 per annum
- A Housing Standards financial assistance offer budget of £30,000 per annum.

Background papers

Housing Standards Enforcement Policy

Appendix A: Overview of empty homes formal enforcement action – EDMO and CPO procedures

	Empty Dwelling Management Order (EDMO)	Compulsory Purchase Order (CPO)		
Requirements	Property must be empty for more than two years before commencement.	Must demonstrate a CPO application is a last resort process. Level of evidence needed to demonstrate last resort is high. This includes at least one voluntary offer of purchase to the owner.		
Approval body	Residential Property Tribunal	Secretary of State		
		No agreement to fund Voluntary Offer of Purchase re: CPO	Voluntary Offer of Purchase	Offer Declined - CPO procedure
Potential Costs to the Council	<p>Works to secure and bring property to a decent standard.</p> <p>Management costs of property while under EDMO</p> <p>Surplus rental income paid to the owner</p> <p>Legal costs to be paid by the Council</p> <p>Any legal costs awarded to the owner</p> <p>Liability for council tax lies with owner/tenant.</p>	None	<p>Compensation (sale value)</p> <p>Additional compensation negotiated</p> <p>Legal costs to be paid by the Council</p> <p>Works to secure and bring the property to a decent/safe standard</p> <p>Council Tax while property is empty</p> <p>Sales fees and surveyors valuation if selling</p> <p>Management/void costs if renting</p>	<p>Works to secure and bring the property to a decent/safe standard:</p> <p>Sales fees and surveyors</p> <p>Compensation (sale value) once the property is sold which is negotiated with the owner</p> <p>Additional compensation negotiated</p> <p>Legal costs to be paid by the Council</p> <p>Any additional legal costs as a result of upper tier tribunal findings against the Council</p>
Potential income to the Council	Council can recoup initial and management costs from rental income.	If empty for more than 2 years owner will be liable	Onward sale price of property including any increase in value.	Few opportunities unless costs are awarded to the council through any legal procedures or

	Empty Dwelling Management Order (EDMO)	Compulsory Purchase Order (CPO)		
		for additional Council Tax Premium	Or: Rental income	compensation is not claimed within seven years of CPO.
Outcomes	Property can be rented as part of the Council's Private Sector Leasing Scheme providing a home for a household at risk of homelessness.	Unlikely any CPO application will be approved as Council cannot demonstrate CPO is a last resort measure. Recourse to engagement work with owner.	Council has an asset. Property is brought back into use. It can be brought up to a decent/safe standard and either sold or managed as part of a housing offer providing a much needed home.	Property is compulsorily purchased. Property is brought back into use. It can be brought up to a decent/safe standard and either sold or managed as part of a housing offer providing a much needed home.
Risks	Not a permanent solution. Requirement to reapply at end of EDMO period. Opportunities for EDMO to be appealed by owner Costs to bring property back into use may be significant. May not recoup costs during rental period, Council would need to follow up with owner.	Unknown when/if property will come back into use.	If offer of purchase is accepted, council to fund purchase which is through compensation negotiated with owner. Additional compensation to be paid to the owner may be negotiated. Risk property sale may not recoup money spent by the council. If managing as rented property may not cover management/void costs.	Opportunities to appeal the process by owner ending the CPO process and risking a home remains empty. Risks that costs will be awarded against the council and that compensation agreed/mandated is more than the sale price.

Empty Homes Criteria for Action

Property										
System Ref			Assessment Date							
Position		Points	Score	Access			Years Empty			
Urban GN		150	0	Good	Good	10	0-2 yrs	5-10 yrs	0	0
Market Town / Service Village		100	0	Adequate		-20	2-5 yrs		50	0
Village		80	0	Poor		-80	5-10 yrs		300	300
Rural		0	0				More than 10 yrs		400	0
Rural Isolated		-150	0							0
Property Type				Services			Renovation in progress			
Detached	Detached	0	0	Gas	Yes	50	Yes under 2 yrs	No	-50	0
Not Detached		100	0	Electric	Yes	10	Yes over 2 yrs		100	0
				Oil	Yes	20	No		150	150
				Telephone	Yes	10				
				Mains Water	Yes	30				
				Satisfactory Sewage	Yes	20				
No of Bedrooms				Category One Hazards			No of Complaints			
1	2	100	0	None	Above 6	0	Nuisance	1	50	50
2		150	150	Between 1 and 3		40	Believed Community Impact	2	50	100
3		150	0	Between 4 and 6		60	Rats/Vermin		50	0
4		50	0	Above 6		100	Planning Enforcement		50	0
More than 4		0	0							
Garden size				Estimate of Category 2 Hazards D or E		40	Brief Estimate of Costs (don't impact on assessment at this stage)			
No Garden	10-50m2	10	0	More Than 6	More Than 6		Less than £2000	£2000 - 5000	200	0
Less than 10m ²		30	0				£2000 - 5000		150	150
10-50m ²		50	50				£5000 - £10000		100	0
More than 50m ²		10	0				£10000 - £15000		0	0
				Category Score		700	£15000 - £25000		-100	0
							Above £25000		-250	0
				Category Band		A	Estimated Property Value	£301,00-£350,000		
				EDMO/CPO		350	£0 - £150,000		200	0
							£151,000 - £200,000		150	0
							£201,00 - £250,000		100	0
							£251,000 - £300,000		0	0

Brief Estimate of Costs

Less than £2000	Less than £2000	200	0
£2000 - 5000		150	150
£5000 - £10000		100	0
£10000 - £15000		0	0
£15000 - £25000		-100	0
Above £25000		-250	0

Estimated Property Value

£0 - £150,000		200	0
£151,000 - £200,000		150	0
£201,00 - £250,000		100	0
£251,000 - £300,000		0	0
£301,00-£350,000		-100	0
£351,000 +		-150	0

Capital Gains Tax likely to be due**Column1**

£0 - £150,000
£151,000 - £200,000
£201,00 - £250,000
£251,000 - £300,000
£301,00-£350,000
£351,000 +

Column1

Not Eligible
Offered - Application progressed
Offered - Declined

Column1

Fully engaged
Engagement with support
Engagement ceased
No engagement recorded



South Norfolk Council

Empty Homes Policy

Adopted: June 2021
Review Date: June 2023

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- 2.3 Adjacent Legislation (working in partnership)
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1. INTRODUCTION

1.1. Policy Statement

The Council has a clear vision to work together to create the best place and environment for everyone, now and for future generations. This will be achieved through protecting and improving our natural and built environment, whilst maximising quality of life, supporting individuals, including those who are vulnerable, and empowering communities. This can only be realised by working collaboratively, across services, councils and external organisations.

This Empty Homes Policy feeds into these strategic ambitions. It sets out how we will work proactively, using our discretionary powers to support and advise when tackling Empty Homes giving confidence to our communities that the Council will use its resources responsibly but take action to enforce when required, demonstrating a holistic and muscular approach.

1.2. General Principles

The Council's enforcement approach is one of education first and using enforcement powers when required. Enforcement activity can be split broadly into two areas, actions where the council has a statutory duty under legislation, and actions where the Council has a discretionary power. This policy seeks to set out activity undertaken by the Council in relation to Empty Homes where the Council may act using the powers available to it through discretionary enforcement.

This Empty Homes Policy is complementary to the *Housing Standards Enforcement Policy* adopted in 2020 and forms part of the Council's overall regulatory framework. Where statutory enforcement action arises from discretionary activity, the legislation, conditions and principles as set out in the *Housing Standards Enforcement Policy* will be adhered to and referenced in this document.

As per Section 1.1 *Housing Standards Enforcement Policy*, all enforcement action, including that relating to discretionary enforcement will be based upon an objective assessment following consideration of all the facts of the matter, and will not be based on anecdotal evidence, hearsay or other subjective assessment.

All discretionary action will have regard to the Informal Action and Formal Action conditions as laid out in Section 2 of the *Housing Standards Enforcement Policy*

In addition, all action shall have regard to relevant legislation, duties and powers, codes of practice, guidance and case law periodically issued by the Government, the Chartered Institution of Environmental Health, Local Government Regulation and other relevant bodies. This also includes the Human Rights Act 1998 and the test of proportionality. Regard will also be had for departmental procedures and work instructions.

All authorised officers, when making enforcement decisions will abide by the requirements of this Empty Homes Policy in conjunction with the *Housing Standards Enforcement Policy*. Any departure from these policies must be exceptional, be capable of justification and be fully considered by the Assistant Director Individuals and Families before the decision is taken, unless there would be a significant risk to public health and/or safety by delaying the decision.

The Housing Standards team will work collaboratively with other Council departments and external organisations such as:

- Environmental Protection
- Council Tax
- Community Safety
- Food Safety and Licensing
- Help Hub
- Housing and Benefits
- Planning Enforcement
- Adults Social Care/Children's Services inc. Multi Agency Safeguarding Hub (MASH)
- Health Services
- Norfolk Fire and Rescue;
- Voluntary and Charitable Sector

This is not an exhaustive list and will be in order to determine the best approaches to tackling the issues, including formal enforcement based on assessment of circumstances. This demonstrates the Council's comprehensive and muscular approach to enforcement.

2. APPROACH TO EMPTY HOMES ACTIVITY AND ENFORCEMENT

An empty home can have a negative impact on the property, the local community and, in some cases, the wellbeing of the owner. Empty homes can also raise multiple concerns for communities, including anti-social behaviour, nuisance, and unauthorised entry and for some adjoining properties, structural or disrepair issues.

Bringing an empty home back into use can benefit everyone, owners can be better off financially as well as giving someone a much-needed new home. This also contributes to sustaining the local economy and local services while improving the outlook of the local community.

The Council will take a measured and responsive approach to reports of empty homes in the district.

The Council will:

- Provide feedback on likely action to those reporting an empty home based on an assessment of the information provided.
- Liaise with Council tax department to establish:
 - a. Owner details
 - b. Length of time property has been empty
 - c. Specific circumstances recorded as to why property is empty
 - d. Correct council tax banding has been applied, including any applicable discounts or premium.
- Make contact or take steps to trace property owners
- Undertake a visit to the property to assess site and property condition, including evidence of anti-social behaviour

2.1 Informal Action

The Council will make an offer of support to the owner to assist with bringing the home back into use. This can include:

- Advice and guidance
- Financial Assistance, where appropriate:
 - Provision of a letter for properties empty for longer than 2 years to allow building works to take place at a reduced VAT rate of 5% or as HRMC proscribes at the time.
 - An interest free loan of £4,000 for renovation of empty properties, a further £1,000 can be made available for insulation of solid external walls only. Loans are placed as a land charge against the property and are repayable upon sale.
- An offer for the property to be let through a Private Sector Leasing Scheme managed through the Housing and Benefits team, subject to the following conditions:
 - a. The property is leased to, and managed by the Council for a minimum two year period

- b. The property is let to a household on the housing list or to enable the Council to discharge a duty under the Housing Act 1996 as amended by the Homelessness Reduction Act 2017.
- c. The property is let where there is demonstrable practical use for a home in that area subject to assessment of property size, location, access to amenities.
- d. Property is let at the Local Housing Allowance rates to allow for affordability
- e. The Council will fund the costs of any works to bring the property to a decent standard not exceeding the equivalent value of 6 month's rent.
- f. Rent is guaranteed to the owner, minus the Council recouping the cost of works to bring to a decent standard and paid 6 monthly in advance.

2.2 Formal Action – Compulsory Purchase Order and Empty Dwelling Management Order

The Council provides resource for a Community Enforcement Officer to explore formal enforcement, namely an Empty Dwelling Management Order (EDMO) under the Housing Act 2004 or Compulsory Purchase Order (CPO) under the Housing Act 2004 and/or Town and Country Planning Act 1990, for up to two properties per year.

2.2.1 Criteria for Action and Financial Assessments

These properties will be identified for prioritisation using a Criteria for Action Assessment. The Assessment will score on:

- Length of time empty, (particular consideration given to properties empty for longer than 5 years)
- Community impact – Nuisance, Anti-Social Behaviour
- Category One or Category Two hazards present
- Location
- Property size
- Access to utilities
- Engagement with the owner/person responsible for the property
- Renovations in progress

This assessment will also help to determine which enforcement action would be most appropriate. Where the Criteria for Action assessment provides an overall score of more than 700, this will indicate the threshold has been met for a CPO or EDMO process to be explored. Scores below 700 will not be considered for enforcement. This assessment will also help to determine which enforcement action would be most appropriate.

Properties scoring above 700 will be subject to a further financial assessment considering:

Compulsory Purchase Order	Empty Dwelling Management Order
<i>Costs associated with bringing the property to a useable standard</i>	<i>Costs associated with bringing the property to a useable standard</i>
Repairs/maintenance required to correct hazards and bring the property to a safe standard, where applicable.	Repairs/maintenance required to correct hazards and bring the property to a useable standard
Property/Grounds clearance and removals/Storage costs	Property/Grounds clearance and removals/storage costs
Costs to secure the property	Costs to secure the property
<i>Costs associated with the sale of the property</i>	<i>Costs associated with the letting and management of the property</i>
Market value of property	Estimated Rental Income
Costs to market the property for sale	Void costs
Stamp duty	Property management costs
<i>Compensation and Legal costs</i>	<i>Legal costs</i>
Compensation to be paid to the owner/person responsible for property (property sale price) Either with voluntary offer of purchase or following vestment of CPO	Legal Costs (Council)
Additional compensation costs negotiated with owner/person responsible for property	Further legal costs awarded against the Council
Legal Costs (Council)	
Further legal costs awarded against the Council	
Public Notices	

Table 1: Costs to be considered when bringing enforcement action

For an EDMO this will determine that the Council can reasonably recoup any initial costs to bring the property to a useable standard and any ongoing management costs.

For a CPO, the financial assessment will concentrate on an evaluation of property value based on surveyor evaluation, in addition to allowing for indicative costs to bring the property back into use and additional compensation to be negotiated with the owner. The financial assessment will need to demonstrate that it is unlikely that there would be any significant cost to taxpayers from pursuing a CPO and/or making a voluntary offer of purchase as part of a CPO process.

Where more than 2 properties reach the 700 threshold, prioritisation will take place, taking into account the length of time empty, community impact and the highest scoring properties above the 700 points mark in consultation with the Assistant Director Individuals and Families and the Portfolio Holder for Better Lives.

The Criteria for Action and Financial Assessments will provide direction on the use of the property once an EDMO or CPO has been approved by the relevant authority.

EDMO:

- Let and managed by the Council as part of the Housing & Benefit's Private Sector Leasing Scheme
- Offer to an external management company to let the property on behalf of the Council

CPO

- Sale of the property through the open market
- Purchase by the Council as an asset to be used as per EDMO above

The Criteria for Action assessment will be reviewed annually.

2.2.2 Authorisation to commence formal enforcement

Approval to seek to undertake an EDMO or CPO processes will be granted by Cabinet upon presentation of the particulars of each case, including outcomes from the Criteria for Action and Financial Assessments.

2.3 Adjacent Legislation (working in partnership)

The Housing Standards team will work collaboratively with Environmental Protection to determine if issues arising as a result of an empty home require formal action under Environmental Protection legislation. This may include, but is not limited to, the issuing of a Community Protection Notice (CPN) to help rectify any such issues.

The Housing Standards team will work collaboratively with the Planning team to determine if issues arising as a result of an empty home are detrimental to the amenity of the local area. This may result in issuing a notice under section 215 of the Town and Country Planning Act 1990.

In relation to this section 2.3, where the conditions of any notice are not met within the specified time, the Council may seek to undertake works in default as determined within section 2.2.12 of the *Housing Standards Enforcement Policy*

The Housing Standards team may consider an Enforced Sale Procedure where a debt arises through the property as a result of action taken by the Housing Standards team. Where a debt arises in relation to other Council functions, for example Council Tax, the Policy as laid out by that function will be followed.

2.4 Empty Homes Data

Elected Members will be provided with numbers of empty homes at town/parish level as part of quarterly performance reporting. This will be for properties empty for longer than two years and for total numbers. It will not identify individual properties.

HOUSES IN MULTIPLE OCCUPATION DISCRETIONARY ACTIVITY POLICY

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Portfolio: Better Lives

Ward(s) Affected: All

Purpose of the Report:

To present the draft Housing Standards Houses in Multiple Occupation Discretionary Activity Policy for Cabinet approval for adoption.

Recommendations:

1. Cabinet to approve adoption of the Houses in Multiple Occupation Discretionary Activity Policy.
2. Cabinet to approve amending an existing vacancy from Band E to Band F enabling recruitment to 1fte Community Enforcement Officer post.

1. Summary

- 1.1 The Council's Environmental Strategy 2020-2025 sets out a clear five year vision to create the best place for everyone now and for future generations, with a key priority to protect our natural and built environment, such as open spaces, parks, homes and places of work and leisure, while maximising quality of life. One of the approaches to achieving this is through making sure our green spaces, streets and public places are clean, safe and attractive.
- 1.2 In addition, one of the Councils key functions is to ensure the quality of life of residents. This work is delegated across the Councils' various functions which includes, housing, planning, community services and environmental protection. Within the housing standards enforcement remit sits specific requirements around Houses in Multiple Occupation (HMOs) Empty Homes, Gypsy and Travellers and ensuring safe living conditions in the rental sector. The remits feed into, and works closely with, the wider enforcement functions of the Council under a broad regulatory framework.
- 1.3 The Council's Housing Standards Enforcement Policy for **statutory** enforcement was agreed in November 2020. However, the Council also has a number of **discretionary activities and powers** that can be drawn upon through the housing standards team. In relation to HMOs this can be a means to maintain and improve living conditions and detect illegal activity; such as modern slavery.
- 1.4 This report presents the Houses in Multiple Occupation Discretionary Activity Policy which details the proactive approach the Council will take in identifying and monitoring HMOs outside of the Council's statutory functions.
- 1.5 The approach is aimed at being clear and transparent to residents about the action we can take, and when we will take these actions, but also give confidence to our communities that the Council will take action to enforce when required. In addition it will provide clarity and alignment in the direction of the one Housing Standards team while forming part of a wider policy structure and service offer to support residents including those who are vulnerable. This is in addition to being part of a wider council response to maintain and improve our environment.

2. Background

- 2.1 The Council has a number of statutory duties in relation to Houses in Multiple Occupation (HMO's), this includes being the licensing authority for any HMO's. A house is considered an HMO if both of the following apply:
 - At least three tenants live there, forming more than one household, and
 - Facilities such as a toilet, bathroom or kitchen are shared with other tenants.

- 2.2 From April 2018, the mandatory licensing requirements for HMOs were extended to properties that are occupied by five persons or more forming more than one household, regardless of the number of storeys. A licence is also required for any purpose build flats where there are up to two flats in the block and one or both are occupied as an HMO, including flats above or below shops and other businesses. Councils can levy a fee for the provision of a five year licence and in South Norfolk this is £825.
- 2.3 The Council is also responsible for ensuring HMOs meet mandatory requirements as laid out in the Housing Act 2004 and associated regulations, this can include areas around minimum space standards, facilities, property condition and fire safety, for example escape routes.
- 2.4 In addition, the Council during the course of its activities may be in a position to identify HMOs, including those above commercial premises that are being used for the purposes of housing victims of modern slavery. Accommodation of this type tends to be overcrowded, substandard and may put occupants at significant risk.

3. Current position/findings

- 3.1 In South Norfolk there are currently 30 licensed HMOs and approx. 35 known unlicensed HMOs in that they do not meet the conditions for requiring a licence.
- 3.2 Prior to the Covid-19 outbreak, the Housing Standards team took a mainly reactive approach to working with HMOs. This includes undertaking the licensing process and responding to reports of potentially licensable properties and queries regarding standards of accommodation.
- 3.3 This would also include responding to any concerns relating to modern slavery activity including reports through the Council's licensing teams and the environmental protections teams. If a premises should be identified as being connected to modern slavery, a multi-agency approach would be adopted linking the council as a first responder, the police, and relevant social services departments etc. Under the Modern Slavery Act 2015, the Council also has a duty to notify the Home Office of potential victims of modern slavery. Additionally, the Council is represented on the Norfolk Anti-Slavery Network, which seeks to enhance the response to modern slavery and human trafficking in Norfolk.
- 3.4 During the initial pandemic period in March-June 2020, staff resource to undertake enforcement activity was restricted due to lockdown requirements meaning that visits were only undertaken where absolutely necessary. In addition staffing levels were impacted due to the redeployment of members of the Housing Standards team to support the council's community response to Covid-19.
- 3.5 However, as part of the Councils involvement in implementing local outbreak management plans in response to a number of outbreaks in factories, an

opportunity was discovered through the test and trace process for those employees, to identify previously unknown HMOs within the district. This identified 11 potential HMOs in Broadland and 43 in South Norfolk. For all properties identified the team liaised with the Council tax team to share information on the number of potential occupants and every property was followed up / investigated. This included; sending formal Notices to the owner / landlord of each property requesting details on the number of occupants and arranging visits, where possible due to lockdown circumstances, where the Council had information concerning unsatisfactory conditions.

- 3.6 As a result of the follow up action, three HMO licences have been issued at Broadland and six at South Norfolk. Further HMO licence applications have been made and licences are in the process of being issued. As restrictions ease, if sufficient resources are in place the Council will undertake further inspections. It should also be noted that during the first lockdown the Housing Standards team had the assistance of two leisure centre employees who were tasked with identifying HMO's using internet property searches, site observations, etc. This process identified seven potential HMO's in Broadland and twelve in South Norfolk and provides an example of additional resource enabling a proactive approach to identifying HMOs.

4. Proposed action

- 4.1 The HMO discretionary activity model outlined within the policy will embed the work that began as a result of the pandemic and allow the housing standards team to proactively identify and inspect all HMOs in the districts. This will enable the development of a register of all HMOs in Broadland and South Norfolk, encompassing both those who require or do not require a licence, with a corresponding inspection regime. Priority will be given to high risk properties for example, those above commercial premises and those properties associated with risk of modern slavery e.g. car washes nail bars, restaurants and agricultural workers.
- 4.2 Adopting this approach means that officers can actively work with landlords to reduce risk and potential escalation of hazards, ideally before it gets to the point where they would have been reported to us. It also provides opportunities for statutory enforcement work where this is necessary, including supporting licence applications where appropriate. It could result in the levying of a fine through a civil penalty process where there is strong evidence of non-compliance. This will ensure that HMOs provide a safe place to live for our residents. In addition, officers will be well placed to feed into work to identify where there may be instances of modern slavery.
- 4.3 Following the successful work as part of the pandemic, there is an opportunity for proactive work to be undertaken in partnership with local businesses where it is likely there is increased incidence of employees living in HMOs. This would increase the visibility of the Housing Standards team, improve knowledge of

mandatory living standards for tenants and where to seek support and increase identification of HMOs.

- 4.4 In order to meet the ambitions of this model and to build resilience into the Housing Standards team, the Council is seeking Cabinet approval to recruit to 1fte Community Enforcement Officer post at Salary Band F. Currently, there is an existing vacancy within the Housing Standards team for 1fte Housing Technical Officer which sits at salary Band E and it is proposed to repurpose this vacancy to allow for the recruitment of a Community Enforcement Officer.
- 4.5 There would be an increase in salary spend to facilitate this role up to £3,436 inc. on-costs if appointed at the mid-point range. This increase can be met through savings within the Individuals and Families budget and would ensure that staff resource within the team can deliver a comprehensive approach to enforcement.
- 4.6 In addition, to provide further capacity to allow for the initial roll out of HMO discretionary activity, a further temporary role is to be recruited to. This 0.5fte Community Enforcement Officer post will be in place for two years and will be funded through the COVID-19 Outbreak Management Fund.
- 4.7 Together, the two posts will ensure that the forward thinking and proactive approach enabled last year can be permanently adopted within Housing Standards. The additional capacity will provide an opportunity for the Council to develop good working relationships with HMO landlords meaning that issues can be identified and rectified sooner. This is particularly relevant in seeking to engage with the landlords of the additional HMOs identified as a result of the pandemic.
- 4.8 A preventative approach benefits all, from our residents in terms of a safe place to live, landlords in terms of costs and the council, as it reduces the need for formal enforcement. In addition, existing knowledge and skills within the team will provide resilience if needed.

5. Other options

- 5.1 Cabinet may choose to not to undertake discretionary activity in relation to HMOs. However, this risks undoing the strides taken to identify HMOs last year. It means unknown HMOs could continue to operate in our districts, including those that, whether by accident or design, place our residents at risk or seek to exploit those who are vulnerable.

6. Issues and risks

6.1 Resource Implications –

- **Staffing** – As noted above, for the Community Enforcement Officer post, it is proposed that an existing 1 fte Housing Technical Officer (Band E) vacancy is

repurposed to a Community Enforcement Officer (Band F) position which will provide resource to deliver the activities contained within this report in addition to the provision of additional enforcement capacity within the Housing Standards team. There is will require a small increase in salary spend which can be found within savings in the Individuals and Families budget. A second temporary 0.5fte post will be met through the COVID-19 Outbreak Management Fund.

- **Interdependencies with other departments** – A joined up approach to discretionary enforcement in relation to HMOs will be crucial to the success of activity across the Council. There will be links into and out of other departments in order to provide a multi-agency approach is taken when tackling housing issues. It will also ensure that where needs for an individual or family are identified, these needs can be assessed and met appropriately. These links within the Council include, Environmental Protection, Housing & Benefits, the Help Hub, Council Tax and the Communications Team.

- 6.2 **Legal Implications** – The report presents the proposed policy direction within the Housing Standards team specifically regarding HMOs, and relates to powers within legislation the Council may wish to utilise to form an additional clear and holistic approach to fulfilling its statutory duties. The policy will form part of the Councils' wider regulatory framework.
- 6.3 **Equality Implications** – The Houses in Multiple Occupation Discretionary Activity Policy is designed to have a positive impact, including for those with one or more of the protected characteristics. This could include younger people who are more likely to live in HMOs and those on lower incomes. In addition, victims of modern slavery can vary in terms of gender, race, age and disability depending on the type of industry in which they are victims of.
- 6.4 **Environmental Impact** – Complementary to the Housing Standards Enforcement policy, agreed options for discretionary activity in relation to HMOs will seek to address any adverse environmental impacts that might arise from poor housing conditions.
- 6.5 **Crime and Disorder** – The Houses in Multiple Occupation Discretionary Activity Policy forms part of the overall remit of the Housing Standards team. This will include proactively identifying enforcement needs to help keep residents living in HMOs safe and to contribute to work to identify incidents of modern slavery.

7. Conclusion

- 7.1 This report is presenting the Houses in Multiple Occupation Discretionary Activity Policy for Cabinet approval for adoption. Although this activity is undertaken by the Housing Standards team it also forms part of an overall regulatory response to enable the Council to demonstrate a holistic and muscular approach to; tackling housing issues and support our work with residents, including those who are

vulnerable. It also feeds into wider strategic ambitions to ensure the quality of life for our residents and support the vision of the Environmental Strategy.

8. Recommendations

- 8.1 A Cabinet to approve adoption of the Houses in Multiple Occupation Discretionary Activity Policy.
- 8.2 Cabinet to approve amending an existing vacancy from Band E to Band F enabling recruitment to 1fte Community Enforcement Officer post.

Background papers

Housing Standards Enforcement Policy



South Norfolk Council

Houses in Multiple Occupation Discretionary Activity Policy

Adopted: June 2021
Review Date: June 2023

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1. INTRODUCTION

1.1. Policy Statement

The Council has a clear vision to work together to create the best place and environment for everyone, now and for future generations. This will be achieved through protecting and improving our natural and built environment, whilst maximising quality of life, supporting individuals, including those who are vulnerable, and empowering communities. This can only be realised by working collaboratively, across services, councils and external organisations.

This Houses in Multiple Occupation Discretionary Activity Policy feeds into these strategic ambitions. It sets out how we will work proactively, using our discretionary powers to provide advice and guidance for landlords and tenants of Houses in Multiple Occupation (HMOs) giving confidence to our communities that the Council will use its resources responsibly but also taking action to enforce when required, demonstrating a holistic and muscular approach.

1.2. General Principles

The Council's enforcement approach is one of education first and using enforcement powers when required. Enforcement activity can be split broadly into two areas, actions where the council has a statutory duty under legislation, and actions where we have a discretionary power. This policy seeks to set out activity undertaken by the Council in relation to Houses in Multiple Occupation.

This Houses in Multiple Occupation Discretionary Activity Policy is complementary to the *Housing Standards Enforcement Policy* adopted in 2020 and forms part of the Council's overall regulatory framework. Where statutory enforcement action arises from discretionary activity, the legislation, conditions and principles as set out in the *Housing Standards Enforcement Policy* will be adhered to and referenced in this document.

As per Section 1.1 *Housing Standards Enforcement Policy*, all enforcement action, including that relating to discretionary enforcement will be based upon an objective assessment following consideration of all the facts of the matter, and will not be based on anecdotal evidence, hearsay or other subjective assessment.

All discretionary action will have regard to the Informal Action and Formal Action conditions as laid out in Section 2 of the *Housing Standards Enforcement Policy*

In addition, all action shall have regard to relevant legislation, duties and powers, codes of practice, guidance and case law periodically issued by the Government, the Chartered Institution of Environmental Health, Local Government Regulation and other relevant bodies. This also includes the Human Rights Act 1998 and the test of proportionality. Regard will also be had for departmental procedures and work instructions.

All authorised officers, when making enforcement decisions will abide by the requirements of this Houses in Multiple Occupation Discretionary Activity Policy in conjunction with the *Housing Standards Enforcement Policy*. Any departure from these policies must be exceptional, be capable of justification and be fully considered by the Assistant Director Individuals and Families before the decision is taken, unless there would be a significant risk to public health and/or safety by delaying the decision.

The Housing Standards team will work collaboratively with other Council departments and external organisations such as:

- Environmental Protection
- Council Tax
- Community Safety and
- Food Safety and Licensing
- Help Hub
- Housing and Benefits
- Planning Enforcement
- Adults Social Care/Children's Services inc. Multi Agency Safeguarding Hub (MASH)
- Health Services
- MAST – (Missing, Adult sex working, Slavery, Trafficking);
- The Norfolk Anti-Slavery Network
- Norfolk Fire and Rescue;
- Norfolk Constabulary, in particular 'Safeguarding & Investigations Command'
- Voluntary and Charitable Sector

This is not an exhaustive list and will be in order to determine the best approaches to tackling the issues, including formal enforcement based on assessment of circumstances. This demonstrates the Council's comprehensive and muscular approach to enforcement.

2. APPROACH TO HOUSES IN MULTIPLE OCCUPATION DISCRETIONARY ACTIVITY

2.1 Function of Houses in Multiple Occupation

A well-managed HMO provides a vital function in offering a low cost accommodation option for people such as, single people, those who are younger, people on low incomes, people who don't want to live alone or need accommodation for working or studying away. In addition, HMO rents tend to have bills included meaning it is easier to budget and tenants feel able to approach their landlord and have confidence that any issues will be swiftly resolved.

Less well-managed HMOs can at the very least provide an uncomfortable living space, due to issues around space standards, lack of washing and cooking facilities and lack of privacy. At the extreme end, HMOs can be hazardous and a risk to health and life, they can provide opportunities for exploitation of people with vulnerabilities as they may have less choice in alternative accommodation options or feel able to complain. HMOs can also be sites for criminal activity including modern slavery.

The Council has a number of statutory duties in relation to HMOs under:

- House in Multiple Occupation (HMO) Mandatory Licence (Housing Act 2004)
- The Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018
- The Licensing of Houses in Multiple Occupation (Prescribed Description) (England) Order 2018

As set out in Section 2 of the *Housing Standards Enforcement Policy* and as above, the Council's approach is to seek to advise and support landlords to manage licensed (where applicable) properties that meet, or exceed mandatory requirements. A robust approach to enforcement will be taken for non-compliance.

2.2 Discretionary Activity for Houses in Multiple Occupation (HMOs)

The discretionary activity is as laid out in Section 2 of this Houses in Multiple Occupation Discretionary Activity Policy is complementary to the statutory duties. It sets out the proactive approach the Council has adopted in order to comprehensively manage HMOs in the district to ensure that:

- The Council has detailed knowledge of HMOs in the district.
- All HMOs requiring a licence have the opportunity to submit an application
- A preventative approach is maintained, seeking to identify potential hazards or issues before statutory intervention is required
- Tenants of HMOs are living in safe accommodation and any vulnerabilities are not exploited.
- Tenants are able to access a full range of support where necessary
- Strong, open relationships with HMO landlords, tenants, specific large employers and external support organisations are developed
- The Council is well regarded for having a supportive, but muscular approach to enforcement.

- Intelligence gathered by the Council supports actions to identify and eliminate disreputable practices by some landlords, unsafe living conditions and modern slavery.

2.3 Houses in Multiple Occupation Discretionary Activity Model

The HMO discretionary activity model comprises:

- Community Enforcement Officer staff resource working across Broadland and South Norfolk districts to proactively identify and inspect all HMOs.
- A target of 30 properties per year across both districts to be identified. This figure to be reviewed annually.
- A register of all HMOs across the district
- A proactive inspection regime for all HMOs
- Prioritisation given to high risk properties, for example those at increased risk of fire and those associated with risk of modern slavery.
- Partnership work with local businesses where it is likely there is increased incidences of employees living in HMOs
- Partnership working with other council departments and external organisations for the provision of additional guidance and support where needs are identified, particularly for those who are vulnerable and/or believed to be victims of modern slavery.

Where the need for formal enforcement action is identified, this will be undertaken as part of the Council's statutory duties under the *Housing Standards Enforcement Policy*

Review of the Councils temporary stopping place for Gypsies and Travellers

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Portfolio: Better Lives

Ward(s) Affected: All

Purpose of the Report:

The purpose of this report is to outline the proposal to restart the temporary stopping place (TSP) as part of the Councils overall policy towards gypsies and travellers, to support all members of our community, and ensure a robust but proportionate response to unauthorised encampments when needed.

Recommendations:

1. Cabinet agree to delegate the redesign and management plan of the TSP up to £125,000, to the Assistant Director of Individuals and Families, in consultation with the portfolio holder for Better Lives.

1. Summary

- 1.1 The Council's Environmental Strategy 2020-2025 sets out a clear five year vision to create the best place for everyone now and for future generations, with a key priority to protect our natural and built environment, such as open spaces, parks, homes and places of work and leisure, while maximising quality of life.
- 1.2 Where a Council chose to invest in a TSP, the options for dealing with unauthorised encampments are substantially enhanced, particularly when this has a high community impact. It allows the Council and partners to speed up the movement of unauthorised encampments by having a place to move families too. Specifically, the Police can enact section 62A-E of the Criminal Justice and Public Order Act 1994, this can only be used where a TSP is available for use. Furthermore, section 61-62 and section 77-78 of the same act, provides Police and South Norfolk Council the option to move on families from an unauthorised site more quickly than if the Council did not have a TSP.
- 1.3 This report provides the background to the site and highlights the issues associated with managing a successful TSP and outline the plans to opening up the site as soon as reasonably practical.

2. Background

- 2.1 Local planning authorities are required by national planning policy in *Planning Policy for Traveller Sites* to prepare and maintain an up to date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan. This work should be undertaken in collaboration with neighbouring local planning authorities.
- 2.2 In January 2020, the Council reported that there were 101 permanent pitches and six temporary pitches available in the district. This information is compiled as part of the National Gypsy and Traveller Count. The count included a number of private sites that have been developed by and for the use of specific gypsy and traveller families in the district. In addition, the count includes the eight pitches on the permanent site at Brookes Green, which is managed by Broadland Housing Group, the Bawburgh TSP and Roundwell Park in Costessey which is sited on Council owned land that is leased to Norfolk County Council.
- 2.3 The Bawburgh TSP was developed and brought into use in 2014 in recognition of some of the long-standing unauthorised encampments in the area. The site provides six pitches for families in need of somewhere to stay for up to six weeks, although the period of stay can, in special circumstances, be extended to twelve weeks. The land on which the TSP is built was purchased from Norfolk County Council for £5,000. The cost of the land and the subsequent development costs were partially funded by a £250,000 Innovation Grant from the now defunct GO East. The balance of costs was met by South Norfolk Council.

3. Current position/findings

- 3.1 Since 2014 there have been ongoing issues relating to the operation and utilisation of the Bawburgh TSP which has led to its closure from July 2020 to present. The issues are complex and interrelated.

Homelessness

- 3.2 The purpose of the TSP is to provide a short-term stopping place for the use of gypsy and traveller families who are staying in the area for a short period of time. However, it is widely recognised that a number of the extended families who have stayed on the site for periods of varying length in recent years, do so because they say they have no permanent place to stay. This is despite the fact that some own land and buildings elsewhere in the County, which for various reasons they are unable to occupy.
- 3.2 A few of the families in question have formed an attachment to the TSP and have come to identify with it as being theirs to use as and when they wish. Thus far it has proved impossible to break this link between the TSPs intended use and the past unauthorised encampments. As a result the site has rarely fulfilled the purpose for which it was designed. This is not uncommon, and it is often the case that temporary sites end up meeting much longer term needs rather than those who are passing through an area for work. This situation is reflected in the Greater Norwich Local Plan assessment that identifies a deficit of permanent sites available in the Greater Norwich area.
- 3.3 The Council has a statutory duty under part seven of the Housing Act 1996 to assist Gypsies and Travellers and others if their accommodation 'consists of a movable structure, vehicle or vessel designed or adapted for human habitation and there is no where they are entitled or permitted both to place it and to reside in it'.
- 3.4 In order to meet this statutory duty the Council has made provision in its current Housing Allocations Scheme for gypsies and travellers (as defined in the Caravan Sites Act 1968) to be afforded a local connection and are therefore eligible to apply for a vacancy on the permanent site at Brookes Green or for bricks and mortar housing. Our Housing Solutions team works closely with our Housing Standards team as part of our integrated approach to support those gypsies and travellers who wish to apply for settled housing to do so. Since the closure of the site, of the families who were regularly using the TSP, three family groups have been re-housed into settled accommodation by the Council.

Refusal by site residents to sign the relevant licences

- 3.6 The TSP is in effect emergency temporary accommodation it is often the case that people move onto the site before they have signed the relevant documentation. Although not always the case, it has often proved difficult to secure signatures retrospectively. Often the reasons for refusing to sign agreements relate to the condition of the site including the amount of waste present. This is of course a situation that has most likely been created by residents and any unauthorised occupants on the site themselves.

Unsanctioned use of the site by others

- 3.7 From the outset the TSP suffered frequent incursions by gypsies and travellers who have not been approved by the Council. These incursions are normally only identified when an officer has undertaken a routine visit to collect rent, check on the legitimate occupants and the condition of the site. At the point when the site was closed in 2020 there was only one authorised tenant (who was evicted) whilst others on the site were there illegally. This had been the pattern of usage at the site leading up to its closure.

Non-payment of Security Deposit and Rent

- 3.8 The site agreement which should be signed by all occupants on the site requires payment of £40 rent per week per pitch. This charge includes the cost of provision of a communal cold-water supply and portable toilets. The weekly rent is modest by comparison to that charged by some other authorities, although in those cases it may be that additional facilities such as bathing are also provided.
- 3.9 Collection of rent has often been problematic at the TSP with periods of time when occupants have failed to pay any rent at all. Reasons given for non-payment of rent have included affordability and concerns about the condition of the site and the Councils alleged failure to improve those conditions. However, the Council for its part has challenged these allegations sighting the frequent accumulation of fly tipping on the site by the occupants, as being the primary reason for the poor conditions.

Flytipping and Burning of Waste

- 3.10 The nature of the business of some of the occupants of the TSP over the years has included waste clearance from residential homes and commercial premises. In addition there is demonstrable evidence that cable stripping and other such activities to retrieve valuable metals for re-sale were common place on the site. Since opening, the site has had to be cleared of waste and toxic materials on several occasions. This has been at considerable cost to the Council. The clean-up of the site following its most recent closure resulted in 24 tonnes of material being removed at a cost of £4,910.

Provision of Toilet Facilities

- 3.11 When the TSP is occupied the Council provides rented portable toilet facilities at a cost of £20 per unit per week. Normally two portable toilets are provided however since the time of the COVID 19 Pandemic the number of units on site was increased to three.

Oversight and Management of the TSP

- 3.14 The TSP was originally sited in Bawburgh in recognition of the long historic pattern of short-term visits by gypsies and travellers whilst working in the area. The actual site had also been a long-standing tolerated site whilst in the ownership of Norfolk County Council. At that time the primary use of the land was storage of highways materials. This meant that when the land was unavailable to gypsies and travellers they would stop on the roadside on Long Lane instead.

Design of the TSP

- 3.18 The TSP is a large open concrete pad surrounded on three sides by gabions and on the fourth side by a low level metal chain link fence. Individual pitches are not defined spaces and as a result it is impossible to hold individual residents to account for the collective accumulation of waste. The size, orientation and planning restrictions previously applied to the site mean it is unlikely to ever be used as a permanent site without significantly reducing the number of pitches.
- 3.22 The cost of managing the TSP is currently £20,000 per annum, this equates to 0.4fte of a Community Enforcement Officer and includes on costs. The cost of grounds maintenance of the site since it opened in 2014 amounts to £30,000. The majority of this cost arose from various site clearances over the years but also includes repairs to the infrastructure of the site. The cost of toilet facilities on the TSP has amounted to £7,086 since 2014. This cost is predominantly for the rental of the portable toilets but also includes the cost of flushing them out when they become blocked.

4. Proposed action

- 4.1 Reopening the TSP is part of our wider protocol for working with gypsies and travellers and the Council will continue to support the ongoing work of the Greater Norwich Local Plan to identify future sites to meet unmet need. As well as reopening the site, the proposal will strengthen our team to manage unauthorised encampments in South Norfolk, with the TSP helping to speed up evictions of unauthorised sites. A diagramme of the process of our wider protocol is at appendix one.
- 4.2 The reopened site will have significant improvements made to the security of the site and will include a robust management plan to ensure that past issues of the site are not repeated.
- 4.3 Officers plan to re-open the site in Bawburgh as soon as practical following redesign and consulting with local stakeholders. This work is in progress with the proposal seeing the TSP having the following improvements:
- Improve the lay out of the site in order to clearly define the areas individual families are responsible for thus enabling more effective management
 - Improvements to site security including access arrangements, CCTV and effective site fencing and access barriers
 - Improved clothes washing, toilet and bathing facilities in order to bring them up to acceptable TSP standards
 - Enforce the six weeks maximum length of stay with an extension to three months only approved by the Assistant Director in correspondence with the Portfolio Holder.
 - Increase the rate to £50 per week as the price has not increase since the initiation of the TSP and this amount is on par with similar sites.
 - Creating a management plan for the site that is fully resourced and is integrated with our wider operations to deal with unauthorised

encampments. A management plan will be developed alongside the physical improvement to the site and will include increasing the Community Enforcement Team to ensure we have the right level of resource available. These changes will ensure:

- we have the right skills and resource to deal with families on site, ensuring their welfare but compliance with the sites standing orders. A review of existing staff is being carried out and we will increase the resource as necessary to deal with the TSP and wider enforcement with skills specifically around dealing with enforcement action.
- deal with unauthorised encampments swiftly through the Norfolk protocol to minimise the impact on the local community and environment.
- taking enforcement action in a more timely manner; preventing unauthorised use of the site.
- maximising income from the site through being clear who is on the site at any given time and recording entrance and exit and so it is identifiable perpetrators of damage to the site or environmental crime
- provide additional support for those families who are in effect homeless and need a longer-term housing solution

Enforcement action

- 4.4 CCTV will be installed which will be robust enough to ensure that we can record exactly who comes on and off the site, including times and dates. Barriers will be installed at the entrance which will mean it will be difficult to break into the site and authorisation will be needed before staying on site. The site will be visited within one working day of the site being utilised to record details and collect payment. This will also include providing clear communication on the site rules and action if these are not adhered to. Refusal to comply, pay or suspicion of crime will result in an immediate order to the family to leave. While families are on site, CCTV will be checked daily and at least two physical visits a week (or more if required) to check on the state of the site and deal with any issues.

Management plan

- 4.5 A management plan will include a range of measures outlined above and will include an assessment of their intentions after leaving the site to ensure there is a clear understanding of what their move on plans will be. We will nominate specific staff resource to ensure we are able to work with partners to share information about enforcement, welfare needs and move on.
- 4.6 A management plan will include a range of measures outlined above and will include an assessment of the intentions of travellers after leaving the site. The Council will then be in a position to share information about enforcement, welfare needs upon the departure of the site by the travellers.
- 4.7 The benefits to this proposal will be that the Council continue to deliver against its obligations to provide accommodation options for Gypsies and Travellers whilst improving the on-site facilities. The offer to gypsies and travellers on the TSP will be considerably improved and income from the site will increase

- 4.8 The capital costs to the site improvements will be fully identified through the resign of the site. However, we are expecting this cost to no higher than £125,000 with £114,000 agreed in the capital budget this for 21/22 as an estimated cost subject to final specification and tender process.
- 4.9 The site is operated and funded by the Council for sole use of dealing with unauthorised encampments in the district of South Norfolk. The security measures that will be introduced will ensure that no family can enter the site without prior approval from Officers of the Council. Policing powers, particularly section 62A-E of the Criminal Justice and Public Order Act 1994 allows the Police to directing a family onto a TSP only where one is available. It is proposed that the Council limits the use of this site to unauthorised encampments in our district. Therefore, the Police will only be able to direct families to the TSP if they are within South Norfolk district and with prior agreement of the Council
- 4.10 Should an exceptional issues arise in another district where they require the use of our TSP, then a legal agreement for use will be created by Officers to protect our assets and the funds that we have invested in the site.

5. Other options

- 5.1 The Council could seek plans to sell the site or to lease to an individual family which would bring in additional finance to the Council but would reduce our capacity to deal with unauthorised encampments

6. Issues and risks

- 6.1 There would be significant risks to the Councils reputation if it reopens the TSP at Bawburgh without investing additional resources. Equally if the Council decides to permanently close the TSP without ensuring the same level of overall provision that was provided up until mid-2020 this could be perceived as a retrograde step for the Council.

Resource Implications

- 6.2 Capital resources identified in this report have been approved by Cabinet with additional staffing resource being consumed within the wider savings of the Sub-directorate.

Legal Implications

- 6.3 The Council has a range of enforcement powers for dealing with illegal and unauthorised encampments that can be utilised in order to tackle illegal encampments. These powers include Section 77 of the Criminal Justice and Public Order Act 1994.

Equality Implications

- 6.4 Gypsies and travellers are protected from discrimination by the Equality Act 2010 together with other ethnic groups who have a particular culture, language and values. Romani Gypsies and Irish Travellers have been held to be separate 'ethnic groups' and therefore have protected characteristics under the legislation on the basis of their ethnic origin.

- 6.5 The Council's legal obligations in relation to the provision of suitable accommodation for gypsies and travellers are set out in Part 7 of the Housing Act 1996 as referenced elsewhere in this report. In recognition of those obligations the Council has, as part of its role on the Greater Norwich Growth Board, commissioned successive Gypsy and Traveller accommodation needs assessments and strived to meet those needs through the planning process.

Environmental Impact

- 6.6 This proposal will remove the potential for illegal waste carriers to use the site as a dumping ground without being identified, thus helping the Council and police with evidence for enforcement action

Crime and Disorder

- 6.7 As above

Risks

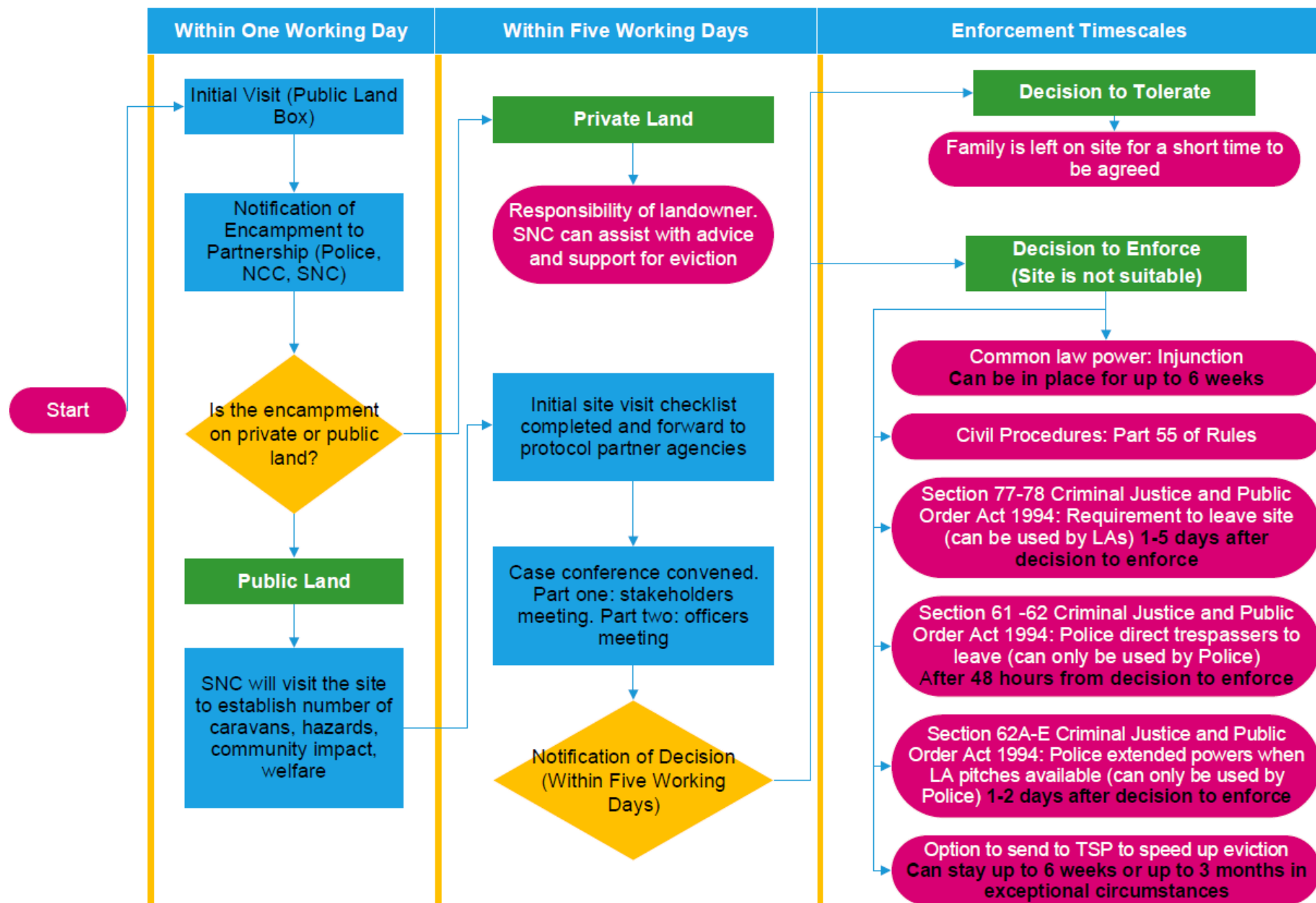
- 6.8 In addition to the key reputational risks identified there are also concerns that the past history of unauthorised encampments in this location could mean this activity will recommence, if the site is reopened without clear investment and a robust management plan, thus impacting upon the wider settled community.

7. Conclusion

- 7.1 The TSP at Bawburgh is an effective tool for the Council to support unauthorised encampments. Through a redesign and robust management of both the site and encampments, the Council can minimise the impact on the local community through a speedily and muscular response.

8. Recommendations

- 8.1 Cabinet agree to delegate the redesign and management plan of the TSP up to £125,000, to the Assistant Director of Individuals and Families, in consultation with the portfolio holder for Better Lives.



CABINET CORE AGENDA 2021

Date	Key	Title of Report	Responsible Officer	Portfolio Holder	Exempt
1 Jun	Key	SN Village Clusters Housing Allocation Plan – Regulation 18 Consultation	Paul Harris	John Fuller	
	Key	Temporary Stopping Place for Gypsies and Travellers	Kevin Philcox/ Leigh Booth	Alison Thomas	
		Q4 Performance, Risk and Finance Report	Sinead Carey	Josh Worley	
		Empty Homes Policy	Kevin Philcox/ Victoria Parsons	Alison Thomas	
		HMOs Discretionary Activity Policy	Victoria Parsons	Alison Thomas	
	Key	Local Development Scheme	Paul Harris	John Fuller	
	Key	Reopening the High Streets Safely & Welcome Back Fund	Tig Armstrong	Lisa Neal	
	Key	Covid Recovery Plan	Jamie Sutterby/Leigh Booth	John Fuller	
		Environmental Enforcement	Nick Howard	Michael Edney	
5 Jul		Business Case Finance System	Rodney Fincham	Josh Worley	
	Key	Insurance Contract – Request for Delegation	Rodney Fincham	Josh Worley	
		Review of Contract Procedure Rules	Rodney Fincham	Josh Worley	
		Customer Satisfaction Strategy	Shaun Crook / Charis Brown	John Fuller	
	Key	Greater Norwich Local Plan	Paul Harris	Lisa Neal	
		Tree Management Policy	Tig Armstrong	Lisa Neal	
	Key	South Norfolk Use of the Strategic Fund	Tig Armstrong	John Fuller	
		Emergency Planning Structures	Nick Howard	John Fuller	
9 Aug		Procurement Options	Rodney Fincham	Josh Worley	
		Re-design of Care and Repair and Disabled Facilities Grant service element of Integrated Housing Adaptations Team	Leah Booth/ Kevin Philcox	Alison Thomas	
		Regulatory Enforcement Policy	Nick Howard/ Tony Cooke	Michael Edney	
13 Sept		Rules of Financial Governance	Rodney Fincham	Josh Worley	

Date	Key	Title of Report	Responsible Officer	Portfolio Holder	Exempt
18 Oct		Food Safety Services – commercialisation options	Nick Howard	Michael Edney	
		Licensing Services – commercialisation options	Nick Howard	Michael Edney	

Key decisions are those which result in income, expenditure or savings with a gross full year effect of £100,000 or 10% of the Council's net portfolio budget whichever is the greater which has not been included in the relevant portfolio budget, or are significant (e.g. in environmental, physical, social or economic) in terms of its effect on the communities living or working in an area comprising two or more electoral wards in the area of the local authority.