



SOUTH NORFOLK VILLAGE CLUSTERS HOUSING ALLOCATIONS DOCUMENT

STATEMENT OF CONSULTATION

PART 3 – REG. 19 PUBLICATION

December 2023

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1. Introduction

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

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

Legislative requirements

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

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

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

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

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

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

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

Timetable for publication

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

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

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

Consultees

2.8 Each of the specific and general consultation bodies that were consulted on the Regulation 18 draft of the VCHAP document were directly notified of the publication of the proposed submission documents and invited to submit representations.

2.9 A list of the specific consultation bodies consulted (including the 'Relevant Authorities') can be found in Appendix 1. These bodies were notified by email/letter, a copy of which can be found in Appendix 2.

2.10 In addition, all of the individuals and organisations registered on the Council's Local Plan consultation database (Opus Consult) were notified of the publication period, by email or letter.

2.11 This database comprises specific and general consultation bodies, interested individuals, organisations and businesses that have previously registered an interest in the development of the Greater Norwich Local Plan, the VCHAP, or both documents.

2.12 It also includes those individuals or organisations that have previously promoted sites for consideration, whether through the GNLP originally, or through South Norfolk Council during the development of the VCHAP.

Availability of documents and representation procedure

2.13 The consultation took the form of an online document to which consultees were directed via a URL, provided in their notification email/letter or via on the many forms of wider publicity (see below) concerning the publication of the VCHAP.

2.14 The online document was essentially the proposed submission version of the VCHAP, with consultation points alongside each paragraph (meaning that respondents could submit representations on any aspect of the plan).

2.15 The online and hard copy representation form asked respondents to state whether or not the Plan is legal and/or procedurally compliant and whether it meets the tests of soundness set out in the National Planning Policy Framework. It was made clear in the statement of representations procedure and in the representation form guidance note that any representations which do not address these questions may not be able to be considered during the independent examination of the plan. The statement of representations procedure, the representation form, and the representation form guidance notes feature as appendices 3, 4 and 5, respectively.

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

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

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

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

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

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

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

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

Additional publicity

2.22 In addition to the initiatives discussed above, further work was undertaken by the Council to publicise the Regulation 19 publication period and bring it to the attention of those with an interest in the matters addressed by the VCHAP.

2.23 Similar to the event undertaken at the start of the previous Regulation 18 consultation stage, the Council held a briefing event for South Norfolk's parish and town councils.

2.24 This briefing event was held in the Council Chamber at the Council's offices (then, Thorpe Lodge, 1 Yarmouth Rd, Norwich) on 26th January 2023, and it was simultaneously broadcast virtually, via Zoom, to attendees who weren't able to attend in person. 23 parish/town councillors registered to attend in person, and a number of others attended the briefing virtually.

2.25 The event provided an opportunity for Council officers to explain the background to the Regulation 19 publication stage and how the proposed submission VCHAP had developed since the previous Regulation 18 consultation. It also allowed parish and town council representatives to put questions to officers regarding the proposed Plan.

2.26 Other publicity included a public notice that was sent to libraries, GP surgeries and parish and town councils in the district, with a request for the notice to be placed on notice boards in these respective locations.

2.27 In addition, a press release was written and distributed to local media at the start of the consultation period. This press release was run in the Eastern Daily Press on 18th January 2023.

2.28 South Norfolk Council also produced several social media posts on Facebook and Twitter, throughout the publication period, alerting people to the document and inviting representations.

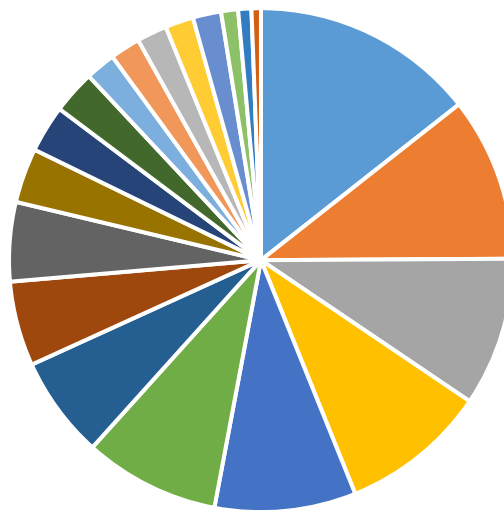
Submitted representations

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

3. Summary of main issues raised in representations

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

Main Issues Raised in VCHAP Reg 19 Responses



- | | |
|---|---|
| ■ Traffic congestion / road safety / capacity | ■ Local services / facilities capacity (incl. school) |
| ■ Landscape / character | ■ Road / pedestrian access |
| ■ Surface water flooding / drainage | ■ Heritage / historic environment |
| ■ Scale / density of proposals | ■ Utilities capacity |
| ■ Biodiversity / natural environment | ■ Impact on local amenity (light, noise, privacy etc) |
| ■ Consider alternative sites | ■ Consistency with NPPF |
| ■ Affordability / Housing Mix | ■ Design of development |
| ■ Strategy of dispersal | ■ Public transport |
| ■ Loss of valuable agricultural land | ■ Nutrient Neutrality |
| ■ Decoupling from GNLP | ■ Climate Change |

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

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

Issue Raised	South Norfolk Council Response
<p>Traffic congestion, road safety and the capacity of local road networks</p>	<p>The Council has undertaken significant engagement with the Highways Authority (HA) throughout the site assessment and selection process and following the Regulation 19 consultation. As a technical consultee the HA has provided comments on both immediate access into each site as well as a commentary on the wider road network. A technical review was undertaken by the HA for each site promoted to the VCHAP with subsequent discussions continuing with the HA on specific sites where queries arose or clarifications were needed. Meetings were held with the HA to review all of the shortlisted and preferred sites. Meetings were also held to discuss specific issues that arose relating to comments raised during the Regulation 19 consultation. All sites that were submitted for consideration as part of the Regulation 19 consultation were subject to the same process as those submitted at previous stages. Details of the HA comments are included in the Site Assessment forms.</p> <p>The detailed information provided by the HA has helped to inform the site selection process with sites considered to be unacceptable in highway safety terms rejected from the process. The HA has identified site specific highway mitigation works that would be required for each site, as well as local highway improvements that would be necessary in certain areas for a site to be acceptable in highway terms – these mitigation measures are reflected in the site-specific planning policy text.</p> <p>The Council acknowledges the concerns of residents about highways matters. The Council also recognises that growth in rural locations will result in some increase in traffic, but this is balanced with supporting existing local services (including public transport) through modest growth. The approach to the distribution of growth within the village clusters seeks to ensure that a higher proportion of growth is supported within the more accessible areas whilst seeking to limit new development in those areas that are either poorly connected or constrained by the local highway network. Furthermore, the scale of development that is proposed within the VCHAP, as well as its distribution, seeks to avoid significant highway impacts arising from this new development.</p>

Issue Raised	South Norfolk Council Response
<p>The capacity of local services/facilities (incl. schools, doctors etc.)</p>	<p>The Council recognises the concerns of residents about the impact of future growth on existing infrastructure. As part of the technical consultations that have been undertaken and following the Regulation 19 consultation the Council has proactively engaged with infrastructure providers including utility providers, the local education authority and the Integrated Care System (ICS) which has responsibility for coordinating healthcare provision in the area.</p> <p>Discussions with the education authority at Norfolk County Council indicate that there is currently sufficient capacity within the existing primary school network to accommodate the level of growth proposed in the village cluster settlements. The perception of schools operating at capacity is based in part on the impact of parental choice of primary schools, as well as previous capacity issues. The Education Authority has also confirmed a trend for falling birth rates in the county which is also reducing pressure on new school places throughout the county. In addition, new provision and planned growth of primary schools in some areas (such as Hethersett, Wymondham and Trowse) has had a positive impact on some nearby village cluster schools previously considered to be at capacity. Moderate growth is seen as a positive way to support some of the smaller schools in the District which are currently experiencing falling pupil numbers and could be at risk of viability issues.</p> <p>The ICS has expressed some concerns about the level of growth proposed in the District. However, the Council recognises this to be a strategic issue, most appropriately dealt with via the Greater Norwich Local Plan. Pressures faced by the healthcare system are in evidence nationwide and should not prevent the identified housing growth from being delivered locally. The Council has sought engagement with the ICS throughout the process and has highlighted locations in which growth is planned; these discussions have taken place to help inform resource planning for the ICS, including (but not limited to) facilities within existing GP practices and healthcare practitioners operating within the community. Therefore, whilst the Council remains sympathetic to the concerns of residents about this matter it is also not considered to be an issue that can be resolved at a local level via the VCHAP.</p> <p>Generally, utilities providers such as Anglian Water have stated that there is capacity for the level of development being proposed in the VCHAP. In the few areas where concerns over capacity have been raised, these concerns have not been at a level where the amount of development being allocated has needed to be significantly reduced or even removed, and mitigation measures have been identified. Where relevant, these have been included within the policies in the VCHAP.</p>

Issue Raised	South Norfolk Council Response
<p>Impacts on the landscape and the form and character of the settlement</p>	<p>The Council recognises the special value of both the landscape and the form and character of existing settlements throughout the South Norfolk District. The VCHAP assessment process seeks to protect and enhance these wherever possible for the ongoing benefit of both current and future residents. All site assessments included an initial landscape and townscape assessment which has considered the key features, as well as identifying any impacts arising. In particular, the preferred and shortlisted sites were specifically considered by the Council's respective Design, Landscape and Arboricultural specialists.</p> <p>Following comments received during the technical consultation it was determined that Landscape and Visual Appraisals (LVAs) should be undertaken for all sites preferred for allocation, to provide further information about the landscape and visual implications of development on these sites. A template appraisal form was prepared in conjunction with the Council's Landscape Architect. Mitigation measures identified via the site assessment process, the Regulation 18 consultation and the LVAs were included within the site-specific policy allocation text as appropriate. The site assessments also included an assessment of the townscape impact of proposed allocation sites, with advice sought from the Council's Senior Heritage and Design Officer on the existing form and character of an area.</p> <p>Whilst the evaluations and commentaries of the landscape and townscape impacts helped to inform the site selection process it is recognised that all new development will result in an impact on the existing context. The site selection process however sought to minimise these effects, avoid harmful impacts and wherever possible enhance the existing situation.</p>

Issue Raised	South Norfolk Council Response
Road and pedestrian access to sites	<p>Accessibility of the sites to local services and facilities, as well as vehicular and pedestrian access into the sites, has been a key consideration in the determination of a site's suitability for allocation in the VCHAP.</p> <p>One of the identified objectives of the VCHAP is the delivery of new development in a range of settlements to support and enhance the existing rural services and facilities that are already available; the proximity of a site to these local services and facilities has therefore formed an important part of the overall site assessment and selection process.</p> <p>Following the initial site assessment (which included reviewing the distance of a site from existing facilities and services set out in the agreed site assessment criteria) a significant focus of the ongoing discussions with the Highways Authority (HA) was the opportunities available to create safe vehicular and pedestrian access both into and from the sites. This continued following the Regulation 19 consultation where specific issues were raised by the HA. VC ROC2 was removed from the VCHAP due to a safe vehicular access not being achievable.</p> <p>It is recognised that due to the rural nature of the District the ability to achieve pedestrian footways can be limited. Within this rural context it is considered reasonable that on occasion the only possible solution will be pedestrian links along quiet rural roads with stepping off places available. It is also accepted that it may not be possible to connect a site via pedestrian footways with all existing facilities and services within a settlement/ cluster.</p> <p>Wherever necessary, engagement has taken place with site promoters to seek assurances that the required accesses, visibility splays and pedestrian footways can be incorporated into the delivery of the site. As appropriate the requirements of the HA will be included within the site-specific policy allocation text and all highways details will be subject to scrutiny at the detailed planning application stage by the HA to ensure that they meet appropriate standards.</p>

Issue Raised	South Norfolk Council Response
<p>Surface water flooding and site drainage</p>	<p>Concerns were raised in response to the Regulation-19 consultation about the impact that new development will have on drainage and flooding in South Norfolk.</p> <p>The site assessment process included a review of both flood risk zones (which reflect fluvial flooding) and identified areas of surface water flooding that may affect the deliverability of the sites. This information was consolidated by technical consultation responses from the Lead Local Flood Authority (LLFA), the Internal Drainage Boards and the Environment Agency. Detailed discussions continued with the LLFA following receipt of their comments with these discussions resulting in the reclassification of some sites to avoid areas considered to be at risk, or which may cause off-site risks. In some instances site boundaries have been drawn to specifically exclude areas noted as potentially being at risk from surface water flooding. Specific issues that were raised during the Regulation 19 consultation were also discussed with technical consultees. All of these processes have resulted in mitigation measures being identified for some sites and as appropriate which have been incorporated into the site-specific policy allocation text.</p> <p>In addition to the engagement referred to above, the Council also commissioned a Part II Strategic Flood Risk Assessment (SFRA) which considers in further detail the potential impact of allocating some sites. This forms part of the evidence base for the final sites selected for allocation.</p>

Issue Raised	South Norfolk Council Response
<p>Impacts on local heritage and the historic environment</p>	<p>The Council has liaised closely with both the Council's own Senior Heritage and Design Officer and Historic England during the site assessment and selection process.</p> <p>Following a review of all sites, the Council's Heritage Officer was invited to comment on all of the preferred and shortlisted sites as part of the technical consultations, specifically focussing on those considered to have a potential impact on identified heritage assets. These comments were included within the site assessments and helped to inform the sites selected as preferred and shortlisted options at Regulation 18 and those carried over into the Regulation 19 consultation.</p> <p>Historic England (HE) also provided comments as a statutory consultee to the VCHAP process. HE identified a number of sites considered to have a possible impact on the significance of the setting of a listed building (or Conservation Area) and requested that Heritage Impact Assessments be undertaken for these sites. The Council subsequently entered into discussions with HE to agree a template form and assessment criteria for the production of the HIAs. These were subsequently completed and used to inform the site-specific policy allocation text as appropriate.</p> <p>Further comments were received from HE during the Regulation 19 consultation. These comments were discussed further during an in-person meeting with Historic England which also included joint site visits to a number of sites. These comments have been actioned alongside further discussions with our Senior Heritage and Design Officer. VC TAS1 has been reduced by 5 dwellings due to these actions.</p>

Issue Raised	South Norfolk Council Response
<p>The scale and density of growth / specific proposals</p>	<p>A number of representations were concerned with the suggested level of growth on promoted sites, both in terms of the scale promoted to the Council by the site promoter and the quantum of development suggested on a site by the Council at the Regulation-19 consultation stage.</p> <p>The Council has a responsibility (under National Planning Policy) to ensure the efficient use of land is achieved when approving new development. In recognition of the rural context of sites allocated in the village cluster plan it was considered that 25 dwellings per hectare was a reasonable starting point for site density, although where it is considered appropriate the density of a site has been adjusted to reflect its context within the final site-specific policy allocation text.</p> <p>As set out in the Reg-19 consultation material, the VCHAP seeks to allocate a series of smaller sites that are typically within the range of 12-50 homes. The site-specific policy wording clearly sets out the numbers of dwellings that the Council considers could be accommodated on a site, either as an approximate or maximum number, within the site area that is being allocated.</p> <p>Some sites have however been subject to a review of housing numbers following third party comments and observations and further consideration of the site itself. For example, VC TAS1 has been reduced by 5 dwellings to consider its impacts on the historic environment.</p> <p>Smaller sites (fewer than 12 dwellings) have also come forward following updates to some of the existing Local Plan Settlement Limits. Detailed proposals for development on these sites will be subject to assessment at the planning application stage against planning policies in place at the time. These smaller sites identified for inclusion within the settlement limits lie adjacent to existing settlement limits (or within newly formed settlement limits), and have been subject to the same site assessment as the allocation sites.</p>

Issue Raised	South Norfolk Council Response
<p>The capacity of local utilities infrastructure (incl. sewerage, water supply, broadband)</p>	<p>Concerns were raised regarding the capacity of local utilities infrastructure to be able to accommodate new development. The majority of concerns related to wastewater and sewerage. However other concerns were also raised.</p> <p>To support the VCHAP a Water Cycle Study (WCS) has been produced, which considers the in-combination impacts with those larger sites allocated in the GNLP, and highlights any particular areas of concern that may exist in the wastewater network. The Council has also liaised with Anglian Water to discuss network capacity and infrastructure issues. Any sites that require specific mitigation have had this mitigation included within the site specific policies. Specific concerns raised by local residents during the Regulation 19 consultation have also been proactively raised by the Council with Anglian Water and actioned where appropriate.</p> <p>The Council has considered the availability of all utility infrastructure to a site and where known developers have confirmed its availability (or otherwise). This information is reflected in the site assessment forms. The delivery of strategic infrastructure, or upgrades to existing networks, is ultimately the responsibility of the utility provider however in accordance with emerging Policy 4 of the GNLP it will be for applicants to make provision for on-site capacity and connections – either via the transfer of land or developer contributions.</p> <p>The availability of Broadband has been assessed via the Better Broadband for Norfolk website.</p>
<p>Impacts on biodiversity and the natural environment</p>	<p>The Council has given due regard to the impact of site development on the natural environment and existing biodiversity, both on-site and in proximity to the promoted sites. Technical comments of Norfolk County Council's ecology team and the Council's own Arboricultural Officer have been included in site assessments where relevant. All requirements have been reflected, as appropriate, in the site-specific policy background and allocation text.</p> <p>Both Norfolk Wildlife Trust and Natural England are consultees in the Development Plan process and were contacted during the preparation of the site assessments. They were also contacted during both the Regulation 18 and 19 consultations.</p> <p>In addition, the VCHAP is supported by a Habitats Regulation Assessment in accordance with the Habitats Regulations (2017) to assess the potential effects of the plan on designated habitats.</p>

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

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

Issue Raised	South Norfolk Council Response
The affordability / mix of housing	<p>The representations received in relation to this topic were split between respondents seeking increased numbers of affordable housing, fewer affordable housing units or alternative housing mixes on sites. However, it should be noted that following the Regulation 18 consultation the decision was taken to remove general Development Management policies from within the VCHAP. A specific policy relating to affordable housing/ mix of housing will be set out in the GNLP and it was determined that this did not need to be repeated within the VCHAP.</p> <p>In terms of the representations submitted relating to the affordability of new housing and the mix of housing on site, the Council is committed to delivering an appropriate mix of housing to meet the identified local need, as set out in the latest evidence. Site promoters were required to confirm the viability of their site, as well as confirming their acceptance of the requirement to deliver the requisite amount of affordable housing on their site if allocated. Any proposed departure from either the specified housing mix or the percentage of affordable housing delivered on the site would need to be robustly justified and supported with appropriate evidence at the planning application stage.</p>
The design of development	<p>The appropriate layout and design of a site is important, particularly when planning development within smaller settlements. The Council recognises this and, as appropriate, has included design requirements in the site-specific policy allocation text for certain sites. The design requirements set out in these policies have been informed by the assessments and discussions that have occurred during the VCHAP production process, including (but not limited to) the Heritage Impact Assessments and Landscape and Visual Appraisals.</p> <p>For all sites, the final detailed design and layout will also be subject to the usual requirements of the adopted Local Plan policies, including any adopted Neighbourhood Plans, and will be subject to full assessment against these at the planning application stage. It should be noted that following the Regulation 18 consultation the decision was taken to not include general Development Management policies within the VCHAP. These policies are set out elsewhere in the planning policy framework and it was determined that they did not need to be repeated within the VCHAP.</p>

Issue Raised	South Norfolk Council Response
<p>The overarching strategy of dispersing growth amongst villages</p>	<p>The overall distribution of development, including the allocation of 1,200 homes to the South Norfolk Village Clusters is covered by the GNLP and is an issue which has been raised through the GNLP Examination. The GNLP is currently consulting on its Main Modifications and is therefore at an advanced stage of preparation. No significant modifications have been proposed that affect the strategy of the VCHAP.</p> <p>Within this context, the Council carefully considered the available options for allocating the level of development required by the Greater Norwich Local Plan (GNLP) within the 48 village clusters in the District. Three scenarios were identified in the Sustainability Appraisal (SA) which sits alongside the VCHAP and forms part of the evidence base for the selection of sites. The VCHAP has been produced taking into account the findings of the SA and it is considered that this approach to distributing development throughout the village clusters offers the most opportunities for encouraging existing settlements, services and facilities to thrive in a sustainable manner.</p>
<p>Lack of public transport services locally</p>	<p>Infrequent connectivity via public transport was a concern raised in the consultation responses, alongside a lack of public transport in some locations. The Council has sought to identify existing public transport facilities locally as part of the site assessment process but recognises that these services and timetables have seasonal fluctuations and are subject to change at the discretion of the public transport providers. Nevertheless, where they exist regular public transport services are considered to be an advantage for a site.</p> <p>The constraints of the public transport network are acknowledged but it is also recognised that this is a limitation within any rural area. The VCHAP is seeking to distribute development throughout the District, focusing primarily on sites that have access to existing local facilities and services. Pedestrian connectivity of a site (either current or proposed) to existing facilities and services was also a key factor in the site assessment process, at the same time recognising the constraints identified in the 'Road and pedestrian access to sites' section. As a rural District it is also acknowledged that residents have a higher level of car ownership.</p>

Issue Raised	South Norfolk Council Response
Loss of valuable agricultural land	<p>As part of the site assessment process the Council identified the status of the agricultural land promoted for development, automatically classifying the most versatile land as having an ‘amber’ impact on the landscape in accordance with the approach taken by the GNLP.</p> <p>Whilst the Council is mindful of concerns about development occurring on agricultural land, it also recognises that in order to achieve the required housing growth within a rural context the majority of development will inevitably occur on greenfield land, much of which will be agricultural. However, it should also be noted that not all sites within the VCHAP are currently within active agricultural use. Sites identified for allocation comprise a combination of agricultural land, commercial and brownfield sites, undeveloped areas of land as well as privately owned (non-agricultural) parcels of land.</p> <p>Overall the GNLP seeks to maximise the level of development on previously used land; however this would not be sufficient to accommodate the growth required.</p>
Nutrient Neutrality	<p>The Council acknowledges the concerns raised relating to the introduction of Nutrient Neutrality requirements in certain areas of South Norfolk. The Council also acknowledges that these issues relate to both the impact on new development on the natural environment as well as the impact of Nutrient Neutrality on the delivery of new housing. The Council is working with neighbouring authorities and relevant partners to establish a mitigations strategy to respond to the need to consider Nutrient Neutrality. This includes the consideration and preparation of the Norfolk Environmental Credits Joint Venture.</p> <p>However, the VCHAP is a long-term planning document that sets out the Councils plan for housing delivery in the Village Clusters up to 2038 as the Council is required to prepare even with Nutrient Neutrality in place. Nutrient Neutrality is not considered a material issue that could undermine the principle of development and therefore the Council is still required to produce a development plan for the area to meet the housing needs identified for South Norfolk. While Nutrient Neutrality may have an impact on the delivery of new housing in the short term whilst the mitigation strategy is being developed, it is considered that once this is in place this impact will be negated.</p>

Issue Raised	South Norfolk Council Response
<p>The 'de-coupling' of the South Norfolk Village Clusters from the GNLP</p>	<p>The principle of the VCHAP was established through the preparation of the Greater Norwich Local Plan. The GNLP states that the VCHAP has been prepared due to the nature of South Norfolk as much larger and with a much more rural nature than the other areas within the GNLP area. Therefore, the VCHAP will allow this to be recognised and provide a strategy of development that is appropriate for this area, whilst also being incorporated as part of the overall strategy for the Greater Norwich area.</p> <p>At the time of writing, the GNLP is currently conducting its Main Modifications consultation and is therefore at a late stage in its preparation. While the VCHAP is not at this stage yet, the general principle for the VCHAP and its preparation are still included within the GNLP and have not changed since the beginning of the preparation of the VCHAP.</p>
<p>Impact of housing development on climate change</p>	<p>The Council takes its role within the climate change agenda seriously. The Greater Norwich Local Plan is responsible for setting out the strategic policy for addressing climate change throughout the whole of the Greater Norwich area, as well as the overall distribution of development. It should be noted that following the Regulation 18 consultation the decision was taken to not include general Development Management policies within the VCHAP. These policies are set out elsewhere in the planning policy framework and it was determined that they did not need to be repeated within the VCHAP.</p> <p>The VCHAP is part of a wider strategy that focuses the vast majority of growth on a strategic growth area that is well placed to exploit existing and future opportunities for alternative modes of transport such as walking, cycling and public transport. At a local level sustainable development and changes to the Building Regulations will play an important role in tackling climate change.</p> <p>The VCHAP recognises the shift in working patterns that has occurred, particularly the increase in working from home, which reduces the need to travel to workplaces. There is also a movement towards the increased usage of electric cars. At a more strategic level the Council continues to work with the County Council to address rural accessibility and transport issues.</p> <p>There is also a concern that without modest growth in villages the existing local services and facilities will not remain viable, resulting in additional and lengthier journeys to schools, recreational opportunities etc.</p>

Appendix 1: Specific Consultation Bodies

3

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

Relevant authorities:

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

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

<Recipient Address>

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

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

Email: paul.harris@southnorfolkandbroadland.gov.uk

Dear Sir / Madam,

South Norfolk Village Clusters Housing Allocations Plan- Regulation 19 Publication

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

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

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

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

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

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

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

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

Yours faithfully

A handwritten signature in black ink, appearing to be 'Paul Harris', with a stylized, somewhat abstract form.

Paul Harris

Place Shaping Manager - Planning
South Norfolk and Broadland Councils

Appendix 3: Statement of Representations Procedure

South Norfolk Village Clusters Housing Allocations Plan

(Regulation 19 Pre-submission Draft)

Statement of Representations Procedure

Subject Matter and Area Covered

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

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

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

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

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

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

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

Publication Period

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

How to view the documents

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

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

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

Making Representations

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

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

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

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

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

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

Requests to be notified

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

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

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

That the Village Clusters Housing Allocations Plan has been adopted.

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

Appendix 4: Representation Form

South Norfolk Village Clusters Housing Allocations Plan

(Regulation 19 Pre-submission Draft)

Publication Stage Representation Form

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

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

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

Completed forms should be posted to:

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

Email: localplan.snc@southnorfolkandbroadland.gov.uk

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

This form has two parts:

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

Part A – Personal Details

1. Respondent Details

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

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

2. Agent Details (if applicable)

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

Part B – Your Representation(s)

(Please use a separate sheet for each representation)

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

Paragraph No.		Policy No.		Policies Map	
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4. Do you consider the proposed Village Clusters Housing Allocations Plan is:

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

(Please tick as appropriate)

YES	NO

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

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

(Continue on a separate sheet if necessary)

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

(Continue on a separate sheet if necessary)

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

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

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

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

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

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

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

Appendix 5: Representation Form Guidance Notes

South Norfolk Village Clusters Housing Allocations Plan

(Regulation 19 Pre-submission Draft)

Representation Form Guidance Note

January 2023

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

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

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

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

Data Protection & Privacy

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

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

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

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

1. Introduction

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

2. Legal Compliance and Duty to Co-operate

- 2.1 You should consider the following before making a representation on legal compliance:

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

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

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

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

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

3. Soundness

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

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

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

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

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

4. General advice

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