



SOUTH NORFOLK VILLAGE CLUSTERS HOUSING ALLOCATIONS DOCUMENT

STATEMENT OF CONSULTATION

PART 4 – ALTERNATIVE SITES & FOCUSED CHANGES (REG. 18)

April 2024

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1. Introduction

- 1.1 This document, Part 4 of the Statement of Consultation, details the 'Alternative Sites and Focused Changes' consultation that was undertaken by South Norfolk Council in the development of the Village Clusters Housing Allocations Plan (VCHAP).
- 1.2 This consultation followed a review of representations submitted in response to the Regulation 19 Publication stage of the Plan that was held between 23 January and 8 March 2023 (the results of which are summarised in Part 3 of the Statement of Consultation).
- 1.3 This review found that one of the proposed sites would no longer be deliverable and that another site should be slightly reduced in numbers to address heritage concerns. As a minimum, this consultation on 'Alternative Sites and Focused Changes' sought to make up the resulting shortfall in order to deliver the housing numbers needed.
- 1.4 This part of the Statement of Consultation has been produced to accompany the Regulation 19 Publication of the VCHAP proposals, which incorporates the findings of the 'Alternative Sites and Focused Changes' Regulation 18 consultation. The document sets out the aims, the timings and the methodology of the Regulation 18 consultation on the 'Alternative Sites and Focused Changes' document. It also summarises the results of the consultation and provides the Council's response to the main issues raised.
- 1.5 Once South Norfolk Council has undertaken its Regulation 19 consultation and analysed responses in relation to the 'Alternative Sites & Focused Changes', this part of the Statement of Consultation will be updated to reflect the findings of this consultation stage and to summarise the main issues raised.

2. Focused Changes & Alternative Sites - Reg. 18 Consultation (December 2023 – February 2024)

Aim

- 2.1 Between 23 January and 8 March 2023 the South Norfolk Village Clusters Housing Allocations Plan (VCHAP) was published for representations under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.2 Following the close of the publication period it was identified that one of the proposed allocation sites (VC ROC2, South of The Street, Rockland St Mary) could no longer be delivered, whilst a second (VC TAS2, Church Road, Tasburgh) needed to be slightly reduced in capacity.
- 2.3 The resultant loss of 30 units would take the VCHAP allocations marginally below the Greater Norwich Local Plan (GNLP) minimum requirement for the South Norfolk Village Clusters.
- 2.4 In order to address the shortfall and resolve other minor issues, the Council decided to progress a further focused consultation, looking a limited range of possible ‘alternative’ sites to repair the VCHAP. The consultation looked at both the merits of the sites individually and the size of the overall buffer, above the GNLP minimum requirement of 1,200 dwellings, that should be allocated.
- 2.5 Following assessment, a limited range of alternative sites were identified and proposed as part of this consultation. These sites fell within one of the following categories:
 - a) New/substantially amended sites submitted during the Regulation 19 consultation – whilst the Regulation 19 did not include a ‘call for sites’, a small number were submitted, and a handful of other sites were significantly amended in response to the comments and concerns from the earlier Regulation 18;
 - b) Extensions to the preferred Regulation 19 allocation sites – several of the allocations are part of larger sites submitted for consideration, which have been reduced in scale and/or density to fit with the aims of the VCHAP, as such there is scope for small increases to a number of those sites; and/or
 - c) Use of the ‘reasonable alternative’ sites identified at the Regulation 18 stage – many of these were not taken forward because they were in a cluster/settlement where a preferred site was already identified, however, they are still considered potentially suitable for development.

2.6 The sites were located in the following settlements:

- Alington
- Barford
- Barnham Broom
- Bawburgh
- Broome
- Ditchingham
- Earsham
- Gillingham
- Swardeston
- Spooner Row
- Tacolneston
- Wicklewood

Timescale

2.7 This consultation took place between 11 December 2023 and 5 February 2024.

Consultees

2.8 Each of the specific and general consultation bodies that were consulted on the original Regulation 18 draft of the VCHAP document were directly notified of the consultation and invited to submit responses.

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.

Description

Consultation Document

- 2.14 The online consultation document was made available via the Council's Local Plan consultation platform, Opus Consult, in the same manner as previous VCHAP consultations. A link to the platform featured within the notification letters and emails that were issued to consultees, as well as in other publicity (see below).
- 2.15 The structure of the document was set out as follows:
- a) Introduction and Background
 - b) Context for the Current Consultation
 - c) The Assessment of Sites
 - d) Evidence Base
 - e) The Consultation
 - f) Village Cluster chapters:
 - a. Alington, Yelverton and Bergh Apton
 - b. Barford, Marlingford, Colton and Wrampingham
 - c. Barnham Broom, Kimberley, Carleton Forehoe, Runhall and Brandon Parva
 - d. Bawburgh
 - e. Ditchingham, Broome, Hedenham and Thwaite
 - f. Earsham
 - g. Gillingham, Geldeston and Stockton
 - h. Mulbarton, Bracon Ash, Swardeston and East Carleton
 - i. Tacolneston and Forncett End
 - j. Wicklewood
 - g) Glossary
- 2.16 The bulk of the document comprised section f), above, setting out details of alternative site options within the respective Village Cluster chapters. The consultation points relating to these sites also allowed respondents to view the proposals on an interactive map of the district.
- 2.17 The consultation also asked a question (within section [e]) as to what scale of housing delivery buffer (above the minimum of 1,200 homes set out in the GNLP) would be appropriate for the VCHAP to allocate.
- 2.18 The consultation document is available to view online at <https://southnorfolkandbroadland.oc2.uk/document/17>.
- 2.19 As well as being made available online, the consultation document and selected supporting documents (including representation forms) were made available at the following locations:
- South Norfolk Council offices – The Horizon Centre, Broadland Business Park, Peachman Way, Norwich, NR7 0WF
 - The Octagon – Mere Street, Diss, Norfolk, IP22 4AH

- The following libraries –
 - Hethersett
 - Loddon
 - Long Stratton
 - Millennium Library, Norwich
 - Poringland
 - Wymondham

Supporting Documents

2.20 Alongside the main consultation document (and also hosted on the Council's consultation platform), the Council made available an array of supporting documentation. This comprised:

- PDF copy of the consultation document
- Policy Maps for each of the settlements where an alternative site was proposed
- Carried forward allocations review
- Equality Impact Assessment Addendum
- Interim Sustainability Appraisal Report*
- Health Impact Assessment Report
- Heritage Impact Assessments
- Landscape Visual Appraisals
- Site assessments booklet – consultation sites
- Site assessments booklet – sites submitted at Reg. 19 (not for consultation)
- Site selection table and background note
- Statement of Consultation – Part 1 GNLP consultations
- Statement of Consultation – Part 2 South Norfolk Council consultations
- Statement of Consultation – Part 3 Reg 19. Publication
- Strategic Flood Risk Assessment – Groundwater Site Assessments

*Respondents were also able to provide comments on this documents, if they wished.

Virtual Exhibition

2.21 In common with the previous Regulation 18 and Regulation 19 consultations, a virtual exhibition room was also established, using the same URL as for the previous exhibition (<https://vchap.exhibition.app>).

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

2.23 The exhibition room included contextual and background information regarding the VCHAP and why the Alternative Sites & Focused Changes consultation was being undertaken. It also provided links to the various supporting documentation and the proposed submission document itself.

2.24 The virtual exhibition was seen as providing a consistent approach to broadening digital engagement in the development of the VCHAP. During the consultation period, the site attracted 721 unique visitors with 2,685 different page views within the exhibition.

Publicity

2.25 A variety of publicity was undertaken in support of the consultation document, in order to bring it to the attention of as wide a cross section of the public as possible. Specific measures included:

- A public notice advertising the consultation (see Appendix 3), which was distributed to libraries, GP surgeries and Parish Councils (for putting on parish noticeboards) in locations within relative proximity to the alternative sites being proposed.
- A press release which was issued to local media (see copy of EDP article from 09.12.2023 that forms Appendix 4).
- Updates on South Norfolk Council's social media accounts throughout the consultation period.
- Details on the South Norfolk Council / Broadland District Council website (www.southnorfolkandbroadland.gov.uk/emerging-local-plan/south-norfolk-village-clusters-housing-allocations-plan)

Parish Councils briefing event

2.26 South Norfolk Council also organised a briefing event for those Parish Councils affected by the consultation (although other Parish Councils could attend if they wished to), in order to explain the background to the consultation, and how respondents could have their say. This took place on the evening of Wednesday 13th December 2023 at the Council's offices. Those interested could either attend in person or remotely, via MS Teams.

2.27 Eight representatives (representing five different Parish Councils) attended the event in person, and eight attended remotely (representing six different Parish Councils).

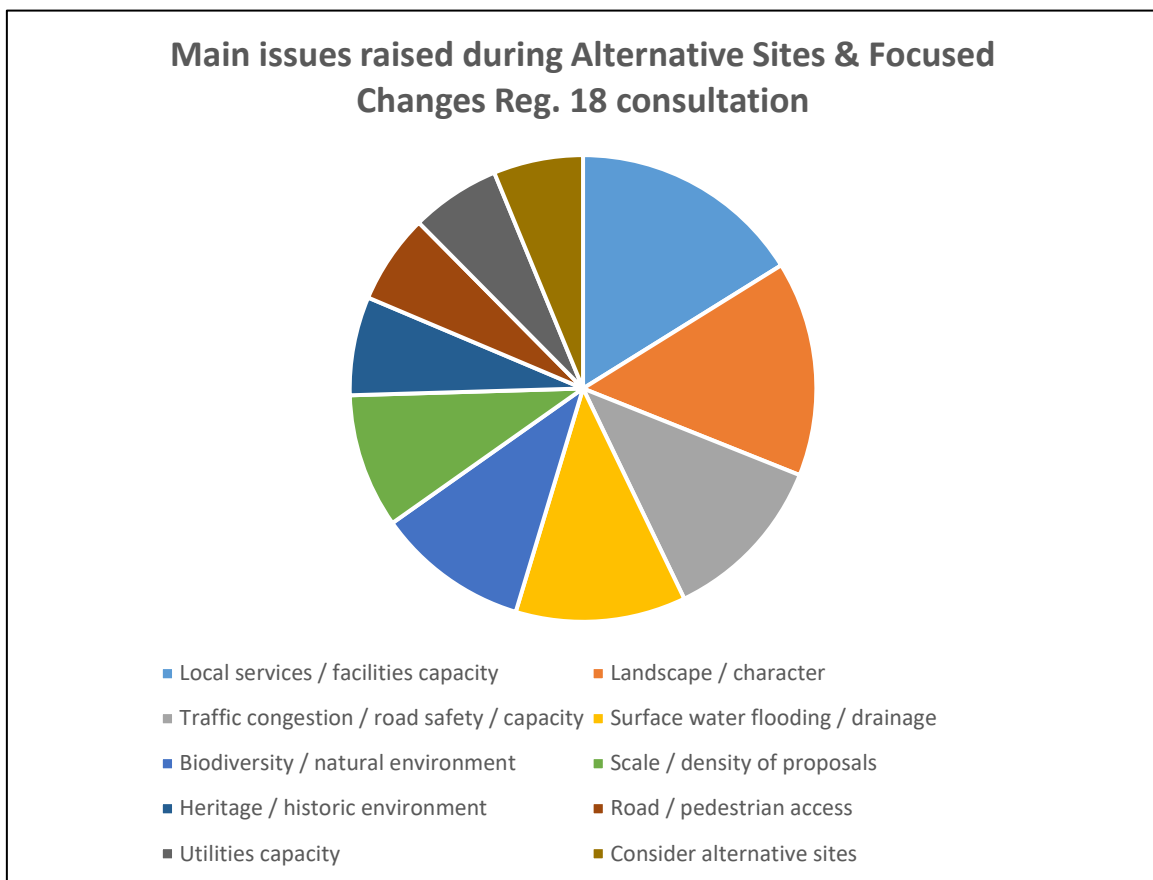
2.28 The briefing took the form of a presentation from Planning officers, followed by questions and answers.

Results Summary

- 2.29 In total, 576 individual representations were received from 252 individuals or organisations.
- 2.30 The majority of these representations (67%) were submitted directly via the online consultation platform. 30% of representations were submitted via email and 3% were received as hard copy submissions.
- 2.31 The majority of submitted representations (60%) were marked as objections to specific proposals. 35% were marked as comments (neither explicitly supporting nor objecting to proposals), and 5% were marked as supportive of specific proposals.
- 2.32 The settlement and site proposal which was subject to the highest number of representations was Barford (site SN6000), with 105 representations, followed by the Barford site SN0552REVC, which received 84 representations. The sites in Bawburgh (74 representations), Alington (60) and Wicklewood (54) were the next most popular elements of the consultation. The lowest numbers of representations received were in relation to Ditchingham (SN4020), Swardeston and Tacolneston, which received 12 representations each.

3. Summary of main issues raised and how these have been considered

- 3.1 A variety of issues were raised within the responses to the 'Alternative Sites and Focused Changes' consultation. Many of these issues replicate those identified within responses at the previous Regulation 18 and Regulation 19 consultation stages in relation to the VCHAP document.
- 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 the question dealing with the scale of housing delivery buffer, and for responses on the interim Sustainability Appraisal Report) is available to view as part of Appendix 5.
- 3.3 In a similar fashion to the previous parts of the Statement of Consultation, a categorisation of the main issues raised in the consultation responses has been undertaken. Again, this has identified a number of key themes which emerge from the responses across all of the areas subject to consultation. The chart below illustrates these key themes (many of which are similar in nature and frequency to those identified following the previous consultation stages) and shows which of these featured most often within the representations submitted.



3.4 The table below provides South Norfolk Council's 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.

Main issues raised during Reg. 18 Focused Changes & Alternative Sites consultation and South Norfolk Council response

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 services and facilities. The Council has proactively engaged with providers including the local education authority and the Integrated Care System (ICS) and have discussed specific concerns raised during consultations with these providers to ensure these are addressed.</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 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.</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>

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.</p> <p>All site assessments included an initial desk-based landscape and townscape assessment which was followed by a site visit to all shortlisted sites which considered the key features, as well as identifying any impacts arising.</p> <p>Landscape and Visual Appraisals (LVAs) were 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 through the site assessment process and consultation stages either have been included within the site-specific policy allocation text as appropriate.</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
<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 every consultation stage. This has included specific discussions on issues raised during consultations and potential mitigation measures to address these.</p> <p>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.</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>Surface water flooding and site drainage</p>	<p>The Council acknowledges the concerns of residents regarding how new development could impact drainage on sites and the subsequent impact on surface water flooding.</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 excluded areas noted as potentially being at risk from surface water flooding. 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 and has been updated throughout the VCHAP preparation.</p>

Issue Raised	South Norfolk Council Response
Impacts on biodiversity and the natural environment	<p>The impact of site development on the natural environment and existing biodiversity, both on-site and in proximity to the promoted sites, is a key consideration during the site assessment and selection process and throughout the VCHAP preparation as a whole.</p> <p>Technical comments of Norfolk County Council's ecology team and the Council's own Arboricultural Officer have been included in all site assessments where this is relevant. The sites have also been discussed with the Council's internal tree officers and any trees that are considered worthy of protection have been evaluated. 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 and at every consultation stage.</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>The scale and density of growth / specific proposals</p>	<p>The Council recognises that concerns have been raised over the suggested level of growth on promoted sites in terms of the scale promoted to the Council by the site promoter, the quantum of development suggested on a site by the Council on sites included in the VCHAP and the overall level of growth in the VCHAP.</p> <p>The VCHAP seeks to allocate a series of smaller sites that are typically within the range of 12-50 homes to meet the housing requirement of at least 1,200 homes set out in the Greater Norwich Local Plan. The VCHAP is required to meet this total need to contribute to the total development need in the Greater Norwich Area.</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 either as an approximate or maximum number.</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 from the Regulation 19 consultation 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>Impacts on local heritage and the historic environment</p>	<p>The Council has carefully considered the potential impacts on the historic environment when assessing sites and throughout the VCHAP preparation process.</p> <p>The site assessment process began with a desk-based assessment, which was followed by a site visit, with any notable features being noted. Following this, the Council's Heritage Officer was invited to comment on all of the preferred and shortlisted sites as part of the Technical Consultations, focusing 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.</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 various stages of public consultation. These comments were discussed further with HE 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. For example, VC TAS1 has been reduced by 5 dwellings since the Regulation 19 consultation due to these actions.</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>The initial site assessment included reviewing the distance of a site from existing facilities and services set out in the agreed site assessment criteria. Following this, 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. 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 have been 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>The capacity of local utilities infrastructure (incl. sewerage, water supply etc.)</p>	<p>The Council acknowledge the concerns from residents on the potential impacts of new development on local utilities and their capacities.</p> <p>The potential capacity of utilities on sites was initially evaluated during the site assessment stage and any potential issues, such as sewerage connections and power/telephone lines crossing a site, were noted. Any concerns raised during public consultations were also discussed with utilities providers to determine if any mitigation measures would be needed.</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. Specific concerns raised by local residents during the consultations have also been proactively raised by the Council with Anglian Water and actioned where appropriate. Any sites that require specific mitigation have had this mitigation included within the site specific policies.</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 have been discussed with the relevant provider and 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. 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>

Issue Raised	South Norfolk Council Response
Preference for alternative sites	<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 during the various stages of public consultation. 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>

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: Letter/email to consultees

Place Shaping Manager - Planning
South Norfolk and Broadland District Councils
The Horizon Centre
Broadland Business Park
Peachman Way
Norwich
NR7 0WF

8 December 2023

Dear Sir/Madam,

Village Clusters Housing Allocations Plan – consultation on Alternative Sites & Focused Changes (Reg. 18)

South Norfolk Council is carrying out a Focused Regulation 18 Consultation on Alternative Sites and Focused Changes for the Draft Village Clusters Housing Allocations Plan (VCHAP) between **9:00am on Monday 11 December 2023 and 5:00pm on Monday 5 February 2024**. The consultation is in accordance with Regulation 18 of the Town & Country Planning (Local Planning) (England) Regulations 2012.

This consultation follows a review of representations submitted in response to the Publication stage of the Plan (Regulation 19), held between 23 January and 8 March 2023, which determined that one of the proposed sites is no longer deliverable (VC ROC2 in Rockland St Mary) and that another site should be slightly reduced in numbers to address heritage concerns (VC TAS1 in Tasburgh). As a minimum, this consultation on alternative sites and focused changes seeks to make up the resulting shortfall in order to deliver the housing numbers needed.

The proposed VCHAP will allocate sufficient sites for housing in South Norfolk's villages, which will deliver the bulk of the approximately 1,200 new homes that are to be delivered in the district's Village Clusters by 2038. Once adopted, the VCHAP will become part of the Development Plan for South Norfolk.

You can view the consultation material at the following locations:

Online at - www.southnorfolkandbroadland.gov.uk/vchap

South Norfolk Council offices – Horizon Centre, Broadland Business Park, Peachman Way, Norwich, NR7 0WF (open Mon-Fri: 8.30am-5pm)

The Octagon – Mere Street, Diss, Norfolk, IP22 4AH (open Mon-Fri: 9am-5pm)

The following libraries –

Hethersett
Loddon
Long Stratton

Millennium Library, Norwich
Poringland
Wymondham

Please visit the Norfolk County Council website for details of your local branch (www.norfolk.gov.uk/libraries-local-history-and-archives)

Anyone wishing to submit a consultation response may do so **before 5.00pm on Monday 5 February 2024**. 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. Completed hard copy forms should be posted to the Place Shaping Team at the South Norfolk Council office address listed above.

Further background and supporting material relating to the VCHAP is also available through our **Virtual Exhibition**, from where you can also comment on the consultation, which can be accessed at <https://vchap.exhibition.app>.

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

Yours sincerely,

Paul Harris
Place Shaping Manager - Planning
South Norfolk and Broadland Councils

Appendix 3: Public Notice



PUBLIC NOTICE

South Norfolk Village Clusters Housing Allocations Plan (VCHAP) Consultation on Alternative Sites & Focused Changes (Regulation 18)

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- **South Norfolk Council offices** – The Horizon Centre, Broadland Business Park, Peachman Way, Norwich, NR7 0WF (open Mon-Fri: 8.30am-5pm)
- **The Octagon** – Mere Street, Diss, Norfolk, IP22 4AH (open Mon-Fri: 9am-5pm)
- **The following libraries** –
 - Hethersett
 - Loddon
 - Long Stratton
 - Millennium Library, Norwich
 - Poringland
 - Wymondham

Please visit the Norfolk County Council website for details of your local branch, including opening hours (www.norfolk.gov.uk/libraries-local-history-and-archives)

Anyone wishing to submit a consultation response may do so **before 5.00pm on Monday 5 February 2024**. 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.

Completed hard copy forms should be posted to the Place Shaping Team at the South Norfolk Council office address listed above.

Further background and supporting material relating to the VCHAP is also available through our **Virtual Exhibition**, from where you can also comment on the consultation, which can be accessed at <https://vchap.exhibition.app>

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

Appendix 4: Eastern Daily Press article (09/12/2023)

Consultation for south Norfolk 1,200 village homes plan

9th December

LOCAL GOVERNMENT

By George Thompson

Local democracy reporter



Woodton, one of the areas which could be developed (*Image: Denise Bradley/Newsquest*)

People will be able to have their say on updated plans for where 1,200 homes could be built in Norfolk villages.

South Norfolk Council (SNC) is launching a public consultation this month on fresh plans for where houses should be built in a range of rural communities between now and 2038 after new sites were proposed.

In total, 48 villages have been included in the South Norfolk Village Clusters Housing Allocations Plan (VCHAP), including Brooke, Pulham St Mary and Woodton, which will see some of the largest number of new homes.

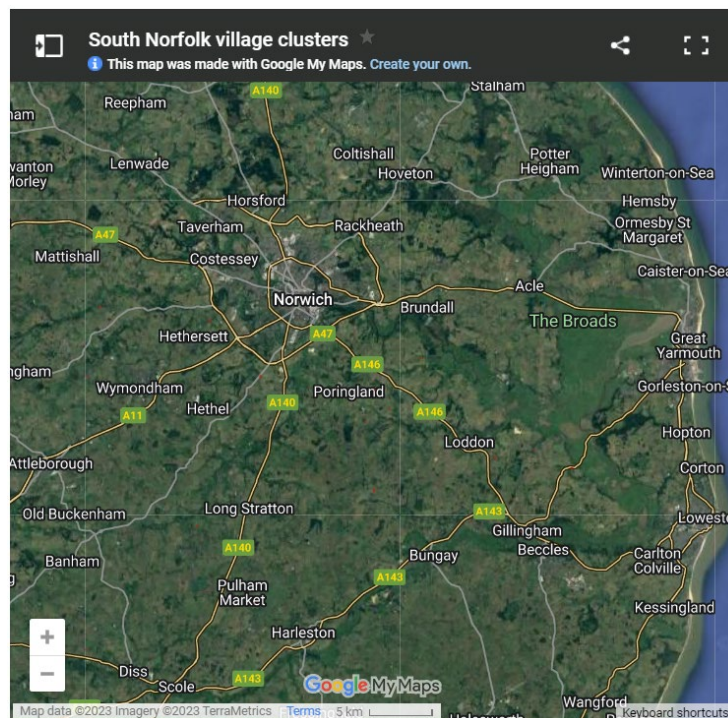
But sites in Rockland St Mary and Tasburgh had to be cut or reduced in size, bringing the VCHAP under the required 1,200 homes. A fresh consultation must now be held for newly proposed or expanded areas.

The changes are:

A new site for 30 homes in Barford.

Five existing sites – in Ditchingham, Spooner Row, Wicklewood, Gillingham and Swardeston - could be expanded. The increases range from five to 20 properties.

Five previously shortlisted sites – which did not progress in earlier stages of the VCHAP - will be reconsidered. These are in Alington, Barford, Barnham Broom, Broome and Earsham.



Addressing a recent cabinet meeting, John Fuller, leader of SNC, said: “Although it is uncomfortable for a number of communities to have more uncertainty about dwelling sites in their villages, we are going to consult on 13.

“We are unlikely to need more than a small handful to meet the numbers.

“With the benefit of hindsight, there wasn’t enough slack [in the numbers] to allow for things to fall out.

“It’s a shame to go another time round the block but I think it is a necessary evil, it’s right that we do in the interest of full transparency.”

The cabinet agreed to launch the consultation on December 11. It will run until February 5, 2024.

Appendix 5: Summary of issues raised during VCHAP ‘Alternative Sites & Focused Changes’ Reg. 18 consultation and South Norfolk Council responses

Overall numbers and housing delivery buffer

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 1: Overall numbers and housing delivery buffer	3521, 3684, 3705, 3731	Mixed	<p>Summary of miscellaneous comments submitted in response to Question 1:</p> <ul style="list-style-type: none"> - New sites to be chosen with care and attention for the environment and existing communities – focus should solely be on the suitability of the location; - Decision makers should consider whether the *quantity* of new houses is in proportion to the existing houses in the area, including additional proposed development locally; - Local utilities, amenities, infrastructure and services should all be sufficient to support the development; - Concerns about flooding within the South Norfolk area and the introduction of non-porous surfaces; - Development decisions need to be consistent with historical planning decisions; - The requirement for 1200 homes is arbitrary; - Development is focused on greenfield sites rather than brownfield sites in urban and suburban areas which have key housing needs; - The VCHAP should be reviewed alongside the opening up of credits for nutrient neutrality and the ability to focus development in more appropriate locations; - Small rural and semi rural villages are not appropriate for big allocations; - The VCHAP was originally intended to ensure the natural sustainable growth of small villages; - The number of houses needs to be limited as much as possible to preserve the historical heritage and character of the village, it’s natural environment and biodiversity; and - Barford is a small and thriving community which should be protected from overpopulation. 	<p>Whilst these comments do not respond directly to the question posed, the Council would take the opportunity to reiterate that it has carefully reviewed the sites that have been promoted to the VCHAP. As clearly set out in the site assessment forms and the evidence base for the VCHAP the matters raised within these representations have been given appropriate weight and consideration in the site selection process.</p> <p>As noted elsewhere throughout this process the minimum housing requirement for 1,200 homes to be delivered via the VCHAP is a strategic requirement set by the Greater Norwich Local Plan. The GNLP has subsequently been through an Examination process. Whilst there is a suggestion in some responses that the December 2023 revisions to the National Planning Policy Framework have subsequently removed the need for this housing target, the Council disputes this interpretation of the NPPF. Rather, the Council considers that as the GNLP target is the strategic housing requirement and the VCHAP is simply seeking to fulfil this (as opposed to supersede it) then the original requirement for achieving a minimum target of 1,200 new homes remains valid.</p> <p>The Council has invited site promoters to submit land for consideration, including brownfield sites, and these sites have been assessed for inclusion within the Plan in accordance with the agreed site assessment criterion. It is not possible for the housing requirement to be met solely on brownfield sites and greenfield sites are required to meet the growth required in the Plan area.</p>	1584	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 1: Overall numbers and housing delivery buffer	3480, 3826	Comment	<p>Summary of comments in support of sites previously promoted to the VCHAP submitted in response to Question 1:</p> <ul style="list-style-type: none"> - support for existing preferred allocation VC SWA1 but the landowner considers the eastern boundary of the site to be arbitrary and does not make efficient use of land; - the landowner of V SWA1 also has additional land available should it be required; - shortlisted site SN0196 at Barnham Broom is no longer available for consideration; - shortlisted sites SN0174 and SN5057 at Barnham Broom should be reconsidered for inclusion in the VCHAP as both are acceptable in terms of access (due to the preferred status of VC BB1); - three omission sites at Little Melton could be allocated, as well increasing density on the preferred allocation site at Little Melton; - A small number of small number of rejected sites / site specific options could have a degree of merit and the Regulation-18 focused consultation is flawed for failing to consider shortlisted sites that are of equal standing to preferred sites. 	<p>The Council welcomes the support of existing site promoters for the ongoing inclusion of sites for consideration in the VCHAP, as set out in these representations.</p> <p>However, the documents published in support of this consultation set out a clear rationale for the sites that have been selected for inclusion in the Alternative Sites and Focused Changes consultation (Sustainability Appraisal, Site Selection Table) as well as a summary table setting out the reasons for omitting the remaining shortlisted sites. The Council did not consider it either necessary or proportionate to re-assess those sites had been rejected at an earlier stage of the process.</p>	1561	No action required.

<p>QUESTION 1: Overall numbers and housing delivery buffer</p>	<p>3281, 3339, 3436, 3558, 3580, 3766, 3796, 3824</p>	<p>Comment</p>	<p>Summary of comments submitted by statutory and non-statutory consultees in response to Question 1:</p> <p>National Highways - National Highways' wishes to continue to be involved through the production of the Plan, in particular to issues and proposed allocation sites relating to Transport issues and the Strategic Road Network in the area (A47 and A11). It is acknowledged that the that once adopted, the VCHAP will become part of the Development Plan for South Norfolk;</p> <p>East Norfolk Transport Users Association - work for new housing does not fall within the area of influence affecting of our association. New areas of housing should however be considered in areas with adequate provision for regular bus services and also for provision where possible for bus shelters and for up to date timetable information;</p> <p>NCC Natural Environment Team - All sites will require Landscape Assessment/LVIA to inform the scale, form and density of the development, as well as establishing any protection and enhancement of existing landscape features/boundary vegetation.</p> <p>Where trees are present on site, or immediately adjacent to sites, appropriate Arboriculture surveys will be needed to ascertain any trees that require protection and to establish working arrangements should there be risk of damage to trees or roots. Where sites are adjacent to Public Rights of Way the right of way should remain unobstructed at all times and should any closure or diversion be required suitable consultation with the Highways Authority will be required. If a site is looking to create access directly onto a public right of way this should also be in consultation with the Highways Authority. Any proposals of new Public Rights of Way will need to be agreed and suitable constructed and legally registered through creation orders. All sites may require Ecological surveys which should be agreed in discussion with a suitably qualified ecologist;</p> <p>East Suffolk Council – No comments</p> <p>Anglian Water - No specific comments regarding the appropriate buffer to be accorded to the housing target. Increasing the buffer should be aligned with suitable locations where there is sufficient headroom at our water recycling centres (WRCs) to accommodate future growth. We continue to actively endorse early engagement with Anglian Water, so we can assess the connection requirements of each development and its impact and implement any mitigation necessary. Increasing the number of dwellings in certain settlements through additional site allocations could in some circumstances exceed available headroom at the receiving WRC. This may lead to delays in delivery if further investment is required;</p> <p>NCC Lead Local Flood Authority - With regard to the LLFA's previous comments provided to South Norfolk District Council (SNDC) on the South Norfolk Level 2 Strategic Flood Risk Assessment (SFRA) (FW2022_1170 dated 16 January 2023, the LLFA have been in further discussions with the LPA. The</p>	<p>In response to Question 1 the Council has received a number of comments from both statutory and non-statutory consultees that address wider matters within the VCHAP (rather than simply the scale of the housing buffer to be allocated within the VCHAP). As noted in the summary of these representations, some indicate that they have no comments to make at this stage but wish to remain informed of the process. The Council notes this position.</p> <p>With regards to specific comments the Council responds as follows:</p> <p>Transport matters - As noted elsewhere, a key component of the site selection process is the accessibility of sites to local services and facilities, including via public transport routes where possible. The Council has however consistently recognised the difficulty in delivering sites that are fully accessible by public transport due to the constraints placed on the public transport network in a rural area. Where possible the Council has sought sustainable sites in the most accessible locations. With regards to the comments of Suffolk County Council (SCC) the Council has previously engaged with SCC and Norfolk County Council on this matter and considered that the matter had been appropriately addressed. The Council will revisit this correspondence following receipt of these comments if appropriate.</p> <p>Landscape/ Ecology/ Biodiversity matters – The Council notes the comments of the Natural Environment Team at NCC and considers that these align with the work that has been undertaken to date on existing preferred allocation sites. The Council proposes the same approach for any sites identified for inclusion in the VCHAP following this consultation.</p> <p>Drainage and hydraulic modelling matters - The Council notes the comments of Anglian Water and will consider these in the context of the Water Cycle Study (WCS). The Council will continue to engage with Anglian Water (AW) throughout this process and welcomes the input of Anglian Water to date. The Council also notes the comments of the Lead Local Flood Authority (LLFA) in response to this focused consultation. The Council has sought significant engagement with the LLFA to agree an acceptable approach to the modelling and is disappointed that agreement has not been reached, despite the support of the Environment Agency for the Council's strategy. The Council remains of the opinion that its approach is both proportionate and reasonable.</p>	<p>1559</p>	<p>The Council will review the earlier correspondence with Suffolk County Council regarding cross boundary matters.</p>
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Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			<p>conclusion of these discussions has resulted in a number of the LLFA's concerns not being addressed by the LPA. The LLFA has raised concerns regarding the approaches applied in the SNDC hydraulic modelling with the LPA. The LPA has indicated that they do not intend on addressing the LLFA's concerns at this time due to their Local Plan schedule and the associated resources that it would involve. The LLFA continues to consider that 45% climate change allowance should be applied to the model.</p> <p>Sport England - The importance of sport should be recognised as a key component of local plans, housing allocations and should not be considered in isolation. Sport England advise that the allocations are clear that sports facilities are protected or replaced in advance of any development in accordance with the criteria in paragraph 103 of the NPPF. Where on-site or off-site replacement provision is required to facilitate the development of a site, the replacement site should be referenced in the policy and if appropriate a related site allocation should be made in the plan to provide certainty that the facility can be replaced in practice. Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements.</p> <p>Suffolk County Council - Generally, SCC supports the draft Village Clusters Local Plan. However, consider that there are some matters that require further evidence for the Plan to be considered sound. No action has been taken regarding undertaking a strategic assessment of cross border traffic impacts arising from the proposed allocations.</p>			

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 1: Overall numbers and housing delivery buffer	3277, 3437, 3611	Comment	<p>Comments submitted in response to Question 1 and relating to the Sustainability Appraisal (SA):</p> <ul style="list-style-type: none"> - The Plan will help to deliver much needed homes within the Greater Norwich area and contribute towards meeting the housing targets sets out within the emerging Greater Norwich Local Plan; - Any decisions should be informed by the Sustainability Appraisal and prior to finalising and submitting the plan for its examination, South Norfolk should be satisfied that the policy approach and the sites chosen will deliver housing in a sustainable manner; - Agree with the SA that it is important to maintain a healthy buffer of housing sites over and above the minimum dwelling requirement; - Natural England has noted the production of the latest iteration of the Interim Sustainability Appraisal (SA) Report, dated November 2023, and prepared by AECOM. Natural England has no specific comments to make on the scope of this and considers the aforementioned document to be satisfactory; - The Council must also be able to demonstrate transparently that the sites identified can be delivered in order to meet the test of soundness ("effective") and be based on a robust evidence base and guided by the Sustainability Appraisal ("justified"); and - [Taylor Wimpey UK Ltd] queries the suitability of the alternative sites in this consultation and questions whether the tests of soundness can be met. 	<p>The Council welcomes this engagement with the production of the VCHAP, including a recognition of the important role played by the Sustainability Appraisal (SA) in the site selection process. At each stage of the VCHAP the Council has sought to update the evidence base in a proportionate and appropriate manner, including the Sustainability Appraisal. The SA supports the decision making process throughout the preparation of the Plan. At the Regulation-18 focused consultation stage this has included an appraisal of the alternative sites considered to be available to the Council to address the shortfall of housing identified following the publication of the Regulation-19 Plan. In terms of the role of the SA the Council clearly recognises the important role this document plays in the identification of sites however its conclusions must also be considered alongside the findings of the wider evidence base and it is therefore not a definitive document in the site selection process. The Council is satisfied with the approach taken to the selection of sites for this consultation (as set out in the consultation material) and will continue its work to be assured that the final sites selected are deliverable and that the tests of soundness are met prior to submission of the Plan for Examination.</p>	1558	No action required.

<p>QUESTION 1: Overall numbers and housing delivery buffer</p>	<p>3340, 3355, 3418, 3467, 3469, 3478, 3511, 3607, 3613, 3623, 3632, 3746, 3760, 3795, 3812</p>	<p>Mixed</p>	<p>The following is a summary of the representations submitted in response to Question 1 directly commenting on the three options presented in paragraph A.30:</p> <p>Option 1 (buffer of c. 30 dwellings/ 2.5%) - reluctantly support Option 1 as there is a need to maintain village culture within Norfolk villages; Any further material increase in development [above the Option 1 buffer] will add unmanageable pressure to existing oversubscribed services (i.e. GPs, dentists, schools etc);</p> <p>Releasing as few greenfield sites as possible is of paramount importance to protect rural Norfolk's special character;</p> <p>The GNLP already includes a significant housing delivery buffer therefore, releasing a large buffer of extra land on greenfield "village cluster" sites is unnecessary;</p> <p>Option 1 is the least worst option for Barford – the cluster can not support large numbers of new houses;</p> <p>Option 1 is consistent with the previous approach;</p> <p>Developers of those developments that do go ahead will no doubt apply to squeeze more properties on the land than was originally agreed, so a small 'buffer' would be created in that way;</p> <p>Support Option 1 however a recognition that whilst this approach minimises the release of greenfield land, the limitations of this approach have been demonstrated by the need to carry out an additional consultation as a result of the loss of a limited number of sites/dwellings from those previously proposed;</p> <p>The new NPPF appears to suggest that the target for an additional 1200 homes in rural villages is no longer required. This suggests that Option 1 is the most appropriate of the options presented. Further sites should only be included where there is local support or the site proposed is consistent with an approved neighbourhood plan;</p> <p>Option 2 (allocation of all sites in the consultation) - Option (ii) represents the most appropriate approach [to ensure a healthy buffer]. It should also be noted that there are other shortlisted sites that have not been allocated and one in particular ref: SN0274REVA /B which was regarded as a 'shortlisted site' which represents an available and sustainable location for additional housing located outside of the Nutrient Neutrality catchment zone;</p> <p>[Norfolk Wildlife Trust] do not consider Option 2 to be appropriate - the focus should be on brownfield and previously developed sites;</p> <p>Option 3 (buffer of c. 60-70 dwellings/ 5-6%) - consider Option 3 to be appropriate and adequate given the indepth review and selection of the sites - given the Plan is to be scrutinised by the Secretary of State's Examiner, we agree it is sensible to add a carefully considered buffer to ensure sufficient dwellings are</p>	<p>The Council notes the comments submitted directly in response to Question 1 and the three different options presented for the level of growth to be identified within the VCHAP. The Council will review these views and comments in due course as part of the final site selection process.</p> <p>However, the Council would take the opportunity to reiterate that the minimum housing target for the VCHAP has been set by the Greater Norwich Local Plan which itself has been through an Examination process. The housing requirement for the VCHAP is therefore considered to be sound and this position has not been altered by the December 2023 updates to the National Planning Policy Framework. In order to identify appropriate sites for allocation the Council has invited interested parties to submit sites for assessment on a number of occasions – this has included both brownfield and greenfield sites and these have all been assessed in a transparent and consistent manner. Where appropriate brownfield sites have been included in the preferred allocations however, due to the scale of growth required, it is not possible to meet this housing need without releasing greenfield sites for development. The Council is seeking to do this in a managed and sustainable way so that it can meet its housing obligations whilst preserving the special character of the District and its villages.</p>	<p>1556</p>	<p>Review local services and facilities available within the Barford cluster to determine whether alternate wording is appropriate.</p>
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Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			<p>available in the event of any rejections;</p> <p>Miscellaneous - [Barford & Wrampingham Parish Council] continue to question our grouping with Marlingford & Colton as a village cluster when there are so few facilities and no shops on the ground plus Barford is approximately 4 miles from the nearest accepting GP surgery and there is no public transport;</p> <p>The December 2023 NPPF has removed the need for housing targets therefore, the raison d'être for the 1200 minimum residential units as set out the Plan is no longer a requirement - in its place must be a total number of units driven by each proposed site's ability accommodate residential development;</p> <p>Errors have been made in the level of facilities and amenities available in Barford - absence of shops, removal of employment, misidentified plantation, failing flood scheme, B1108 traffic hazard and struggling GP service;</p> <p>It is important to give consideration to the potential impact of site development on local biodiversity and designated sites as well as ensuring that future allocations do not impede the delivery of the upcoming Nature Recovery Network for Norfolk;</p>			

Alpington, Yelverton and Bergh Apton

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 2a: Do you agree with the allocation of SN0433, Land south of Wheel Road, Alpington for at least 12 dwellings on an area of 1.0ha? Please explain your response.	3370	Support	Please see FW Properties' detailed comment on this land. The new dwellings will be served by two new private accessways on to Wheel Road only and will be set back from the road to minimise effects on existing houses opposite. The stretch of Wheel Road in front of the two new accesses will be widened to 5 metres. A two metre wide pavement will be provided along the southern side of Wheel Road to connect into the existing pavement to the school. The development will include an overflow car park for the pub to be transferred to them after completion.	Comments noted. Welcome the site promoter taking steps to address some of the issues and concerns raised in the Site Assessment process. Consideration still needs to be given to the balance the loss of hedgerow to create the required highways improvements with the benefits of delivering new housing.	1709	Consider the balance between the loss of hedgerow to create the required highways improvements with the benefits of delivering new housing. Consider the inclusion of overflow parking for the adjacent pub, as part of the approach to addressing highways concerns.
QUESTION 2a: Do you agree with the allocation of SN0433, Land south of Wheel Road, Alpington for at least 12 dwellings on an area of 1.0ha? Please explain your response.	3499	Support	No more than the 12 proposed houses with garaging and a driveway at each plus front and rear gardens. A minimum of a 5kw solar installation on each property and a new cul-de-sac, from the main road, to provide direct access to each property. The site should be bounded by indigenous hedging with adequate screening between the pub and the adjacent houses. The application should recognise the pub as an ongoing business and no restrictions be placed on the pub's current activities including receptions, occasional outdoor music and the use of the pub garden.	Comments noted. Whilst some elements would be covered by other policies of the Development Plan, or by other regulatory regimes outside of Planning, a number of these requirements could be considered in an allocation policy, should the site progress to the Regulation 19 stage.	1708	Consider allocation policy requirements related to appropriate landscaping/hedging, screening to the existing pub and a form of access which reduces hedgerow loss.
QUESTION 2a: Do you agree with the allocation of SN0433, Land south of Wheel Road, Alpington for at least 12 dwellings on an area of 1.0ha? Please explain your response.	3526	Comment	Whilst there are no designated heritage assets within the site boundary, there is a grade II listed building, Stacey's Cottage to the south of the site. The development has the potential to impact the significance of this heritage asset via a change in its setting. We welcome the preparation of the Heritage Impact Assessment for the site. The assessment recommends a landscaping buffer along the southern boundary of the site to help mitigate any impact on the listed building to the south as well as retention of hedgerow along eastern border, limiting density to retain rural character and open space along eastern boundary to separate development from Wheel of Fortune PH.	Comments noted. The HIA sets out the potential mitigation measures to address any impacts on the designated and non-designated heritage assets.	1667	Consider the conclusions of the HIA when preparing policy criteria, should the site go forward to Regulation 19.
QUESTION 2a: Do you agree with the allocation of SN0433, Land south of Wheel Road, Alpington for at least 12 dwellings on an area of 1.0ha? Please explain your response.	3562	Object	The Parish Council strongly objects to further development in this village cluster. Two sites have already been allocated totalling 50 houses and a further 12+ is 62+ too many given the lack of infrastructure. We question the Children's Services report that approves these additional 12+ houses as they have not commented on the approved 50 and the school is already at capacity. All roads in and out of Alpington are single track at some point and additional traffic will cause even greater congestion.	NCC Children's Services has been engaged throughout the preparation of the VCHAP and is aware of the other allocation being made in the cluster. NCC has raised no objection in terms of the standard or capacity of the wider road network. The VCHAP seeks to allocate the minimum 1,200 required by the GNLP, which now looks likely to be confirmed through adoption, on the best of the available sites, which means that some clusters will accommodate more dwellings than others.	1666	No Action required.
QUESTION 2a: Do you agree with the allocation of SN0433, Land south of Wheel Road, Alpington for at least 12 dwellings on an area of 1.0ha? Please explain your response.	3581	Comment	No objection to this site.	Comment noted.	1665	No Action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 2a: Do you agree with the allocation of SN0433, Land south of Wheel Road, Alpington for at least 12 dwellings on an area of 1.0ha? Please explain your response.	3489	Comment	All site allocations for Alpington need to be renewed. You are talking about the land behind Church Meadow having 25 houses. This is incorrect as the deeds of the neighbouring houses to Church Meadow only allow 16 maximum houses to be built on this site (written proof which can be provided). Therefore you would need to rethink the allocation/numbers of all Alpington sites.	To date, no substantive proof has been provided that covenants prevent 25 dwellings being delivered on VC ALP1. Investigation by the Council indicates that the covenants relate to the 16 dwellings on the already completed part of Church Meadow i.e. odd numbers 11 to 21 and even numbers 22 to 40. In any event, this does not affect the assessment of SN0433.	1664	Assess further information, if submitted.
QUESTION 2a: Do you agree with the allocation of SN0433, Land south of Wheel Road, Alpington for at least 12 dwellings on an area of 1.0ha? Please explain your response.	3451	Comment	Catchment numbers are low and can accommodate this development, parental preference will mitigate any pressure and will be managed by the admission round.	Comments noted.	1663	No Action required.
QUESTION 2a: Do you agree with the allocation of SN0433, Land south of Wheel Road, Alpington for at least 12 dwellings on an area of 1.0ha? Please explain your response.	3392	Comment	Amber - archaeological mitigation will probably be necessary but is unlikely to prevent development.	Comment noted.	1662	Consider the need for an archeological requirement within a site-specific policy, if the site is taken forward, or whether this is already adequately covered by other national and local planning policy.

<p>QUESTION 2a: Do you agree with the allocation of SN0433, Land south of Wheel Road, Alingtonfor at least 12 dwellings on an area of 1.0ha? Please explain your response.</p>	<p>3284, 3288, 3290, 3295, 3298, 3299, 3301, 3302, 3307, 3314, 3323, 3440, 3466, 3481, 3482, 3506, 3507, 3672, 3676, 3695, 3781, 3835, 3836</p>	<p>Mixed</p>	<p>Main Objections to the site relate to:</p> <p>(1) HIGHWAYS/TRANSPORT - Wheel Road is too narrow and congested, especially at school drop off and pick up times and parking problems related to the pub. Surrounding road network is also poor, particularly links to the A146 and Poringland. Concern that the required visibility splays are not achievable, or will require substantial hedgerow loss.</p> <p>(2) ECOLOGY/HEDGEROW - potentially involves significant loss of hedgerow, which is home to house sparrows.</p> <p>(3) INFRASTRUCTURE - Lack of capacity at both the Primary School and local medical facilities.</p> <p>(4) NUMBERS - 'at least 12 dwelling' is not specific enough and opens up the possibility of significantly larger numbers.</p> <p>(5) VIABILITY/DELIVERABILITY - no contact from the site promoter since 2016. Potential for highways measures to impact on the ability to deliver affordable units. Impact of the overhead powerlines on the scheme.</p> <p>(6) CHARACTER - loss of rural character to this part of the village.</p> <p>(7) RESIDENTIAL AMENITY - loss of views across the existing site.</p> <p>(8) HERITAGE - Impact on the Listed Stacey's Cottage to the south.</p> <p>(9) OTHER - frustration that the site was only recently rejected in the VCHAP process. More than 50 dwellings proposed for the cluster, which is contrary to the VCHAP principles. The Regulation 19 allocation (VC ALP1) at Church Meadow may not be deliverable for the full, due to restrictive covenants in the deeds of existing properties.</p>	<p>The Responses to the main points are:</p> <p>(1) HIGHWAYS/TRANSPORT - NCC as highways authority has set out their criteria for the site and it is considered that these can be met within the existing highway and the site itself (i.e. no reliance on third party land). No objection has been raised in terms wider road network. The site offers the potential to alleviate some of the parking issues related to the adjoining pub.</p> <p>(2) ECOLOGY/HEDGEROW - appropriate surveys would be required at the time of any planning application and the site would need to demonstrate Biodiversity Net Gain (BNG), in accordance with national and local policies. Representations have made assumptions about where access points would be to derive the amount of hedgerow to be removed.</p> <p>(3) INFRASTRUCTURE - NCC Children's Services has indicated that catchment pupil numbers are low (i.e. pressure is currently from out of catchment) and that new development could be accommodated via future admission rounds. The Council has engaged with the NHS (ICS) so that future service planning can take on board the areas of growth. Whilst healthcare provision is recognised as a national and regional concern, failure to deliver sufficient good quality housing will not help improve this situation.</p> <p>(4) NUMBERS - At least 12 dwellings is specified in order to help ensure the delivery of the required proportion of affordable units. A site of 1ha in an edge of village location will be naturally constrained in numbers, but a more specific policy wording can be considered.</p> <p>(5) VIABILITY/DELIVERABILITY - the site promoter has remained fully engaged in the Village Clusters process and responded to the Regulation 18 consultation. As a greenfield village site with no known extraordinary costs, the delivery of an appropriate percentage of affordable housing should be achievable. Confirmation will be sought, should the site progress to the Regulation 19 version of the Plan. The overhead powerlines were noted in the initial site assessment, but were not raised by UK Power Networks (UKPN) as a constraint development of this site in subsequent consultations.</p> <p>(6) CHARACTER - loss of hedgerow and new development will impact on the character of the area; however, this is an edge of village location, adjacent to a busy pub and opposite relatively modern housing (Fortune Green) and is being allocated at a relatively low density.</p> <p>(7) RESIDENTIAL AMENITY - loss of views from residential properties is not a key planning consideration.</p> <p>(8) HERITAGE - Stacey's Cottage is some distance from the site and contains sufficient space to provide screening, if necessary (as set out in the HIA).</p> <p>(9) OTHER - The site was not previously rejected, but remained a reasonable alternative. Therefore, has been reconsidered as part of this consultation. The VCHAP seeks to allocate the minimum 1,200 required by the GNLP, which now looks likely to be confirmed through adoption of the plan, on the best of the available sites, which means that some clusters will accommodate more dwellings than others. To date, no</p>	<p>1661</p>	<p>Policy requirements to consider improvements to Wheel Road, including the pedestrian environment. Potential for the site to deliver parking improvements for the adjacent pub. Over an above BNG, consider the need to policy criteria relating to new hedgerows/landscaping to both the north (front) and south (rear) of the site. Consider policy wording which states 12 to 15 dwellings.</p>
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Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
				substantive proof has been provided that covenants prevent 25 dwellings being delivered on VC ALP1.		
QUESTION 2b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3372	Support	Please see FW Properties' detailed comment on this land. The new dwellings will be served by two new private accessways on to Wheel Road only and will be set back from the road to minimise effects on existing houses opposite. The stretch of Wheel Road in front of the two new accesses will be widened to 5 metres. A two metre wide pavement will be provided along the southern side of Wheel Road to connect into the existing pavement to the school. The development will include an overflow car park for the pub to be transferred to them after completion.	Comments noted. The Council welcomes the site promoter undertaking initial work to address the issues raised by the Site Assessment, including the comments of technical consultees. The Council will need to balance loss of hedgerow/impact on the character of the area with the required highways measures and the need to deliver new housing in line with the GNLP.	1707	Liaise with the site promoter to address concerns, should the site progress to the Regulation 19 stage, and reflect the requirements in any subsequent allocation Policy for the site.
QUESTION 2b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3747	Comment	We note that if allocated, this site will result in loss of the frontage hedgerow. Local Authorities have a duty under the NERC Act 2006 and the Environment Act 2021 to have regard to the conservation and enhancement of Priority Habitats in their decision making. Hedgerows are listed as a Priority Habitat under the requirements of section 41 of the NERC Act. We recommend that clear and robust policy wording with respect to hedgerows/trees is included in this policy and have suggested some wording.	The extent of hedgerow loss required to accommodate NCC highways requirements needs to be balanced with the ability to mitigate that loss, the need to deliver housing and the national requirement for Biodiversity Net Gain.	1676	Consider the suggested wording in the context of the balance between highways requirements, hedgerow loss, possible mitigation and the need to deliver housing. To be considered in terms of Policy criteria, should the site progress to Regulation 19.
QUESTION 2b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3582	Comment	No objection to this site. Adjacent to water supply and foul drainage networks. Sewer within the site boundary. The applicant is advised to engage with Anglian Water to ensure suitable measures are undertaken so that our asset can be repaired and maintained. "Early engagement with Anglian Water to identify infrastructure crossing the site."	Comments noted.	1675	To be considered as part of any Policy criteria, should the site be taken forward to the Regulation 19 stage.
QUESTION 2b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3527	Comment	The HIA has identified the need for landscape buffer along the southern boundary of the site as well as retention of hedgerow along eastern border, limiting density to retain rural character and open space long eastern boundary to separate development from Wheel of Fortune PH. These requirements should be included as a criterion in the policy for the site.	The issues will be considered, should the site progress to the Regulation 19 stage.	1674	Consider the heritage mitigations raised in the HIA as part of any Policy criteria, should the site progress to the Regulation 19 stage.
QUESTION 2b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3488, 3508, 3689	Mixed	Concerns relate to the overall scale of development in the cluster, but also specifically that the Regulation 19 allocation (VC ALP1) at Church Meadow may not be deliverable in full, due to restrictive covenants in the deeds of existing properties.	The issues of the overall levels of development in the cluster are covered in the responses to Question 2a. To date, no substantive proof has been provided that covenants prevent 25 dwellings being delivered on VC ALP1. Investigation by the Council indicates that the covenants relate to the 16 dwellings on the already completed part of Church Meadow i.e. odd numbers 11 to 21 and even numbers 22 to 40. In any event, this does not affect the assessment of SN0433.	1673	No Action required.

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QUESTION 2b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3419	Comment	<p>There is a County Wildlife Site to the north of the site, whilst it is not understood if this currently benefits from public access (formal or informal), any increased pressure of nearby development should be considered.</p> <p>FP11 is immediately north of the site and consideration should be given as to whether a crossing point would be required to facilitate access to the wider countryside from the development. It is expected that the development could increase footfall and recreational pressures on both FP11 and FP9.</p> <p>The Site is immediately adjacent to the settlement boundary but will infill a current open space between existing isolated dwellings, the scheme should be designed in such a way as to be sensitive to this.</p> <p>Entire loss of the hedgerow and trees to the frontage of the site along Wheel Road would be unacceptable and consideration will need to be given as to what would constitute an acceptable loss for highways access and visibility splays. Any losses would need to be suitably mitigated, likely with mixed native hedgerows.</p>	<p>The site will be required to make GIRAMS payments, to offset the impact on designated sites.</p> <p>A crossing point has not specifically been requested by NCC Highways, but consideration can be given to this, should the site go forward to Regulation 19.</p> <p>The Council does not agree with the characterisation of the site as infilling 'between existing isolated dwellings', given the extent of development north of Wheel Road, on Burgate Lane and the adjoining pub.</p> <p>The extent of hedgerow loss required to accommodate NCC highways requirements needs to be balanced with the ability to mitigate that loss, the need to deliver housing and the national requirement for Biodiversity Net Gain.</p>	1672	Consider the balance between highways requirements, hedgerow loss, possible mitigation and the need to deliver housing. To be considered in terms of Policy criteria, should the site progress to Regulation 19.
QUESTION 2b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3405	Comment	<p>The revision to the proposed layout is noted, however the improvements identified in the earlier Highway Authority response are still required e.g. carriageway widening to 5.5m, along with 2.0m wide footway. The proposal to access development via private drives might reduce impact, but an acceptable highway layout would still require extensive removal of the existing frontage hedge.</p> <p>Subject to the above, the Highway Authority does not object to the proposal.</p>	Comments noted and will be taken account in any policy criteria, should the site progress to Regulation 19.	1671	Consider the balance between highways requirements, hedgerow loss, possible mitigation and the need to deliver housing. To be considered in terms of Policy criteria, should the site progress to Regulation 19.
QUESTION 2b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3363	Comment	<p>Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment.</p> <p>Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).</p>	Comments noted.	1670	No Action required.

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QUESTION 2b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3285, 3289, 3296, 3303, 3483, 3492, 3500, 3505, 3563, 3614, 3675, 3677, 3696, 3779, 3802	Mixed	<p>Issues to be considered in a Policy should the site be allocated:</p> <p>(1) HIGHWAYS - widening of Wheel Road and routes to Poringland/the A146. Better pedestrian access to the primary school. Junction improvements to Reeders Lane. Overflow car park for the Wheel of Fortune. Extending the existing 30mph/introduce 20mph speed limits.</p> <p>(2) HEDGEROW/LANDSCAPING - minimise the loss of the frontage hedgerow, including locating any footpath to the rear.</p> <p>(3) INFRASTRUCTURE - new doctor surgery. Ensure children can attend the Primary School.</p> <p>(4) HOUSE DESIGN/TYPES - include 30% affordable units. Include bungalows, rather than larger properties. Appropriate off-road parking.</p> <p>(5) OTHER - limit the development to 12 units. More detailed consultation with residents who will be impacted. No street lighting. Limitations on construction traffic and times.</p> <p>Issues were also raised with the approach taken in the VCHAP and the overall numbers in the cluster, which are covered in Questions 1 and 2a.</p>	<p>An number of the issues raised will be considered as part of policy criteria, should the site be taken forward. However, a number are also (a) beyond the scope of what can reasonably be expected of a small housing development, (b) are outside what can be required through the planning process an/or are overly prescriptive or (c) are covered by other polices of the development plan.</p> <p>Specifically:</p> <p>(1) HIGHWAYS - localised improvements have been sought by Norfolk County Council and would be necessary for any allocation. However improvement to the wider network are not justified by this scale of development. Overflow car park could be considered as part of necessary improvements to the immediate highways network.</p> <p>(2) HEDGEROW/LANDSCAPING - It would be reasonable to reduce the loss of hedgerow to a minimum and require landscaping around the site, given it's edge of village location. As 'major' development the site would also need to achieve Biodiversity Net Gain.</p> <p>(3) INFRASTRUCTURE - Development will be required to pay CIL and GIRAMS to make a proportionate contribution to infrastructure.</p> <p>(4) HOUSE DESIGN/TYPES - housing mix will be sought in accordance with planning policies in pace at the time of any application, currently this would include circa 33% affordable units.</p> <p>(5) OTHER - the site extends to 1ha, therefore a development slightly over 12 units might be appropriate. Detailed consultation would take place at the planning application stage.</p>	1669	To consider the following issues in the Policy criteria, should the site go forward to Regulation 19: localised highways improvements, including the pedestrian environment, and off-street parking for the adjoining pub; hedgerow protection and landscaping; scale of development appropriate for the site.
QUESTION 2b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3283, 3300, 3308, 3313	Object	<p>Concerns raised to the principle of development, which are covered in the Representations to Question 2a, relating to Highways (immediate vicinity of the site and the wider network) and Infrastructure capacity.</p> <p>Additional point raised regarding impact on property values.</p>	<p>Responses in relation to Highways and Infrastructure are covered under Question 2a. The issue of the impact of new allocations on house prices is not a direct concern of the planning system.</p>	1668	Immediate Highways requirements to be considered in any policy criteria, should the site go forward to Regulation 19.

Barford, Marlingford, Colton and Wrampingham

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QUESTION 3a: Do you agree with the allocation of SN6000, Land north of Chapel Street, Barford? Please explain your response.	3374	Support	Please see FW Properties' detailed comment on this land. With regards to surface water drainage and flooding, the development of this land will provide the opportunity to address the current flooding issues which are occurring on the playing field and in some of the properties around this land. Our drainage engineers have reviewed these issues and the local Flood Alleviation Scheme and have confirmed that these can be addressed and improved by the new development. We have assumed continuity of operations for the village hall and playing field so that the new facility opens when the existing hall is closed.	Comments noted. Welcome the moves by the site promoter to address some of the issues raised through the Site Assessment process and by the public and other consultees.	1711	Consider how the measures suggested by the site promoter could be incorporated into an allocation policy, should the site progress to the Regulation 19 stage.
QUESTION 3a: Do you agree with the allocation of SN6000, Land north of Chapel Street, Barford? Please explain your response.	3688	Comment	<p>The Village Hall Committee unanimously agreed that if the following conditions were agreed with the land owner and developer we would consider surrendering the 37 years left on the lease.</p> <p>That the new land for the hall and Playing field will be gifted to the Village.</p> <p>That the developer would provide a new hall and Playing field to the north end of the land.</p> <p>That before any development could take place the new Village hall would be built .</p> <p>That the any flooding issues would be resolved prior to any development.</p> <p>That the new hall will be eco friendly</p>	<p>Comments noted.</p> <p>Following a number of responses to the Regulation 18 consultation, further consideration is being given to keeping the village hall on the southern part of the site, maintaining the links between the hall, playing field, play area and primary school. This would also have benefits in terms of retaining the open break and setting of the nearby listed farmhouse.</p> <p>The Council would also be seeking continuity of use, although securing the new village hall prior to any development is unlikely to be considered reasonable.</p> <p>A new village hall would need to be completed to the latest Building Regulation standards.</p>	1684	Should the site progress to the Regulation 19 stage, consideration be given to reconfiguring the site, retaining the play area, playing pitch and new village hall together in the southern part, to address a number of issues including combined use, retaining a green break, flood risk concerns, school drop off/pick up parking etc. Policy criteria to ensure continuity of use for the village hall.
QUESTION 3a: Do you agree with the allocation of SN6000, Land north of Chapel Street, Barford? Please explain your response.	3822	Object	<p>Site cannot be released immediately unlike SN0552REVC.</p> <p>Question deliverability and effectiveness due to use with Village Hall and recreation ground. Subject to 38 year lease and registered charity.</p> <p>Not considered reasonable alternative. Would require termination of lease and consent of charity commission.</p> <p>Equivalent re-provision cannot be delivered with 25-30 dwellings including affordable dwellings. Sport England will object.</p>	<p>Whilst the site may not be available immediately, it is considered available/deliverable within a plan which covers the period to 2038. It should also be noted that SN0552REVC is reliant on an adjoining site for pedestrian access, which also limits its immediate availability.</p> <p>The Village Hall Committee has responded to the Regulation 18 and has not raised any 'in principle' concerns with the proposals. Sport England is a consultee on the Local Plan and has not raised an objection, and any allocation would require a scheme which incorporates equivalent or better provision than currently exists.</p> <p>New village hall provision has previously been secured from a similar number of dwellings in recent years (Ashwellthorpe), albeit with a reduced proportion of affordable units. Further investigation will be required to establish deliverability of a policy compliant scheme.</p>	1683	Further investigation of the viability of delivering all of the site requirements, should the site progress to the Regulation 19 stage.
QUESTION 3a: Do you agree with the allocation of SN6000, Land north of Chapel Street, Barford? Please explain your response.	3583	Comment	No objection to this site.	Comments noted.	1682	No Action required in relation to this representation. But follow up with Anglian Water comments made in several representations from residents.

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QUESTION 3a: Do you agree with the allocation of SN6000, Land north of Chapel Street, Barford? Please explain your response.	3528	Object	<p>Whilst there are no designated heritage assets within the site boundary, there is a grade II listed building, School Farmhouse, to the south east of the site. The development has the potential to impact the significance of this heritage asset via a change in its setting.</p> <p>We welcome the preparation of the Heritage Impact Assessment for the site. However, the HIA doesn't really explore the relationship between the farmhouse and the former farmland.</p> <p>The HIA says that there will be no harm to the significance of the heritage asset. However, we consider this underplays the relationship between the farmhouse, the barns to the rear and the former agricultural land beyond.</p> <p>We consider that some open space/landscaping to help protect the setting of the farmhouse would be helpful.</p> <p>We suggest that the HIA is revisited to address this.</p> <p>We note that part of the site is to be used as a recreation ground. Careful rearrangement of the layout of land uses could be used to both deliver housing, open space and protection for the setting of the heritage asset.</p> <p>We look forward to seeing a revised HIA and hope that this will address our concerns.</p>	Comments noted. The farmhouse and barns are to the south east of the site. Consideration is being given to retaining the playing pitch in approximately its current location, which would maintain the open aspect of these properties.	1681	<p>HIA to be reconsidered.</p> <p>Should the site progress to the Regulation 19 stage, consideration be given to reconfiguring the site, retaining the play area, playing pitch and new village hall together in the southern part, to address a number of issues, including maintaining a more open aspect reflecting the former agricultural setting of the listed farmhouse and adjoining barns.</p>
QUESTION 3a: Do you agree with the allocation of SN6000, Land north of Chapel Street, Barford? Please explain your response.	3450	Comment	<p>Catchment numbers in decline and school would have capacity to accommodate additional local children, preference relatively strong any pressure would be managed by the admission round.</p> <p>The school would have capacity based on current numbers taken Jan23 but there is some concern relating to the play space which this appears to consume, that it is assumed the school have use of as part of its curriculum requirement, and the impact losing this would have of the community.</p>	Comments noted. Consideration to be given to reconfiguring the site, to retain the playing pitch in approximately the same location, to the south of the sites.	1680	Should the site progress to the Regulation 19 stage, consideration be given to reconfiguring the site, retaining the play area, playing pitch and new village hall together in the southern part, to address a number of issues, including proximity to the school.
QUESTION 3a: Do you agree with the allocation of SN6000, Land north of Chapel Street, Barford? Please explain your response.	3393	Comment	Amber - archaeological mitigation will probably be necessary but is unlikely to prevent development.	Comments noted.	1679	Consider the need for inclusion in policy criteria, should the site progress to the Regulation 19 stage.

<p>QUESTION 3a: Do you agree with the allocation of SN6000, Land north of Chapel Street, Barford? Please explain your response.</p>	<p>3272, 3274, 3293, 3294, 3304, 3316, 3319, 3335, 3351, 3364, 3375, 3380, 3382, 3386, 3421, 3470, 3486, 3493, 3496, 3498, 3501, 3509, 3512, 3519, 3524, 3559, 3574, 3621, 3624, 3628, 3635, 3640, 3644, 3653, 3654, 3659, 3666, 3668, 3682, 3699, 3702, 3706, 3707, 3712, 3713, 3720, 3724, 3727, 3733, 3738, 3759, 3769, 3797, 3827, 3831</p>	<p>Mixed</p>	<p>Three key issues have been raised in relation to this site:</p> <p>(1) FLOOD RISK/DRAINAGE - the current playing field contributes to the flood alleviation scheme in the village, but the field itself has been water-logged/ suffered surface water flooding numerous times. This in turn has caused problems for adjoining properties and raises concerns that developing the field could damage the works and/or exacerbate the problems. Concerns have also be raised that these issues are related to the inability of the foul drainage in the village to cope at certain times, due to surface water ingress.</p> <p>(2) HIGHWAYS - safety concern raised about extra traffic through the village. Concern that the site is too far from bus stops.</p> <p>(3) COMMUNITY ASSET - concerns that splitting the village hall and playing field away from the refurbished play area (and to the rear of new development) would harm the use of all of these assets which function as a group and allow parents to easily supervise children. It would move the playing field away from the primary school, breaking any link between the two for use such as sports days. Additionally, the village hall car park is used at school drop off/pick up times, reducing parking on Chapel Street itself. There should be no break in the continuity of provision, given the importance of the asset to the village. The site also provides a green break in the centre of the village. Concerns that the village hall does not need improvement and is functional as it is.</p> <p>A number of other issues have also been raised:</p> <p>(4) SCALE OF DEVELOPMENT - the level of development proposed is out a keeping with the village, particularly if more than one allocation goes ahead.</p> <p>(5) INFRASTRUCTURE - school is already busy. Lack of local shops and services.</p> <p>(6) ECOLOGY/BIODIVERSITY - potential loss of trees/hedgerow areas for wildlife.</p> <p>(7) HOUSE TYPES/DESIGN - lack of detail provided.</p> <p>(8) RESIDENTIAL AMENITY - amenity of dwellings immediately adjoining the site will be impacted, particularly as these are bungalows.</p> <p>(9) PRINCIPLE - NPPF has removed the housing targets. Enabling development should only be allowed for heritage purposes. Building on 'Open Countryside'.</p> <p>(10) LANDSCAPE - Impacts have not been fully assessed.</p> <p>(11) HERITAGE - sensitivity of the site and nearby listed buildings not fully taken into account.</p>	<p>In Response to the key issues:</p> <p>(1) FLOOD RISK/DRAINAGE - the issues that have affected Barford for many years are acknowledged by the Council. Works have been undertaken (and recently updated) to improve highways drainage on the south side of Chapel Street (opposite the village hall car park/entrance), into the open land to the south. In assessing the site and responses to it, it is likely that a more appropriate approach will be to leave the playing field largely undeveloped, which would allow for further improvements to the drainage and possible bunding to the rear of the properties which front Chapel Street.</p> <p>(2) HIGHWAYS - NCC has recommended localised improvements in the vicinity of the site, but not raised concerns about the wider network in the village or beyond. The bus stops on the B1108 Watton Road are less than 800m walking distance from the furthest part of the site, which is considered to be a reasonable 10 minute walk.</p> <p>(3) COMMUNITY ASSET - there would be benefits to retaining the links between both the assets on-site (play area, playing field and village hall) and between these and the primary school. As such, the majority of development could be located to the rear (north) of the overall site, which would also help retain the open character in the centre of the village (combined with the space south of Chapel Street). This would be subject to further assessment in terms of landscape/visual impact on the wider townscape/landscape of moving development north. Continuity of provision is something that can be sought through a policy for the site, should it go forward to the Regulation 19 stage. Whilst the current village hall still functional, the length of the lease means that securing new funding to invest in ongoing repairs and improvements becomes more difficult.</p> <p>In response to the remaining issues:</p> <p>(4) SCALE OF DEVELOPMENT - 50 dwellings would represent less than a 10% increase in dwellings in the clusters, in line with the level of development the GNLP sets out for clusters as a whole, and considerable less than in larger settlements.</p> <p>(5) INFRASTRUCTURE - NCC Childrens Services has indicated that pupil numbers in the school catchment are declining, and there should be no issue with accommodating new pupils by admission round. Whilst the village has no shop/post office/health facilities, this is not uncommon for the village cluster locations.</p> <p>(6) ECOLOGY/BIODIVERSITY - No overriding constraints have been identified, and relevant surveys would need to be undertaken at the time of any planning application. As 'major' development the site would need to achieve 10% Biodiversity Net Gain.</p> <p>(7) HOUSE TYPES/DESIGN - these would be assessed in accordance with national and local policies at the time of any planning application, including the proportion of affordable units.</p> <p>(8) RESIDENTIAL AMNEITY - other national and local polices would be used to assess the amenity implications of proposals. Reconfiguring the site to move dwellings to the north could also assist in this regard.</p>	<p>1678</p>	<p>Should the site progress to the Regulation 19 stage, consideration be given to reconfiguring the site, retaining the play area, playing pitch and new village hall together in the southern part, to address a number of issues including combined use, retaining a green break, flood risk concerns, school drop off/pick up parking etc. Policy criteria to ensure continuity of use for the village hall.</p>
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				<p>(9) PRINCIPLE - Whilst NPPF para 61 refers to the standard method being an 'advisory starting-point' for housing requirements, it goes on to state that there would need to be 'exceptional circumstances' which justify an alternative approach; no exceptional circumstances have been identified. In any event, the housing figures have recently been tested through the examination of the GNLP and found to be sound. Whilst the site will facilitate a replacement village hall, would not be 'enabling development', but a positive allocation to meet the requirements of the GNLP. Whilst the site is Countryside in the current local plan, the purpose of the VCHAP is to facilitate the managed release of further sites o accommodate housing requirements.</p> <p>(10) LANDSCAPE - and LVA has been produced to support the Regulation 18, which is considered proportionate prior to any detailed scheme being brought forward.</p> <p>(11) HERTIAGE - see response to Historic England comments.</p>		
QUESTION 3b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3377	Support	Please see FW Properties' detailed comment on this land. With regards to surface water drainage and flooding, the development of this land will provide the opportunity to address the current flooding issues which are occurring on the playing field and in some of the properties around this land. Our drainage engineers have reviewed these issues and the local Flood Alleviation Scheme and have confirmed that these can be addressed and improved by the new development. We have assumed continuity of operation for the village hall and playing field so that the new facility opens when the existing hall is closed.	Comments noted. Welcome the moves by the site promoter to address some of the issues raised through the Site Assessment process and by the public and other consultees.	1712	Consider how the measures suggested by the site promoter could be incorporated into an allocation policy, should the site progress to the Regulation 19 stage.
QUESTION 3b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3420	Comment	<p>The Yare Valley County Wildlife Site is situated to the North of the site, and whilst not immediately adjacent, due to the public access to part of the CWS, it could be assumed that residents would seek out this location. The increased recreational pressures on the CWS should be considered, especially if informal access exists through the wider CWS which may be less monitored.</p> <p>The Site constitutes an infill between two existing settlement boundaries, and therefore must be designed taking this into consideration.</p> <p>Roadside trees should be retained to preserve the street scene and landscape of the village.</p> <p>A tree belt runs through the middle of the site which appears to first show on 1988 aerial imagery, this now appears to be quite mature and substantial in nature and efforts should be made to retain this where possible. There is also extensive boundary vegetation including mature trees which should be retained.</p>	<p>Should the site go ahead, development will contribute to the GIRAMS requirements, which seek to mitigate impacts on designated sites. This site will also be immediately adjacent the main public open space in the village, and will be seeking to enhance the use of this site. The retention of tress and hedgerows will, as far a reasonably possible, be incorporated into the development of the site.</p> <p>And LVA and HIA have been undertaken for the site, to inform its allocation, and design, landscape etc. are also covered by other national and local planning policies.</p>	1692	Consider allocation policy criteria relating to the retention of mature trees and hedgerows within and bounding the site, should the site progress to the Regulation 19 stage. If necessary update the LVA to reflect the change in approach of retaining the open space to the front (south) of the site and moving the development to the rear (north) and reflect any relevant outputs in policy criteria.

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QUESTION 3b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3794	Comment	Within this strategic site there are playing pitches, car parking and a village hall. The village hall would provide ancillary facilities for the playing field. Mitigation is proposed to relocate the playing field and village hall to the field located to the north of the existing site. Sport England requests that the policy refers to the loss of the playing field and ancillary facilities (village hall and any associated car parking) re-location and that they should be replaced by equivalent or better provision in terms of quantity and quality in a suitable location to the north of the site, in accordance with criteria b of paragraph 103 in the National Planning Policy Framework. To ensure sufficient mitigation is delivered wording in the policy should be included to the affect of 'the loss of playing field and ancillary facilities (car parking and a village hall) resulting from the proposed development shall be replaced by equivalent or better provision in terms of quantity and quality in a suitable location to the north of the existing site.'	Comments noted. Following assessment of the Representations, consideration is now being given to retaining the village hall and playing pitch facilities on the southern part of the site, to maintain links with the refurbished play area and the primary school. However, the site will still require a new village hall to secure the long term functioning of the site.	1691	Consider a revised version of the recommended site allocation policy criteria, should the site progress to the Regulation 19 stage.
QUESTION 3b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3767	Comment	The LLFA's Water management team would like to draw the LPA's attention to an opportunity to seek flood risk management enhancement opportunities for the village of Barford on this site. The site is located at the head of a significant surface water flow-paths through the main village where there is a history of flooding. Previously, highways have put in place to mitigate some of the flooding along Chapel Street that flows into the village. The LLFA advises the LPA to include this opportunity within the sites opportunities to contribute towards alleviating flooding to the elsewhere in the community.	Issues of surface water flood risk, and the potential opportunities of developing in this location are noted.	1690	Consider the inclusion of policy criteria requiring the investigation of opportunities to improve surface water flood management at this site, due its location at the head of surface water flow paths, should the site progress to the Regulation 19 stage.
QUESTION 3b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3584	Comment	Adjacent to water supply and foul drainage networks. There is current capacity at Barford Chapel Street WRC for small scale growth – however, this may be impacted by cumulative growth from other commitments including proposed allocations VC BAR1/SNO552REVC across Colton and Barford within the WRC catchment. Suggest a policy requirement is included in the policy: "Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network."	Comments noted. A number of representations have also highlighted existing issues with foul water drainage in Barford at times of high rainfall.	1689	Include the policy criterion as recommended, should the site progress to the Regulation 19 stage. Also, continue to liaise with Anglian Water regarding other issues raised concerning the ability of the foul water network to cope during times of high rainfall.
QUESTION 3b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3529	Comment	The policy wording should include provision of open space/landscaping in the south eastern corner of the site to provide an appropriate setting for the farmhouse and maintain some connection to the former agricultural land. There should also be a requirement for archaeological desk-based assessment to inform any planning application and investigation prior to commencement of development.	Comments noted. Following assessment of the Representations, consideration is being given to retaining the playing pitch in approximately its current location, which would help address the main heritage concern raised.	1688	To consider the retaining the playing pitch in approximately its current location, should the site progress to the Regulation 19 stage. Also consider the wording of an archaeology criteria, as recommended.
QUESTION 3b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3406	Comment	The Highway Authority does not object to the proposed allocation, subject to provision of acceptable visibility splays at the site access. Highway improvements are also required to include 2.0m wide footway at the site frontage with a safe crossing for pedestrians to access existing footway at the south side of Chapel Street and a 20mph zone.	Comments noted and will be reflected in any site allocation policy, should the site progress to the Regulation 19 stage.	1687	To be incorporated into site allocation policy criteria should the site progress to the Regulation 19 stage.

<p>QUESTION 3b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?</p>	<p>3273, 3276, 3320, 3333, 3352, 3366, 3376, 3383, 3430, 3471, 3487, 3495, 3497, 3502, 3510, 3513, 3520, 3525, 3625, 3629, 3643, 3645, 3660, 3663, 3667, 3669, 3700, 3708, 3709, 3714, 3728, 3734, 3743, 3762, 3798, 3803</p>	<p>Mixed</p>	<p>A number of the Representations raise concerns already addressed under Question 3a and consequently a number of general requirements are suggested, should the site progress to the Regulation 19 stage. Again the key issues relate to:</p> <p>(1) FLOOD RISK/DRAINAGE - ensuring the new development does not create additional surface water flood risk issues and, indeed, seeks to address existing problems with both surface water flows and foul water drainage. Specific points have been raised in terms of the Developer and/or Council indemnifying residents, should flood risk measures not be successful.</p> <p>(2) HIGHWAYS - specifically in terms of reduced speeds in the village, junction improvements (e.g. traffic controlled at the entrance to the site and at the Cock Street/B1108 junction) and pedestrian improvements (wider pavements, crossing points etc.). Also maintaining/improving off street parking for school drop off/pick up as part of proposals (including throughout construction).</p> <p>(3) COMMUNITY ASSETS - Keep the playing field, play area and village hall together in the southern part of the site to facilitate combined use, retain parking (see Highways above) and use of the playing field by the school. Ensure that there is no loss of provision/use through the construction phases of development</p> <p>Other issues raised include:</p> <p>(4) ECOLOGY/BIODIVERSITY - no loss of trees, landscaping and planting to be sympathetic to wildlife/biodiversity. Additional tree planting to offset carbon emissions.</p> <p>(5) INFRASTRUCTURE - upgrade GP provision, ensure school capacity.</p> <p>(6) CONSTRUCTION - minimise the disruption from construction.</p> <p>(7) DESIGN/CHARACTER/HOUSE TYPES - to be in keeping with a village location, not urban/suburban. Housing should be smaller/affordable units, less dense, bungalows where overlooking might be an issue. Adequate off-street parking.</p> <p>(8) RESIDENTIAL AMENITY - amenity of adjoining residents to be taken into account.</p> <p>(9) FUTURE DEVELOPMENT - limitations should be placed future development.</p> <p>(10) HERITAGE - proper consideration of the nearby heritage assets.</p>	<p>Several of the broader issues (such as capacity of/contributions to infrastructure and the scale of development proposed for the village) are addressed under the Representations/Responses to Question 3a. Many of the issues raised are already covered by other national and local planning policies (such as residential amenity, design, Biodiversity Net Gain), and no specific points or requirements have been identified in the Representations. Other requirements would also be addressed by condition at the planning application stage, such as construction management measures or are outside the scope of planning legislation. Specifically:</p> <p>(1) FLOOD RISK/DRAINAGE - Development would need to ensure that surface water run off does not exceed greenfield rates and, being located at the head of a flow path, has the potential to improve the current situation. Indemnifying residents from future impacts is not part of the Planning process; however, the Council will follow due process and the advice of specialist parties as part of determining any future planning application. Although Anglian Water has not objected to this site and in ongoing discussions AW has noted that camera surveys are currently being undertaken in Barford to establish where the problems are located.</p> <p>(2) HIGHWAYS - NCC Highways has set out the requirements for allocating this site, including the introduction of a 20mph limit, but has not raised concerns about the wider network in the village or beyond. Following the assessment of representations, consideration is now being given to retaining the village hall and playing field at the front (south) of the site, therefore maintaining parking for school drop off and pick up.</p> <p>(3) COMMUNITY ASSETS - there would be benefits to retaining the links between both the assets on-site (play area, playing field and village hall) and between these and the primary school. As such, the majority of development could be located to the rear (north) of the overall site, which would also help retain the open character in the centre of the village (combined with the space south of Chapel Street). This would also aid continuity of provision, which is something that can be sought through a policy for the site, should it go forward to the Regulation 19 stage.</p> <p>(4) ECOLOGY/BIODIVERSITY - tree and hedgerow loss would be kept to a minimum and the site would need to achieve 10% Biodiversity Net Gain.</p> <p>(5) INFRASTRUCTURE - NCC Childrens Services has indicated that the primary school will be able to accommodate new pupils. Contributions to education provision and other infrastructure are primarily made via CIL contributions. Any S106 contributions would need to be proportionate to the scale of the development.</p> <p>(6) CONSTRUCTION - issues would be dealt with via condition at the planning application stage.</p> <p>(7) DESIGN/CHARACTER/HOUSE TYPES - development would be assessed against the national and local policies in place at the time of an planning application. This would currently include the South Norfolk Place Making Guide and any future replacement Design Guide for South Norfolk. The mix of dwellings, including the proportion of affordable units would also be assessed against the policies in place at the time of any application.</p>	<p>1685</p>	<p>Should the site progress to the Regulation 19 stage, consideration be given to reconfiguring the site, retaining the play area, playing pitch and new village hall together in the southern part, to address a number of issues including combined use, retaining a green break, flood risk concerns, school drop off/pick up parking etc. Policy criteria to ensure continuity of use for the village hall, investigation of opportunities to improve the existing surface water flooding and foul drainage issues in the village, appropriate highways measures, protection of existing trees/hedgerows, landscaping etc.</p>
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				<p>(8) RESIDENTIAL AMENITY - had development continued to be promoted in to the southern end of the site, it may have been necessary to specify bungalows in this location. In any event, amenity is covered by other national and local policies.</p> <p>(9) FUTURE DEVELOPMENT - the current Local Plan cannot specify limits on future growth.</p> <p>(10) HERITAGE - reorganisation of the site to retain open space at the front would help address this issue, see also responses to Historic England.</p>		

<p>QUESTION 4a: Do you agree with the allocation of SN0552REVC, Land north of Watton Road, Barford, as an extension to VC BAR1, for up to 20 additional dwellings on an area of 0.73ha? Please explain your response.</p>	<p>3305, 3317, 3336, 3354, 3367, 3378, 3384, 3387, 3433, 3438, 3441, 3472, 3494, 3514, 3522, 3564, 3568, 3569, 3575, 3626, 3638, 3646, 3648, 3661, 3664, 3670, 3673, 3683, 3686, 3690, 3701, 3710, 3716, 3718, 3721, 3725, 3729, 3761, 3763, 3799, 3828, 3832</p>	<p>Mixed</p>	<p>Summary of representations received in response to Q4A grouped by subject area for ease of reference:</p> <p>Highways - (1) Highway improvements required to enable safe access across Back Lane and to make the B1108 safer for pedestrians; (2) Speed reduction measures required in the vicinity of the site; (3) Potential for increased levels of speeding traffic and noise nuisance; (4) Dangerous point of access to the site on a blind bend; (5) Back Lane in single car width and not suitable for additional traffic – concern that this would be used for access; (6) Back Lane junction is dangerous; (7) Development would worsen the situation for people crossing the B1108; (8) Dangerous area for pedestrians as no footpath;</p> <p>Flooding - (1) No objection if the surface water is directed to the river and not to the attenuation pond and lowest areas in Barford; (2) Existing flooding experienced in Barford and this proposal will exacerbate the situation – existing drainage ditches are unable to cope; (3) Concerns about surface water run-off impacting existing properties on Cock Street;</p> <p>Infrastructure - (1) Existing sewerage infrastructure would be unable to cope; (2) Lack of local services and facilities; (3) Level of existing services in the village overstated/ misrepresented; (4) No capacity in local health services; (5) School has limited capacity for new pupils;</p> <p>Landscape and townscape impact - (1) Significant negative impact on the visual and social character of the village; (2) Wider landscape impact on views towards the listed farmhouse and the approach to the village; (3) Impact on views for existing residents who back onto Back Lane; (4) Modern development will impact on the historic landscape; (5) Earlier assessments noted significant landscape impact; (6) Proposed site is elevated above Back Lane; (7) Density would result in an urban entrance to the village; (8) Allocation of this site would conflict with Objective 3 of the VCHAP relating to protection of the character of villages and their settings;</p> <p>Scale of development - (1) Over development – scale of development proposed is disproportionate to the scale of the existing village; (2) Cumulative total of development proposed is excessive; (3) Not related to the local housing demand;</p> <p>Heritage - (1) Adverse impact on the Grade II listed farmhouse; (2) Impact on St Botolph’s Church, a Grade II* listed building;</p> <p>Ecology & biodiversity - (1) Adverse impact on wildlife in the local area (birds, bats, invertebrates etc);</p> <p>Relationship between VC BAR1 and SN0552REVC - (1) Concerns about the deliverability of the site – query whether there is consent from the adjoining landowner as well as its dependency on VC BAR1; (2) Outside the settlement limit; (3) Disagree with VC BAR1 and the loss of existing businesses on this site; (4) Potential loss of planning gain/ benefits due to the piecemeal nature of the development that is proposed; (5) The site assessment does not consider the impact of cumulative development in the area; (6) If combined with VC BAR1 a single</p>	<p>The Council responds as follows:</p> <p>Highways - (1 – 7) The Council has engaged with the Highways Authority throughout the preparation of the VCHAP, including at this Regulation-18 focused consultation stage. The Council will review the comments of the technical consultees as part of this process however at this stage, in the event the site were to progress as part of the VCHAP it is not expected that access to the site would be via Back Lane, and any site specific requirements would include the provision of a safe pedestrian access through VC BAR1 into the village. Initial discussions with the Highways Authority have not raised an objection to the joint allocation of VC BAR1 and SN0552REVC subject to the technical requirements set out in their response to the consultation;</p> <p>Flooding - (1-3) The Council has engaged with technical consultees including the Lead Local Flood Authority, the Environment Agency and Anglian Water throughout the preparation of the VCHAP, including via this consultation. The Council has not received any objections from these consultees but will consider their representations in further detail as part of this review. The Council is, however, aware of concerns that have been expressed by local residents regarding past flood events (both surface water and foul water) within the village and the potential impact of further development on the existing infrastructure and flood mitigation measures that are in place and will review these as appropriate. It should be noted however that surface water run-off following new development must not exceed the existing greenfield run-off rates and, with appropriate drainage strategies in place, new development may improve the existing situation locally;</p> <p>Infrastructure - (1) The Council has not received an objection from Anglian Water (AW) to proposed site allocations at Barford however it is aware of the concerns expressed locally about previous foul water drainage issues. The Council will forward these onto AW for their comment and review the response as appropriate; (2) In terms of the local services and facilities, and as previously noted in response to earlier consultation stages, Barford is a comparatively well served village in terms of local services and facilities. As the Council has stated elsewhere, it is aware of the tension that exists when planning growth in a rural area however the village has a regular bus to Norwich, which runs via the hospital, with some services also stopping at the bus interchange at Cringleford for connecting routes. Buses also run in the opposite direction, to Watton (via Hingham), which has a range of shops and services, including a weekly market. These public transport routes provide access to additional services and facilities. (3) Concerns regarding local medical facilities reflect wider issues at a national level and are beyond the scope of the VCHAP to resolve; however, the Council has proactively engaged with the Integrated Care Board who has responsibility for planning medical resources and provision to meet both existing and future need across the District; (4) Norfolk County Council Education Service has repeated its earlier advice confirming that due to a combination of falling birth rates and parental choice for local primary schools there is sufficient capacity additional pupils;</p> <p>Landscape & townscape impact - (1 – 6) The Council has recognised in the site assessment, the supporting Landscape Visual Appraisal and the consultation document the sensitivity of the landscape, including the transitional role of the site within the local landscape. Should the site be preferred for allocation careful consideration would need to be given to the site-specific policy to ensure appropriate design, landscaping and</p>	<p>1531</p>	<p>Refer local concerns re. foul water infrastructure to Anglian Water for their comment/ review.</p>
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			<p>assessment of the whole site area should be undertaken; (7) The site should not be considered as an extension to VC BAR1 as it is a physically separate site; (8) If VC BAR1 is found to be an unsound allocation, this site would be separated from the village; and</p> <p>Miscellaneous - (1) If additional development is necessary it should be in the main area of the village, closer to the village hall; (2) Historical precedent – previous refusal of planning permission; (3) Impact on residents opposite the site in terms of noise, safety, air quality; (4) Pedestrianisation of Back Lane would improve safety and recreational value for local residents; (5) Loss of privacy for existing residents of farmhouse opposite the site; (6) Unclear why a previous omission site has been included for consideration; (7) Concern about gradual expansion of development across the field if the site is allocated; (8) Building on greenfield sites is at odds with the Council’s own Environmental Strategy, including an aim to reduce carbon emissions; (9) Impact of light pollution from the development; (10) The consultation process has made it difficult for people to communicate their thoughts adequately;</p>	<p>mitigation of the site – this could include site density, the layout of the site including the location of on-site open space and the landscaping of the scheme. The Council recognises however that new development can result in changes to the local landscape however it also considers that the development proposed would retain the largely open wider setting of the village;</p> <p>Scale of development - (1, 2) The Council is currently consulting on a focused number of options that could be alternative or additional sites for the VCHAP and it is premature to suggest that VC BAR1, SN0552REVC and SN6000 would all be considered allocation sites within Barford. Individually each site is within the threshold range of 12-50 dwellings. In addition, as previously noted the 2015 Local Plan allocation for Barford has not been delivered and is not being carried forward in the VCHAP, and the level of windfall development in the settlement was relatively modest. As such, the proposed allocations, noting the additional benefits being provided, could be acceptable (3) The VCHAP is seeking to deliver the minimum housing requirement (as established via the Greater Norwich Local Plan) throughout the rural village clusters in the District, rather than on an individual settlement basis. Growth is proposed on sites that are considered to be sustainable, deliverable and meet the objectives of the VCHAP ensuring a distribution of new homes throughout the District to support existing communities and facilities;</p> <p>Heritage - (1, 2) The Council has prepared Heritage Impact Assessments to support the allocation of sites within the VCHAP. These assessments are intended to (a) assess the impact of proposed development on heritage assets and their settings; and (b) identify possible mitigation measures to address the impact of development. The Council has recognised the impact of development on the setting of Sayers Farm (opposite the site) in the Heritage Impact Assessment that was published alongside the Regulation-18 focused consultation. The Council is also aware of the comments of Historic England submitted in response to this consultation and will review these to determine the appropriateness of the inclusion of this site in future iterations of the VCHAP;</p> <p>Ecology & biodiversity - (1) The Council has consulted with the Environment Team at Norfolk County Council and Norfolk Wildlife Trust and has not received an objection to the proposed inclusion of the site in the VCHAP. In addition, the Council is preparing a Habitats Regulation Assessment as part of the evidence base to inform both the ecological considerations of the Plan and the site selection process and this will continue to be updated as the Plan progresses. Appropriate ecological assessments will be required at the planning application stage for any site allocated via the VCHAP;</p> <p>Relationship between VC BAR1 and SN0552REVC - (1 – 8) The Council is aware that there is a range of views locally regarding the possible combined allocation of VC BAR1 and SN0552REVC with some respondents considering that the sites should remain as separate allocations whilst others suggesting that further work should be undertaken in order to combine the sites as a single allocation. To date the Council has assessed each site individually but has explored linkages between the two parcels of land and, should the site progress, it would intend to allocate the site as a single allocation to ensure a comprehensive allocation. This would, however, require confirmation of a joint working arrangement between the landowners and this is</p>		
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				<p>currently being explored with these parties. The Council is aware of the separation that would exist in both landscape and townscape terms should the sites be delivered separately with SN0552REVC being developed in advance of VC BAR1. For this reason, as well as the requirement of the highways authority for a pedestrian link through VC BAR1 to provide a safe connection between SN0552REVC and the village, the Council does not consider individual allocations of these sites to be appropriate; and</p> <p>Miscellaneous - (1) The Council has consulted on two sites promoted within Barford, including a site closer to the village hall (SN6000). Access to the existing services and facilities is a key consideration in the site selection process and whilst SN0552REVC does not benefit from the same central location of SN6000 with an appropriate pedestrian link the Council considers that its proximity to the village hall, primary school etc would be acceptable; (2, 7, 8) The Council is currently seeking the managed release of land to meet the identified housing requirement for the District, rather than assessing speculative planning applications. Whilst the site assessment includes a review of the planning history of promoted sites, a previous refusal of planning permission does not preclude the inclusion of a site as an allocation site if they are found to be acceptable in the context of the allocation process. The Council has sought to include brownfield sites within the VCHAP however the availability of suitable brownfield sites is limited and is not sufficient to meet the housing target set for the VCHAP; as such, the Council is required to release greenfield land for this purpose but is seeking to do so in a controlled manner to minimise the impact as far as possible; (3, 4, 5, 9) As part of the initial site assessment the Council considers the relationship between the promoted site and the surrounding land uses, including existing residential properties. Detailed matters would be assessed at the planning application stage once further details are known however the Council considers that in principle the residential development on this site would be acceptable (10) The Council has remained available throughout the consultation process and has provided advice and assistance as required. It is unclear from the submitted representation what has caused difficulties however the Council is satisfied that the high levels of engagement with the consultation (particularly in Barford) reflects the accessibility of the process.</p>		

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QUESTION 4a: Do you agree with the allocation of SN0552REVC, Land north of Watton Road, Barford, as an extension to VC BAR1, for up to 20 additional dwellings on an area of 0.73ha? Please explain your response.	3808, 3821	Support	<p>Summary of representations in support of SN0552REVC:</p> <ul style="list-style-type: none"> - The site is currently identified as being a Reasonable Alternative site by the Council; - The site can offer improvements to the existing landscaping on entrance to the village; - The site can improve road safety at B1108, Back Lane and Cock Street; - On site drainage works could provide flood mitigation and reduce surface water flow into the village; - Provision of an (off-site) country park; - On-site foul water drainage system to avoid increased load into the existing infrastructure; - The site is both deliverable and viable; and - Question the deliverability of SN6000 which is also under consideration as part of this consultation. 	The Council welcomes confirmation from the site promoter and landowner of the deliverability and viability of the site and notes the benefits that are being promoted should this site be selected for allocation in the VCHAP, in particular reference to highway improvements and flood mitigation measures which have been identified as issues of concern locally. The Council is aware that this proposal includes the provision of an off-site country park but does not consider that this should be included in the assessment of the merits of the site as it is not directly related to the delivery of the site in the VCHAP process.	1522	No action required
QUESTION 4a: Do you agree with the allocation of SN0552REVC, Land north of Watton Road, Barford, as an extension to VC BAR1, for up to 20 additional dwellings on an area of 0.73ha? Please explain your response.	3530	Object	<p>Response from Historic England:</p> <p>Whilst there are no designated heritage assets within the site boundary, there is a grade II listed building, Sayers Farmhouse, to the south of the site, just across Watton Road. The development has the potential to impact the significance of this heritage asset via a change in its setting.</p> <p>We welcome the preparation of the Heritage Impact Assessment for the site. However, the HIA identifies a major impact on the significance of the heritage asset. There would be considerable harm to the significance of the asset through development within its setting. Whilst we note suggested mitigation in the form of planting and open space, this is not sufficient.</p>	The Council has proactively engaged with Historic England throughout the preparation of the VCHAP, including in the preparation of the template forms used to assess the potential impact of development on the significance of heritage assets as well as their settings. The Council, guided by its own Senior Heritage and Design Officer recognised the impact that development of this site could have on Sayers Farmhouse and notes that these concerns have been repeated by Historic England in their representation. The Council will review these comments in the context of the evidence base and the consultation responses when undertaking the final site selection process but considers this to be a clear objection from a statutory consultee in response to this site.	1521	Review whether it is appropriate to include SN0552REVC in the VCHAP due to its identified impact on Sayers Farmhouse.
QUESTION 4a: Do you agree with the allocation of SN0552REVC, Land north of Watton Road, Barford, as an extension to VC BAR1, for up to 20 additional dwellings on an area of 0.73ha? Please explain your response.	3585	Comment	<p>Comments from Anglian Water:</p> <p>No objection to the site. Adjacent to water supply and foul drainage networks. Current capacity at Barford WRC although this may be exceeded by cumulative development in the area therefore a policy requirement for early engagement with Anglian Water is recommended.</p>	The Council welcomes the ongoing engagement of Anglian Water with the preparation of the VCHAP and notes the suggested policy requirements regarding early engagement should the site be considered suitable for further progression in the Plan. However, the Council is also aware of representations submitted by local residents expressing concerns about the local foul water infrastructure, including anecdotal incidences of flooding during periods of high rainfall. The Council will therefore contact Anglian Water directly to highlight these concerns and seek specific feedback from the technical team.	1520	Contact Anglian Water to raise the local concerns about the existing foul water infrastructure.

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QUESTION 4a: Do you agree with the allocation of SN0552REVC, Land north of Watton Road, Barford, as an extension to VC BAR1, for up to 20 additional dwellings on an area of 0.73ha? Please explain your response.	3394	Comment	<p>Comments from NCC Historic Environment Service:</p> <p>Amber - archaeological mitigation will probably be necessary but is unlikely to prevent development.</p>	The Council welcomes the ongoing engagement of the Historic Environment Service and notes the comments submitted in respect of SN0552REVC.	1519	No action required
QUESTION 4b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3810	Support	<p>The site promoter has submitted the following comments in response to Question 4B:</p> <ul style="list-style-type: none"> - Improved landscape provision of housing adjoining the existing village boundary on two sides. - Road safety improvements to the B1108 junctions around Back Lane & Cock Street through improved vision splays, road and access widths - Significant flood mitigation delivered via catchment ponds and drainage retained on site to reduce water flow into the village from road and field run off. - Provision of a 7ha publicly accessible semi natural open space in the form of a new Country Park at no cost to the village of district. - On site sewage treatment and rainwater catchment for environmental benefit which avoids adding to the existing main infrastructure which near capacity. <p>The site is deliverable and viable enabling the required housing to provided in conjunction with major benefits to Barford.</p>	The Council welcomes the confirmation from the site promoter that the site remains both deliverable and viable, as well as the acknowledgement of some of the site-specific requirements that have been identified to date. Should the site be considered appropriate for inclusion in the VCHAP the Council will review the evidence base, as well as the responses to this consultation, to determine an appropriate policy for the site. As noted elsewhere, whilst the Council recognises the landowner continues to promote the delivery of a Country Park as part of this site, this is not considered to be either proportionate or necessary for the allocation of the site and as such should not be given undue weight as part of the site selection process.	1553	No action required.

<p>QUESTION 4b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?</p>	<p>3318, 3334, 3356, 3368, 3379, 3381, 3385, 3388, 3435, 3439, 3473, 3515, 3523, 3565, 3627, 3647, 3649, 3662, 3665, 3671, 3674, 3685, 3687, 3711, 3719, 3726, 3730, 3764, 3792, 3800</p>	<p>Mixed</p>	<p>Summary of the responses received to Question 4B:</p> <p>Drainage/ Flooding – Improvements/upgrades to the existing drainage infrastructure in the village; Solution to address existing drainage issues locally; Evidence that flood mitigation and drainage measures can be achieved successfully; Indemnity for the foul water infrastructure to be guaranteed by SNDC against increases to flood and pollution risks in the village;</p> <p>Highways – Speed calming measures to be installed at Watton Road, Back Lane, Cock Street and Church Lane/ Chapel Street; Street lighting to be installed along Cock Street and the site; Realignment of the existing B1108 road layout; Evidence that a safe site access and pedestrian access onto Cock Street is achievable; Reduction in speed limit to 30mph; Installation of speed cameras on the Watton Road; Assessment of the existing Back Lane junction to be undertaken during spring/summer to visibility is at its lowest; A roundabout to be installed by The Cock Inn;</p> <p>Heritage – Consideration to be given to the impact of development on heritage assets;</p> <p>Landscape & townscape – Visual intrusion of the site to be addressed;</p> <p>Landscaping to minimise the visual impact of dwellings and maintain the character of the village at its entrance; No further street lighting to be installed; Design, layout and building heights to be restricted to minimise their impact; Design of dwellings to reflect existing village character;</p> <p>Retention of existing trees and hedgerows;</p> <p>Miscellaneous – Mitigation to address noise and air pollution; Measures to be put in place to address the ecological impact of development during and after the construction period; Restrictions on further/ future development of the remainder of the field; Measures to address highway safety and noise impacts during the construction period; A covenant to be placed on the land to restrict further development of site; Relocation of existing jobs and services elsewhere but within easy access of the village; Investigation of the negative impact on wildlife; Total number of dwellings across the combined VC BAR1 and SN0552REVC to be limited to 20 dwellings; Improvements to existing healthcare provision; Council to replace and fund the loss of greenspace; Funding from the developer towards the school, as well as a guarantee that children from the village will have school places;</p> <p>Funding from the developer towards healthcare provision;</p> <p>In addition to the above specific responses to Question 4B, the Council also received a number of duplicate submissions repeating the issues raised in response to Question 4A regarding the principle of development in this location (with a particular focus on highways, drainage and landscape impact). Rather than repeat the responses to those matters here please</p>	<p>The Council welcomes the suggestions that have been received for a site-specific policy for SN0552REVC and, should the site progress as a preferred allocation in combination with VC BAR1, the Council will consider these alongside the comments of the technical consultees, the supporting evidence base and the existing site-specific policy for VC BAR1. However, the Council would respond specifically on the following points raised in response to this question:</p> <p>In terms of drainage, the site developer would be required to submit an appropriate drainage assessment and scheme as part of a planning application. This would be subject to scrutiny at that stage but the Council would not undertake to indemnify residents against this work;</p> <p>The developer is not expected to remedy existing drainage issues within the village however there would be an expectation that further development did not worsen the existing situation. As noted in response to Q4A an appropriate drainage scheme could offer betterment to the existing issues experienced;</p> <p>The highways authority has set out their requirements should the site be allocated and whilst highway improvements would be necessary it is not recommended that the either a re-alignment of the B1108 is required, or that a roundabout is appropriate;</p> <p>The Council would not be able to add a restrictive covenant onto the remainder of the land to prevent future development as it is not a landowner of the site. However, nor would the Council consider it appropriate to do so;</p> <p>The Council is not able to relocate the existing businesses (from the VC BAR1 site) to an alternative location within the vicinity. The site has been actively promoted for allocation by the landowner; and</p> <p>In accordance with the Council’s adopted Community Infrastructure Levy the developer is required to make a financial contribution towards the impact of development. A proportion of this tariff is collected for both education and healthcare purposes. A guarantee of places at school for local school children is neither appropriate nor necessary (as confirmed by the response from NCC Education Service).</p>	<p>1529</p>	<p>Review the responses alongside the comments of the technical consultees, the supporting evidence base and the existing site-specific policy for VC BAR1 should the site be selected for allocation.</p>
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Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
			see the Council's response to Question 4A for a comprehensive response to these individual issues.			
QUESTION 4b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3586	Comment	<p>Summary of response from Anglian Water:</p> <p>Adjacent to water supply and foul drainage networks. There is current capacity at Barford Chapel Street WRC for small scale growth – however, this may be impacted by cumulative growth from other commitments including proposed allocations VC BAR1/SN6000 across Colton and Barford within the WRC catchment.</p> <p>Suggest a policy requirement is included in the policy: "Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network."</p>	The Council notes the suggested policy criterion from Anglian Water regarding early engagement by the landowner.	1528	Review policy requirement for inclusion within site-specific policy if appropriate.
QUESTION 4b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3531	Comment	<p>Comments from Historic England:</p> <p>We recommend that the site is not allocated but if the site is allocated, we would expect the policy criterion to include the mitigation measures recommended in the HIA including planting and open space and views to the countryside.</p>	The Council notes the objection of Historic England to the inclusion of this site in the VCHAP due to its impact on Sayers Farmhouse. However, the Council welcomes the suggested policy criteria should the site be considered an acceptable site during the site selection process and this would be incorporated into any site specific policy requirements.	1527	The Council will review the requested site-specific policy requirements submitted by Historic England as appropriate.
QUESTION 4b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3422	Comment	<p>Comments of the Environment Team at Norfolk County Council:</p> <p>The site is adjacent to a designated River Valley Landscape area. Being a large extension into the countryside and the current recessive nature of Barford in the landscape - the design, layout and especially boundary treatments of this site should it come forward for development are going to be very important. The site itself however is largely void of existing landscape features and formed of arable land. In the wider vicinity there are a number of County Wildlife sites, and Ancient Woodland (Colton Wood), public access to these sites and potentially increases in recreational pressures should be considered.</p>	The Council is aware of the local landscape designations but does not consider that these would necessarily preclude development of a site, subject to all other considerations being found acceptable. The Council acknowledges the important role that design, layout and landscaping would have in ensuring the successful assimilation of the site into the existing landscape and the details requirements for this would be set out within site-specific policy if appropriate. In terms of the potential increase in recreational pressures on existing sensitive sites the Council has adopted a 'Green Infrastructure and Recreational Avoidance Mitigation Strategy' which seeks to address some of these pressures, including through the provision of additional green infrastructure as part of new development.	1526	Consideration of the matters raised for inclusion in a site-specific policy should the site be considered appropriate for allocation in the VCHAP.
QUESTION 4b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3407	Comment	<p>Comments of NCC Highways Authority:</p> <p>The Highway Authority would not object to the proposed allocation, subject to provision of visibility splays, measuring 2.4m x 120m in both directions, 2.0m wide footway to provide a safe route between the site and the village, this may include a requirement for of a safe pedestrian crossing at the B1108, assessment of the village speed limit and implementation of recommendations. Improvement to Back Lane may also be required.</p>	The Council welcomes the ongoing engagement of the Highways Authority and notes the site specific requirements that would be necessary to facilitate development in this location. The Council is aware that the pedestrian link from the site would pass through existing preferred site VC BAR1 and as such a single site allocation for both sites would likely be necessary to secure this at an appropriate stage in the development of the site.	1525	The Council will review and include site-specific policy requirements as required should the site be included in the VCHAP.
QUESTION 4b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3361	Comment	<p>Comments of the Water Management Alliance:</p> <p>Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).</p>	The Council notes these comments and will consider them as appropriate in due course when drafting site specific policy text should the site be chosen as a preferred allocation site.	1524	No action required

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QUESTION 4b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3315	Support	Summary of support for the site: - No objection to sites accessed via B1108/ Back Lane junction - consider that it would be safer for the school and result in less upheaval for the village	The Council notes these comments	1523	No action required

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

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 5a: Do you agree with the allocation of SN0055, Land east of Spur Road and south of Norwich Road, Barnham Broom, for approximately 15 dwellings on an area of 1.0ha? Please explain your response.	3829, 3833	Comment	Surface water flooding is a major concern and discussion with stakeholders over mitigation in all these villages has been ongoing. Need to ensure the existing problems of surface water flooding and the potential for making things worse has been properly considered. Scale of development north of Wymondham has potential to significantly damage the rural character and supporting infrastructure does not keep up. Loss of greenfield land contradicts Objective 3 of the VCHAP.	<p>The Council has engaged with Norfolk County Council as the Lead Local Flood Authority (LLFA) throughout this process, with specific discussions on a number of sites as appropriate. The Council has not received an objection to the proposed allocation from the LLFA. In accordance with current policy guidance and legislation, run-off from new development should not exceed the existing greenfield run-off rates of the site. Furthermore, in some instances, it is possible that development can result in improvements in local drainage and flooding matters due to improvements in on-site drainage.</p> <p>To support the publication of the Focused Regulation 18 document, a number of Landscape Visual Appraisals (LVA) were produced to evaluate the sites included in the document. The LVA for this site concluded that the impact on the landscape from this site would be limited. It also states that the site frontage would follow the established settlement pattern and development further into the site would be contained. Neither Natural England nor the Norfolk County Council Natural Environment Team have objected to this site. The Council recognises that new development can result in changes to the local landscape, however this site is considered to be well contained within the wider landscape.</p> <p>Objective 2 of the VCHAP states that new development provides the opportunity to support and potentially improve local services and facilities. The Council has engaged with various service providers including Norfolk County Council and Anglian Water, and no objections have been raised for this site, or for the overall development in Barnham Broom, relating to services that would prevent this site from being allocated.</p>	1651	No action required.

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QUESTION 5a: Do you agree with the allocation of SN0055, Land east of Spur Road and south of Norwich Road, Barnham Broom, for approximately 15 dwellings on an area of 1.0ha? Please explain your response.	3328, 3739	Mixed	<p>Current plan has already identified SN0018SL for 15 dwellings and SN4051 for 40 dwellings within a village of 225 properties. With a further 15 properties this would increase village by 32%. This is too much for current support services including highways, water and sewerage infrastructure. Previously raised our concerns under 2023/0863.</p> <p>SN0055 is completely outside the village development line and will not enhance the surrounding existing dwellings or the landscape.</p> <p>The site was previously proposed for 25 dwellings however numbers are likely to increase. Evidence decision 2021/2523 which is a relatively small plot of land backing onto Spur Road that has been approved for 5 dwellings.</p> <p>2022/3086 has been supported and appears to only awaiting nutrient neutrality agreement.</p> <p>There are strong local concerns regarding this proposal. Alternative sites within the parish would be more acceptable.</p>	<p>Objective 2 of the VCHAP states that new development provides the opportunity to support and potentially improve local services and facilities. The Council has engaged with various service providers including Norfolk County Council and Anglian Water, and no objections have been raised for this site, or for the overall development in Barnham Broom, relating to services that would prevent this site from being allocated.</p> <p>The purpose to the Settlement Limits in the VCHAP is to provide opportunities for 'windfall' development as required through the Greater Norwich Local Plan whilst ensuring that 'windfall' development does not occur in isolated areas of the countryside. The site allocations have not been included within the Settlement Limits as their purpose is to provide areas for growth within the Village Clusters to ensure their future sustainability through an appropriate scale of development that acknowledges and is sympathetic to the character of the existing settlements.</p> <p>The Focused Regulation 18 Document states that the site is being considered for allocation of 15 dwellings. This quantum of development has been determined based on a number of factors including the density of the site, effective use of land and landscape impacts.</p> <p>The Council considered numerous sites in the area and all were subject to the site assessment process. Based on the results of these site assessments, the sites that were considered the most appropriate for development were taken forward for further assessment, such as consulting with technical consultees, leading to groups of 'Preferred' and 'Reasonable Alternative' sites. These site assessments have been subject to consultation throughout the VCHAP preparation process. The Council considers that its site assessment process has been robust and transparent and therefore the sites being considered as part of this consultation to be the most appropriate sites for potential development.</p>	1650	No action required.

<p>QUESTION 5a: Do you agree with the allocation of SN0055, Land east of Spur Road and south of Norwich Road, Barnham Broom, for approximately 15 dwellings on an area of 1.0ha? Please explain your response.</p>	<p>3297, 3321, 3325, 3343, 3371, 3474, 3484, 3503, 3572, 3612, 3618, 3619, 3650</p>	<p>Mixed</p>	<p>A summary of the representations received in response to Question 5a grouped together by subject matter for ease of reference: Scale of development – site is outside the development boundary, would damage character of the area, would lead to loss of views from short back gardens adjacent to site and new dwellings will have line of sight into existing dwellings, development as a whole does not feel planned, unspecified number of houses. Highways – Spur Road is main entrance to village but is narrow and has no footpath, site access onto Norwich Road would be dangerous due to blind bend, generally oppose increase in cars, need better footpaths on Spur Road and Norwich Road. Natural environment – loss of greenfield land, hedges and trees, site has been used for grazing, fields also used by birds of prey, hedgerows listed on BTO Red List. Flooding – area floods with surface water in winter especially along Spur Road. Sewerage – current system could not cope with extra demand. Services and facilities – could not support new development, especially GPs and Dentists, power cuts are frequent. Consultation – lack of awareness of residents.</p>	<p>The Council notes the concerns raised in these representations and responds to them with the following: Scale of Development - The purpose to the Settlement Limits in the VCHAP is to provide opportunities for ‘windfall’ development as required through the Greater Norwich Local Plan whilst ensuring that ‘windfall’ development does not occur in isolated areas of the countryside. The site allocations have not been included within the Settlement Limits as their purpose is to provide areas for growth within the Village Clusters to ensure their future sustainability through an appropriate scale of development that acknowledges and is sympathetic to the character of the existing settlements. To support the publication of the Focused Regulation 18 document, a number of Landscape Visual Appraisals (LVA) were produced to evaluate the sites included in the document. The LVA for this site concluded that the impact on the landscape from this site would be limited. It also states that the site frontage would follow the established settlement pattern and development further into the site would be contained. Neither Natural England nor the Norfolk County Council Natural Environment Team have objected to this site. The Council recognises however that new development can result in changes to the local landscape, however this site is considered to be well contained within the wider landscape. The loss of views is not a material consideration in the planning process and therefore cannot be considered as a reason for a site to not be allocated. The Focused Regulation 18 document states as part of the ‘Reasoned Justification’ for this site that it could be developed in a sympathetic manner with a low overall density. Therefore, there is the opportunity to respond to the amenity of adjacent properties through the design of the site should it be taken forward. It should be noted that the two Settlement Limit Extensions have been proposed for a total of approximately 8 dwellings. The Focused Regulation 18 Document states that the site is being considered for allocation of 15 dwellings. This quantum of development will be determined based on a number of factors including the density of the site, effective use of land and landscape impacts.</p> <p>Highways - Norfolk County Council as the Highways Authority have been proactively engaged throughout the preparation of the VCHAP, with specific discussions on a number of sites. Norfolk County Council Highways do not have any specific objections to this site. They have recommended that vehicular access only comes from Norwich Road, with pedestrian access required at both Norwich Road and Spur Road. Any specific requirements for the development of this site will be discussed with the Highways Authority and included within a site specific policy if this site is taken forward as a preferred allocation.</p> <p>Natural Environment - Where possible, the Council has considered the allocation of brownfield sites in the VCHAP. However, there is insufficient brownfield land in the Village Clusters to meet the 1,200 dwelling requirement. Therefore, it is necessary that greenfield land will be used for site allocations. Where this occurs, the Council has considered the existing uses, biodiversity value, landscape contributions and agricultural land value and proposed those of lowest value wherever possible. The Council acknowledges the concerns relating to the loss of trees, hedgerows and other related habitats and how this could impact local wildlife. As part of assessing the sites included in this consultation the Council has engaged with specialist officers to determine potential habitats, including trees and hedgerows, that should be protected through TPOs and relevant legislation on sites that are being considered for allocation. For this site, it was noted that established hedgerows and trees form the boundaries of this site and</p>	<p>1649</p>	<p>No action required.</p>
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				<p>these have been evaluated by specialist officers. Natural England and the Norfolk Wildlife Trust have also been consulted as part of this consultation and neither have raised any objections to this site. Wherever valuable habitats have been identified these will be acknowledged as part of any future policy if this site is taken forward. It is considered by the Council that any biodiversity and natural environment matters can be appropriately addressed through the planning application process.</p> <p>Flooding - The Council has engaged with Norfolk County Council as the Lead Local Flood Authority (LLFA) throughout this process, with specific discussions on a number of sites as appropriate. The Council has not received an objection to the proposed allocation from the LLFA. In accordance with current policy guidance and legislation, run-off from new development should not exceed the existing greenfield run-off rates of the site. Furthermore, in some instances, it is possible that development can result in improvements in local drainage and flooding matters due to improvements in on-site drainage.</p> <p>Sewerage - The Council has engaged with Anglian Water throughout the preparation of the VCHAP, with specific discussions taking place on a number of sites where appropriate. Anglian Water has specifically stated that they have no objection to this site. Any specific requirements relating to sewerage would need to be agreed with Anglian Water as part of the planning application process.</p> <p>Services and facilities - Objective 2 of the VCHAP states that new development provides the opportunity to support and potentially improve local services and facilities. The Council has engaged with various service providers including Norfolk County Council and Anglian Water, and no objections have been raised for this site, or for the overall development in Barnham Broom, relating to services that would prevent this site from being allocated. The Council acknowledges the concerns regarding services such as GPs and dentists being oversubscribed. However, this is a national issue and beyond the scope of the VCHAP to address. Due to this being a national issue, it is also not considered a material reason to prevent development from coming forward and for the Council to not meet its housing needs. The Council has engaged with service providers, including the NHS, throughout the preparation of the VCHAP and no objections have been raised regarding this site.</p> <p>Consultation - The Council published this consultation to meet the requirements of the Town and Country Planning (England) (Local Plans) Regulations 2021 (as amended), specifically Regulation 18. The consultation document was published online and copies were provided to view in public libraries. Notices were also provided to affected parish Councils and placed in local GP surgeries and elsewhere. The Council considers that it has taken appropriate action to notify residents of the consultation in line with the regulations.</p>		

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 5a: Do you agree with the allocation of SN0055, Land east of Spur Road and south of Norwich Road, Barnham Broom, for approximately 15 dwellings on an area of 1.0ha? Please explain your response.	3587	Comment	No objection to this site.	The Council welcomes the engagement of Anglian Water with the preparation of the South Norfolk Village Clusters Housing Allocations Plan and welcomes the response submitted in response to SN0055.	1614	No action required.
QUESTION 5a: Do you agree with the allocation of SN0055, Land east of Spur Road and south of Norwich Road, Barnham Broom, for approximately 15 dwellings on an area of 1.0ha? Please explain your response.	3532	Object	No heritage assets on site. Home Farm to the east and development could impact setting. Welcome HIA and identification of Grove Farm as a NDHA. Also identifies site as a WWII military site. Further archaeological assessment needed to determine if the site is suitable for development.	The Council welcomes the engagement of Historic England with the preparation of the South Norfolk Village Clusters Housing Allocations Plan and welcomes the response submitted in response to site SN0055. The Council has received comments from our Design and Conservation Officer regarding the archaeological potential of the site, who concluded that while some investigation is needed this should not affect the layout of the site. The Council will continue to engage with Historic England should this site progress as a preferred allocation.	1613	Review suggestions for a site-specific policy should SN0055 be preferred for allocation.
QUESTION 5a: Do you agree with the allocation of SN0055, Land east of Spur Road and south of Norwich Road, Barnham Broom, for approximately 15 dwellings on an area of 1.0ha? Please explain your response.	3452	Comment	With other sites being proposed this could add additional pressure into the area. The school has a confined site with limited ability to expand, some classrooms are undersized to meet existing need, but catchment numbers are in decline. PAN of 18 additional pupils will be required, improvement to local walking/cycling routes would be required to support safe and sustainable travel.	The Council welcomes the ongoing engagement of NCC Childrens Services with the preparation of the VCHAP and the suggestions for a site-specific policy for SN0055. Should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base.	1612	Review suggestions for a site-specific policy should SN0055 be preferred for allocation.
QUESTION 5a: Do you agree with the allocation of SN0055, Land east of Spur Road and south of Norwich Road, Barnham Broom, for approximately 15 dwellings on an area of 1.0ha? Please explain your response.	3395	Comment	Amber - archaeological mitigation will probably be necessary but is unlikely to prevent development. Site of a WW2 compound.	The Council notes the response of the Historic Environment Service and, as appropriate, will reflect this in any updated policy requirements for the site should the amendments to the site be considered acceptable in the context of the VCHAP.	1611	Review suggestions for a site-specific policy should SN0055 be preferred for allocation.
QUESTION 5a: Do you agree with the allocation of SN0055, Land east of Spur Road and south of Norwich Road, Barnham Broom, for approximately 15 dwellings on an area of 1.0ha? Please explain your response.	3270	Support	Serves well as an extension to the village without major effect on its character.	The Council notes these comments.	1610	No action required.

<p>QUESTION 5b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?</p>	<p>3322, 3329, 3344, 3373, 3447, 3475, 3485, 3504, 3573, 3615, 3620, 3651, 3741</p>	<p>Mixed</p>	<p>A summary of the representations received in response to Question 5b grouped together by subject matter for ease of reference: Consultation – direct consultation with adjacent homeowners, requirement that anyone who looks over land should be given chance to extend gardens. Highways – provide footpath from Spur Road to Norwich Road, improvements along whole of Spur Road, only vehicular access from Norwich Road with signage regarding blind bend, address parking outside school. Flooding – address surface water flooding on Spur Road, replace ponds, ditches etc. filled in by new development and commitment to maintain them by Council. Scale of development – restrict to 15 dwellings or reduce total, include communal green area and large gardens, development of a coherent plan for village. Affordable housing – require 33%. Services and facilities – require improvements to key infrastructure, namely sewers and drainage, as well as GPs and Dentists, confirm school can accommodate extra children, provision of public transport. Design – should be in keeping with existing dwellings, no overlooking from new dwellings. Natural Environment – retain hedgerow on Spur Road, planting to screen development.</p>	<p>The Council welcomes the suggestions that have been received for a site-specific policy for SN0055 and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base. The Council has responded to some of the issues in Council Response ID 1649, and wishes to respond directly to some of the issues raised:</p> <p>Consultation - The Council published this consultation to meet the requirements of the Town and Country Planning (England) (Local Plans) Regulations 2021 (as amended), specifically Regulation 18. The consultation document was published online and copies were provided to view in public libraries. Notices were also provided to affected parish Councils and placed in local GP surgeries and elsewhere. The Council considers that it has taken appropriate action to notify residents of the consultation in line with the regulations. The site being proposed has been submitted for consideration by the landowner. The Council does not have the remit to control how the landowner approaches the use of their land beyond the planning process.</p> <p>Flooding - Norfolk County Council as the Lead Local Flood Authority (LLFA) has been consulted throughout the preparation of the VCHAP. As part of this consultation, the LLFA did not have any specific objections to this site. Any specific requirements for flood mitigation will need to be agreed with the LLFA as part of any planning application should this site be taken forward.</p> <p>Affordable housing - The VCHAP, once adopted, will form part of the Local Development Plan for South Norfolk alongside the emerging Greater Norwich Local Plan (GNLP). The GNLP includes policies on affordable housing which this site, if allocated, will be subject to. It is not considered necessary to repeat this as part of the VCHAP.</p> <p>Scale of Development - The Council considers the number of dwellings proposed for the site to be appropriate for the site considering the location and size. The Council is required to balance the need to make effective use of the land as required by the NPPF with the character of the local area. It is considered that 15 dwellings per hectare is a suitable density to meet both requirements. The Council considers that the overall plan for development in Barnham Broom is appropriate. Should this site be taken forward, the overall quantum of development in Barnham Broom will be approximately 35 dwellings, The sites being considered have been appropriately assessed and considered to be the most appropriate areas for development based on numerous criteria including landscape impacts and access considerations.</p> <p>Services and Facilities - Objective 2 of the VCHAP states that new development provides the opportunity to support and potentially improve local services and facilities. The Council acknowledges the concerns regarding services such as GPs being oversubscribed. However, this is a national issue and beyond the scope of the VCHAP. Due to this being a national issue, it is also not considered a material reason to prevent development from coming forward. The Council has engaged with service providers, including the NHS, throughout the preparation of the VCHAP and no objections have been raised regarding this site.</p> <p>Design - The VCHAP will form one part of the development plan for the Greater Norwich Area. Policies relating to the design of proposals are</p>	<p>1660</p>	<p>No action required.</p>
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				detailed elsewhere and it is not considered necessary to repeat the requirements of these in the VCHAP.		
QUESTION 5b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3748	Comment	Greenfield site outside of the current development boundary. Authorities have a duty under the NERC Act 2006 and the Environment Act 2021 to have regard to the conservation and enhancement of Priority Habitats. Hedgerows are listed as a Priority Habitat under the requirements of section 41 of the NERC Act. Recommend clear and robust policy wording with respect to hedgerows/trees.	The Council welcomes the suggestions that have been received for a site-specific policy for SN0055 and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base.	1656	Review suggestions for a site-specific policy should SN0055 be preferred for allocation.
QUESTION 5b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3588	Comment	Adjacent to water supply and foul drainage networks. There is current capacity at Barnham Broom WRC for small scale growth however, this may be impacted by cumulative growth from other commitments including the existing proposed allocation VC BB1 within the WRC catchment. Suggest a policy requirement is included in the policy: "Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network."	The Council welcomes the suggestions that have been received for a site-specific policy for SN0055 and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base.	1655	Review suggestions for a site-specific policy should SN0055 be preferred for allocation.
QUESTION 5b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3533	Comment	If the site is considered suitable for allocation, the policy criteria should include the recommendations from the HIA including tree planting along the southern boundary, low density developer to retain rural character, area of open space along eastern boundary to maintain separation between development and Grove Farm, retention of sight line from Grove Farm to Norwich Road and archaeological investigation prior to commencement of development.	The Council welcomes the suggestions that have been received for a site-specific policy for SN0055 and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base.	1654	Review suggestions for a site-specific policy should SN0055 be preferred for allocation.
QUESTION 5b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3423	Comment	Extensive vegetation to the road frontage should be retained as much as possible when considering access. It will also be important that a landscaped boundary is given to the south-east backing onto the remainder of the field. Development should be designed to be self-contained and not give rise to extended proposals to the south- east. Where boundary vegetation exists this should be retained and enhanced.	The Council welcomes the suggestions that have been received for a site-specific policy for SN0055 and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base.	1653	Review suggestions for a site-specific policy should SN0055 be preferred for allocation.
QUESTION 5b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3408	Comment	No objection subject to vehicular access from Norwich Road only, with suitable visibility splays and pedestrian access at Spur Road. 2.0m wide footway to be provided at Norwich Rd frontage and at north side of Norwich Road with safe crossing to tie in with ex facility to west of site. New 2.0m wide footway to be provided at Spur Road between the site and Norwich Road.	The Council welcomes the suggestions that have been received for a site-specific policy for SN0055 and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base.	1652	Review suggestions for a site-specific policy should SN0055 be preferred for allocation.
QUESTION 5b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3271	Support	Houses should be designed sympathetically to the surrounding village, and as much of the surrounding horticulture should be maintained to avoid damage and disruption to wildlife.	The Council welcomes the suggestions that have been received for a site-specific policy for SN0055 and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base.	1615	Review suggestions for a site-specific policy should SN0055 be preferred for allocation.

Bawburgh

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 6: Do you agree with the boundary of revised allocation VC BAW1 REV, Land to the east of Stocks Hill, Bawburgh, to facilitate a reduced density of up to 35 dwellings on an area of 1.9ha? Please explain your response.	3464, 3825	Support	The site promoters have indicated their support for a lower density scheme which will allow for a better range of properties to delivered in a manner which addressed the allocation policy in VC BAW1 in the 2023 Regulation 19 version of the VCHAP, more sympathetic to the village location and landscape setting.	Comments noted, specifically that the site is considered deliverable in the context of current national and local planning policies.	1714	No Action required.
QUESTION 6: Do you agree with the boundary of revised allocation VC BAW1 REV, Land to the east of Stocks Hill, Bawburgh, to facilitate a reduced density of up to 35 dwellings on an area of 1.9ha? Please explain your response.	3442	Support	I would like to see this development happen as I have worked in Bawburgh for 8 years and have never had the opportunity to move closer to where i work as houses for sale are very scarce in the village and unaffordable. Looking at it from local people's point of view if houses are not built in this village residents children are not going to be able to stay in the village.	Comments noted. Part of the remit of Planning is to deliver a range of homes across a variety of locations, to try and ensure that local needs are met.	1713	No Action required.
QUESTION 6: Do you agree with the boundary of revised allocation VC BAW1 REV, Land to the east of Stocks Hill, Bawburgh, to facilitate a reduced density of up to 35 dwellings on an area of 1.9ha? Please explain your response.	3534	Object	<p>Whilst there are no designated heritage assets within this site, the site lies immediately to the south of the boundary of the Bawburgh Conservation Area. Any development of this site therefore has the potential to affect the Conservation area and its setting including views into and out of the Conservation area.</p> <p>We note that the revised allocation boundary has been extended to enable a lower density of development. We broadly welcome this approach.</p> <p>We reiterate our previous comments in relation to archaeological investigation for this site.</p> <p>Bullet point 3 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. However, this is different to the recommendation in the HIA which states that 'Require investigation on the proposed site prior to development commencing to identify and further historic activity'.</p> <p>In our view, some assessment is needed to inform any planning application.</p> <p>We therefore advise that bullet point 3 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</p>	Comments noted. Policy VC BAW1 of the January 2023 Regulation 19 document highlights the need for archaeology to be considered; however, the Council's experience is that the need for field evaluation prior an application being determined is rare and can be required under NPPF paragraph 200 if necessary.	1706	No Action required.

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QUESTION 6: Do you agree with the boundary of revised allocation VC BAW1 REV, Land to the east of Stocks Hill, Bawburgh, to facilitate a reduced density of up to 35 dwellings on an area of 1.9ha? Please explain your response.	3589	Comment	No objection to this site.	Comments noted.	1705	No Action required.
QUESTION 6: Do you agree with the boundary of revised allocation VC BAW1 REV, Land to the east of Stocks Hill, Bawburgh, to facilitate a reduced density of up to 35 dwellings on an area of 1.9ha? Please explain your response.	3409	Comment	No objection subject to satisfactory access visibility.	Comments noted.	1704	Consider the need for a specific reference in an allocation Policy.
QUESTION 6: Do you agree with the boundary of revised allocation VC BAW1 REV, Land to the east of Stocks Hill, Bawburgh, to facilitate a reduced density of up to 35 dwellings on an area of 1.9ha? Please explain your response.	3453	Comment	Catchment numbers are low and can accommodate this development, parental preference will mitigate any pressure and will be managed by the admission round, could access from extension site and pathway be linked into existing school site.	Comments noted. Consideration can be given to providing a second pedestrian/cycle access to the primary school, which would avoid the need to walk along Stocks Hill and Hockering Lane.	1703	Consider including in an allocation policy a requirement to investigate and implement a second pedestrian access to Bawburgh Primary School, should the extended site be taken forward to the Regulation 19 stage.
QUESTION 6: Do you agree with the boundary of revised allocation VC BAW1 REV, Land to the east of Stocks Hill, Bawburgh, to facilitate a reduced density of up to 35 dwellings on an area of 1.9ha? Please explain your response.	3424	Comment	The exiting hedgerows on the northern boundaries should be retained where possible.	Comments noted. Already covered by Policy VC BAW1 in the January 2023 Regulation 19 Version of the VCHAP.	1702	No Action required.
QUESTION 6: Do you agree with the boundary of revised allocation VC BAW1 REV, Land to the east of Stocks Hill, Bawburgh, to facilitate a reduced density of up to 35 dwellings on an area of 1.9ha? Please explain your response.	3396	Comment	Amber - archaeological mitigation will probably be necessary but is unlikely to prevent development.	Comments noted. Already covered by Policy VC BAW1 in the January 2023 Regulation 19 Version of the VCHAP.	1701	No Action required.

<p>QUESTION 6: Do you agree with the boundary of revised allocation VC BAW1 REV, Land to the east of Stocks Hill, Bawburgh, to facilitate a reduced density of up to 35 dwellings on an area of 1.9ha? Please explain your response.</p>	<p>3278, 3279, 3280, 3282, 3306, 3309, 3310, 3311, 3312, 3324, 3326, 3327, 3330, 3331, 3332, 3337, 3341, 3342, 3345, 3348, 3349, 3350, 3446, 3448, 3461, 3463, 3465, 3468, 3477, 3479, 3491, 3516, 3518, 3553, 3554, 3555, 3556, 3557, 3560, 3561, 3579, 3606, 3616, 3691, 3692, 3697, 3698, 3715, 3717, 3722, 3740, 3742, 3771, 3786, 3789, 3793, 3801, 3806, 3811, 3816, 3817, 3819, 3820, 3823, 3838</p>	<p>Mixed</p>	<p>The Representations cover a range of issues:</p> <p>(1) LANDSCAPE - site is within the Norwich Southern Bypass Landscape Protection Zone (NSBLZ) and will impact on views across the Yare Valley. A number of representation also refer to the site as being Green Belt.</p> <p>(2) HERITAGE/CHARACTER- site is adjacent to, and will impact on, the Conservation Area. Out of character with the village setting. Would be contrary to SNC Development Management Policies. Impact on the bridge as an ancient monument.</p> <p>(3) PRINCIPLE - Changes in national policy mean that this site is no longer required/should not be taken forward i.e. greenfield site which goes against the wishes of the community. Bawburgh has already had 10 new build units which has met the requirements in terms of South Norfolk's housing need. Bawburgh is not clustered with other villages. Potential to open up the rest of the field to development. Developers have already stated that the development will go ahead.</p> <p>(4) SERVICES/INFRASTRUCTURE - Lack of services and facilities in the village. School currently over-subscribed. Local GP also over subscribed, Drainage system old and unable to cope.</p> <p>(5) HIGHWAYS - concerns about the level of traffic in village, including ret-running, as well as speeding. Access to the site on the brow of the hill is unsafe. Lack of public transport alternative means jobs and services will primarily be accessed by car. Lack of footways, cycleways to connect to services outside of the village. Lack of street lighting. Impact on the ancient monument bridge in the center of the village (see Heritage).</p> <p>(6) FLOOD RISK - would exacerbate the existing flooding problems in the village.</p> <p>(7) SCALE - Residents concerns over density should not be used to increase the size of the site. Size it too 'urban' and density is too high. Could increase the population by 10%-15%.</p> <p>(8) OTHER - uses Grade 3 agricultural land. Should restrict development to brownfield sites.</p>	<p>The issues raised were responded to at the Regulation 19 stage in early 2023. The reduced density has been proposed to address some of those concerns, and is broadly supported by Historic England.</p> <p>In Response to the representations:</p> <p>(1) LANDSCAPE - The site currently affords some views over the Yare Valley towards the Norwich Southern Bypass and, less significantly, new development would be seen in glimpsed views from the bypass towards the village, and potentially from the wider river valley, although the latter would be seen in the context of the existing development in the village. The LVA has been produced to support the potential allocation and notes that the views across the field are limited. The impact is will be most noticeable to those using the footway on Stocks Hill. The LVA also notes the potential need to landscape the eastern boundary of the site. The site falls within the Norwich Southern Bypass Landscape Protection Zone (NSBLPZ), as noted in the Site Assessment and LVA. The NSBLPZ is there to prevent development from detrimentally impacting on the landscape setting of Norwich, and the bypass corridor from becoming the developed edge of the city through incremental and unplanned development. The NSBLPZ does not have a distinct landscape character of its own. Through the 2015 Local Plan several allocations were made within the zone (mostly significant larger than proposed here) which balanced the need to protect the setting of the city with locating development on suitable and sustainable sites in close proximity to Norwich. Policy VC BAW1 from the Regulation 19 document requires any future planning application to be accompanied by a landscape appraisal which informs the design, layout and landscaping of the site. It should be noted that there is no statutory Green Belt land in Norfolk.</p> <p>(2) HERITAGE/CHARACTER - Historic England has broadly welcomed the revised site and raised no objections to it's allocation. Conservation Area Character Appraisal for Bawburgh has a short paragraph on Stocks Hill, however the gap that this site occupies is not noted as being of particular significance. Indeed, The 2015 Local Plan allocation, developed as The Warren, is noted as making a positive contribution to the Conservation Area. As such, there is no inherent reason why new development should not fulfil the objectives of national and local policies relating to Conservation Areas, which would apply to any future planning application for the site. Policy VC BAW1 in the Regulation 19 document requires design and materials that make a positive contribution to the Conservation Area and the retention of vegetation on the approach to the Conservation Area. In terms of the Development Management Policies, these would be applied appropriately when any planning application is considered. With regard to the impact on the Ancient Monument bridge, no concerns have been raised either by Historic England or NCC as highway authority.</p> <p>(3) PRINCIPLE - whilst there have been changes in national policy, local authorities are still expected to deliver housing in line with the Government's Standard Method, unless exceptional circumstances suggest other wise; no exceptional circumstances have been identified here. Indeed the GNLP has recently been found 'sound' by Government Planning Inspectors, including the requirement for at least 1,200 new homes in the South Norfolk Village Clusters. Whilst Bawburgh has had some development in the recent past, this was in the context of the</p>	<p>1693</p>	<p>No Action required.</p>
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				<p>2014 Joint Core Strategy, which ran to 2026; the new plans roll forward the requirements to 2038. The Village Clusters are based on Primary School catchments, in the case of Bawburgh the catchment does not extend to adjoining parishes, therefore the parish is treated individually. This applies to a number of Clusters. The scope of the VCHAP is to look for smaller sites, up to circa 50 dwellings, across a range of Village Clusters. There is no reason to suggest that a development of approximately 35 dwellings would lead to any additional housing in the future; decisions on further development would be for future Local Plan processes to determine. Whilst the potential developers of the site have met with the local community, to date they have not met with the Council's Place Shaping Team, and any future planning application would be subject to consultation and open decision making in the usual way.</p> <p>(4) SERVICES/INFRASTRUCTURE - In terms of the capacity at the primary school, Norfolk County Council Education Services team has reiterated that catchment numbers are low and can accommodate this development, parental preference will mitigate any pressure and will be managed by the admission round. Bawburgh attracts a number of out of catchment pupils. NCC is looking to increase provision in nearby areas, including as part of the major growth at Easton and Hethersett. As such, increased pupil numbers locally will support the ongoing future of rural schools throughout the village cluster area. In terms of NHS provision, this is recognised as a regional and national issue, which will not be aided by failing to provide adequate decent quality housing. Representatives of the NHS Integrated Care System (ICS) have been engaged with both the Greater Norwich Local Plan and the VCHAP in order to inform their ongoing healthcare strategies and future investment. Anglian Water has been consulted and not raised any objection to this site.</p> <p>(5) HIGHWAYS - NCC has raised no objection to the allocation on highways grounds, either in terms of in access to/from the village, the speed/volume of traffic through the village, or the suitability of another access off Stocks Hill, subject to achieving appropriate visibility splays. The site offers the ability to walk to both the village hall and primary school (and a possible to access to the school sites). Various demand-based transport options are available in Bawburgh, including Transport Plus and Wymondham Flexi-bus. The Council acknowledges that village cluster sites are likely to be more reliant on car transport than those in more urban locations; however, the proximity to Norwich (via the nearby Park and Ride), the A47, and to a wider range of facilities in nearby settlements, makes those journeys shorter than in many other villages. The Council also notes the Government's targets for moving new vehicle sales away from combustion engine options over the next decade.</p> <p>(6) FLOOD RISK - The site has been screened as part of the Stage 2 SFRA and has not been identified as needing a specific assessment at this stage. Similarly, whilst the LLFA notes a significant flow path near to the site, the site itself was not considered to be a concern.</p> <p>(7) SCALE - In terms of the overall scale of development, 35 dwellings is not out of keeping with the cluster of houses immediately to the south, which contains 25 dwellings, or to the east of the primary school on Hockering Lane, which contains 40 dwellings, both established parts of the village. Whilst a 10%-15% increase in the size of the village is above the Village Clusters average, it is significantly below the average level of</p>		
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				<p>growth across Greater Norwich area, and therefore not considered disproportionate.</p> <p>(8) OTHER - The site is Grade 3 agricultural land, although there is no evidence to show that it is 3a, and therefore classified as best and most versatile; in any event, the development of this site does not prejudice the continued agricultural use of the remaining area of field. The VCHAP forms part of the overall strategy for development across the Greater Norwich area, which aims to focus as much development on suitably located brownfield sites as possible; however it is not possible to deliver the required level of housing solely on brownfield sites.</p>		

Ditchingham, Broome, Hedenham and Thwaite

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 7a: Do you agree with the proposed allocation of VC DIT1 REV, Land at Thwaite Road and Tunney's Lane, Ditchingham, for up to 45 dwellings on an area of on an area of 2.42ha? Please explain your response.	3454	Comment	Catchment numbers are high for the size of school, it appears parental preference draws children to surrounding schools, this volume of development for family homes could put some pressure on the school.	The Council welcomes the ongoing engagement of NCC Children's Services with the preparation of the VCHAP and notes the comments regarding pressure on school places. The capacity of the local school will be fully considered when discussing the allocation of future local plan sites.	1590	No action required.
QUESTION 7a: Do you agree with the proposed allocation of VC DIT1 REV, Land at Thwaite Road and Tunney's Lane, Ditchingham, for up to 45 dwellings on an area of on an area of 2.42ha? Please explain your response.	3783	Comment	Due to limited dry weather flow capacity at Ditchingham Water Recycling Centre, we recommend including within policies SN4020 and VC DIT1 REV the requirement for developers to liaise with Anglian Water and submit a Drainage Strategy as part of any future applications, demonstrating that flows from the development can be accommodated within the permitted capacity and without causing increased risk of deterioration to the status of the waterbody. It should also demonstrate that the development will not compromise the LPA's obligations under the Water Framework Directive and the NPPF's requirement to have due regard to the River Basin Management Plan.	<p>The Council welcomes the ongoing engagement of the Environment Agency with the preparation of the VCHAP and notes the comments regarding the limited capacity at the local WRC.</p> <p>The Council welcomes the suggestions that have been received for a site-specific policy for SN4020 and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base.</p> <p>The Council notes that Policy VC DIT1 as set out at the Regulation-19 publication requires early engagement with Anglian Water to identify the need to phase the site for possible upgrades to the Ditchingham Water Recycling Centre. As with SN4020, the Council will consider the site-specific policy suggestions alongside the comments of the technical consultees and the supporting evidence base.</p>	1546	<p>The Council will consider the inclusion of a clause requiring a Drainage Strategy at the application stage should the SN4020 site progress as a preferred allocation.</p> <p>Likewise, the Council will consider whether the existing Policy VC DIT1 should be revised to include the requirement for a Drainage Strategy.</p>
QUESTION 7a: Do you agree with the proposed allocation of VC DIT1 REV, Land at Thwaite Road and Tunney's Lane, Ditchingham, for up to 45 dwellings on an area of on an area of 2.42ha? Please explain your response.	3636	Object	<p>Ditchingham is a sustainable Service Village, capable of accommodating growth without adverse impacts. This should be accommodated via the retention of the existing/proposed VC DIT1 (35 Dwellings) with a second site (SN0345 – site at Loddon Road/Tunneys Lane), for approximately 25 dwellings. Its development can take place without any significant adverse impacts; access, visibility and footpaths can be accommodated. It is outside the Nutrient Neutrality catchment.</p> <p>Site is available and deliverable now. Work for an application has been undertaken by the prospective developer, Beauy Homes.</p> <p>Allocation of two, small/medium-sized will provide choice/variety/flexibility, bringing forward alternative sites in a sustainable settlement.</p>	<p>The Council recognises that the site lies outside an area identified as having nutrient neutrality constraints however as the village clusters plan seeks to allocate sites for a 15-year period and work to address the nutrient neutrality matter is currently at an advanced stage this is not considered to carry significant weight in the assessment of sites for inclusion in the VCHAP.</p> <p>The Highways Authority has previously commented on the need to widen Loddon Road to 5.5m. Concerns have been raised that these off-site highways work, as well as the creation of an access point with suitable visibility from Loddon Road, would require the removal of trees from the site frontage. The Council's Arboricultural Officer has confirmed that all of the trees on the northern and eastern boundaries have recently been made subject to a provisional Tree Preservation Order. This reflects the value that is placed on these trees and recognises the contribution that they make to the local landscape, particularly as a gateway into the village. The Council therefore remains of the opinion that existing identified constraints could impact on both the suitability and deliverability of this site as part of the VCHAP. As such the Council continues to favour VC DIT1 for allocation.</p>	1545	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 7a: Do you agree with the proposed allocation of VC DIT1 REV, Land at Thwaite Road and Tunney's Lane, Ditchingham, for up to 45 dwellings on an area of on an area of 2.42ha? Please explain your response.	3353, 3357	Mixed	Access to VC DIT1 REV via Hamilton Way is not viable due to local traffic issues. The allocated area should be enlarged to include the whole of the field to the north-east, with accesses from Waveney Road and Thwaite Road.	Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions alongside consideration of the residential development at Tunney's Lane Field off Hamilton Way (consents 2018/0121 and 2019/1925) have led to the criteria in the Policy. During consideration of outline 2018/0121 the applicants advised that access from Waveney Road was not feasible due to land ownership issues and, at that time, NCC Highways raised no objection to a single access from Hamilton Way. The acceptability of this single access has therefore already been established through the previous approval. NCC comments received at the Reg-19 publication of the VCHAP reiterate their requirement for an access off Hamilton Way. Extension of the VC DIT1 allocation to the north-east was considered when preparing the revised site boundaries prior to this consultation. This option was ruled out due to the land falling within a flood risk zone, thereby prohibiting development. The proposed extension to VC DIT1 is free of this constraint.	1544	No action required.
QUESTION 7a: Do you agree with the proposed allocation of VC DIT1 REV, Land at Thwaite Road and Tunney's Lane, Ditchingham, for up to 45 dwellings on an area of on an area of 2.42ha? Please explain your response.	3535	Comment	No comments.	The Council welcomes the engagement of Historic England with the preparation of the South Norfolk Village Clusters Housing Allocations Plan and welcomes the response submitted in response to the potential amendment to VC DIT1 set out in the focused Regulation-18 consultation.	1536	No action required.
QUESTION 7a: Do you agree with the proposed allocation of VC DIT1 REV, Land at Thwaite Road and Tunney's Lane, Ditchingham, for up to 45 dwellings on an area of on an area of 2.42ha? Please explain your response.	3398	Comment	Amber - archaeological mitigation will probably be necessary but is unlikely to prevent development.	The Council welcomes the ongoing engagement of the Historic Environment Service and notes the comments submitted in respect of VC DIT1 REV.	1532	No action required.
QUESTION 7b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 10 dwellings?	3637	Object	No further comments to representation 3636.	All relevant issues have been addressed in response 1545.	1640	No action required.
QUESTION 7b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 10 dwellings?	3360	Comment	Adjacent to the Waveney, Lower Yare and Lothingland IDD. Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).	The Council notes these comments and will consider them as appropriate in due course when drafting site specific policy text should the site be chosen as a preferred allocation site.	1639	No action required.

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QUESTION 7b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 10 dwellings?	3410	Comment	The Highway Authority does not objection subject to satisfactory access.	The Council notes these comments and will continue to engage with Norfolk County Council as the Highways Authority as part of the VCHAP preparation process and the planning application process.	1638	The Council will continue to engage with Norfolk County Council as the Highways Authority as we continue to prepare the VCHAP.
QUESTION 7b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 10 dwellings?	3425, 3749	Comment	<p>There is a Site of Special Scientific Interest to the east of the site, and County Wildlife Sites to the south-east and south-west of the site. It is also situated within a designated River Valley Landscape. Impacts of new developments on these close lying sites, and its situation within the River Valley should be taken into consideration.</p> <p>The option to extend the existing allocation homes at this site could have an impact on Broom Heath CWS. We recommend that policy wording should reflect the proximity to the CWS and any applications should review any potential indirect disturbances to this site in an ecological assessment, in particular with respect to potential visitor pressure impacts.</p>	The Council is aware of the local landscape designations but does not consider that these would necessarily preclude development of a site, subject to all other considerations being found acceptable. The Council acknowledges the important role that design, layout and landscaping would have in ensuring the successful assimilation of the site into the existing landscape and the details requirements for this would be set out within site-specific policy if appropriate. In terms of the potential increase in recreational pressures on existing sensitive sites the Council has adopted a 'Green Infrastructure and Recreational Avoidance Mitigation Strategy' which seeks to address some of these pressures, including through the provision of additional green infrastructure as part of new development.	1637	Consideration of the matters raised for inclusion in a site-specific policy should the site be considered appropriate for allocation in the VCHAP.
QUESTION 7b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 10 dwellings?	3536	Comment	We welcome the preparation of the HIA. The recommendations of the HIA in relation to archaeology should be included in the policy requirements.	The Council welcomes the suggestions that have been received for a site-specific policy for VC DIT1 REV and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees, the supporting evidence base and the site-specific policy for VC DIT1.	1636	Review suggestions for a site-specific policy should the proposed amendment to VC DIT1 be preferred for allocation.
QUESTION 7b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 10 dwellings?	3591	Comment	<p>It is noted that the site is proposed to be increased to accommodate an additional 10 dwellings to bring the site total to 45 dwellings. Based on current information, there is capacity at Ditchingham WRC for small scale growth –however, this may be impacted by cumulative growth from other commitments including the new proposed allocation SN4020 within the WRC catchment.</p> <p>In addition to our previous recommendations for policy wording we would suggest the policy is amended to state: Early engagement with Anglian Water to identify infrastructure crossing the site and connection to the local water recycling network.</p>	The Council welcomes the suggestions that have been received for a site-specific policy for VC DIT1 REV and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees, the supporting evidence base and the site-specific policy for VC DIT1.	1635	Review suggestions for a site-specific policy should the proposed amendment to VC DIT1 be preferred for allocation.
QUESTION 7b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 10 dwellings?	3390	Comment	Proposed allocation VC DIT1 REV is 2.42ha and underlain by safeguarded mineral resource, sand and gravel. Therefore, the policy wording for this site should state: 'This site is underlain by a safeguarded mineral resource; therefore investigation and assessment of the mineral will be required, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place.'	The Council notes the comments of the Mineral Planning Authority. It is not considered necessary to repeat this information as all development is required to comply with the requirements of the Local Development Plan, which includes the Minerals and Waste Local Plan.	1620	No action required.

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QUESTION 7b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 10 dwellings?	3490	Comment	<p>Submitted as both a comment and objection on response form.</p> <p>Subject to the sufficiency of suitable infrastructure, Ditchingham Parish Council is not against the provision of more housing in the village. However, the Council cannot support further development of the land north of Rider Haggard Way unless the access is changed from Hamilton Way (right opposite the primary school) to either Waveney Road or Thwaite Road.</p>	Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites, including this allocation. Those discussions alongside consideration of the residential development at Tunney's Lane Field off Hamilton Way (consents 2018/0121 and 2019/1925) have led to the criteria in the Policy. During consideration of outline 2018/0121 the applicants advised that access from Waveney Road was not feasible due to land ownership issues and, at that time, NCC Highways raised no objection to a single access from Hamilton Way. The acceptability of this single access has therefore already been established through the previous approval. NCC comments received at the Reg-19 publication of the VCHAP reiterated their requirement for an access off Hamilton Way, and they raised no concerns regarding the site modifications set out in this consultation.	1555	No action required.
QUESTION 8a: Do you agree with the proposed allocation of SN4020, Land west of Old Yarmouth Road, Broome for at least 12 dwellings on an area of 0.76ha? Please explain your response.	3443	Object	<p>Site extends linear settlement of Broome which does not score well for accessibility as stated in the Sustainability Appraisal. The site also extends into the Countryside and would alter the edge of the village significantly, as noted in the Sustainability Appraisal.</p> <p>No other reasonable alternatives in Broome, therefore the Sustainability Appraisal considers the alternative option of further development in Ditchingham. However this would extend a site further from 45 to 57 dwellings, which the Sustainability Appraisal raises as potentially going against the Objectives of the Plan.</p> <p>Therefore the question is raised if the Plan has failed to provide a clear and appropriate strategy towards delivering sustainable rural growth?</p> <p>It is difficult to achieve sustainable growth with smaller sites without significantly impacting the Countryside. Other sites could be more sustainable, however this may not be possible if sites become too large and contrary to the Plan objectives.</p> <p>When identifying additional sites, there needs to be a clear rationale. Is there a preference for dispersed growth? Or a preference to focus on higher order settlements?</p>	The Council welcomes this engagement with the production of the VCHAP, including a recognition of the important role played by the Sustainability Appraisal (SA) in the site selection process. At each stage of the VCHAP the Council has sought to update the evidence base in a proportionate and appropriate manner, including the Sustainability Appraisal. The SA supports the decision making process throughout the preparation of the Plan. At the Regulation-18 focused consultation stage this has included an appraisal of the alternative sites considered to be available to the Council to address the shortfall of housing identified following the publication of the Regulation-19 Plan. In terms of the role of the SA the Council clearly recognises the important role this document plays in the identification of sites however its conclusions must also be considered alongside the findings of the wider evidence base and it is therefore not a definitive document in the site selection process. The Council is satisfied with the approach taken to the selection of sites for this consultation (as set out in the consultation material) and will continue its work to be assured that the final sites selected are deliverable and that the tests of soundness are met prior to submission of the Plan for Examination.	1646	No action required.
QUESTION 8a: Do you agree with the proposed allocation of SN4020, Land west of Old Yarmouth Road, Broome for at least 12 dwellings on an area of 0.76ha? Please explain your response.	3610	Support	<p>This site is a logical extension to the village, being immediately adjacent to a recently completed housing development. There is a footpath running along the site frontage, providing safe pedestrian access into Broome and towards Ellingham. Broome itself is a well-serviced village, but is also close to Ditchingham, which benefits from a village shop, restaurant and primary school, all of which are within safe walking distance of the site.</p> <p>The site was previously shortlisted as an allocation, and landscape impacts can be mitigated through a sensitive design (as per the adjacent development). The site remains available for development immediately.</p>	The Council welcomes the continued promotion and support of the site promoter for SN4020 and notes the comments in favour of allocating this site.	1643	No action required.

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QUESTION 8a: Do you agree with the proposed allocation of SN4020, Land west of Old Yarmouth Road, Broome forat least 12 dwellings on an area of 0.76ha? Please explain your response.	3369	Object	These representations object to the allocation of the site reference SN4020 on the periphery of Broome. It is considered that Broome is a suitable location for a small housing allocation. However, the site proposed does not represent a good location for housing. It creates 'ribbon development' which has a harmful effect on the character of the countryside, and is remote from the nearest facilities in nearby Ditchingham. It is proposed that the site with the Local Planning Authority reference SN0346 in the Ditchingham and Broome Cluster would be a better allocation.	As identified in the Landscape Visual Appraisal for SN4020, development on this site would expand the linear development in the area further into the countryside. However, this form of development would reflect the existing built form of Broome, including that already seen on Sun Road and Loddon Road. The LVA also notes that SN4020 provides an opportunity to frame a gateway feature to Broome, along with suggesting native planting along the northern boundary to mitigate the landscape impact. The Council maintains that the overriding concerns outlined in the site assessment for SN0346 remain. Designation of the site as a Local Nature Reserve has ecological significance and insufficient evidence (e.g. habitat surveys) has been provided to prove otherwise. Impact on the setting of Broome Heath County Wildlife Site has also not been addressed and the Council remains of the opinion this site is not appropriate for allocation in the VCHAP.	1642	No action required.
QUESTION 8a: Do you agree with the proposed allocation of SN4020, Land west of Old Yarmouth Road, Broome forat least 12 dwellings on an area of 0.76ha? Please explain your response.	3770	Object	The response of Broome Parish Council is to oppose. The development would further reduce the gap between the settlements of Broome and Ellingham, would be an intrusion into open countryside, and involve the loss of good quality agricultural land. There is land within the village of Broome that is suitable for necessary development, and development should be of affordable housing.	As set out in the site assessment, SN4020 comprises grade 3 agricultural land, of good to moderate quality. Other sites were put forward in Broome, but were not judged to be suitable for allocation. For full details, see the Council's Statement of Consultation published alongside the Regulation-18 focused consultation (Part 3, appendix 6). The Council will expect allocated sites to deliver the requisite level of affordable housing in accordance with emerging GNLP Policy 5. The level of affordable housing required (33%) has been determined following production of the Strategic Housing Market Assessment (June 2017) and the Greater Norwich Housing Needs Assessment (June 2021).	1641	No action required.
QUESTION 8a: Do you agree with the proposed allocation of SN4020, Land west of Old Yarmouth Road, Broome forat least 12 dwellings on an area of 0.76ha? Please explain your response.	3537	Comment	No comments.	The Council welcomes the engagement of Historic England with the preparation of the South Norfolk Village Clusters Housing Allocations Plan and welcomes the response submitted in response to the potential amendment inclusion of SN4020 set out in the focused Regulation-18 consultation.	1537	No action required.
QUESTION 8a: Do you agree with the proposed allocation of SN4020, Land west of Old Yarmouth Road, Broome forat least 12 dwellings on an area of 0.76ha? Please explain your response.	3397	Comment	Amber - archaeological mitigation will probably be necessary but is unlikely to prevent development.	The Council welcomes the ongoing engagement of the Historic Environment Service and notes the comments submitted in respect of SN4020.	1533	No action required.

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QUESTION 8b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3784	Comment	Due to limited dry weather flow capacity at Ditchingham Water Recycling Centre, we recommend including within policies SN4020 and VC DIT1 REV the requirement for developers to liaise with Anglian Water and submit a Drainage Strategy as part of any future applications, demonstrating that flows from the development can be accommodated within the permitted capacity and without causing increased risk of deterioration to the status of the waterbody. It should also demonstrate that the development will not compromise the LPA's obligations under the Water Framework Directive and the NPPF's requirement to have due regard to the River Basin Management Plan.	<p>The Council welcomes the ongoing engagement of the Environment Agency with the preparation of the VCHAP and notes the comments regarding the limited capacity at the local WRC.</p> <p>The Council welcomes the suggestions that have been received for a site-specific policy for SN4020 and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base.</p> <p>The Council notes that Policy VC DIT1 as set out at the Regulation-19 publication requires early engagement with Anglian Water to identify the need to phase the site for possible upgrades to the Ditchingham Water Recycling Centre. As with SN4020, the Council will consider the site-specific policy suggestions alongside the comments of the technical consultees and the supporting evidence base.</p>	1634	<p>The Council will consider the inclusion of a clause requiring a Drainage Strategy at the application stage should the SN4020 site progress as a preferred allocation.</p> <p>Likewise, the Council will consider whether the existing Policy VC DIT1 should be revised to include the requirement for a Drainage Strategy.</p>
QUESTION 8b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3590	Comment	<p>Based on current information, there is capacity at Ditchingham WRC for small scale growth – however, this may be impacted by cumulative growth from other commitments including the revised proposed allocation VC DIT1 REV within the WRC catchment.</p> <p>We suggest the policy is amended to state: Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network.</p>	<p>The Council welcomes the suggestions that have been received for a site-specific policy for SN4020 and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base for SN4020.</p>	1633	Review suggestions for a site-specific policy should SN4020 be preferred for allocation.
QUESTION 8b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3785	Comment	Due to limited dry weather flow capacity at Ditchingham Water Recycling Centre, we recommend including within policies SN4020 and VC DIT1 REV the requirement for developers to liaise with Anglian Water and submit a Drainage Strategy as part of any future applications, demonstrating that flows from the development can be accommodated within the permitted capacity and without causing increased risk of deterioration to the status of the waterbody. It should also demonstrate that the development will not compromise the LPA's obligations under the Water Framework Directive and the NPPF's requirement to have due regard to the River Basin Management Plan.	<p>The Council welcomes the ongoing engagement of the Environment Agency with the preparation of the VCHAP and notes the comments regarding the limited capacity at the local WRC.</p> <p>The Council welcomes the suggestions that have been received for a site-specific policy for SN4020 and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base.</p> <p>The Council notes that Policy VC DIT1 as set out at the Regulation-19 publication requires early engagement with Anglian Water to identify the need to phase the site for possible upgrades to the Ditchingham Water Recycling Centre. As with SN4020, the Council will consider the site-specific policy suggestions alongside the comments of the technical consultees and the supporting evidence base.</p>	1631	<p>The Council will consider the inclusion of a clause requiring a Drainage Strategy at the application stage should the SN4020 site progress as a preferred allocation.</p> <p>Likewise, the Council will consider whether the existing Policy VC DIT1 should be revised to include the requirement for a Drainage Strategy.</p>
QUESTION 8b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3426	Comment	There is a nearby adjacent pond which may require surveys prior to development. The expansion into the countryside would require careful design to ensure there is no negative impacts on the landscape character of the area. The proposals here would constitute a continued linear development with extensive road frontage which extends considerably away from the village centre.	<p>The Council welcomes the suggestions that have been received for a site-specific policy for SN4020 and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base for SN4020.</p>	1630	Review suggestions for a site-specific policy should SN4020 be preferred for allocation.

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QUESTION 8b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3539	Comment	We welcome the preparation of the HIA. The recommendations of the HIA in relation to archaeology should be included in the policy requirements.	The Council welcomes the suggestions that have been received for a site-specific policy for SN4020 and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base for SN4020.	1629	Review suggestions for a site-specific policy should SN4020 be preferred for allocation.
QUESTION 8b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3411	Comment	No objection subject to footway widening at site frontage along with enhanced speed limit signing to east of site. The enhanced signing could comprise a vehicle activated sign and/or village gateway.	The Council welcomes the suggestions that have been received for a site-specific policy for SN4020 and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base for SN4020.	1628	Review suggestions for a site-specific policy should SN4020 be preferred for allocation.

Earsham

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QUESTION 9a: Do you agree with the allocation of SN0218REV, Land north of The Street, Earsham for up to 25 dwellings on an area of 1.4ha? Please explain your response.	3602	Support	Yes. The site scores highly in the Sustainability Appraisal and has been received favourably with all consultees. Utilising typical mitigation measures there appear to be no site constraints which would rule this site out for development. Initial Concept and Highways Plans have been prepared by Clayland Architects on behalf of the developer and demonstrate the Highways Mitigations can be achieved. Please see attached. This would include extending the 30mph zone, Traffic Calming/Village Entrance Feature, Roadside Footpath to Village and Crossing Point. These mitigation measures are continuing to be developed and we would welcome further discussion on this.	The Council welcomes the continued promotion and support of the site promoter for SN0218REV and notes the supporting documents and comments in favour of allocating this site.	1648	No action required.
QUESTION 9a: Do you agree with the allocation of SN0218REV, Land north of The Street, Earsham for up to 25 dwellings on an area of 1.4ha? Please explain your response.	3444	Object	<p>This allocation would result in a total of 50 dwellings being allocated in Earsham.</p> <p>It is a smaller parcel of a wider site that could come forward in the future. Therefore have planning benefits been missed by not considering the whole site?</p> <p>This highlights tensions between the desire to support local services while also providing additional benefits. Unclear if additional benefits or infrastructure improvements will be required from these developments and piecemeal development makes these difficult to secure.</p> <p>Have all of the alternatives been fully explored to ensure that the strategy is the most appropriate? For example, would allocating 50 on the whole site be better than separate sites in Earsham? No evidence this has been explored. Rationale behind allocating parts of sites must be fully explained in order to be "Justified".</p>	The Council welcomes this engagement with the production of the VCHAP, including a recognition of the important role played by the Sustainability Appraisal (SA) in the site selection process. At each stage of the VCHAP the Council has sought to update the evidence base in a proportionate and appropriate manner, including the Sustainability Appraisal. The SA supports the decision making process throughout the preparation of the Plan. At the Regulation-18 focused consultation stage this has included an appraisal of the alternative sites considered to be available to the Council to address the shortfall of housing identified following the publication of the Regulation-19 Plan. In terms of the role of the SA the Council clearly recognises the important role this document plays in the identification of sites however its conclusions must also be considered alongside the findings of the wider evidence base and it is therefore not a definitive document in the site selection process. The Council is satisfied with the approach taken to the selection of sites for this consultation (as set out in the consultation material) and will continue its work to be assured that the final sites selected are deliverable and that the tests of soundness are met prior to submission of the Plan for Examination.	1647	No action required.
QUESTION 9a: Do you agree with the allocation of SN0218REV, Land north of The Street, Earsham for up to 25 dwellings on an area of 1.4ha? Please explain your response.	3599	Support	<p>The site is located in a sustainable location and is ready to come forward for development immediately.</p> <p>The Site was previously a preferred site, and would serve as a new gateway to Earsham from the west. The other allocated site is well separated from the site, minimising impacts of the two allocations potentially being delivered simultaneously.</p> <p>A footway link into the village can be delivered from the site. The landowner is currently instructing the required technical advice to confirm the final design of this link.</p> <p>Suitable vehicular access can be achieved, with the 30mph speed limit to be relocated west.</p>	The Council welcomes the continued promotion and support of the site promoter for SN0218REV and notes the comments in favour of allocating this site.	1644	No action required.

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QUESTION 9a: Do you agree with the allocation of SN0218REV, Land north of The Street, Earsham for up to 25 dwellings on an area of 1.4ha? Please explain your response.	3577, 3578, 3776	Object	<p>Summary of objections received to the allocation of SN0218REV:</p> <ol style="list-style-type: none"> 1. Traffic: The junction from The Street onto the A143 is dangerous, and both are already busy roads requiring safety improvements. 2. Housing type: New two-storey houses may overlook existing bungalows and are not in keeping with the existing built form. 3. Increased pressure on medical services. 	<p>Issues relating to traffic and pressure on medical services have been addressed fully in response 1557 to representation 3694 by Earsham Parish Council.</p> <p>The Council welcomes the suggestions that have been received for a site-specific policy concerning housing types for SN0218REV and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base.</p>	1618	The Council will consider whether the inclusion of a policy criterion concerning house types would be relevant and proportionate, should the site progress as a preferred allocation.
QUESTION 9a: Do you agree with the allocation of SN0218REV, Land north of The Street, Earsham for up to 25 dwellings on an area of 1.4ha? Please explain your response.	3694	Comment	<p>Since the last submission, when parish councillors did not have any strong views on the site, there has been a parish council election in 2023, which has meant a change of council and not all members agree with this proposed site now. The main comments for Q9a are:-</p> <ol style="list-style-type: none"> a. Infrastructure: storm and foul water sewers at capacity. b. Traffic: speed limit should be extended to the A143 junction and footpaths/signage improved. c. Proximity to the A143: reduction in speed limit to reduce noise and pollution desirable. Provide natural shielding with trees/hedgerows. d. Amenities: No retail amenities in Earsham, increasing traffic pressures and demand on local medical services. 	<p>The Council has proactively engaged with the Lead Local Flood Authority (LLFA) and the Environment Agency (EA) throughout preparation of the VCHAP. Few or no constraints were identified over the original SN0218 site area, with a small section on the southern boundary considered at low risk of surface flooding. No concerns regarding flood risk have been raised by these statutory consultees over the revised SN0218REV site area proposed at this consultation. Anglian Water (AW) have confirmed that "the site is close to existing water supply and sewerage networks, and there is sufficient headroom at Earsham-Bungay Rd WRC to accommodate additional development in Earsham."</p> <p>The Highway Authority have confirmed during this consultation that they "would not object to allocation of the site if the promotor demonstrates that a satisfactory footway(2m wide) can be delivered". They would also require "suitable visibility splays, along with extension of the 30mph speed limit and relocation of the speed reducing gateway feature" while maintaining the width of The Street at 6.5m. Specifically in term the speed limit on the A143, the County Council may wish to review the situation as part of the submission of a planning application for the site, but has not indicated that this needs to be a requirement for allocation.</p> <p>No biodiversity concerns have been raised at the site assessment stage. A Landscape and Visual Appraisal (LVA) of the site suggested retention of the frontage hedgerow as far as possible and reinforcement of the northern belt of trees to act as a visual, auditory and ecological buffer with the A143.</p> <p>In terms of the local services and facilities, Earsham is a comparatively well served village with a primary school, pub and village hall. As the Council has stated elsewhere, it is aware of the tension that exists when planning growth in a rural area; however, the village has a regular bus service to Bungay, Beccles, Diss and Yarmouth. These public transport routes provide access to additional services and facilities. Concerns regarding local medical facilities reflect wider issues at a national level and are beyond the scope of the VCHAP to resolve; however, the Council has proactively engaged with the Integrated Care Board who has responsibility for planning medical resources and provision to meet both existing and future need across the District.</p>	1557	No action required.

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QUESTION 9a: Do you agree with the allocation of SN0218REV, Land north of The Street, Earsham for up to 25 dwellings on an area of 1.4ha? Please explain your response.	3592	Comment	No objection. The site is close to existing water supply and sewerage networks, and there is sufficient headroom at Earsham-Bungay Rd WRC to accommodate additional development in Earsham.	The Council welcomes the ongoing engagement of Anglian Water with the preparation of the VCHAP and notes the comments confirming the capacity of the local WRC.	1543	No action required.
QUESTION 9a: Do you agree with the allocation of SN0218REV, Land north of The Street, Earsham for up to 25 dwellings on an area of 1.4ha? Please explain your response.	3455	Comment	Catchment numbers are low and could accommodate additional pupils, school has a confined site with limited classbases available. Improved cycle walking routes would need to be established to encourage safe and sustainable travel to school.	The Council welcomes the ongoing engagement of NCC Childrens Services with the preparation of the VCHAP, including the reiteration of earlier advice confirming that catchment numbers of pupils are low and the new development can be accommodated within the local primary school.	1540	No action required.
QUESTION 9a: Do you agree with the allocation of SN0218REV, Land north of The Street, Earsham for up to 25 dwellings on an area of 1.4ha? Please explain your response.	3540	Comment	No comments.	The Council welcomes the engagement of Historic England with the preparation of the South Norfolk Village Clusters Housing Allocations Plan and welcomes the response submitted in response to the potential inclusion of SN0218REV set out in the focused Regulation-18 consultation.	1538	No action required.
QUESTION 9a: Do you agree with the allocation of SN0218REV, Land north of The Street, Earsham for up to 25 dwellings on an area of 1.4ha? Please explain your response.	3399	Comment	Amber - archaeological mitigation will probably be necessary but is unlikely to prevent development. Cropmark of significant prehistoric remains.	The Council welcomes the ongoing engagement of the Historic Environment Service and notes the comments submitted in respect of SN0218REV.	1534	No action required.
QUESTION 9b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3750	Comment	We note that this is a greenfield site outside of the current development boundary. Authorities have a duty under the NERC Act 2006 and the Environment Act 2021 to have regard to the conservation and enhancement of Priority Habitats in their decision making. Hedgerows are listed as a Priority Habitat under the requirements of section 41 of the NERC Act. We recommend that clear and robust policy wording with respect to hedgerows/trees is included in this policy and suggest some wording.	The Council welcomes the suggestions that have been received for a site-specific policy for SN0218REV and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base for SN0218REV.	1626	Review suggestions for a site-specific policy should SN0218REV be preferred for allocation.
QUESTION 9b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3427	Comment	This site constitutes a large extension to the existing settlement which will cause a change in the landscape character and setting of the village. It would be beneficial for this to be a landscape led scheme, with key consideration given to the boundary vegetation. The Norfolk Broads are situated to the north, this is an important context in terms of the landscape and visual impacts of the development, as well as considering wider habitats. A public right of way crosses the western end of the site and runs along the entire south-western and southern boundaries. Access along the Public Right of Way must remain at all times, should access be proposed on to the Public Rights of Way discussion should be had with Norfolk County Council Public Rights of Way and Highways team. There is also a pond to the north of the site which may require further surveys before development.	The Council welcomes the suggestions that have been received for a site-specific policy for SN0218REV and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base for SN0218REV.	1625	Review suggestions for a site-specific policy should SN0218REV be preferred for allocation.

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QUESTION 9b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3412	Comment	<p>The site should be accessed via The Street only. The access would require suitable visibility splays, along with extension of the 30mph speed limit and relocation of the speed reducing gateway feature.</p> <p>A 2.0m wide footway would be required at The Street, between the site access and Milestone Lane to connect with the existing facility, this would need to include a simple pedestrian crossing.</p> <p>Trees east of the development, at the north side of The Street could present a constraint to delivery of footway if they are 3rd party owned. At the south side of The Street, some hedging is present, along with a ditch. In some instances, carriageway can be utilised for footway delivery, The Street is a bus route and needs to be maintained at 6.5m wide.</p> <p>The Highway Authority would not object to allocation of the site if the promotor demonstrates that a satisfactory footway as above can be delivered.</p>	The Council welcomes the suggestions that have been received for a site-specific policy for SN0218REV and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base for SN0218REV.	1624	Review suggestions for a site-specific policy should SN0218REV be preferred for allocation.
QUESTION 9b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3603	Comment	<p>Allocation Policy could ;</p> <p>-Ensure the scheme gives consideration and provision to future growth if required of additional land adjoining the site.</p> <p>-Secure Highways mitigation measures with the scheme</p> <p>-Secure landscape features and planting measures</p>	The Council welcomes the suggestions that have been received for a site-specific policy for SN0218REV and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base for SN0218REV.	1623	Review suggestions for a site-specific policy should SN0218REV be preferred for allocation.
QUESTION 9b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3622	Object	<p>Regarding the proposed 25 new houses in Earsham:</p> <ol style="list-style-type: none"> 1. The houses would be exceptionally close to the A143 and the noise would be unbearable for the people who buy the homes. 2. The infrastructure in the village is already struggling to cope with drainage, sewage and sufficient places at the local primary school. 3. It could be dangerous to put an entrance/exit to the houses so close to traffic which has just come off the A143 unless the speed limits can be lowered on approach to the Earsam turning off the A143 which is already an accident hot spot. 4. There are already too many houses in the village which is prone to flooding from The River Waveney . 	These issues have been addressed fully in response 1557 to representation 3694 by Earsham Parish Council, and it is not considered necessary to repeat them here.	1622	No action required
QUESTION 9b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3541	Comment	We welcome the preparation of the HIA. The recommendations of the HIA in relation to archaeology should be included in the policy requirements.	The Council welcomes the suggestions that have been received for a site-specific policy for SN0218REV and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base for SN0218REV.	1621	Review suggestions for a site-specific policy should SN0218REV be preferred for allocation.

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QUESTION 9b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3389	Comment	<p>Norfolk Minerals and Waste Core Strategy Policy CS16 'Safeguarding mineral and waste sites and mineral resources' applies as the proposed allocation, SN0218, is located within the consultation area for safeguarded mineral extraction site, Earsham Quarry, which is only 25m from the boundary of SN0218 at the closest point, with the A143 in between. The site assessment should include this information.</p> <p>Therefore, the policy wording for this site should state: 'The site is within the consultation area for a safeguarded mineral extraction site and the development must not prevent or prejudice the use of the existing mineral extraction site unless suitable alternative provision is made, or the applicant demonstrates that the site no longer meets the needs of the aggregate industry.'</p>	The Council notes the comments of the Mineral Planning Authority. It is not considered necessary to repeat this information as all development is required to comply with the requirements of the Local Development Plan, which includes the Minerals and Waste Local Plan.	1619	No action required.
QUESTION 9b: If the site is allocated, do you think there are any specific requirements that should be set out in the allocation policy?	3693	Comment	<ul style="list-style-type: none"> • Some open space would lessen the impact of the density of dwellings on a small development and would be welcomed by families with children, especially if there was a small play area. • Adequate footpath from the proposed development onto The Street would be necessary. • Adequate natural screening from the A143. • The style of dwellings to be sympathetic to the surroundings and in keeping with a rural village. 	The Council welcomes the suggestions that have been received for a site-specific policy for SN0218REV and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees and the supporting evidence base.	1560	Should the site progress as a preferred allocation, the Council will consider these suggestions alongside the comments of the technical consultees and the supporting evidence base.

Gillingham, Geldeston, and Stockton

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 10a: Do you agree with the proposed allocation VC GIL1 REV, South of Geldeston Road and Daisy Way, Gillingham, on 2.92ha, for approximately 40 dwellings. Please explain your response.	3782	Comment	The proposed increase to the site boundary and the additional five dwellings does not change objection position on flood risk grounds to planning application 2022/1993. Highlight that there is a risk on the deliverability of this site allocation for housing until flood risk objections are resolved.	The Council recognises the concerns that have been raised and continues to liaise with both the Environment Agency and Norfolk County Council as the Lead Local Flood Authority regarding flood risk matters relating to this site, and the current planning application for the site (2022/1993). However, the Council has undertaken significant engagement with these technical bodies throughout the course of preparing the VCHAP and did not receive an objection to the allocation of this site in response to the publication of the Regulation 19 Plan. The Council remains of the opinion that the site is suitable for allocation, with developers required by the site-specific policy to undertake a Flood Risk Assessment that will be informed by the Strategic Flood Risk Assessment (SFRA) that has been prepared to support the production of the Plan. This SFRA will inform both the site layout and design and mitigation measures.	1601	No action required.

<p>QUESTION 10a: Do you agree with the proposed allocation VC GIL1 REV, South of Geldeston Road and Daisy Way, Gillingham, on 2.92ha, for approximately 40 dwellings. Please explain your response.</p>	<p>3570, 3576, 3600, 3641, 3703, 3744, 3756, 3805, 3813</p>	<p>Object</p>	<p>A summary of the representations received in response to Question 12a grouped together by subject matter for ease of reference: Scale of Development - District has sufficient housing land supply, out of character will area, detrimental to Broads, encroachment into countryside and object to use of greenfield land, Daisy Way site already overdeveloped. Highways - Cannot cope with flow of traffic, acute bend and on -street parking at The Street, roundabout already dangerous, Daisy way is private road, future residents will be car dependent. Flooding - heighten problem that already exists, Daisy way already floods, new houses will require protection which will make them unaffordable. Sewerage - more strain on treatment works and more effluent being released in River Waveney. Natural Environment - 2 species of bat roost in mature oak trees. Alternative sites - north site has better access, further from Broads, preferred by local community but ignored. Primary School - extension does not need to be reliant on this site, already oversubscribed, funding for expansion is unlikely.</p>	<p>The Councils notes the concerns raised in these representations and responds to them with the following:</p> <p>Scale of Development - The 5 Year Housing Land Supply referred to relates to the delivery of the Councils housing requirements for the following 5 years only. The VCHAP is being prepared to allocate the growth required in the Village Clusters up to 2038. The Council is required to identify land to meet this need as stated in the Greater Norwich Local Plan. To support the publication of the Regulation 19 VCHAP, a number of Landscape Visual Appraisals (LVA) were produced to evaluate the sites included in the document. The LVA for this site concluded that a full Landscape Assessment would need to be undertaken due to the proximity of the Broads, however it was also noted that the site is relatively well contained by existing development and the field boundaries. This has been included within the Regulation 19 policy VC GIL1 and would remain if the site is extended as proposed as stated in the 'Reasoned Justification'. The proposed extension was not considered to necessitate a review of the previous LVA. The agricultural land value of sites was considered as part of the site assessment process. Wherever possible, the Council have considered the sites of lowest value for allocation. This site was established as Grade 3 and therefore below the threshold to be considered the best and most versatile land. Therefore the agricultural value of the site is not considered a sufficient reason for the site to be discounted. The Council notes the comments regarding the level of growth proposed at Gillingham. The Council has carefully considered the most sustainable development options throughout the Village Clusters. The Council considers that the quantum of development being proposed in Gillingham is appropriate and is still within the scope of the VCHAP with the site being below 50 dwellings. The site will contribute to the delivery of the objectives of the VCHAP, namely to delivery of housing to meet the needs of the area.</p> <p>Highways - Norfolk County Council as the Highways Authority have been proactively engaged throughout the preparation of the VCHAP, with specific discussions on a number of sites. Norfolk County Council highways do not have any specific objections to this extension provided the access to the development is to an adoptable standard. It has been acknowledged through discussions with the Highways Authority that Daisy Way is a private road however this has not been subject to a specific objection from the Highways Authority. Objective 2 of the VCHAP states that new development provides the opportunity to support and potentially improve local services and facilities. Therefore, sites have been allocated in villages where services do exist in order to achieve this objective. The VCHAP has also considered the provision of sustainable travel methods during the site assessment stage and this has been considered when selecting the preferred sites. The Council acknowledges that due to the rural nature of the District, opportunities to access facilities and services by either public transport or pedestrian routes can be limited. However it should be noted that the VCHAP will form one part of the Local Development Plan alongside the Greater Norwich Local Plan which allocates the majority of development in the Greater Norwich area.</p> <p>Flooding - The Council has engaged with Norfolk County Council as</p>	<p>1600</p>	<p>Continue to engage with Anglian Water and appropriately consider suggestions for a site-specific policy should VC GIL1 REV be preferred for allocation.</p>
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Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
				<p>the Lead Local Flood Authority (LLFA) throughout this process, with specific discussions on a number of sites as appropriate. The Council has not received an objection to the proposed extension from the LLFA. Specific requirements relating to the construction of dwellings on the site will be determined through the planning application process through discussions with technical consultees including Norfolk County Council. In accordance with current policy guidance and legislation, run-off from new development should not exceed the existing greenfield run-off rates of the site. Furthermore, in some instances, it is possible that development can result in improvements in local drainage and flooding matters due to improvements in on-site drainage.</p> <p>Sewerage - The Council has engaged with Anglian Water throughout the preparation of the VCHAP, with specific discussions taking place on a number of sites where appropriate. Anglian Water has noted capacity issues at the local Wastewater Recycling Centre, however have also stated that they will take appropriate actions to ensure there is capacity should this extension be taken forward. The Council will continue to engage with Anglian Water through the preparation of the VCHAP. Any specific requirements relating to sewerage would need to be agreed with Anglian Water as part of the planning application process.</p> <p>Natural Environment - The potential presence of protected species on the site was noted within the site assessment. It was also noted that the impacts on these could be suitably mitigated. Natural England have been consulted as part of this consultation, as well as at previous consultation stages, and have raised no objections to this extension. Any specific requirements relating to protected species would be determined during the planning application process.</p> <p>Alternative sites - The site referred to (SN0274REVA and REVB) was assessed during the site assessment stage and was concluded to be a 'Reasonable Alternative'. While very few constraints were identified, VC GIL1 does provide greater certainty that the expansion of the school, which has been identified as necessary, will be delivered due to this being included within the site-specific policy. The delivery of this expansion will be determined through the planning application process in consultation with Norfolk County Council.</p> <p>Primary School - The Council has actively engaged with Norfolk County Council as the education provider. As part of this consultation they have stated that the school is currently constrained and that the expansion land included will benefit the school. The delivery of this expansion will be determined through the planning application process in consultation with Norfolk County Council.</p>		

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 10a: Do you agree with the proposed allocation VC GIL1 REV, South of Geldeston Road and Daisy Way, Gillingham, on 2.92ha, for approximately 40 dwellings. Please explain your response.	3456	Comment	School sits on a confined site with limited class base, the expansion site will benefit additional facilities. Having the proposed site in close proximity to the school will support safe and sustainable travel. Catchment numbers remain low, numbers will need to be carefully managed to support school organisation.	The Council welcomes the ongoing engagement of NCC Childrens Services with the preparation of the VCHAP and the support for the proposed expansion site for the school.	1599	No action required.
QUESTION 10a: Do you agree with the proposed allocation VC GIL1 REV, South of Geldeston Road and Daisy Way, Gillingham, on 2.92ha, for approximately 40 dwellings. Please explain your response.	3594	Comment	Beccles-Marsh Lane WRC does not currently have capacity. Anglian Water would therefore take the necessary steps to ensure that there is sufficient treatment capacity should the Planning Authority grant planning permission. The Drainage and Wastewater Plan proposes a medium-term strategy to increase capacity at the WRC.	The Council notes the capacity issues at Beccles-Marsh Lane WRC. The Council will continue to engage with Anglian Water and will consider this alongside the comments of other technical consultees the supporting evidence base should the extension progress as a preferred allocation.	1598	Continue to engage with Anglian Water and appropriately consider suggestions for a site-specific policy should VC GIL1 REV be preferred for allocation.
QUESTION 10a: Do you agree with the proposed allocation VC GIL1 REV, South of Geldeston Road and Daisy Way, Gillingham, on 2.92ha, for approximately 40 dwellings. Please explain your response.	3542	Comment	No comments.	The Council welcomes the engagement of Historic England with the preparation of the South Norfolk Village Clusters Housing Allocations Plan.	1597	No action required.
QUESTION 10a: Do you agree with the proposed allocation VC GIL1 REV, South of Geldeston Road and Daisy Way, Gillingham, on 2.92ha, for approximately 40 dwellings. Please explain your response.	3400	Comment	Amber - archaeological mitigation will probably be necessary but is unlikely to prevent development. There has already been a planning application on this site.	The Council notes the response of the Historic Environment Service and, as appropriate, will reflect this in any updated policy requirements for the site should the amendments to the site be considered acceptable in the context of the VCHAP.	1596	Review suggestions for a site-specific policy should VC GIL1 REV be preferred for allocation.
QUESTION 10a: Do you agree with the proposed allocation VC GIL1 REV, South of Geldeston Road and Daisy Way, Gillingham, on 2.92ha, for approximately 40 dwellings. Please explain your response.	3358, 3608	Support	Support the proposed changes to the boundaries of the allocation. Site is well located with a number of planning benefits and outside of Nutrient Neutrality. Amendment is outside of Environment Agency's projected flood zone.	The Council welcomes the support for the proposed amendment to the site.	1595	No action required.
QUESTION 10b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 5 dwellings?	3751	Comment	The site is within Geldeston Meadows SSSI Impact Risk Zone. We recommend that policy wording in VC GIL1 should reflect NPPGF 180. This site is noted as being amber for great crested newts. We recommend that policy wording includes reference to the need for an appropriate GCN assessment.	The Council welcomes the suggestions that have been received for a site-specific policy for VC GIL1 REV and, should the extension progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees, the supporting evidence base and the site-specific policy for VC GIL1.	1609	Review suggestions for a site-specific policy should VC GIL1 REV be preferred for allocation.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 10b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 5 dwellings?	3413	Comment	Daisy Way is a private unadopted road. The Highway Authority policy is for a maximum of 9 dwellings accessed via a private drive. However, subject to the development access being laid out to an adoptable standard, the Highway Authority does not object to the allocation revision.	The Council notes these comments and will continue to engage with Norfolk County Council as the Highways Authority as part of the VCHAP preparation process and the planning application process.	1608	The Council will continue to engage with Norfolk County Council as the Highways Authority as we continue to prepare the VCHAP.
QUESTION 10b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 5 dwellings?	3745, 3788	Object	Dwellings delivered on the site should be affordable rather than 'executive' homes. Dwelling should also be in keeping with village which is mostly bungalows and terraced dwellings.	The VCHAP, once adopted, will form part of the Local Development Plan for South Norfolk alongside the emerging Greater Norwich Local Plan (GNLP). The GNLP includes policies on the type and tenure of housing to be delivered on sites, including affordable housing, which this site will be subject to. As the Local Development Plan should be read as a whole, it is not considered necessary to repeat this as part of the VCHAP.	1607	No action required.
QUESTION 10b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 5 dwellings?	3571, 3601, 3642, 3704, 3807, 3814	Mixed	A summary of the representations received in response to Question 12b grouped together by subject matter for ease of reference: Scale of Development - no extra dwellings required, District has sufficient housing land supply, out of character will area, detrimental to Broads, encroachment into countryside and object to use of greenfield land. Highways - Cannot cope with flow of traffic, acute bend and on -street parking at The Street, Daisy way is private road, future residents will be car dependent. Primary School - extension does not need to be reliant on this site. Flooding - heighten problem that already exists, already oversubscribed. GPs and Dentists already oversubscribed in Beccles.	The Councils notes these comments and has provided a response to most of the issues raised in Response ID 1600. The Council acknowledges the concerns regarding services such as GPs and dentists being oversubscribed. However, this is a national issue and beyond the scope of the VCHAP. Due to this being a national issue, it is also not considered a material reason to prevent development from coming forward and for the Council to not meet its housing needs. The Council has engaged with service providers, including the NHS, throughout the preparation of the VCHAP and no objections have been raised regarding this site.	1606	No action required.
QUESTION 10b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 5 dwellings?	3543	Comment	No comments.	The Council welcomes the engagement of Historic England with the preparation of the South Norfolk Village Clusters Housing Allocations Plan.	1605	No action required.
QUESTION 10b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 5 dwellings?	3359, 3609	Comment	It is envisaged that the Council will attach appropriately worded conditions setting out any additional requirements, which will need to be approved by the Council at the detailed application stage.	The Council notes these comments and welcomes the continued engagement on this site.	1604	No action required.
QUESTION 10b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 5 dwellings?	3428	Comment	The trees along Forge Grove, Gillingham should be protected. Taking into account the existing Tree Preservation Order.	These trees are outside of the site boundary to the east and will not be affected by development on this site.	1603	No action required.

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QUESTION 10b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 5 dwellings?	3362	Comment	Major development - A riparian watercourse runs from the south-east corner of the site boundary and feeds into the Waveney, Lower Yare and Lothingland IDD. If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).	The Council notes these comments and will consider them as appropriate in due course when drafting site specific policy text should the site be chosen as a preferred allocation site.	1602	Review suggestions for a site-specific policy should VC GIL1 REV be preferred for allocation.

Mulbarton, Bracon Ash, Swardeston and East Carleton

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 11a: Do you agree with the proposed increase in density on allocation VC SWA2, Land on Main Road, Swardeston, to accommodate approximately 40 dwellings? Please explain your response.	3595	Comment	An increase to 40 dwellings from 30 dwellings proposed at Reg.19. Anglian Water has no objection to the increase in housing numbers on this site.	The Council welcomes the engagement of Anglian Water with the preparation of the South Norfolk Village Clusters Housing Allocations Plan and welcomes the response submitted in response to the potential amendment to VC SWA2 set out in the focused Regulation-18 consultation.	1567	No action required.
QUESTION 11a: Do you agree with the proposed increase in density on allocation VC SWA2, Land on Main Road, Swardeston, to accommodate approximately 40 dwellings? Please explain your response.	3544	Comment	No comments.	The Council welcomes the engagement of Historic England with the preparation of the South Norfolk Village Clusters Housing Allocations Plan and welcomes the response submitted in response to the potential amendment to VC SWA2 set out in the focused Regulation-18 consultation.	1566	No action required.
QUESTION 11a: Do you agree with the proposed increase in density on allocation VC SWA2, Land on Main Road, Swardeston, to accommodate approximately 40 dwellings? Please explain your response.	3457	Comment	Catchment numbers in decline closest school has capacity for 2FE, with some capacity to expand if needed.	The Council welcomes the ongoing engagement of NCC Childrens Services with the preparation of the VCHAP, including the confirmation that catchment numbers of pupils are declining and the new development can be accommodated within the local primary school.	1565	No action required.
QUESTION 11a: Do you agree with the proposed increase in density on allocation VC SWA2, Land on Main Road, Swardeston, to accommodate approximately 40 dwellings? Please explain your response.	3414	Comment	The Highway Authority does not object to the revised allocation.	The Council welcomes the ongoing engagement of the Council with the Highways Authority at Norfolk County Council. The Council notes that the Highways Authority has not raised an objection to the proposed increase in density at VC SWA2. The earlier comments of the Highways Authority which were received in relation to VC SWA2 at the Regulation-19 stage of the VCHAP will be considered in the context of the increased density as appropriate.	1564	No action required.
QUESTION 11a: Do you agree with the proposed increase in density on allocation VC SWA2, Land on Main Road, Swardeston, to accommodate approximately 40 dwellings? Please explain your response.	3401	Comment	Amber - archaeological mitigation will probably be necessary but is unlikely to prevent development. There is already a planning application on this site.	The Council notes the response of the Historic Environment Service and, as appropriate, will reflect this in any updated policy requirements for the site should the amendments to the site be considered acceptable in the context of the VCHAP.	1563	Review suggestions for a site-specific policy should VC SWA2 be preferred for allocation.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 11a: Do you agree with the proposed increase in density on allocation VC SWA2, Land on Main Road, Swardeston, to accommodate approximately 40 dwellings? Please explain your response.	3286	Object	Swardeston has insufficient facilities and infrastructure to support the original planned 30 dwellings so this should not be increased. The claim that "neighbouring Mulbarton" has easily accessible facilities ignores the fact that Mulbarton is not accessible by pedestrians or cyclists due to the extremely dangerous nature of the road and footpath. Building more houses that necessitate using a car to access anything cannot be allowed in the present climate.	Objective 2 of the VCHAP states that new development provides the opportunity to support and potentially improve local services and facilities. The Council notes that due to the rural nature of the District, opportunities to access facilities and services by either public transport or pedestrian routes can be limited. The Council has liaised with the highways authority about pedestrian connectivity from sites to existing amenities and has also reviewed public transport routes as part of the initial site assessment. Norfolk County Council highways do not have any specific objections to this increase in density. The Council has also engaged with various service providers, including the NHS and Anglian Water, and no objections have been raised for this increase in density.	1562	No action required.
QUESTION 11b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 10 dwellings?	3429, 3752	Comment	County Wildlife Site to North West with well used public access and informal paths and pressures could be increased. Two ponds already affected by run-off. Recommend discussion with Norfolk Fringe and policy wording to reflect proximity to CWS and require ecological assessment. Site is also gateway to village and design and boundary treatments should be considered. Landscape led design would be best suited to ensure frontage properties. Unmade tracks at The Common should be protected for green infrastructure.	The Council welcomes the suggestions that have been received for a site-specific policy for VC SWA2 and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees, the supporting evidence base and the site-specific policy for VC SWA2. The Council notes the landscape considerations for the site and raises that Policy VC SWA2 included in the Regulation 19 version of the VCHAP states that the design and layout of the site should reflect the prominent location at the gateway to the village. As stated in the 'Reasoned Justification' the Council is not planning to change any other aspects of the policy before it is submitted for examination. Therefore it is expected that any design proposed for the site will respond to the issues raised.	1574	Review suggestions for a site-specific policy should the amendment for VC SWA2 be preferred for allocation.
QUESTION 11b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 10 dwellings?	3732	Comment	Neither the facilities within the village, the access/egress of vehicles onto the site, or the access to suitable facilities in nearby areas make this site suitable for development of this nature.	Objective 2 of the VCHAP states that new development provides the opportunity to support and potentially improve local services and facilities. The Council notes that due to the rural nature of the District, opportunities to access facilities and services by either public transport or pedestrian routes can be limited. The Council has liaised with the highways authority about pedestrian connectivity from sites to existing amenities and has also reviewed public transport routes as part of the initial site assessment. The Council has engaged with various service providers including Norfolk County Council and Anglian Water, and no objections have been raised for this increase in density.	1572	No action required.
QUESTION 11b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 10 dwellings?	3545	Comment	Archaeological assessment is needed to inform a planning application. Recommend that bullet point 3 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	The Council welcomes the suggestions that have been received for a site-specific policy for VC SWA2 and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees, the supporting evidence base and the site-specific policy for VC SWA2.	1571	Review suggestions for a site-specific policy should the amendment for VC SWA2 be preferred for allocation.
QUESTION 11b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 10 dwellings?	3391	Comment	Site is underlain with safeguarded mineral resource, sand and gravel. Recommend policy wording for this site should state: 'This site is underlain by a safeguarded mineral resource; therefore investigation and assessment of the mineral will be required, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place.'	The Council notes the comments of the Mineral Planning Authority. It is not considered necessary to repeat this information as all development is required to comply with the requirements of the Local Development Plan, which includes the Minerals and Waste Local Plan.	1569	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 11b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 10 dwellings?	3287	Object	No more dwellings should be built in Swardeston without major road improvements between Swardeston and Mulbarton to allow cyclists, pedestrians and users of mobility scooters easy access to the facilities in Mulbarton. The existing road and adjoining footpath are dangerous due to the winding nature of the route, the very narrow and uneven footpath and the proximity of speeding heavy traffic.	The Council welcomes the suggestions that have been received for a site-specific policy for VC SWA2 and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees, the supporting evidence base and the site-specific policy for VC SWA2. The Council will continue to engage with Norfolk County Council as the Highways Authority throughout the preparation of the VCHAP.	1568	Review suggestions for a site-specific policy should the amendment for VC SWA2 be preferred for allocation and continue to engage with the Highways Authority.

Spooner Row and Suton

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 12a: Do you agree with the proposed allocation VC SPO1 REV, Land west of Bunwell Road, Spooner Row, for approximately 35 dwellings on 2.34ha? Please explain your response.	3458	Comment	Overall allocation would add 22 pupils to increasing catchment numbers. School is on confined site and may require travel to other schools. Encouraging sustainable and safe travel improvements to walking and cycling routes may need to be considered.	The Council welcomes the ongoing engagement of NCC Childrens Services with the preparation of the VCHAP. The Council welcomes the suggestions for a site-specific policy for VC SPO1REV and, should the extension progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees, the supporting evidence base and the site-specific policy for VC SPO1.	1586	Review suggestions for a site-specific policy should VC SPO1 REV be preferred for allocation.
QUESTION 12a: Do you agree with the proposed allocation VC SPO1 REV, Land west of Bunwell Road, Spooner Row, for approximately 35 dwellings on 2.34ha? Please explain your response.	3431	Comment	Site has potential to drastically change landscape which needs to be considered. Potential for further infill and removal of green spaces. Needs to be sensitively planned and landscape led, with retention of hedgerows and trees on boundaries.	The Council acknowledges the concerns relating to the potential landscape impacts of this site. This has been noted in the site assessment published supporting the Focused Regulation 18 Consultation and is one reason why 35 dwellings is considered the most appropriate level of development for this site. The Regulation 19 policy VC SPO1 also acknowledges these issues stating that landscaping on the north and west boundaries will be required to contain the site, including the protection and enhancement of existing vegetation. The existing vegetation has also been evaluated by specialist officers in the Council. Should this extension be taken forward, the Council will consider these comments alongside the comments of the technical consultees, the supporting evidence base and the site-specific policy for VC SPO1.	1585	Review suggestions for a site-specific policy should VC SPO1 REV be preferred for allocation.
QUESTION 12a: Do you agree with the proposed allocation VC SPO1 REV, Land west of Bunwell Road, Spooner Row, for approximately 35 dwellings on 2.34ha? Please explain your response.	3546	Comment	Whilst there are no designated heritage assets within the site, the site lies immediately to the north east of grade II listed The Orchards. Therefore, any development of this site has the potential to impact upon the significance of this heritage asset however appreciate that the property is well screened by existing landscaping. Welcome the preparation of the HIA, paragraph 34.8 and the second bullet point of the policy in relation to strengthening boundary vegetation.	The Council welcomes the engagement of Historic England with the preparation of the South Norfolk Village Clusters Housing Allocations Plan and welcomes the response submitted in response to the potential amendment to VC SPO1REV set out in the focused Regulation-18 consultation.	1583	No action required.
QUESTION 12a: Do you agree with the proposed allocation VC SPO1 REV, Land west of Bunwell Road, Spooner Row, for approximately 35 dwellings on 2.34ha? Please explain your response.	3415	Comment	The Highway Authority does not object to the revised allocation.	The Council welcomes the ongoing engagement of the Council with the Highways Authority at Norfolk County Council. The Council notes that the Highways Authority has not raised an objection to the proposed expansion of VC SPO1REV. The earlier comments of the Highways Authority which were received in relation to VC SPO1 at the Regulation-19 stage of the VCHAP will be considered in the context of VC SPO1REV as appropriate.	1582	No action required.
QUESTION 12a: Do you agree with the proposed allocation VC SPO1 REV, Land west of Bunwell Road, Spooner Row, for approximately 35 dwellings on 2.34ha? Please explain your response.	3402	Comment	Amber - archaeological mitigation will probably be necessary but is unlikely to prevent development.	The Council notes the response of the Historic Environment Service and, as appropriate, will reflect this in any updated policy requirements for the site should the amendments to the site be considered acceptable in the context of the VCHAP.	1581	Review suggestions for a site-specific policy should VC SPO1 REV be preferred for allocation.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 12a: Do you agree with the proposed allocation VC SPO1 REV, Land west of Bunwell Road, Spooner Row, for approximately 35 dwellings on 2.34ha? Please explain your response.	3365	Comment	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment. Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).	The Council notes these comments and will consider them as appropriate in due course when drafting site specific policy text should the site be chosen as a preferred allocation site.	1580	No action required.
QUESTION 12a: Do you agree with the proposed allocation VC SPO1 REV, Land west of Bunwell Road, Spooner Row, for approximately 35 dwellings on 2.34ha? Please explain your response.	3445	Object	Question whether the Council have fully explored the benefits of maximising the full extent of field parcels. Sustainability Appraisal raises the possibility of expanding SPO2. Question why this has not been explored over expansion of VC SPO1. Question allocating 4 smaller sites over 1 larger site. It is appreciated that the intention is to allocate less than strategic sites, when a settlement is taking 80 new dwellings but does this meet objectives of the plan?	The Council has carefully considered the most sustainable development options throughout the Village Clusters. The Council considers that the quantum of development being proposed in Spooner Row is appropriate with all sites being considered still within the scope of the VCHAP being below 50 dwellings. The Council has actively engaged with the landowners of all preferred sites to ensure they are deliverable, with VC SPO1 being actively promoted at present. While Spooner Row currently has 4 sites, 2 of these are carried forward from the 2015 Site Allocations Document and already have planning permission. The Council has considered the cumulative impact of development in Spooner Row and considers this impact to overall be consistent with the objectives of the VCHAP. The sites will contribute to the delivery of these objectives, namely to delivery of housing to meet the needs of the area.	1579	No action required.
QUESTION 12a: Do you agree with the proposed allocation VC SPO1 REV, Land west of Bunwell Road, Spooner Row, for approximately 35 dwellings on 2.34ha? Please explain your response.	3275, 3657	Object	Objections to the use of greenfield land when towns have brownfield sites. housing is proposed to the land past the school, past the railway line and opposite the former council properties heading towards Wymondham and a half finished estate opposite the site. Total development does not feel planned and sites of least resistance taken forward. Requires further engagement with community.	<p>Where possible, the Council has considered the allocation of brownfield sites in the VCHAP. However, there is insufficient brownfield land in the Village Clusters to meet the 1,200 dwelling requirement. Therefore, it is necessary that greenfield land will be used for site allocations. Where this occurs, the Council has considered the existing uses, biodiversity value, landscape contributions and agricultural land value and proposed those of lowest value wherever possible.</p> <p>The Council has carefully considered the most sustainable development options throughout the Village Clusters. The Council considers that the quantum of development being proposed in Spooner Row is appropriate with all sites being considered still within the scope of the VCHAP being below 50 dwellings. The Council has considered the cumulative impact of development in Spooner Row and considers this impact to overall be consistent with the objectives of the VCHAP. The sites will contribute to the delivery of these objectives, namely to delivery of housing to meet the needs of the area.</p> <p>The Council published this consultation to meet the requirements of the Town and Country Planning (England) (Local Plans) Regulations 2021 (as amended), specifically Regulation 18. The consultation document was published online and copies were provided to view in public libraries. Notices were also provided to affected parish Councils and placed in local GP surgeries and elsewhere. The Council considers that it has taken appropriate action to notify residents of the consultation in line with the regulations.</p>	1578	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 12a: Do you agree with the proposed allocation VC SPO1 REV, Land west of Bunwell Road, Spooner Row, for approximately 35 dwellings on 2.34ha? Please explain your response.	3268, 3538, 3804	Object	A summary of the representations received in response to Question 12a grouped together by subject matter for ease of reference: Flooding - currently poor drainage and cannot cope with existing development let alone more. Highways - on road parking serious issue, heavy good vehicles using Bunwell Road, traffic uses Spooner Row to access A11, will add 40 vehicles to traffic, Sutton Lane inadequate, car dependence in area. Scale of development - alarmed over maximising site size as large sites will overwhelm village.	The Councils notes the concerns raised in these representations and responds to them with the following: Flooding - The Council has engaged with Norfolk County Council as the Lead Local Flood Authority (LLFA) throughout this process, with specific discussions on a number of sites as appropriate. The Council has not received an objection to the proposed extension from the LLFA. In accordance with current policy guidance and legislation, run-off from new development should not exceed the existing greenfield run-off rates of the site. Furthermore, in some instances, it is possible that development can result in improvements in local drainage and flooding matters due to improvements in on-site drainage. Highways - The Council acknowledges that due to the rural nature of the District, opportunities to access facilities and services by either public transport or pedestrian routes can be limited. Norfolk County Council as the Highways Authority have been proactively engaged throughout the preparation of the VCHAP, with specific discussions on a number of sites. Norfolk County Council Highways do not have any objections to this extension. Scale of Development - The Council acknowledges concerns raised regarding the quantum of development being proposed on site VC SPO1REV. The revised site assessment which was published alongside the Focused Regulation 18 Document states that 35 dwellings is considered to make a more effective use of land as required by NPPF Chapter 11. However, any higher levels of development were considered to have detrimental landscape and townscape impacts as well as additional pressure on the limited services in the area. On balance, the Council considers 35 dwellings to be an appropriate level of development for this site.	1577	No action required.
QUESTION 12a: Do you agree with the proposed allocation VC SPO1 REV, Land west of Bunwell Road, Spooner Row, for approximately 35 dwellings on 2.34ha? Please explain your response.	3840	Support	Support allocation and increase in dwellings but site could accommodate 45 with wider benefits. Site is sustainable and outside Nutrient Neutrality. Draft policy would result in inefficient use of land.	The Council welcomes the engagement of the site promoter regarding the possible revision to the site. The revised site assessment which was published alongside the Focused Regulation 18 Document states that 35 dwellings is considered to make a more effective use of land as required by NPPF Chapter 11. However, any higher levels of development were considered to have detrimental landscape and townscape impacts as well as additional pressures on the limited services in the area. On balance, the Council considers 35 dwellings to be an appropriate level of development for this site.	1575	No action required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 12b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 20 dwellings? Please tick the 'comment' button in your response and complete the associated text box.	3269, 3547, 3839	Mixed	<p>Need to consider recent flooding on Bunwell Road/Queen Street. Cannot sustain further development due to flooding. Flooded twice in recent years and further development will make this worse. Poor drains, poor ditches and building on fields will take away flood plains.</p> <p>Traffic already makes conditions difficult in village and pedestrian safety needs to be considered. Need to conduct studies to understand impacts.</p>	<p>The Council has engaged with Norfolk County Council as the Lead Local Flood Authority (LLFA) throughout this process, with specific discussions on a number of sites as appropriate. The Council has not received an objection to the proposed extension from the LLFA. In accordance with current policy guidance and legislation, run-off from new development should not exceed the existing greenfield run-off rates of the site. Furthermore, in some instances, it is possible that development can result in improvements in local drainage and flooding matters due to improvements in on-site drainage.</p> <p>Norfolk County Council as the Highways Authority have been proactively engaged throughout the preparation of the VCHAP, with specific discussions on a number of sites. Norfolk County Council Highways do not have any objections to this extension. A highways scheme will need to be agreed with the Highways Authority through the planning application process.</p>	1593	No action required.
QUESTION 12b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 20 dwellings? Please tick the 'comment' button in your response and complete the associated text box.	3753	Comment	Support the following policy wording and recommend that this is retained – “Appropriate landscaping of the north and west boundaries, to contain the development and integrate it with the wider countryside, and the protection and enhancement of the existing vegetation along the south west boundary”.	The Council welcomes the suggestions that have been received for a site-specific policy for VC SPO1REV and, should the extension progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees, the supporting evidence base and the site-specific policy for VC SPO1.	1589	Review suggestions for a site-specific policy should VC SPO2 REV be preferred for allocation.
QUESTION 12b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 20 dwellings? Please tick the 'comment' button in your response and complete the associated text box.	3596	Comment	Previously advised there is limited capacity regarding future connections to our foul drainage network given that the existing WRC. The supporting text should emphasise that Spooner Row WRC is constrained. Policy should therefore reference early engagement with Anglian Water to address future connection requirements or the developer to consider alternative on-site treatment subject to the necessary permits.	The Council notes the capacity issues at Spooner Row WRC and note that limited capacity was also acknowledged in the Regulation 19 version of the VCHAP under paragraph 34.9. The Council will continue to engage with Anglian Water and consider this alongside the comments of other technical consultees the supporting evidence base should the extension progress as a preferred allocation.	1588	Continue to engage with Anglian Water and appropriately consider suggestions for a site-specific policy should VC SPO2 REV be preferred for allocation.
QUESTION 12b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 20 dwellings? Please tick the 'comment' button in your response and complete the associated text box.	3552	Comment	Archaeological assessment required to support planning application. Advise that bullet point 5 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	The Council welcomes the suggestions that have been received for a site-specific policy for VC SPO1 REV and, should the extension progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees, the supporting evidence base and the site-specific policy for VC SPO1.	1587	Review suggestions for a site-specific policy should VC SPO1 REV be preferred for allocation.

Tacolneston and Forncett End

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 13a: Do you agree with the boundary of revised allocation VC TAC1 REV, Land to the west of Norwich Road, Tacolneston, to facilitate 'approximately 25 dwellings' on 1.0ha? Please explain your response.	3772	Support	<p>The boundary of revised allocation VC TAC1 REV is welcomed and better reflects the proposed development of 29 affordable dwellings, access, provision of open space, soft landscaping, hardstanding, vehicle and cycle parking and associated infrastructure currently being considered by the Local Planning Authority under Full Planning Application Ref: 2023/2234.</p> <p>Furthermore, it is considered that, as demonstrated by Full Planning Application Ref: 2023/2234, 29 dwellings can be accommodated within the boundary of the revised allocation VC TAC1 REV as opposed to 25 dwellings. Therefore, it is respectfully requested that the allocation should be revised to 'up to 29 dwellings'.</p>	The Council welcomes the continued promotion and support of the site promoter for VC TAC1 and notes the supporting comments in favour of allocating this site. The Council also notes the suggestions that have been received for a site-specific policy for VC TAC1 REV and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees, the supporting evidence base and the site-specific policy for VC TAC1.	1657	Review suggestions for a site-specific policy should the proposed amendment to VC TAC1 be preferred for allocation.
QUESTION 13a: Do you agree with the boundary of revised allocation VC TAC1 REV, Land to the west of Norwich Road, Tacolneston, to facilitate 'approximately 25 dwellings' on 1.0ha? Please explain your response.	3459	Comment	Catchment appears stable, school sits on a confined site with little ability to expand the school to accommodate demand beyond site being proposed. If additional children generated likely children will need to travel to next nearest school.	The Council welcomes the ongoing engagement of NCC Children's Services with the preparation of the VCHAP and notes the comments regarding pressure on school places. The capacity of the local school will be fully considered when discussing the allocation of future local plan sites.	1592	No action required.
QUESTION 13a: Do you agree with the boundary of revised allocation VC TAC1 REV, Land to the west of Norwich Road, Tacolneston, to facilitate 'approximately 25 dwellings' on 1.0ha? Please explain your response.	3566	Object	<p>We consider the area to be too small to accommodate the proposed number of dwellings for the reasons stated:</p> <ul style="list-style-type: none"> a. Erosion of rural character. b. Increased traffic and accessibility concerns. c. Over-concentration of affordable housing units. 	<p>The PC has raised concerns about the landscape and townscape impact of the site, making reference to the site assessment form. However, the Council considers that the planning permission for 3 detached bungalows along the road frontage (granted on Appeal in 2016) has to some extent eroded the gap within the landscape. Furthermore, the proposed allocation site would extend to the west away from the road frontage and therefore not further reduce the gap in the streetscene.</p> <p>Comments relating to highways matters are noted and the Council is aware of the presence of the protected tree along the site frontage, as reflected in Policy VC TAC1. The Council has engaged consistently with the Highways Agency throughout production of the Plan, and they have not raised any concerns to the proposed site modifications presented at this consultation.</p> <p>The Council will expect allocated sites to deliver the requisite level of affordable housing in accordance with emerging GNLP Policy 5. The level of affordable housing required (33%) has been determined following production of the Strategic Housing Market Assessment (June 2017) and the Greater Norwich Housing Needs Assessment (June 2021). In terms of design and compatibility with the existing housing, development proposals will be expected to respond positively to the existing context, including in terms of scale, layout and design, as set out in existing policies within the Local Plan.</p>	1554	No action required.

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QUESTION 13a: Do you agree with the boundary of revised allocation VC TAC1 REV, Land to the west of Norwich Road, Tacolneston, to facilitate 'approximately 25 dwellings' on 1.0ha? Please explain your response.	3597	Comment	No objection. We note reference to the current planning application, which Anglian Water has provided a consultation response to indicate that capacity is available at Forncett-Forncett End WRC.	The Council welcomes the ongoing engagement of Anglian Water with the preparation of the VCHAP and notes the provision of comments at the consultation stage of the current planning application 2023/2234 confirming the capacity of the local WRC.	1542	No action required.
QUESTION 13a: Do you agree with the boundary of revised allocation VC TAC1 REV, Land to the west of Norwich Road, Tacolneston, to facilitate 'approximately 25 dwellings' on 1.0ha? Please explain your response.	3416	Comment	The Highway Authority does not object to the proposed amendment, increasing the allocation frontage overcomes concerns with the original allocation.	The Council welcomes the ongoing engagement of the Council with the Highways Authority at Norfolk County Council. The Council notes that the Highways Authority has not raised an objection to the proposed expansion of VC TAC1. The earlier comments of the Highways Authority which were received in relation to VC TAC1 at the Regulation-19 stage of the VCHAP will be considered in the context of VC TAC1 REV as appropriate.	1541	No action required.
QUESTION 13a: Do you agree with the boundary of revised allocation VC TAC1 REV, Land to the west of Norwich Road, Tacolneston, to facilitate 'approximately 25 dwellings' on 1.0ha? Please explain your response.	3548	Comment	No comments.	The Council welcomes the engagement of Historic England with the preparation of the South Norfolk Village Clusters Housing Allocations Plan and welcomes the response submitted in response to the potential amendment to VC TAC1 set out in the focused Regulation-18 consultation.	1539	No action required.
QUESTION 13a: Do you agree with the boundary of revised allocation VC TAC1 REV, Land to the west of Norwich Road, Tacolneston, to facilitate 'approximately 25 dwellings' on 1.0ha? Please explain your response.	3403	Comment	Amber - archaeological mitigation will probably be necessary but is unlikely to prevent development. There is already a planning application this site.	The Council welcomes the ongoing engagement of the Historic Environment Service and notes the comments submitted in respect of VC TAC1 REV.	1535	No action required.
QUESTION 13b: Do you think there are any specific requirements that should be added to the allocation policy to reflect these changes?	3773	Comment	<p>Change the policy wording to the following:</p> <p>Policy VC TAC1 REV: Land to the west of Norwich Road</p> <p>1.0ha is allocated for up to 29 dwellings.</p> <p>The development of the site will be required to ensure:</p> <ol style="list-style-type: none"> 1. Highway works to include the creation of crossing points and a bus stop on the B1113 in order to connect to the existing pedestrian footpaths, and provide a safe route to school; 2. Appropriate boundary treatments to the south of the site minimise the landscape impact of the development. 3. Early engagement with Anglian Water (AW) to determine the capacity of the receiving Water Recycling Centre (WRC), and the consequent potential need to phase the site until capacity is available. 	The Council welcomes the suggestions that have been received for a site-specific policy for VC TAC1 REV and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees, the supporting evidence base and the site-specific policy for VC TAC1.	1659	Review suggestions for a site-specific policy should the proposed amendment to VC TAC1 be preferred for allocation.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 13b: Do you think there are any specific requirements that should be added to the allocation policy to reflect these changes?	3754	Comment	<p>We recommend that wording is included within the policy to ensure ongoing connectivity between the network of off-site ponds.</p> <p>We support the following policy wording and recommend that this is retained – “Retention and protection of the horse chestnut tree on the site frontage which is subject to an existing Tree Preservation Order”.</p> <p>We note that this is a greenfield site outside of the current development boundary. Authorities have a duty under the NERC Act 2006 and the Environment Act 2021 to have regard to the conservation and enhancement of Priority Habitats in their decision making.</p>	<p>The Council welcomes the suggestions that have been received for a site-specific policy for VC TAC1 REV and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees, the supporting evidence base and the site-specific policy for VC TAC1.</p> <p>The status of the existing policy wording is under review as part of the consideration of the proposed alteration to VC TAC1. Note that the removal of the frontage horse chestnut tree has been approved under application 2021/2384, a principle continued by the pending planning application 2023/2234.</p>	1658	Review suggestions for a site-specific policy should the proposed amendment to VC TAC1 be preferred for allocation.
QUESTION 13b: Do you think there are any specific requirements that should be added to the allocation policy to reflect these changes?	3432	Comment	<p>There is an extensive network of PRoW to the south-east of the site, increased pressures on footpath network to be considered. Importantly a crossing point should be considered to allow access to the footpath network. There are hedgerows running along the existing access drive which runs through the middle of the site, worth noting these as they are likely to be lost to facilitate development and we'd require suitable replacements. Development is very much into the countryside, so boundary treatments important to minimise visual and landscape impacts. Mature tree in the south-east corner of the road frontage should be retained and protected.</p>	<p>The Council welcomes the suggestions that have been received for a site-specific policy for VC TAC1 REV and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees, the supporting evidence base and the site-specific policy for VC TAC1.</p> <p>The requirement for a footpath is set out in the policy wording, and any loss of trees or hedgerow would require mitigation as set out in the NPPF.</p> <p>In terms of the potential increase in recreational pressures on existing sensitive sites the Council has adopted a 'Green Infrastructure and Recreational Avoidance Mitigation Strategy' which seeks to address some of these pressures, including through the provision of additional green infrastructure as part of new development.</p>	1627	Review suggestions for a site-specific policy should the proposed amendment to VC TAC1 be preferred for allocation.
QUESTION 13b: Do you think there are any specific requirements that should be added to the allocation policy to reflect these changes?	3567	Object	<p>We believe that a number of specific requirements should be added to the allocation policy to address the following issues.</p> <p>a. There is only a very limited local bus service, and the primary school is currently full. Improvements to the bus service and additional school places will be needed to accommodate the increased population.</p> <p>b. Concerns previously raised over the poor drainage of the site and the impact of the housing on nutrient neutrality have yet to be addressed satisfactorily.</p>	<p>As set out in paragraph 10.5 of the consultation document, Tacolneston itself has a range of social and community facilities as well as a bus service to Norwich. Norfolk County Council have been continually engaged in their role as Education Authority, and the Council is reassured that the school has capacity to accept children from the potential modification to this allocation.</p> <p>The Council has proactively engaged with the Lead Local Flood Authority (LLFA) and the Environment Agency (EA) throughout preparation of the VCHAP. No concerns have been raised by the technical consultees in relation to this site. In accordance with current policy guidance and legislation, run-off from new development should not exceed the existing greenfield run-off rates of the site. Furthermore, in some instances, it is possible that development can result in improvements in local drainage and flooding matters due to improvements in on-site drainage.'</p>	1617	No action required.
QUESTION 13b: Do you think there are any specific requirements that should be added to the allocation policy to reflect these changes?	3549	Comment	No comments.	The Council welcomes the engagement of Historic England with the preparation of the South Norfolk Village Clusters Housing Allocations Plan and welcomes the response submitted in response to the potential amendment to VC TAC1 set out in the focused Regulation-18 consultation.	1616	No action required.

Wicklewood

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
QUESTION 14a: Do you agree with the proposed allocation VC WIC1 REV, Land to the south of Wicklewood Primary School, to accommodate up to 40 dwellings on 2.97ha? Please explain your response.	3593	Comment	Please note 9 houses off Milestone Lane (previously Ashcroft project) have a combined sewage system that has a soakaway outlet running through the proposes site. We need assurance that any development will take account of our sewage requirement.	The Council has been advised in earlier correspondence (received outside this consultation) that this issue relates to VC WIC2 rather than VC WIC1REV. However, for clarity the Council can confirm that it has forwarded these concerns onto the site promoter who in turn has confirmed that as part of their due diligence in promoting the site they have undertaken an extensive drainage review and are aware of the existing situation. If allocated the detailed drainage and technical matters will be reviewed as part of any future planning application.	1695	No action required.

<p>QUESTION 14a: Do you agree with the proposed allocation VC WIC1 REV, Land to the south of Wicklewood Primary School, to accommodate up to 40 dwellings on 2.97ha? Please explain your response.</p>	<p>3291, 3346, 3476, 3517, 3604, 3617, 3630, 3633, 3634, 3639, 3652, 3656, 3658, 3679, 3680, 3681, 3723, 3735, 3737, 3758, 3765, 3774, 3775, 3778, 3787, 3790, 3809, 3830, 3834, 3837</p>	<p>Mixed</p>	<p>Summary of representations received in response to VC WIC1REV (grouped by subject area):</p> <p>Landscape and visual impact – (1) Inappropriate impact on the landscape on the outskirts of the village; (2) Sensitive landscaping can not compensate for the loss of mature trees or existing landscapes that require protection; (3) increasing housing in a concentration of relatively small villages north of Wymondham over a relatively short time has the potential to damage the rural character, important landscapes and bucolic nature of these communities [including Wicklewood];</p> <p>Highway Safety – (1) The Green is an unsuitable access road for the amount of traffic to be generated; (2) The site is adjacent to dangerous bends; (3) Poor access to the site; (4) Increase existing problems with school parking; (5) Wider road network will require passing places; (6) Lack of pedestrian footpaths; (7) Traffic issues will be exacerbated during the construction period; (8) Proposed highway improvement works are inadequate;</p> <p>Highway Safety – (1) The Green is an unsuitable access road for the amount of traffic to be generated; (2) The site is adjacent to dangerous bends; (3) Poor access to the site; (4) Increase existing problems with school parking; (5) Wider road network will require passing places; (6) Lack of pedestrian footpaths; (7) Traffic issues will be exacerbated during the construction period; (8) Proposed highway improvement works are inadequate</p> <p>Scale of development – (1) The increase in numbers exceeds the Council’s own limit of 50 dwellings in settlements;</p> <p>Flooding – (1) There are existing unacceptable flooding and surface drainage issues in the village; (2) Existing flooding in the area around The Green and Primrose Farm; (3) Water from this site would threaten Wicklewood Mere SSSI; (4) Additional groundwater could impact on the septic tanks of properties along Milestone Lane; (5) Discussion with stakeholders over flooding mitigation has been ongoing for considerable time;</p> <p>Local infrastructure and amenities - (1) Poor local amenities; (2) Lack of local walking routes; (3) Excessive car use by new inhabitants; (4) No access to utilities (sewers, gas etc); (5) Village school is oversubscribed with children from outstanding areas so local children are unable to attend; (6) Anglian Water have recently advised Wicklewood Pumping Station does not have sufficient capacity to get tankers on site quickly enough to prevent overspill into the river if the pumps fail. Although a generator has recently been installed, this only deals with power failure and would not address any mechanical failure; (7) No capacity for doctors, dentists, vets in the local area;</p> <p>Existing character of the settlement - (1) Two adjacent sites would transform the site into a vast housing estate; (2) Development proposed is out of proportion to the existing settlement and of high density; (3) The site has been rejected in earlier Local Plans due to it being less well related to the settlement, the views across the plateau farmland and the impact of subdivision on the setting of the village; (4) the site lies beyond the historic settlement boundary therefore concerns that this will set a precedent for future expansion of the village;</p>	<p>Responses to VC WICREV representations (grouped by subject area):</p> <p>Landscape and visual impact - (1, 3) The Council has previously recognised the sensitivities of the landscape in this location, as set out in both earlier iterations of the Plan and the supporting evidence base. The Council has also previously sought to address this as far as possible via the site-specific policy wording for VC WIC1 (the preferred allocation for 30 dwellings) and, in proposing a small extension to the site, has sought to minimise any additional visual impact with the proposed site boundaries seeking to respond to the existing field boundary to the south of the site (as opposed to a further extension to the west of the site); (2, 3) The existing site has minimal existing vegetation, as noted in the supporting evidence base, and development of the site offers an opportunity to improve the local ecological/ biodiversity network, as well as an opportunity to reinstate in part the lost hedgerows on the site. However, it is inevitable that new development will alter the immediate landscape and the Council recognises this as a concern within local communities. Notwithstanding this, the Council maintains that the rural setting of the village would be retained if an allocation in this location. Landscape and Visual Impact Appraisals have been prepared to inform existing site-specific policies and will be updated/ prepared to support those sites identified for inclusion in the Plan following this consultation.</p> <p>Highway safety - (1, 2, 3, 5, 6, 8) Norfolk County Councils Highways Authority have been proactively engaged throughout the preparation of the VCHAP, with specific discussions on a number of sites, including this proposed amendment at Wicklewood. These detailed discussions have included the matters raised again in response to this consultation (i.e. existing road layout of Hackford Road, access to the site, pedestrian connectivity and the wider highway network). NCC has not raised an objection to the additional site area or dwellings in response to this consultation. In due course, should VC WIC1REV be the preferred allocation site the Council will prepare a site-specific policy to address the highways matters previously raised in relation to the original site VC WIC1; (4) In terms of the school parking, the Council has also previously addressed this as far as it is able in response to comments submitted to earlier consultations. The school benefits from a large on-site car park and any concerns about irresponsible parking by parents should be addressed to the school and the appropriate authorities. Due to the proximity of the site to the school it is unlikely that additional traffic movements to the school will be generated by this proposed allocation; (7) The impact of construction traffic on highways is generally considered to be a short term issue and can be most appropriately managed via a planning application, possibly through the application of planning conditions if appropriate.</p> <p>Scale of development - (1) Typically, the VCHAP seeks to allocate a range of sites of between 12-50 dwellings. The Council recognises that the combined allocations of VC WIC1REV (40 dwellings) and VC WIC2 (12 dwellings) would, in combination, marginally exceed the upper limits set out as typical allocations for the VCHAP; however, this exceedance would be across 2 separate sites, rather than a single site and the individual site numbers remain within the overall parameters of the Plan. Furthermore, the extra dwellings proposed on VC WIC1REV (10 units) would assist with meeting the overall housing requirement set out for the VCHAP on a site which the</p>	<p>1694</p>	<p>Correct the site area in the Regulation-19 Plan should VC WIC1 remain the preferred site for allocation.</p>
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			<p>Miscellaneous – (1) The consultation is misleading & deliberately leaves out inconvenient facts that could affect how people feel about the proposals (reference to extensive views of the surrounding countryside from Hackford and Wymondham Roads, as well as the school operating near/at capacity); (2) Jan 2023 Reg-19 document states the initial allocation of 30 dwellings would be on 1.63ha - the revision states 30 dwellings would be on 2.5ha so where has additional 0.87ha come from? (3) A smaller number of homes would be more acceptable; (4) The village can meet any requirement by sensible single dwelling infill or very small developments as has happened previously on the High Street; (5) This development would set a precedent for future expansion across the field should it be allocated; (6) Development should avoid the use of agricultural land; (7) The proposed area of agricultural land remaining would be unviable to continue farming; (8) This area is an essential route for migrating toads during their breeding season when they return and then leave the ponds in this area.</p>	<p>Council has previously recognised as a preferred location for 30 dwellings.</p> <p>Flooding - (1, 2) The Council has engaged with key stakeholders (the Lead Local Flood Authority, The Environment Agency and Anglian Water) throughout this process, with specific discussions on a number of sites as appropriate. The Council has not received an objection to the proposed allocation of either VC WIC1 in earlier iterations of the Plan, or to the proposed expansion of the site within this consultation (VC WIC1REV). In accordance with current policy guidance and legislation, run-off from new development should not exceed the existing greenfield run-off rates of the site. Furthermore, in some instances, it is possible that development can result in improvements in local drainage and flooding matters due to improvements in on-site drainage. The Council has however liaised with Anglian Water to understand the issues raised in response to this consultation and their possible implications for the site (the AW response is noted below); (3) Similarly Norfolk Wildlife Trust and the Environment Team at Norfolk County Council have commented in response to this consultation and neither have raised an objection to the impact of development on the local ecology and the Council is reassured that ecological/ biodiversity matters can be dealt with appropriately via a planning application. Reference has been made within the representations to the potential impact of development on Wicklewood Mere SSSI. For clarity, Wicklewood Mere is a County Wildlife Site that is bordered by an area formerly considered as an Environmentally Sensitive Area and is not a SSSI. The Council's own Ecologist has reviewed this site within the context of these comments and has confirmed that due to both the distance of the site from Wicklewood Mere and the topography of the land no impact on the CWS is anticipated.; (4) Appropriate drainage schemes for allocation sites would be agreed at the application stage, and it would be expected that these would be designed to avoid an adverse impact on the infrastructure of existing residents, including septic tanks.</p> <p>Local infrastructure and amenities - (1, 2, 3) The Council has previously addressed concerns about the local infrastructure in response to the earlier consultations and is not aware of a material change in the local context at Wicklewood. As set out in earlier responses a key objective of the VCHAP is delivering new development to support existing local facilities and infrastructure within rural areas; however, as also previously acknowledged, due to the rural nature of the District, opportunities to access facilities and services by either public transport or pedestrian routes can be limited. The Council has liaised with the highways authority about pedestrian connectivity from sites to existing amenities and has also reviewed public transport routes as part of the initial site assessment. The Council is also aware of recent investment/ improvements to the bus links serving Wicklewood; (4) The Council has consulted with utility and infrastructure providers, including Anglian Water, throughout preparation of the VCHAP and has not received an objection to the allocation of the site. It is not expected that connection to utilities and infrastructure would be a barrier to development in this location; (5) The Council has previously responded to concerns about capacity at the local school. The Childrens Services team at Norfolk County Council have reiterated their earlier advice about declining pupil numbers in response to this consultation and have not raised an objection to the modest increase in numbers proposed on this site. The Council is reassured</p>		
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				<p>that local school capacity is therefore not an issue. (6) The Council has contacted AW to better understand the context of these comments. AW have advised as follows, “[w]e installed the generator at Wicklewood last year as all the failures at this site were directly caused by power failures – the installation of the generator will address this. The system is designed as a duty standby arrangement so in the event of a mechanical failure we have a standby whilst we complete the repairs to the duty set, this changes over automatically and we will receive an immediate notification of any issues through our telemetry system”. Anglian Water has not raised an objection to the inclusion of sites at Wicklewood and the Council is satisfied that this is not a reason to exclude/ omit development in this location. (7) The Council remains aware of issues regarding medical capacity (dentist, GP etc) but as previously stated in response to earlier consultations considers this to be part of a wider national issue that falls outside the remit of the planning system. The Council has, however, engaged with the Integrated Care System which is responsible for planning the growth in medical services and facilities to ensure that the broad locations of anticipated allocations/ new development is known at an early stage.</p> <p>Existing character of the settlement - (1) To clarify, the Council is not considering two adjacent allocation sites at VC WIC1, rather the proposal set out here is for a single allocation for 40 dwellings in total. If taken forward this would replace the earlier proposal for 30 dwellings on the site; (2) Whilst the Council recognises that development proposed in Wicklewood would be at the upper parameters of the VCHAP the Council does not consider this to be either unsustainable or of an inappropriate density. Overall density proposed for this site is approximately 13.5 dwellings per hectare which is low density development; however, this recognises the landscape sensitivity of the site and the transitional village-countryside location and therefore includes an area for open space around the village sign and substantial landscaping (as previously set out in the site-specific policy wording for VC WIC1); (3) As set out in the Council’s response to concerns about the landscape and visual impact of development on this site, landscape sensitivity has been acknowledged however at this stage the Council is seeking the managed release of land to meet an identified housing need in the District and as such it is appropriate that a balanced approach is taken to assessing the merits/constraints of sites promoted for allocation, independently of conclusions drawn in earlier Local Plan processes. In response to concerns about the consistency of the approach taken in the assessment of the land the Council would refer to earlier iterations of the Local Plan which noted the importance of the parcel of land adjacent to the windmill in the village – this area was subsequently released via the Local Plan process and allocated for development as part of a similar process; (4) A key function of the site allocation process is the managed release of land in order to meet the identified housing need within the District. The Council is unable to fulfil this obligation utilising only sites that currently lie within either defined or historic development boundaries. As such, the majority of sites identified for allocation within the VCHAP lie outside existing settlement boundaries. The site selection process has been supported throughout the VCHAP process by the preparation of a Sustainability Appraisal at each stage and the Council has sought to identify sites that are deliverable and have a relationship with existing</p>		
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Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
				<p>settlements as far as possible. Any proposals for development will need to be assessed against the relevant Development Management policies and national guidance at that time.</p> <p>Miscellaneous - (1) The Council has previously addressed these points in its Statement of Consultation, prepared in response to the Regulation-19 publication of the VCHAP. To re-iterate the Council's earlier response on this matter, the Council amended the text regarding the outlook from properties along Hackford and Wymondham Roads to more accurately reflect the situation. The Council has also previously responded to the concern raised about the capacity at the local primary school. The amendment and/or omission of these statements is not misleading; (2) The Council recognises that there was an error in the site area for VC WIC1 that was published within the Regulation-19 version of the VCHAP (the site area for 30 dwellings was incorrectly stated as being 1.63ha). The correct site area for the 30 dwellings proposed at that time was 2.5ha (as set out in the Regulation-18 focused consultation document) and the Council will seek to address this as a main modification to VC WIC1 at the next stage should the original Regulation-19 site remain the preferred allocation option in this location. (3) The Council has previously considered the site for a lower number of dwellings (VC WIC1/ 30) and is currently seeking views and technical comments about the possible expansion of this site to 40 dwellings; (4) Small scale windfall development remains possible within the defined development limits of the settlement however the Council is obliged to allocate sufficient sites to meet the identified housing need for the District and this can not be achieved simply via infill development. The Council is therefore seeking to achieve the managed release of sites to fulfil its obligations (5) Should this site be allocated then any further/ future proposals for development in this location would be scrutinised via the usual planning application route and be expected to accord with both national and local planning policies in force at that time – allocation of a site does not, therefore, necessarily set a precedent for future development. (6, 7) The Council is mindful of the requirement to utilise brownfield sites where possible however it must also allocate sites to meet its identified housing requirement. Within a rural context this will inevitably require the use of greenfield sites however the Council has sought to avoid site allocations on the areas classified as being the best and most versatile agricultural land – this was considered as part of the initial site assessment. The area excluded from the proposed site allocation lies adjacent to other parcels of agricultural land and the Council therefore remains satisfied that its ongoing use as agricultural land can be achieved; (8) Norfolk Wildlife Trust and the Environment Team at Norfolk County Council have commented in response to this consultation and neither have raised an objection to the impact of development on the local ecology and the Council is reassured that ecological/ biodiversity matters can be dealt with appropriately via a planning application.</p>		

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QUESTION 14a: Do you agree with the proposed allocation VC WIC1 REV, Land to the south of Wicklewood Primary School, to accommodate up to 40 dwellings on 2.97ha? Please explain your response.	3842	Support	Comments of the site promoter: Confirm committed to working with Council to deliver aspirations for the site; Will deliver on sustainability objectives and VCHAP objectives; Opportunities for enhanced landscaping through open space and a more natural boundary; No physical constraints or serious obstacles; Single land ownership, ensuring deliverability.	The Council welcomes confirmation from the site/promoter of the ongoing availability and deliverability of the site, including in its proposed revised form (VC WIC1REV).	1552	No action required.
QUESTION 14a: Do you agree with the proposed allocation VC WIC1 REV, Land to the south of Wicklewood Primary School, to accommodate up to 40 dwellings on 2.97ha? Please explain your response.	3460	Comment	Summary of Norfolk County Council Childrens Services comments: Catchment numbers are low and school can accommodate proposed development in area. Improvements to walking cycling routes for all sites may need some consideration to encourage sustainable and safe travel.	The Council welcomes the ongoing engagement of NCC Childrens Services with the preparation of the VCHAP, including the reiteration of earlier advice confirming that catchment numbers of pupils are low and the new development can be accommodated within the local primary school.	1518	No action required.
QUESTION 14a: Do you agree with the proposed allocation VC WIC1 REV, Land to the south of Wicklewood Primary School, to accommodate up to 40 dwellings on 2.97ha? Please explain your response.	3404	Comment	Comments of Norfolk County Council's Historic Environment Service: Amber - Amber means that archaeological mitigation will probably be necessary but is unlikely to prevent development.	The Council notes the response of the Historic Environment Service and, as appropriate, will reflect this in any updated policy requirements for the site should the amendments to the site be considered acceptable in the context of the VCHAP.	1517	No action required.
QUESTION 14a: Do you agree with the proposed allocation VC WIC1 REV, Land to the south of Wicklewood Primary School, to accommodate up to 40 dwellings on 2.97ha? Please explain your response.	3417	Comment	Summary of comments received from Norfolk County Council Highways: The Highway Authority does not object to the revised allocation.	The Council welcomes the ongoing engagement of the Council with the Highways Authority at Norfolk County Council. The Council notes that the Highways Authority has not raised an objection to the proposed expansion of VC WIC1. The earlier comments of the Highways Authority which were received in relation to VC WIC1 at the Regulation-19 stage of the VCHAP will be considered in the context of VC WIC1REV as appropriate.	1516	No action required.
QUESTION 14a: Do you agree with the proposed allocation VC WIC1 REV, Land to the south of Wicklewood Primary School, to accommodate up to 40 dwellings on 2.97ha? Please explain your response.	3550	Comment	Summary of comments from Historic England: No comment	The Council welcomes the engagement of Historic England with the preparation of the South Norfolk Village Clusters Housing Allocations Plan and welcomes the response submitted in response to the potential amendment to VC WIC1 set out in the focused Regulation-18 consultation.	1515	No action required.
QUESTION 14b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 10 dwellings?	3843	Support	Comments in support of the site submitted by the site promoter: - land is available and part of a wider landholding in the same (single) site ownership; - site can provide a range of properties to meet housing needs; - site provides opportunity for enhanced landscaping; and - no known technical constraints to delivery.	The Council welcomes the engagement of the site promoter regarding the possible revision to the site.	1551	No action required.

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QUESTION 14b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 10 dwellings?	3598	Comment	<p>Anglian Water response - An increase in number of dwellings to 40 from 30 dwellings proposed at Reg. 19</p> <p>Anglian Water agrees with the approach taken regarding the site allocation policies for Wicklewood in the Reg. 19 VCHAP where matters regarding cumulative/in-combination effects with the development identified in the GNLP may require the phasing of development beyond the early years of the plan, which is addressed in the supporting text and therefore a policy requirement is not considered necessary.</p> <p>There are assets owned by Anglian Water within or close to the development boundary that may affect the layout of the site. Anglian Water would welcome a policy criterion to state: Early engagement with Anglian Water regarding their infrastructure on and adjoining the site.</p>	The Council notes the comments of Anglian Water and will review these for inclusion in the site-specific policy should the site be a preferred allocation for the VCHAP.	1550	Note the site-specific policy request should VC WIC1REV become a preferred allocation site.
QUESTION 14b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 10 dwellings?	3551	Comment	Historic England - no comments	The Council welcomes the engagement of Historic England and notes the comments regarding VC WIC1REV.	1549	No action required.
QUESTION 14b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 10 dwellings?	3434, 3755	Comment	<p>Summary of comments from Norfolk Wildlife Trust and NCC Environment Team in response to Question 14B:</p> <p>NCC Natural Environment Team - The site is in a rural location and any development has the potential to cause Landscape and Visual Impacts. Boundary treatments to south and west particularly to assimilate the development into the countryside should be considered, as should street frontage important as this is the gateway into the village.</p> <p>Norfolk Wildlife Trust - We support the original policy wording: Landscaping of the southern and western boundaries of the site, respecting the need to integrate the site with the surrounding open rural landscape, as well as the retention and reinforcement of the existing hedgerow along the northern boundary” and recommend that this be retained. The reference to retaining and reinforcing existing hedgerow should also apply to the southern boundary.</p>	The Council welcomes the comments of the Natural Environment Team and Norfolk Wildlife Trust and agrees that appropriate landscaping and layout is important on this site. The Council has previously prepared site-specific policy wording for VC WIC1 that included clear requirements relating to both the landscaping of the site and the provision of open space at the site frontage to create a gateway into the village. These requirements will need to be reviewed and amended as appropriate should VC WIC1REV become the preferred option for allocation.	1548	Review site specific policy wording should the site be considered as a preferred option for allocation.

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QUESTION 14b: Do you think there are any specific requirements that should be added to the allocation policy to accommodate the extra 10 dwellings?	3292, 3347, 3605, 3631, 3655, 3678, 3736, 3757, 3768, 3777, 3780, 3791, 3818	Object	<p>A summary of the representations received in response to Question 14B grouped together by subject matter for ease of reference:</p> <p>Infrastructure – (1) Local services must have capacity to support the development before it is approved; (2) Commitment to school expansion is required to match projected demand (land, funding etc); (3) Improvements to school parking for school drop-off; (4) Increase in bus services to secondary schools; (5) Provision of activities for children and young people;</p> <p>Highways – (1) Why only widen the road heading north, what about traffic heading to the south?; (2) Access to be on roads that can safely accommodate additional traffic movements as well as pedestrian and cycle access; (3) Improvements to safety for walkers, horse riders etc;</p> <p>Flooding – (1) Flooding and surface water issues need to be addressed;</p> <p>Landscape and visual impact – (1) Reinstate reference to ‘extensive countryside views’ as this remains relevant;</p> <p>Scale of development - (1) Any allocation should be small scale (1 / 2 properties); (2) Development should be infill, affordable/ self-build for Wicklewood residents only; (3) No allocation.</p> <p>In addition to the above specific responses to Question 14B, the Council also received a number of duplicate submissions repeating the issues raised in response to Question 14A regarding the principle of development in this location (with a particular focus on the principle and scale of the development proposed, as well as the landscape and highways impact). Rather than repeat the responses to those matters here please see the Council’s response to Question 14A for a comprehensive response to these individual issues.</p>	<p>The Council welcomes the suggestions that have been received for a site-specific policy for VC WIC1REV and, should the site progress as a preferred allocation, the Council will consider these alongside the comments of the technical consultees, the supporting evidence base and the site-specific policy for VC WIC1. However, the Council would respond specifically on the following points raised in response to this question:</p> <p>-Wiklewood Primary School benefits from a substantial off-road car park and as such it is not considered either necessary or appropriate to require additional improvements to this area; and</p> <p>- Although the site lies adjacent to the primary school the proposed orientation of the site avoids land-locking of the school site and therefore a requirement to secure additional land for future school expansion is unnecessary at this time. The developer of the site will be required to pay CIL which includes an education contribution. The distribution of these funds is the responsibility of the Greater Norwich Growth Board.</p>	1547	Review suggestions for a site-specific policy should VC WIC1REV be preferred for allocation.

Interim Sustainability Appraisal Report

Document Element	Representation IDs	Nature of Representations	Summary of Representations	South Norfolk Council Response	Response ID	Action Required
Evidence Base, Interim Sustainability Appraisal Report	3815	Object	Not a safe or sustainable location. Very susceptible to flooding and site assessment notes this and the need for an evacuation plan to be created. Increased hard surfaces will exacerbate the current problems and not cope with future flooding due to climate change. The local area has impermeable clay soils which means that drainage design options are limited and expensive.	The Council has provided responses to most of the issues raised in this representation as part of its response to Question 6 under Council Response ID 1600.	1700	No action required.
Evidence Base, Interim Sustainability Appraisal Report	3462	Object	This development would significantly alter the character of the area and would irreversibly damage the character of a conservation village. Completely within the Southern Bypass Protection Zone, impinging on the Green Belt. It will remove a greenfield Cat. 3 agricultural site. Stocks Hill already suffers with water run-off from surrounding fields, this will make the flooding issues significantly worse. There are no facilities in the village which means more car journeys and traffic pollution for villagers.	The Council has provided responses to most of the issues raised in this representation as part of its response to Question 6 under Council Response ID 1693.	1699	No action required.
Evidence Base, Interim Sustainability Appraisal Report	3449	Object	Site is not sustainable with run-off resulting in imbalance of nutrients in River Yare. No services in village, forcing people to use cars and adding 400 vehicular movements every day. No public transport except weekly bus to Wymondham.	The Council has provided responses to most of the issues raised in this representation as part of its response to Question 6 under Council Response ID 1693. The VCHAP is a long-term development plan document that identifies allocated sites for growth in South Norfolk up to 2038. Nutrient Neutrality may have an impact on the timing of development depending on the delivery of a mitigation strategy but is not considered to undermine the principle of development. The Council and the other Norfolk's Local Authorities, along with Anglian Water, have also set up a not for profit Joint Venture Company (known as Norfolk Environmental Credits) in order to tackle the issue of nutrient neutrality by trading nutrient mitigation credits and enable building work to resume. This is intended to launch in the coming months.	1698	No action required.
Evidence Base, Interim Sustainability Appraisal Report	3338	Object	35 houses will destroy the visual serenity of the village. To suggest the developer is able to limit this with the design, layout and landscaping of the site is completely absurd. To suggest Bawburgh has a "range of facilities" is a stretch, to say the least!	The Council has provided responses to the issues raised in this representation as part of its response to Question 6 under Council Response ID 1693.	1697	No action required.
Evidence Base, Interim Sustainability Appraisal Report	3841	Support	We welcome these continued conclusions that Spooner Row, and the site, are sustainable.	The Council notes these comments and welcomes the support for the conclusions to the Interim Sustainability Appraisal Report.	1696	No action required.