



SOUTH NORFOLK VILLAGE CLUSTERS HOUSING ALLOCATIONS DOCUMENT

STATEMENT OF CONSULTATION

PART 5 – REG. 19 PRE-SUBMISSION ADDENDUM

April 2025

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1. Introduction

- 1.1 This report forms Part 5 of South Norfolk Council's Statement of Consultation in relation to the proposed Village Clusters Housing Allocations Plan (VCHAP). It provides details on the publication and consultation that South Norfolk Council undertook on its proposed addendum to the VCHAP, in compliance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 It follows Part 4 of the VCHAP Statement of Consultation, which sets out details on the 'Alternative Sites and Focused Changes' Reg. 18 consultation that was undertaken by the Council between December 2023 and February 2024.
- 1.3 The 'Alternative Sites and Focused Changes' consultation was undertaken as it had become apparent to the Council that one of the proposed VCHAP sites would no longer be deliverable and that another site should be slightly reduced in numbers to address heritage concerns. As a minimum, the Reg. 18 consultation on 'Alternative Sites and Focused Changes' sought to make up the resulting shortfall in order to deliver the housing numbers needed.
- 1.4 The proposed Addendum document that was published following this consultation, under the requirements of Regulation 19, included the alternative and amended sites proposed for allocation within the VCHAP, as well as a number of other focused changes to the proposed document.
- 1.5 Principally, this report provides details of the number of representations made in relation to the proposed Addendum, under the Regulation 19 requirements, and a summary of the main issues raised within those representations. This meets the requirements of Regulation 22(c) of the aforementioned legislation. In common with the other Parts of the Statement of Consultation, the report also provides a brief response by South Norfolk Council to each of the main issues raised.

2. Publication of the Reg. 19 Pre-submission Addendum

Background

- 2.1 Following publication of the proposed pre-submission draft Village Clusters Housing Allocations Plan (VCHAP) document during January to March 2023, it became apparent that one of the proposed sites was no longer considered deliverable, and that another needed to be reduced in scale due to heritage concerns. The effect of these issues was that there was a shortfall in the overall target number of new homes (minimum of 1,200) for which new sites need to be allocated.
- 2.2 The Council therefore decided to undertake a focused consultation on several alternative site options in order to address the shortfall in numbers. The consultation also sought feedback on various other focused changes. This consultation was in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.3 Following consideration of the consultation responses, the Council published its proposed amendments to the published VCHAP as a 'Pre-submission Addendum' document, in accordance with Regulation 19 of the aforementioned legislation. The details of this Reg. 19 publication stage are set out below.

Legislative requirements

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

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

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

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

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

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

Timetable for publication of the Pre-submission Addendum document

- 2.7 The VCHAP Pre-submission Addendum was published between 9.00am on 12 August and 5.00pm on 7 October 2024.
- 2.8 This constitutes a period of 8 weeks, and thus complies with Regulation 17 where it states that the period for making representations must not be less than 6 weeks from the day on which the statement of representations procedure is published.

Consultees

- 2.9 Each of the specific and general consultation bodies that were consulted on the Regulation 18 draft of the VCHAP document were directly notified of the publication of the Pre-submission Addendum document and were invited to submit representations.
- 2.10 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.
- 2.11 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.
- 2.12 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.
- 2.13 It also includes those individuals or organisations that have previously promoted sites for consideration, whether through the GNLP originally, or through South Norfolk Council during the development of the VCHAP.

Availability of documents and representation procedure

- 2.14 The consultation took the form of an online document to which consultees were directed via a URL, provided in their notification email/letter or via on the many forms of wider publicity (see below) concerning the publication of the Pre-submission Addendum.
- 2.15 The published document only included the changes that the Council was proposing to the Regulation 19 document that was published in 2023.

- 2.16 The online document featured consultation points alongside those paragraphs where amendments were being proposed (with deleted text scored through and new text underlined) and alongside proposed new/amended allocations.
- 2.17 The online and hard copy representation form asked respondents to state whether or not the proposed Addendum is legal and/or procedurally compliant and whether it meets the tests of soundness set out in the National Planning Policy Framework. It was made clear in the statement of representations procedure and in the representation form guidance note that any representations which do not address these questions may not be able to be considered during the independent examination of the plan. The statement of representations procedure, the representation form, and the representation form guidance notes feature as appendices 3, 4 and 5, respectively.
- 2.18 As well as being available online, the proposed VCHAP and other supporting documents (including representation forms, guidance notes and the statement of representations procedure) were made available at the following locations:
- South Norfolk Council offices – The Horizon Centre, Broadland Business Park, Peachman Way, Norwich, NR7 0WF
 - The Octagon (South Norfolk Council) – Mere Street, Diss, Norfolk
 - Libraries in South Norfolk
 - Millennium Library - The Forum, Norwich
- 2.19 Alongside the Pre-submission Addendum document, the Council made available a range of supporting documentation, both online and in hard copy at the locations specified above. These documents comprised:
- Statement of representations procedure
 - Representation form
 - Representation form guidance note
 - Frequently asked questions
 - Composite Regulation 19 document (with and without tracked changes)
 - Policy maps
 - Review of carried forward allocations
 - Duty to Co-operate statement
 - Habitats Regulations assessment – Reg. 19 Addendum Update
 - Sustainability appraisal – Reg. 19 Addendum Update
 - Viability appraisal - Update
 - Equality impact assessment
 - Health impact assessment
 - Heritage impact assessments
 - Landscape visual appraisals
 - Site assessments
 - Water cycle study
 - Statement of consultation (Parts 1-4)

- Strategic flood risk assessment (Levels 1 and 2)
- 2.20 In common with the earlier Regulation 18 consultation, a virtual exhibition room was also established, using the same URL as for the previous exhibition (<https://vchap.exhibition.app>).
- 2.21 The exhibition link was included in notification letters/emails and in wider publicity undertaken by the Council to advertise the publication stage (see below).
- 2.22 The exhibition room included contextual and background information regarding the development of the Pre-submission Addendum, including an outline of how the Council had arrived at the proposals within the document, and links to the various supporting documentation and the proposed submission document itself.
- 2.23 The virtual exhibition was seen as providing a consistent approach to broadening digital engagement in the development of the VCHAP. During the publication period, the site attracted 649 users.

Additional publicity

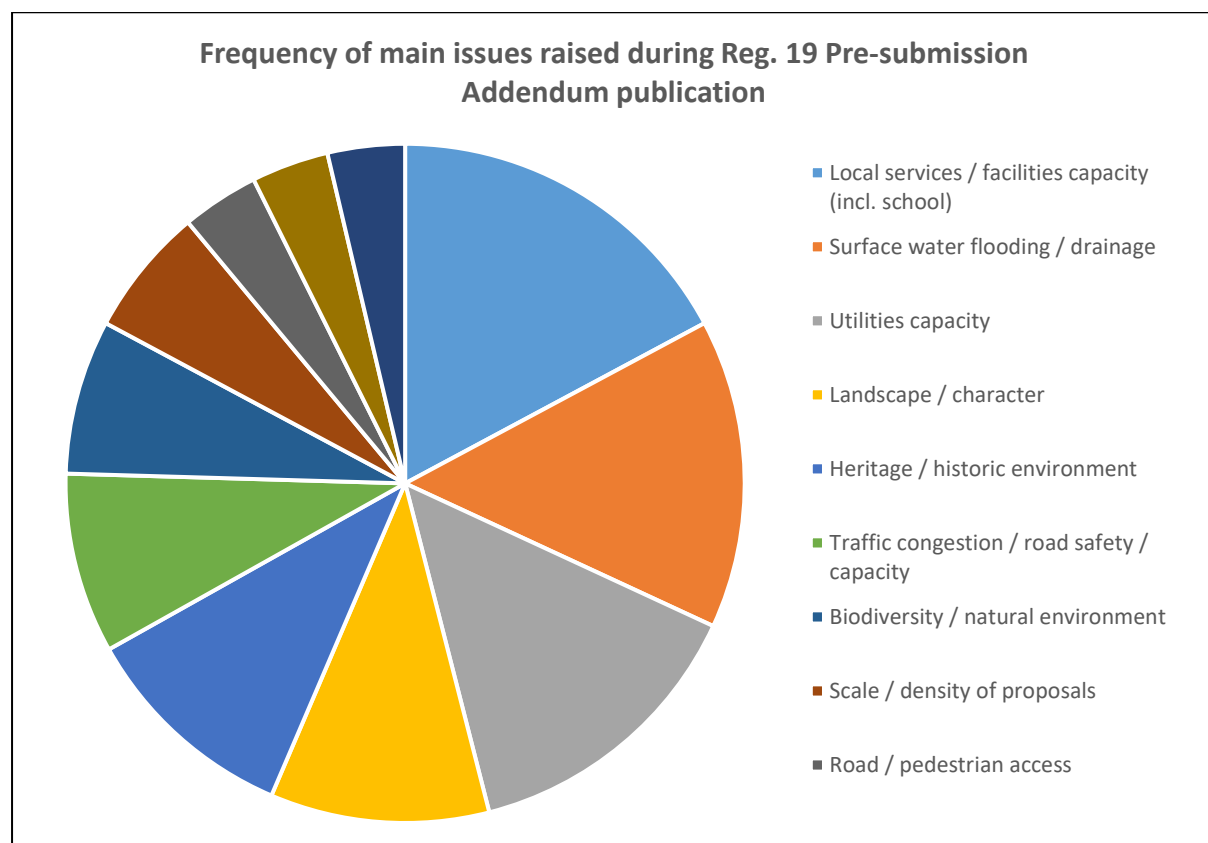
- 2.24 In addition to the initiatives discussed above, further work was undertaken by the Council to publicise the Regulation 19 publication period and bring it to the attention of those with an interest in the matters addressed by the VCHAP.
- 2.25 Similar to earlier consultation stages, the Council held a briefing event for affected parish and town councils within the district. This briefing event was held via Microsoft Teams on 15th August 2024. Eight parish/town councillors registered to attend the briefing.
- 2.26 The event provided an opportunity for Council officers to explain the background to the Pre-Submission Addendum and the nature of the specific changes being proposed. It also allowed parish and town council representatives to put questions to officers.
- 2.27 Other publicity included a public notice that was sent to libraries, GP surgeries and parish and town councils in the district, with a request for the notice to be placed on notice boards in these respective locations.
- 2.28 In addition, a press release was written and distributed to local media at the start of the consultation period. This press release was run in the Eastern Daily Press on 18th August 2024.
- 2.29 South Norfolk Council also produced several social media posts throughout the publication period, alerting people to the document and inviting representations.

Submitted representations

- 2.30 In total, **320 representations** were submitted in relation to the proposed submission VCHAP document.
- 2.31 These were submitted by 92 respondents.
- 2.32 A summary of the main issues raised within these representations can be found in the next section.
- 2.33 A small number of the representations received were considered to be 'not duly made'. That is to say they did not include a response to either the matter of legal compliance, duty to co-operate or legal soundness (as set out in paragraph 2.15 of this document).
- 2.34 Where possible the Council sought to notify the authors of these representations that their responses were considered to be 'not duly made'. Many respondents chose to update their responses within the consultation timeframe as a direct consequence of this correspondence and these submissions were then accepted as duly made responses.
- 2.35 The Council has undertaken to review the outstanding 'not duly made' representations and summarise the key issues raised in these responses where they have not already been addressed in the main representations received and responded to. These will be reported to the Inspector(s) as part of the Examination in due course.

3. Summary of main issues raised in representations

- 3.1 A range of issues were raised within the Regulation 19 representations. Many of these issues replicate those identified within responses during earlier stages of consultation on the Village Clusters Housing Allocations Plan (VCHAP).
- 3.2 A summary of the issues raised and South Norfolk Council's responses to those issues (for each of the Cluster Areas where representations were made, as well as for other elements of the Pre-Submission Addendum) can be found in Appendix 6.
- 3.3 In a similar fashion to Part 2 of the Statement of Consultation, a categorisation of the main issues raised in the Regulation 19 representations has been undertaken. Again, this has identified a number of key themes which emerge from the responses to the Pre-submission Addendum publication. The chart below illustrates these key themes and shows which of these featured most often within the representations submitted.



- 3.4 The table on the following page provides a South Norfolk Council response to each of these identified themes, explaining in general terms how they have been considered and led to the development of a proposed Local Plan which the Council considers best addresses the growth requirements of the villages within South Norfolk.

Main issues raised during Reg. 19 Pre-Submission Addendum publication stage and South Norfolk Council's 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 and potential impacts this could have on healthcare provision in South Norfolk and neighbouring authorities. 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
Surface water flooding and site drainage	<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. Discussions with the LLFA have continued throughout the preparation of the VCHAP. 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
<p>The capacity of local utilities infrastructure (incl. sewerage, water supply etc.)</p>	<p>The Council acknowledges the concerns raised by residents regarding the potential impact on local utilities infrastructure.</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 and how these could be addressed. 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
<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 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
Impacts on local heritage and the historic environment	<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 potentially significant 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
<p>Traffic congestion, road safety and the capacity of local road networks</p>	<p>The Council acknowledges the concerns of residents about highways matters.</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 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
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 promoters, 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
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>Impacts of development on local amenity (e.g. light, noise, privacy etc)</p>	<p>The Council recognises the concerns of existing residents relating to the potential impact of new development on local amenity.</p> <p>All of the allocations included within the VCHAP will be subject to planning applications before any development can take place, are currently going through the planning application process or have been through the process already. As part of this, applications have been or will be subject to Policy DM 3.13 Amenity, noise and quality of life. This policy sets out specific requirements relating to overlooking, light and noise as well as other factors relating to the amenity of existing residents as well as new development.</p> <p>Also, any potential considerations for the design of the sites being allocated have been noted as part of the site assessment process. These considerations have been incorporated into the site-specific policies in the VCHAP where this has been considered necessary.</p>

Issue Raised	South Norfolk Council Response
<p>Concerns around VCHAP procedures (e.g. inaccurate SA; accessibility of consultation etc.)</p>	<p>The Council notes the concerns raised by respondents relating to the Local Plan process.</p> <p>The Council has followed all procedures set out in the national regulations and the processes outlined in the Councils Statement of Community Involvement as required.</p> <p>The Council appreciates that some stages of the Local Plan process, namely the Regulation 19 Stage, is seen to be very technical to some respondents. These regulations are set out in The Town and Country Planning (Local Planning) (England) Regulation 2012 (as amended) and the Council is required to meet these regulations for the VCHAP to be considered Sound. To support the publication periods, the Council produced a number of supporting documents including a Representation Form, Representation Guidance Note and Frequently Asked Questions to assist respondents in making 'Duly Made' representations. The Council also notified any respondents who submitted representations that were not considered to be 'Duly Made' so that they could be resubmitted in the correct format.</p> <p>The Council also utilised digital platforms to make all public consultations as accessible as possible. An online Virtual Exhibition was provided at all relevant stages to provide contextual information and links to documents for members of the public to view. It also provided a direct link to the consultation portal which was set up so respondents could easily submit representations that were in a 'Duly Made' format as outlined by the regulations.</p> <p>The Sustainability Appraisal supporting the VCHAP was produced by AECOM and has been subject to public consultation at all stages of the VCAHP preparation process. Where necessary, the Sustainability Appraisal has been updated throughout the VCHAP preparation. The Council has responded to all specific representations on the Sustainability Appraisal.</p> <p>The Council considers that it has followed all necessary regulations and has provided sufficient guidance to make the various stages of the VCHAP preparation process as accessible as possible whilst still meeting the national requirements.</p>

Appendix 1: Specific Consultation Bodies

3

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

Relevant authorities:

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

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

[ADDRESS]

*Ben Burgess
Assistant Director - Planning
South Norfolk Council
The Horizon Centre
Broadland Business Park
Peachman Way
Norwich
NR7 0WF*

2nd August 2024

Dear Sir/Madam,

South Norfolk Village Clusters Housing Allocations Plan - Regulation 19 Pre-submission Addendum

The South Norfolk Village Clusters Housing Allocations Plan (VCHAP) Regulation 19 Pre-submission Addendum will be published **between 9am on Monday 12 August and 5pm on 7 October 2024**, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Representations are invited on the legal compliance and soundness of the Plan. Any representations submitted must be received by South Norfolk Council within this timeframe.

The purpose of the VCHAP is to deliver growth that will support the vitality of the rural communities of South Norfolk. Following the Regulation 19 Publication in 2023 one of the proposed sites was no longer considered deliverable and another needed to be reduced in scale, which led to a shortfall in the overall target number of new homes (minimum of 1,200).

The proposed Addendum includes the additional and amended sites proposed for allocation within the VCHAP to address this shortfall. The document also includes a number of other focused changes to the proposed VCHAP. The published document only deals with the changes that are being proposed to the Regulation 19 VCHAP document that was published in 2023.

The Addendum and supporting documents can be viewed at:
www.southnorfolkandbroadland.gov.uk/vchap.

During the publication period, the proposed Addendum will be available to view at the following locations:

- Online at - www.southnorfolkandbroadland.gov.uk/vchap
- **South Norfolk Council offices** - The Horizon Centre, Broadland Business Park, Peachman Way, Norwich, NR7 0WF (open Mon-Fri: 9am-5pm)

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

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

Anyone wishing to submit a formal representation on the content of the plan may do so, **in writing, and before 5.00pm on 7th October 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. This will help ensure that submitted representations are in the prescribed format and can be taken into account in the examination of the plan. Completed hard copy forms should be posted to the South Norfolk Council office address listed above.

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

Yours sincerely,



Ben Burgess
Assistant Director - Planning
South Norfolk and Broadland Councils

Appendix 3: Statement of Representations Procedure

South Norfolk Village Clusters Housing Allocations Plan

(Regulation 19 Pre-submission Addendum)

Statement of Representations Procedure

Subject Matter and Area Covered

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

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

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

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

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

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

The pre-submission draft VCHAP was published between January and March 2023. Following this it became apparent that one of the proposed sites was no longer considered deliverable, and that another needed to be reduced in scale due to heritage concerns, which led to a shortfall in the overall target number of new homes (minimum of 1,200). The Council therefore undertook a focused consultation between December 2023 and February 2024 on alternative site options in order to address the shortfall in numbers as well as other focused changes. The consultation responses have been considered by the Council.

The Addendum proposes the allocation of three additional sites within the VCHAP and that a further five proposed VCHAP allocation sites should be extended to accommodate more homes. The document also includes a number of other focused changes to the proposed VCHAP. These amendments will then be considered by the Planning Inspector when the plan is subject to independent examination. The published addendum document only deals with the changes that are being proposed to the Regulation 19 VCHAP document that was published in 2023.

Publication Period

The Village Clusters Housing Allocations Plan will be published between **9.00am Monday 12th August and 5.00pm on Monday 7th October**. Representations are invited on the legal compliance and soundness of the Plan. Any representations submitted must be received by South Norfolk Council within this timeframe.

How to view the documents

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

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

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

Making Representations

Anyone wishing to submit a formal representation on the content of the Plan may do so, **in writing, and before 5.00pm on Monday 7th October**. Late representations cannot be accepted.

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

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

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

The Regulation 19 Pre-submission Addendum document **only** details the changes being proposed to the Regulation 19 VCHAP document that was published in 2023. **Representations can only therefore be accepted where they relate to any of the proposed changes. Representations relating to other elements of the Plan that are not subject to change, will not be able to be considered. Duly made representations relating to other elements of the plan that were submitted in response to the**

previous publication of the VCHAP will be submitted to the Planning Inspectorate as part of the independent examination of the plan.

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

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

Requests to be notified

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

- That the Village Clusters Housing Allocations Plan has been submitted for independent examination;
- That the recommendations of the person appointed to carry out the independent examination of the Village Clusters Housing Allocations Plan have been published;
- That the Village Clusters Housing Allocations Plan has been adopted.

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

Appendix 4: Representation Form

South Norfolk Village Clusters Housing Allocations Plan

(Regulation 19 Pre-submission Addendum)

Publication Stage Representation Form

This form enables you to submit a representation(s) regarding the proposed Village Clusters Housing Allocations Plan Regulation 19 Pre-submission Addendum. The Council is encouraging respondents to view the Addendum and submit representations online, at southnorfolkandbroadland.oc2.uk. However, this Representation Form is available to complete electronically or in hard copy, for those that wish to respond in this way.

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

Please ensure you return your completed Representation Form to South Norfolk Council by 5.00pm on Monday 7th October 2024.

Completed forms should be posted to:

Place Shaping Team, South Norfolk Council, The Horizon Centre, Broadland Business Park, Peachman Way, Norwich, NR7 0WF

Email: localplan.snc@southnorfolkandbroadland.gov.uk

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

This form has two parts:

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

Part A – Personal Details

1. Respondent Details

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

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

2. Agent Details (if applicable)

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

Part B – Your Representation(s)

(Please use a separate sheet for each representation)

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

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

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

(Please tick as appropriate)

YES	NO

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

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

(Continue on a separate sheet if necessary)

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

(Continue on a separate sheet if necessary)

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

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

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

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

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

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

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

Appendix 5: Representation Form Guidance Notes

South Norfolk Village Clusters Housing Allocations Plan (Regulation 19 Pre-submission Addendum)

Representation Form Guidance Note

August 2024

South Norfolk Council has published its proposed Village Clusters Housing Allocations Plan Pre-submission Addendum, in accordance with Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations 2012. The document is now subject to a period whereby anyone may make a formal representation relating to its 'soundness' and/or its legal and procedural compliance. This period commences at **9.00am Monday 12th August and 5.00pm on Monday 7th October 2024.**

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

The Pre-submission Addendum, all supporting documents, and further information can be found at www.southnorfolkandbroadland.gov.uk/vchap.

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

Data Protection & Privacy

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

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

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

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

1. Introduction

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

2. Legal Compliance and Duty to Co-operate

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

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

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

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

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

3. Soundness

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

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

3.2 If you think the content of the Village Cluster Housing Allocation Plan Regulation 19 Pre-submission Addendum is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy?
- Is the issue with which you are concerned already covered by another policy in the plan?

- If the policy is not covered elsewhere, in what way is the plan unsound without the policy?
- If the plan is unsound without the policy, what should the policy say?

4. General advice

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

Appendix 6: Summary of representations and South Norfolk Council responses

The following tables set out a summary of representations and issues raised during the Regulation 19 – Focused Changes publication period relating to the proposed Village Clusters Housing Allocations Plan (VHCAP), which took place between August and October 2024. The tables also include responses by South Norfolk Council to the issues raised.

Each table, below, relates to a different section of the Reg. 19 Focused Changes document. Representation summaries are set out within each table by the specific paragraph or policy that they relate to within that chapter.

Please use ‘Bookmarks’ to navigate between different sections.

Introduction and Background

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Sustainability Appraisal (SA)	3979	Support	Supportive of Council identifying sites to cover shortfall. Do not intend to comment on individual sites but reiterate need for development to be planned in a sustainable way. Pleased to see adjustments made reflecting previous comments. Prior to submission South Norfolk Council should be satisfied that the option chosen will deliver housing in a sustainable manner and is informed by the findings of the SA.	None proposed.	The Council welcomes the support for the VCHAP.	1793	None required.
Sustainability Appraisal (SA)	4201	Support	<p>Natural England has no comments to make on the VCHAP Regulation 19 Pre-submission Addendum.</p> <p>Natural England is broadly satisfied and in agreement with the findings of both the Sustainability Appraisal and the updated Habitats Regulations Assessment which considers the final choice of sites included in the above addendum document.</p> <p>We have no further comments to make at this stage.</p>	None proposed.	The Council welcomes the support for the Sustainability Appraisal.	1794	None required.
Sustainability Appraisal (SA)	4205	Support	The updated Sustainability Appraisal re-confirms the conclusions of the previous Sustainability Appraisal, and confirms its access to transport and services. We welcome these continued conclusions that Spooner Row, and the site, are sustainable.	None proposed.	The Council welcomes the support for the conclusions established in the Sustainability Appraisal.	1797	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Sustainability Appraisal (SA)	4038, 4046, 4129	Object	<p>The proposed developments are out of proportion with the villages. It sets out to add 'small development's where some of the sites are not small at all. For example the two proposed sites in Barford total 65 houses which would be a 20% uplift in housing in a small village with no facilities, other than a village hall and a garage.</p> <p>The houses will not be sustainable and these plans seem at odds with the net zero plans the UK has committed to. The building industry is one of the least sustainable.</p> <p>The use of green sites is inappropriate when there are plenty of brown field sites for housing.</p>	<p>The number one commitment needs to be sustainability.</p> <p>Allocations should be limited to towns that have services and facilities to support them. If all villages are developed they will eventually disappear.</p> <p>The VCHAP is a one size fits all policy which should be reviewed. Villages do not have the services to support growth.</p> <p>The plan should be scrapped.</p>	<p>The Council does not consider the issues raise to relate to the Soundness of the Plan.</p> <p>The preparation of the GNLP established the objectively assessed needs for the Greater Norwich area as well as the settlement hierarchy and growth strategy related to this. Whilst around 74% of the growth will take place in the Strategic Growth area, growth was also allocated to the Village Clusters in Broadland and South Norfolk to respond to the NPPF requirements, namely Paragraph 83 that states 'housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.'</p> <p>The VCHAP allocates a range of sites of various sizes in order to meet the objectives of the Plan, namely to provide a range of houses to meet the needs of different residents. This need has been balanced with the need to protect the character of the existing villages through the Site Assessment process. Any sites that were considered to have a detrimental impact on the character of villages were not taken forward.</p> <p>All new sites allocations within the VCHAP were also subject to Landscape Visual Appraisals in order to understand the landscape impacts of the proposed developments. Any mitigation measures identified through these were incorporated into the site specific policies.</p> <p>All site allocations will also be subject to any relevant policies in the GNLP as well as the Development Management policies for South Norfolk, including any relevant requirements to ensure new dwellings are sustainable.</p> <p>The Council has prioritised the allocation of previously-developed land wherever this has been possible (such as VC BAR2). However, there is insufficient brownfield land available to meet the requirements set out for the VCAHP as part of the GNLP. Therefore, greenfield land has also needed to be allocated to meet these needs. The Council has prioritised areas of low agricultural and biodiversity value as part of the Site Assessment process.</p>	1798	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Sustainability Appraisal (SA)	4126, 4169	Object	<p>GNLP3033, GNLP0321 and GNLP1023 were expressly identified earlier within the plan-making process as a reasonable alternative. However, it does not appear to have been assessed at all as part of the Regulation 19 Addendum SA, let alone to the same level of detail as the sites that are proposed for allocation.</p> <p>No consideration appears to have been given as part of the SEA process as to whether Long Stratton or Poringland / Framingham Earl, as settlements, should accommodate some of the new residential site allocations required for the VCHAP.</p> <p>Separately, Regulation 13 concerns the procedural requirements of consultation on the SEA. It requires inter alia that, as soon as reasonably practicable after the preparation of the SEA, the responsible authority should bring it to the attention of persons who are affected or likely to be affected by, or have an interest in its findings.</p> <p>Two concerns arise from this relating to the Regulation 19 Addendum SA .</p> <p>Firstly, it is not clear if an Environmental Report was prepared to support the Regulation 18 iteration of the Addendum to the VCHAP. If it was, then we should have been consulted on this. If it was not, then this would give rise to a different concern, given the need for plans to be informed by sustainability appraisal which meets legal requirements throughout their preparation (NPPF paragraph 32).</p> <p>Secondly, it is not clear from the information available via the website that comments are being invited on the Regulation 19 Addendum SA itself. The online consultation portal does not appear to have a facility for commenting on the Regulation 19 Addendum SA, only the Regulation 19 Addendum.</p>	<p>The Cogent3 judgment confirms defects in the SEA process can be resolved, even at a very late stage in the plan-making process. However, it is important to recognise that an important lesson from Cogent was that additional requirements to ensure the SEA process complies with the SEA Regulations.</p> <p>Having regard to all of the above, in the preparation of an Environmental Report that properly considered the Sites, as required given that they are reasonable alternatives, and assessed it to the same level of detail as required, the Sites would represent an eminently sustainable option for growth. It is submitted that it would be a more sustainable option than the additional sites that the Regulation 19 Addendum proposes to allocate.</p>	<p>The Council does not consider the issues raised to relate to the Soundness of the VCHAP.</p> <p>Firstly, the sites referred to as stated in the representations are located in Long Stratton and Framingham Earl. These settlements have been included in the Main Towns and Key Service Centres, respectfully, within the GNLP and therefore are covered by the GNLP. They do not form part of the Village Clusters and therefore these settlements have not been included in the VCHAP. Therefore, these sites cannot be considered for the VCHAP. Site considerations were targeted only at the defined village clusters.</p> <p>Reasonable alternatives were considered as part of the Sustainability Appraisal preparation. However, as was made clear throughout the Plan preparation process, these amounted to alternative approaches to achieving the overall plan objectives. It was not appropriate for the SA to consider individual site options.</p> <p>As is standard practice, the Environmental Assessment of Plans and Programmes Regulation 2004 were incorporated into the preparation of the Sustainability Appraisal report and therefore a stand alone SEA was not required.</p> <p>An interim SA report was produced to support the Regulation 18 Alternative Sites and Focused Changes consultation prior to the Regulation 19 Pre-submission Addendum publication. The opportunity to provide comments was included in both cases, with the opportunity to provide representations on the SA report provided as part of the Regulation 19 Pre-submission Addendum document.</p>	1799	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Habitats Regulation Assessment (HRA)	4202	Support	<p>Natural England has no comments to make on the South Norfolk Village Clusters Housing Allocations Plan Regulation 19 Pre-submission Addendum.</p> <p>Natural England is broadly satisfied and in agreement with the findings of both the Sustainability Appraisal and the updated Habitats Regulations Assessment which considers the final choice of sites included in the above addendum document.</p> <p>We have no further comments to make at this stage.</p>	None proposed.	The Council welcomes the support for the Habitats Regulation Assessment.	1795	None required.
Habitats Regulation Assessment (HRA)	4047, 4130	Object	There is a lot of wildlife in Barford and the surrounding fields and woodland, including a recent Polecat sighting. There would be an impact upon this with the proposed development through disruption and impact and loss of habitat.	The plan should be amended. The garage site removed from the allocations and the village hall site should be reduced substantially. 10 houses would be more appropriate in that site and the village. 45 simply isn't viable. There are existing drainage issues on that site which would only be made worse by adding so many houses. There is not the infrastructure in Barford to accommodate more residents.	<p>The Council does not consider the issues raised to relate to the Soundness of the Plan.</p> <p>The potential impacts on the environment and habitats has been considered throughout the preparation of the VCHAP. This included during the site assessment process where potential habitats were identified. Further investigations with specialist officers were conducted where necessary to establish if any specific mitigation measures would be required. Where these were identified, they were incorporated into site specific policies.</p> <p>Individual sites were also assessed as part of the Sustainability Appraisal and Habitats Regulations Assessment. No significant issues have been identified that could not be mitigated against. The site will still be subject to any relevant policies in the GNLP and the South Norfolk Development Management policies.</p>	1800	None required.
Heritage Impact Assessments (HIA)	4049, 4131	Object	Sayers Farm, opposite the proposed garage site, is a listed building. This would be blighted by having 20 new build two storey houses directly opposite it.	The garage plan should be scrapped entirely and the village hall site reduced to a maximum of 10 houses.	<p>The Council does not consider the issues raised to relate to the Soundness of the Plan.</p> <p>A HIA has been prepared to support the allocation of VC BAR1 and has concluded that the impact on Sayer Farmhouse will be minor, or less than substantial if the hedgerow is retained. This has been incorporated into the site specific policy for the allocation. The Council considers that the policy provides adequate protection to the setting of Sayers Farmhouse.</p>	1801	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Landscape and Visual Appraisals (LVA)	4050, 4132	Object	The visual impact of a new housing estate upon entering the village of Barford would be huge and detrimental. There are currently mature oak trees on the site which would need to be saved for the existing beauty of the village. These would be at risk if development took place.	The garage site should be scrapped entirely.	<p>The Council does not consider the issues raised to relate to the Soundness of the Plan.</p> <p>The LVA prepared to support Policy VC BAR1 acknowledges that development on the western side of the change the character of this part of the site as it is currently undeveloped. However, it also concludes that this part of the site relates closer to the existing village to the east and that and wider impacts could be mitigated through the retention of the existing vegetation.</p> <p>The retention and potential enhancement of the existing vegetation has been incorporated into the site specific policy for VC BAR1. Therefore, the Council considers that the policy provides suitable protection for the character of the area.</p>	1802	None required.
Landscape and Visual Appraisals (LVA)	4079	Object	<p>Previous reg 18 landscape assessment recommended that any development on the north site is limited to maintain the open countryside. Reg 19 proposal and assessment contradicts with this view.</p> <p>The leaner character of the village should be maintain.</p>	Exclude VCBAR2 from the project	<p>The Council does not consider the issue raised to relate to the Soundness of the Plan.</p> <p>The site was initially proposed to limit housing development on the southern part of the site during the Regulation 19 Alternative Sites and Focused Changes consultation. However, through this consultation concerns were raised about the new village hall and playing fields, which would have been developed on the northern side, being separated from the rest of the village.</p> <p>The Council therefore reviewed these responses and, on balance, concluded that it would provide more benefits to keep the village hall and playing fields on the southern side of the site, with housing on the north.</p> <p>The revised LVA for the site does acknowledge that the northern side is more exposed, however it does have established vegetation along the centre of the site (separating the northern and southern sides) and along the east and west boundaries. The LVA concluded that impacts on the landscape would be minimal if these are retained. Therefore the retention of the established vegetation and its enhancement where possible have been incorporated into the site specific policy.</p> <p>The Council considers on balance that this provides greater benefits to the village as a whole and suitably reduces the impact on the wider landscape.</p>	1803	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Strategic Flood Risk Assessment (SFRA)	4053, 4138	Object	Barford has been affected by flooding greatly recently. The river has been at bursting point at the bridge. The village hall proposed site is a well-known flood pain, effectively and it's unusable after heavy rains. Rainfall is expected to increase year on year, so how is it possible to improve the flood protection in a village by building on the very land which soaks in the flood waters?	The Barford plan should be scrapped entirely. The flood risks and risk to wildlife make it unfeasible and it happens too frequently.	<p>The Council does not consider the issues raised to relate to the Soundness of the Plan.</p> <p>The Strategic Flood Risk Assessment that was prepared to support the Regulation 19 Pre-submission Addendum acknowledges that there are local flooding issues that may require further investigation on VC BAR2. however, no significant issue shave been identified that would prevent the site from being allocated. VC BAR1 has been identified as being susceptible to groundwater flooding.</p> <p>The VCHAP acknowledges the flooding issues that have been raised as part of the supporting text and policies for both VC BAR1 and VC BAR2.</p> <p>VC BAR2 also includes a requirement to investigate how development could alleviate flood risk within the village. This could include enhancing the existing Barford Flood Alleviation Scheme.</p> <p>The Council considers that the requirements included in the policies will address the identified flooding issues in Barford. The specific flood mitigation measures for both sites will be established at the planning application stage and will be required to meet the requirements as set out in the policies.</p>	1806	None required.
Water Cycle Study (WCS)	3858	Object	Aslacton Proposed Site: For many years sewer system does not have adequate capacity and too frequently we have sewage in the streets. Planners continue to approve developments making the problem worse. Madness and in effect approval of developments is South Norfolk Planning approving ever more sewage in our streets.	No further approval of any developments in the Aslacton sewage catchment area until the sewage system capacity is resolved such that we no longer too often have sewage in the street. Given that this has been an issue for many many years it would seem unlikely there will be any resolution in the near future.	<p>The Council does not consider the issues raised to relate to the Soundness of the Plan.</p> <p>The Water Cycle Study which has been prepared to support the VCHAP does not identify any significant issues in the Long Stratton Catchment Area, however it is acknowledged that improvements will be required as the headroom limit will be reached with the combination of all proposed development in the catchment.</p> <p>The WCS does also acknowledge the sewerage capacity issues in Aslacton and states that Anglian Water is proposing upgrades to the pumping station to address this, as well as work with stakeholders such as the Lead Local Flood Authority.</p> <p>The Council have engaged with Anglian Water throughout the preparation of the VCHAP and they have raised no concerns over the proposed development in Aslacton.</p>	1807	None required.

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Water Cycle Study (WCS)	4055, 4141	Object	It appears a revised WCS is required as in the WCS report provided, the allocation is BAR1 19 houses and BAR2 40 houses. However the latest proposals show 20 houses and 45 houses respectively. Surely a revised WCS report is now required?	Revision of WCS report and further consultation following the results of that.	<p>The Council does not consider the issues raised to relate to the Soundness of the Plan.</p> <p>The Water Cycle Study has been reviewed as part of the preparation of the Regulation 19 Pre-submission Addendum. Any differences in housing numbers used in the report are considered to be negligible (in the case of VC BAR2 they are accurate) and are not considered to have any significant bearing on the results of the report.</p> <p>No significant issues have been identified in the catchment. Some localised network issues have been noted, however it has also been noted that Anglian Water have begun work on a scheme to rectify this.</p>	1808	None required.
Water Cycle Study (WCS)	4186	Object	<p>Many of the descriptive works are based on different descriptive standards that can apply to a much smaller population or cubic metres per day of flow that can restrict the capacity available. The descriptive permits for the following WRCs have a specification for a volume discharge which would equate to populations much lower than 250 and limits the feasibility of connections for proposed growth in these locations:</p> <p>School Lane Spooner Row WRC - 17.65 cubic metres per day,</p> <p>Haddiscoe-Mock Mile Terr WRC - 14.9 cubic metres per day</p> <p>Winfarthing - Chapel Close WRC - 10 cubic metres per day.</p> <p>It is noted that a number of WRCs are identified as exceeding headroom capacity once growth from the GNLP and SNVCHAP are factored in. Some of these have sufficient capacity for growth coming forward and will require subsequent growth investment in later AMPs, whereas WRCs such as Whitlingham and Beccles have already been identified for growth schemes to increase dry weather flow capacity.</p> <p>Anglian Water welcomes the further opportunity to engage with the plan preparation and will continue to liaise with the Council to support the plan and the relevant evidence base documents towards submission.</p>	None stated.	<p>The Council does not consider the issues raised to relate to the Soundness of the Plan.</p> <p>The methodology for the Water Cycle Study (use of 250 PE for viability relating to descriptive permits) was previously agreed with Anglian Water through the Regulation 18 consultation as well as during the preparation of the GNLP. It was not raised that the three WRCs had restricted descriptive standards and therefore the 250 PE was used.</p> <p>In Winfarthing, the amount of growth allocated in the VCHAP is less than assumed thorough the GNLP WCS, which used a worse case scenario. No objections were raised as part of the GNLP. IN Haddiscoe, it is estimated that there would still be capacity even with the quoted PE. In Spooner Row, there is the potential that the prosed development would exceed capacity, however the potential for a change in the permit has not been discounted and could be investigated.</p> <p>The Council does not consider the issues raised to affect the Soundness of the relevant allocations, However, should the Inspector be minded, the Council would not object to a criteria being included in the site-specific policies requiring early engagement with Anglian Water.</p>	1844	The Council does not consider the issues raised to affect the Soundness of the relevant allocations, However, should the Inspector be minded, the Council would not object to a criteria being included in the site-specific policies requiring early engagement with Anglian Water.

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Viability Appraisal (VA)	4037	Support	Specifically about the Barford project I believe this is a good project from which the whole village will benefit and so it should be supported.	None proposed.	The Council welcomes the support for the proposed allocations in Barford.	1796	None required.
Viability Appraisal (VA)	4059, 4143	Object	According to the viability report provided, the types of developments proposed in the village are not economically viable and will leave a developer with a deficit.	Both the proposed allocations BAR1 & BAR2 should be removed from Barford. Both are unsound and not viable in the current economic conditions. The policies under the previous government should be reviewed and adapted accordingly.	The Council does not consider the issues raised to relate to the Soundness of the Plan. The Viability Appraisal that has been prepared concludes that the typologies assessed would be able to provide sufficient surplus to ensure developer profit. However, it is acknowledged that in some situations that typologies 1 and 2 may need to reduce the proportion of developer profit to 15% to allow for additional Nutrient Neutrality costs. The report concludes that South Norfolk is facing similar economic challenges to the rest of the country as a whole and no significant economic issues have been identified to suggest that the proposed development in the VCHAP is unviable.	1809	None required.

Barford, Marlingford, Colton and Wramplingham

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Services and Community Facilities, 1.8	3905, 3912, 3922, 3924, 3929, 4027, 4067, 4149	Object	A number of representations regarding the level of services/facilities in the cluster: (1) the bus service between Marlingford and Wymondham is not daily; (2) Colton does not have 'significant' employment opportunities; (3) the commercial units/opportunities in Barford are limited and located on the edge of the village; and (4) overall there are limited services in Barford, which means development will be car dependent.	Update paragraph 1.8 to more accurately reflect the services and facilities in the cluster.	(1) It is acknowledged that the weekday bus service from Marlingford alternates between Wymondham (Monday, Wednesday, Friday) and Costessey (Tuesday and Thursday) and is limited to one journey in each direction, however the VCHAP is not proposing any allocations in Marlingford; (2) there are a handful of businesses within Colton itself and the village is immediately adjacent to the Honingham Thorpe Farms complex, which has a variety of business units; (3) Barford Industrial Estate and Barford Van Hire are located on the B1108, Watton Road, within the main part of the village, and with footway links to the nearby residential areas, and offer more opportunities than most similarly size villages; and (4) the level of services and facilities in Barford is typical of the Village Clusters, with Barford having a better public transport connection to Norwich than many, and local employment opportunities. The Village Clusters approach has been endorsed through the examination and adoption of the Greater Norwich Local Plan, which directs 92% of new allocations to larger settlements.	1787	Whilst the Council does not consider it a soundness issue, a factual update could be made regarding the bus services to/from Marlingford.

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Barford, 1.10	3869, 3906, 3911, 3923, 4006, 4028, 4068, 4082, 4092, 4151	Object	<p>Historic unresolved flooding problems within Barford - The network is still obviously inadequate and operating at well below capacity even with the existing number of houses, road layout etc.</p> <p>The Barford Flood Alleviation Scheme is dependent on downstream maintenance of a network of privately owned surface water ditches that lead to the River Tiffey. These are largely not accessible to machinery and have to be hand dug/cleared by their increasingly elderly owners. Not all new owners understand their legal responsibilities to do so.</p> <p>The Barford Flood Alleviation Scheme is unlikely to cope with the 25-30% increase in dwellings proposed under the VCHAP scheme. Not aware of any assessment for this issue by Anglian Water or any other body. This would make the VCHAP proposal unsound as defined by the VCHAP Duty to Cooperate Statement.</p>	<p>There should be no development on BAR2. This scheme is unviable with the current flooding problems - This serious issue would need to be resolved and made adequate for the additional proposed increase of dwellings, roads and hardstanding's.</p> <p>Please consider how water exits the Barford Flood Alleviation Scheme, how it reaches the River Tiffey and how it can be maintained in good/effective working order.</p> <p>Please comply with NPPF Clause 165</p> <p>Please comply with the duty to cooperate: It is essential that Anglian Water and Parish Council are consulted.</p>	<p>The VCHAP is supported by Strategic Flood Risk Assessment (and Water Cycle Study), the SFRA does not identify the site itself as being at risk. However the size of the site (over 1.0ha) means that it will require a site-specific Flood Risk Assessment to accompany any planning application. In addition, the Lead Local Flood Authority has noted that the site is at the head of the surface water flow path, and development should therefore take the opportunity to reduce flood risk downstream. The development site can be used to attenuate flows and manage run off. The LLFA, Environment Agency and Anglian Water have all responded to the Regulation 19 Addendum, and no fundamental concern have been raised about this allocation in terms of increasing off-site risk. (4) In line with the NPPF, Policy 2 of the GNLP requires Sustainable Drainage Schemes unless there is 'clear evidence that this would be inappropriate'. This would be determined through any future planning application(s) for the site.</p> <p>Owners of water courses have responsibilities in terms of their maintenance, details of which can be found on the Environment Agency and Norfolk County Council's website. Key amongst these is letting water flow naturally and removing any blockages. Maintenance of ditches and watercourses is an aspect property maintenance, which like all others, may incur a cost on the owner.</p> <p>Anglian Water has responded to the Regulation 19 Addendum and, whilst it has raised a soundness objection to the policy wording, it has not objected in principle to the allocation of this site, and recognises the opportunity to improve flood risk from a site which is at the head of a surface water flow path.</p>	1870	None required.
Barford, 1.10	4060	Object	The removal of the third proposed site on Back Lane/Watton road is welcomed.	The Garage site (BAR2) should also be removed, for both road safety, flooding and viability issues.	Comments noted. Please see Councils responses to issues raised in relation to VC BAR1 and VC BAR2.	1871	None required.

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Policy VC BAR1: Land at Cock Street and Watton Road	4208	Support	<p>Proposed sites in Barford and Swardeston will increase pressure on already constrained Humbleyard GP practice group. There are discussions currently ongoing between the Council and GP practices regarding mitigation.</p> <p>The ambulance service, EEASt, does not have capacity to accommodate the additional growth resulting from the proposed development combined with other developments in the vicinity. This development is likely to increase demand upon existing constrained ambulance services and nationally set blue light response times. The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth and demand generated by this development.</p>	None specified. ICB encourages continued working with the LPA.	<p>The Council welcomes the engagement from the Norfolk and Waveney Integrated Care System.</p> <p>The Council notes the potential impact the proposed development in the VCHAP on local healthcare provision. The Council also notes the current actions being taken to address potential capacity issues.</p> <p>The Council will continue to engage with the ICS as the VCHAP progresses and, where relevant, as site allocations progress through the planning application process.</p>	1866	None required.
Policy VC BAR1: Land at Cock Street and Watton Road	4133	Support	Current data shows limited capacity at Barford Water Recycling Centre (WRC). While there may be some room for limited growth, the proposed allocations and resulting increase in foul water flows pose the potential risk of harm to the waterbody receiving treated effluent from Barford WRC. We therefore recommend including within policies VC BAR1 and VC BAR2 the requirement for developers of the site to enter into early engagement with Anglian Water in order to demonstrate there is sufficient capacity in the network and receiving WRC to accommodate foul flows from the development.	Include a requirement for in VC BAR2 (and VC BAR1) for developers of the site to enter into early engagement with Anglian Water in order to demonstrate there is sufficient capacity in the network and receiving WRC to accommodate foul flows from the development.	Whilst capacity is identified at the Water Recycling Centre to accommodate the planned growth, the representation from Anglian Water has noted that windfall development within the catchment may erode this capacity over time.	1867	Whilst it does not consider this a Soundness issue, the Council would not object to an additional criterion in Policy VC BAR2 to require a flood and drainage strategy to be submitted for the site, which should be supported by a recent pre-planning engagement assessment from Anglian Water.

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Policy VC BAR1: Land at Cock Street and Watton Road	3870, 3879, 3907, 3925, 3930, 4010, 4012, 4029, 4057, 4061, 4083, 4146, 4153	Object	<p>Site is unsound, undeliverable and not justified. Contrary to NPPF. Duty to Cooperate not met. Parish Council object and objection supported by residents. Should require covenant to restrict development on greenfield sites.</p> <p>Landowner has said site is not available.</p> <p>Flooding: Site floods badly. Surface water flooding causes issues on B1108, Cock Street, Sutton's Loke and Style Loke. Must be an in person study based on Storm Water Flow reading.</p> <p>Infrastructure: Sewerage systems should be guaranteed as current system overflows.</p> <p>Amenities: village does not have amenities for extra houses.</p> <p>Ecology: ecologically important for wildlife due to open space and natural tree line. Damp areas attract frogs and newts.</p> <p>Highways: Full traffic survey needed on B1108. Bend is dangerous, especially for pedestrians and children walking to school. No streetlights and therefore unsafe to walk at night.</p> <p>Heritage: Will significantly impact Grade II Sayers Farm.</p> <p>Employment: will remove existing garage and therefore not sustainable.</p> <p>Local Character: 20 dwellings would overdevelop the site, straining services and not being in character.</p>	<p>Abandon the plan and site.</p> <p>Needs to comply with regulations and NPPF.</p> <p>Consider drainage and Barford Flood Alleviation Scheme.</p>	<p>The Council does not consider the issues raised to impact the Soundness of the Plan and that these issues have been addressed at previous stage of the plan preparation process.</p> <p>The Council has been in contact with representatives of the landowner and it has been confirmed that the site is available for development. The evidence provided to the Council confirms that the site is deliverable.</p> <p>The site has been included, along with VC BAR1, as part of the Strategic Flood Risk Assessment and no significant flooding issues have been identified. A site-specific Flood Risk Assessment is required as part of the policy.</p> <p>The limited capacity at the Barford WRC has been noted and early engagement with Anglian Water has been encourage in the supporting text of the policy.</p> <p>The policy includes a requirement to retain and enhance the existing vegetation on the site in order to minimise visual impact and an arboricultural survey to determine the quality of existing vegetation and how this could be incorporated into the design of a scheme on the site.</p> <p>Development of housing on the site is also considered to contribute to the local character through the removal of a 2 storey commercial building.</p> <p>It has been noted in previous stages of consultation that Barford is better served than some other clusters include din the VCHAP. New development will also contribute to the sustainability of existing services.</p> <p>The highways and heritage issues raised have been addressed at previous stages. Norfolk County Council have been engaged throughout the preparation process and have raised no objections. A heritage impact assessment has been prepared and no fundamental objections have been raised by Historic England.</p> <p>The loss of the garage has also been addressed previously and it is acknowledged that the overall benefits of delivery of housing, including affordable housing, and the removal of a commercial building in proximity to a heritage asset will provide local benefits. Other employment sites are also located nearby.</p>	1874	None required.

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VC BAR2	3859	Object	The proposals if adopted would result in an unacceptable reduction in the playing area currently available and this would mean that events such as the annual cricket match and village events would become impossible.	Ensure the playing field remains the same size.	Several responses at the Regulation 18 'Focused Changes' stage and to this Regulation 19 Addendum noted that the playing field is often water logged, therefore currently limiting its use. Whilst the development of the land to the north would require an access road along the western side of the playing field, and possible relocation of the village hall adjacent to the existing play park, the intention is to retain the current sports pitch and create a more useable space/facility for the longer term. Events are able to make use of the adjacent Village Hall e.g. for catering. Whilst there is over 35 years currently left on the village hall lease, the shortening time period makes it increasingly difficult for the Village Hall Committee to secure grants for maintaining and improving to the facilities in the longer term.	1804	None proposed.
VC BAR2	3876, 3913, 4039, 4044, 4052, 4062, 4089, 4154	Object	Several issues raised with the allocation of the site: (1) increased flood risk - settlement is in a floodplain, already existing issues; (2) development will rely on services and facilities outside of the village which means it will be car dependent; (3) housing will increase light and noise pollution; (4) houses will not be affordable to local people; (5) development is out of proportion to the size of the village; (6) impact on wildlife/biodiversity; (7) highways safety, including children crossing the access road to the existing play park, the junction of Cock Street and the B1108 Watton Road, speed of traffic on the B1108; and the lack of street lighting on roads in the village; (8) reduction in the size of the playing field; (9) length of lease on the current village hall and the wording of the lease which requires a vote within the community before it can be surrendered; (10) layout shown by the site promoter shows 45 dwellings, not 40, therefore the evidence base is out of date.	Remove the allocation and/or update the evidence base to reflect 45 dwellings.	(1) The VCHAP is supported by Strategic Flood Risk Assessment (and Water Cycle Study), the SFRA does not identify the site itself as being at risk. However, the size of the site (over 1.0ha) means that it will require a site-specific Flood Risk Assessment to accompany any planning application. In addition, the Lead Local Flood Authority has noted that the site is at the head of the surface water flow path, and development should therefore take the opportunity to reduce flood risk downstream. The LLFA, Environment Agency and Anglian Water have all responded to the Regulation 19 Addendum, and no fundamental concern have been raised about this allocation; (2) the level of services and facilities in Barford is typical of the Village Clusters, with Barford having a better public transport connection to Norwich than many, and local employment opportunities. The Village Clusters approach has been endorsed through the examination and adoption of the Greater Norwich Local Plan, which directs 92% of new allocations to larger settlements; (3) there is no reason to suggest this site will result in any greater increase in light or noise pollution than any other residential development, or that this location is particularly sensitive in this regard, and national and local planning policies on amenity would apply to any future planning application; (4) housing mix will be in accordance with the requirements of the GNLP, including the proportion of affordable and self-build units, as appropriate, failing to deliver new houses will not help resolve issues of affordability; (5) no allocations in Barford have been developed through either the 2003 or 2015 Local Plans, as such Barford has seen little planned growth in comparison to other villages of a similar size, the proportion of development also needs to be seen	1805	None proposed.

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					<p>in the context of the cluster as a whole and the fact that no planned growth is allocated to the other cluster settlements, whilst the proportion of growth is higher than the average across the village clusters, it reflects the location of the available, suitable and deliverable sites; (6) the site is not identified as being of particular importance for wildlife and the proposed allocation policy seeks the retention of biodiversity features as far as possible, in any event any future application(s) will be tested against relevant national and local development management policies and will need to demonstrate biodiversity net gain (BNG); (7) Norfolk County Council as highway authority has been consulted and no issues regarding highways safety have been identified and any future planning application will be tested against relevant national and local development management policies. Existing perceived issues regarding traffic speeds, street lighting etc. should be addressed through the appropriate channels; (8 & 9) several responses at the Regulation 18 'Focused Changes' stage and to this Regulation 19 Addendum noted that the playing field is often water logged, therefore currently limiting its use. Whilst the development of the land to the north would require an access road along the western side of the playing field, and possible relocation of the village hall adjacent to the existing play park, the intention is to retain the current sports pitch and create a more useable space/facility for the longer term. Events are able to make use of the adjacent Village Hall e.g. for catering. Whilst there is over 35 years currently left on the village hall lease, the shortening time period makes it increasingly difficult for the Village Hall Committee to secure grants for maintaining and improving to the facilities for the future. In terms of the lease, the proposed allocation policy makes it clear that there should be continuity of use between the current and new village halls, as such the site promoters do not consider that the clause in the lease requiring a community referendum would be invoked; (10) the representations appear to comment on a draft scheme for the site which is not part of the VCHAP, and which may or may not be reflected in any future planning application(s), in any event the proposed allocation policy refers to 'approximately' 40 dwellings, and the Council considers the evidence base sufficiently support this.</p>		

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VC BAR2	4070	Object	<p>I don't believe that this consultation has not followed the proper process and is discriminatory:</p> <ul style="list-style-type: none"> - This consultation is particularly convoluted and uses a lot of jargon. It therefore puts several barriers in the way of those who wish to put their representations forward. - It has not been well advertised as to accommodate the full demographic of those living in the village. - The background documentation e.g. site assessment is based on the previously quoted lower number of houses and so is no longer valid 	Reject VC BAR2. Review the consultation procedures.	The Regulation 19 process is, by its nature, formal and the Council needs to comply with the relevant Regulations and approach set out in the Statement of Community Involvement (SCI). Guidance notes and FAQs were prepared to assist with understanding the process and completing representations. Council officers were available throughout the 8-week publication period to offer help and support via email, telephone or in person at the Council offices. All of the relevant evidence base documents were updated to reflect the increase to approximately 40 dwellings in the Regulation 19 Addendum,	1828	None proposed.

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VC BAR2, 1.20	3914, 3947, 3967, 4030, 4045, 4063, 4155	Object	Several issues raised regarding the nature and status of the proposed allocation site: (1) Site is outside the current Settlement Limit; (2) Impact on wildlife/biodiversity and lack of surveys undertaken; (3) Would be helpful to see an plan of what is proposed for the site; (4) Reduction in the size of the playing field and no urgency to replace the village hall; (5) Concerns over flood risk.	Remove the proposed allocation from the plan and seek alternative locations for development.	(1) The Settlement Limit in the current local plan covers the period to 2026 and the purpose of the VCHAP is to allocate new sites for future development to 2038, the majority of which will be outside of Settlement Limits; (2) The site is not identified as being of particular importance for wildlife, and Norfolk Wildlife Trust and Natural England have been part of the consultation process. The proposed allocation policy seeks the retention of biodiversity features as far as possible. Any future planning application(s) will need to be accompanied by relevant surveys (as necessary) and be tested against appropriate national and local development management policies, as well as needing to demonstrate biodiversity net gain (BNG); (3) Whilst site promoters can put forward proposals at this stage, these would be indicative only, and the level of detail sought would only be available at the planning application stage; (4) Several responses at the Regulation 18 'Focused Changes' stage and to this Regulation 19 Addendum noted that the playing field is often water logged, therefore currently limiting its use. Whilst the development of the land to the north would require an access road along the western side of the playing field, and possible relocation of the village hall adjacent to the existing play park, the intention is to retain the current sports pitch and create a more useable space/facility for the longer term. Events are able to make use of the adjacent Village Hall e.g. for catering. Whilst there is over 35 years currently left on the village hall lease, the shortening time period makes it increasingly difficult for the Village Hall Committee to secure grants for maintaining and improving to the facilities for the future; (5) The VCHAP is supported by Strategic Flood Risk Assessment (and Water Cycle Study), the SFRA does not identify the site itself as being at risk. However the size of the site (over 1.0ha) means that it will require a site-specific Flood Risk Assessment to accompany any planning application. In addition, the Lead Local Flood Authority has noted that the site is at the head of the surface water flow path, and development should therefore take the opportunity to reduce flood risk downstream. The LLFA, Environment Agency and Anglian Water have all responded to the Regulation 19 Addendum, and no fundamental concern have been raised about this allocation.	1810	None proposed.

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VC BAR2, 1.21	3948, 4064, 4156	Support	Support a freehold village hall, which must be provided in advance of completion of the houses.	n/a	Support noted. The lease for the current village hall expires in approximately 38 years time, however the shortening length of the lease makes it increasingly difficult to secure funding for maintenance and improvement. The proposed allocation policy requires continuity of provision and for the new hall to be provided on a freehold basis, which would be secured via legal agreement at the time of any planning application.	1811	None proposed.

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VC BAR2, 1.21	3896, 3908, 3915, 3926, 3928, 3931, 4007, 4031, 4048, 4071, 4086	Object	<p>Representations that the village hall remains in a good state of repair and the there is no urgency for replacement of upgrading given the length of the existing lease. Specifically (1) to date there has been no issue securing funding, and in any event the residents of the village could raise the funding themselves, as they have done for the adjoining play area. (2) The lease cannot be terminated for the existing hall without the agreement of the Charity Commission and community as a whole, the later of which is unlikely to be forthcoming. (3) The site is therefore not deliverable within 5 years, as set out in NPPF paragraph 16 (sic). (4) Remove emotive language, such as 'heart of the village'. (5) Concern that the Site Assessment was not fully updated to reflect the changes between the Regulation 18 Focused Changes and the Regulation 19 Addendum stages.</p> <p>A number of other comments, not directly relevant to this paragraph (access to services, flood risk etc.) have been addressed elsewhere.</p>	Recognise that the hall is in a good state of repair, and that there is no current urgency for replacement. The policy also needs be clear that the transfer of the freehold applies to the land for the village hall, plus the playing field, not jus the hall itself. Remove emotive language, specifically 'heart of the village'.	The Council has been supplied with details and photographs which suggest the village hall, whilst in a serviceable and functional condition, requires a number of areas of improvement: replacement of parts of the roof not covered by the recent works, replacement of the kitchen units and floor, refurbishment or replacement of the main hall floor, rewiring of kitchen and toilets, replacement of some double-glazing units, replacement of the existing storage shed and provision of additional storage to address increased demand. In response to the specific points (1) whilst there is over 35 years remaining on the current lease, this will diminish over the life of the current Local Plan, with approx. 20 years left at the end date of the plan, which makes securing long term funding for maintenance and improvement increasingly difficult. (2) In terms of the lease, the proposed allocation policy makes it clear that there should be continuity of use between the current and new village halls, with the later provided to the community on a freehold basis, as such the site promoters do not consider that the clause in the lease requiring a community referendum would be invoked. Discussions have already commenced with the Charity Commission. (3) In terms of para 69 of the NPPF (December 2023), whilst Councils are indeed required to identify a supply of "specific, deliverable sites for five years following the intended date of adoption" of the plan, this does not apply to all sites, and further specific, developable sites should be identified for the remainder of the plan period. (4) reference to the 'heart of the village' was based on responses to previous consultations, which noted that the having the village hall, play area, playing field and primary school in close proximity was central to village life. (5) The Site Assessment is supporting evidence for the Plan, but not part of the Plan itself, it was reviewed as part of the development of the Regulation 19 Addendum and wording of the Addendum document reflects the final decision to retain the village hall and playing field to the south, with housing development to the north.	1812	Whilst the Council does not consider it a soundness issue, the allocation policy could be amended to clarify that the transfer of the freehold applies to the village hall and associated land, including the playing field. Similarly, the Council does not consider 'heart of the village' to be an emotive statement which affects the soundness of the plan, but wording could be changed to 'centre of the village'.

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VC BAR2, 1.22	3895, 3916, 3932, 3949, 3968, 4026, 4040, 4051, 4065, 4072, 4087, 4157	Object	Issues raised concerning the location of the site within the village: (1) the site conflicts with the Landscape and Visual Appraisal, particularly with housing proposed on the northern part of the site; (2) The SA is based on an allocation of 30 dwellings; (3) The primary school is already at capacity; (4) Parking is already a problem a school drop off/pick up times; (5) Loss of playing field land is not a benefit to the village; (6) The village is subject to power cuts/outages.	No development of this site, or development of a reduced scale. Ensure that any proposals do not facilitate extension into the adjoining fields. Remove references to improving the playing field. Identify where workers would park during constriction to avoid on-street parking issues.	(1) The LVA was updated to reflect the changes made after the consultation on the Regulation 18 Focused Changes, whilst it notes that the northern part of the site is more elevated and extends into the surrounding countryside, it concludes that the site is still screened by vegetation on the east and west boundaries and outside of the site, and that the impacts can be reasonably mitigated. (2) The SA was updated to reflect the Regulation 19 Addendum, as noted in Table B (page 3) of the Non-Technical Summary. (3) Norfolk County Council Childrens' Services confirmed at the Regulation 18 Focused Changes stage that declining catchment numbers meant that the school would be able to accommodate additional local pupils. (4) A higher proportion of local children should reduce the numbers that are driven to the school from out of catchment. (5)) several responses at the Regulation 18 'Focused Changes' stage and to this Regulation 19 Addendum noted that the playing field is often water logged, therefore currently limiting its use. Whilst the development of the land to the north would require an access road along the western side of the playing field, and possible relocation of the village hall adjacent to the existing play park, the intention is to retain the current sports pitch and create a more useable space/facility for the longer term. Any existing issues should be addressed through the appropriate channels; (6) The relevant energy suppliers have been consulted as part of the VCHAP process and not raised any concerns and any existing issues should be addressed through the appropriate channels; Other issues not directly related to this paragraph, such as flood risk, the lease on the village hall, highways network capacity, development outside of existing settlement limits, ecology/biodiversity etc. are dealt with elsewhere.	1813	Whilst the Council does not consider it a soundness issue, the fourth bullet point of the proposed policy could be expanded to specifically refer to enhancement of landscaping on the northern site boundary.

VC BAR2, 1.22	3909	Object	<p>The development will likely cause flooding (surface and foul water) downstream thereby contravening NPPF Clause 165; the plan fails the duty to cooperate by failure to engage with Anglian Water; the Sustainability Appraisal is inaccurate and probably misleading; the Site Assessment Document consideration of flood risk is misleading; the development will increase car dependency and is in contravention of NPPF Clause 89, the JCS and the Cycling Strategy for Norfolk; it will also reduce the current playing field considerably and is thus unsound.</p>	<p>Please comply with regulations specified above and ensure local knowledge is sought.</p>	<p>The VCHAP is supported by Strategic Flood Risk Assessment (and Water Cycle Study), the SFRA does not identify the site itself as being at risk. However, the size of the site (over 1.0ha) means that it will require a site-specific Flood Risk Assessment to accompany any planning application(s). In addition, the Lead Local Flood Authority has noted that the site is at the head of the surface water flow path, and development should therefore take the opportunity to reduce flood risk downstream. The development site can be used to attenuate flows and manage run off. The LLFA, Environment Agency and Anglian Water have all responded to the Regulation 19 Addendum, and no fundamental concern have been raised about this allocation in terms of increasing off-site risk. Owners of water courses which form part of the local Flood Alleviation Scheme have responsibilities in terms of their maintenance, details of which can be found on the Environment Agency and Norfolk County Council's websites. Key amongst these is letting water flow naturally and removing any blockages. Maintenance of ditches and watercourses is an aspect property maintenance, which like all others, may incur a cost on the owner.</p> <p>Anglian Water has responded to the Regulation 19 Addendum, and has confirmed that it considers there is capacity to accommodate the two proposed allocations in Barford, but requested that the policy text for VC BAR2 be updated to encourage early engagement with Anglian Water to ensure that subsequent windfall development has not significantly reduced that capacity.</p> <p>The Council notes concerns raised relating to increased traffic and car usage. However, the purpose of the VCHAP is to allocate appropriate development in the Village Clusters to support the local services and facilities that are located there, such as the village hall and primary school, as required by the NPPF. Development has also been focused where there is access to local public transport wherever possible.</p> <p>Several responses at the Regulation 18 'Focused Changes' stage and to this Regulation 19 Addendum noted that the playing field is often water logged, therefore currently limiting its use. Whilst the development of the land to the north would require an access road along the western side of the playing field, and possible relocation of the village hall adjacent to the existing play park, the intention is to retain the current sports pitch and create a more useable space/facility for the longer term. Events are also able to make use of the adjacent Village Hall e.g. for catering,</p>	1868	None required.
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Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
					toilets etc.		
VC BAR2, 1.23	3950	Support	The village hall and playing fields are central to village life and well used by the community. This access must not be compromised.	n/a	Comments noted. The proposed allocation policy requires continuity of access to community facilities throughout construction of the site.	1814	None proposed.
VC BAR2, 1.23	3918, 4073	Object	Concerns that continuity of access to community facilities will not be secured and that construction traffic will need to pass by the play area etc.	Remove VC BAR2 from the plan. Set out the penalties if a future developer fails to provide continuity of use.	Continuity of access is a requirement of the proposed allocation policy, which would need to be secured by legal agreement as part of any subsequent planning permission. It is not unusual for construction traffic to pass through existing residential areas and close to recreation facilities as part of the development of new allocations. Highways safety and the need for a construction management plan will be considered as part of the assessment of any future planning application(s).	1815	None proposed.
VC BAR2, 1.24	3951	Support	How is the narrow access on Chapel Street going to accommodate a 2.0 metre wide footway. Where is this going to come from? There needs to be a plan to scale published.	n/a	Norfolk County Council requested this requirement after a preliminary assessment of the site. Where NCC has had concerns over the achievability of a requirement, it has raised and objection and/or sought further information from the site promoter. It would be the for the applicant to demonstrate precisely how this will be achieved at the time of any planning application.	1816	None proposed.
VC BAR2, 1.24	3897, 3917, 3919, 3933, 3969, 4054, 4074	Object	Using the existing access to the village hall will be a danger to users of the play area and playing field and/or sever the linkages between them. Concerns over the capacity of the wider highways network (road widths, lack of footways, parked vehicles, junction visibility). Other issues not directly relevant to this paragraph, such as the lease for the village hall land, are responded to elsewhere.	Remove VC BAR2. Change the location of the site entrance. Restrict the access road to the edge of the site. Provide additional recreation land north of the bisecting tree line, to compensate for that lost to the road.	Norfolk County Council as Highways Authority has not raised any concerns regarding either the access to the site or the network capacity/safety within the village, subject to the requirements set out in the proposed allocation policy. Existing issues should be addressed through appropriate channels.	1817	The Council considers the wording of bullet point 1 of the proposed allocation policy addresses the issue of the new village hall being located close to the play area, to facilitate their combined use; however, whilst the Council does not consider it a soundness issue, the bullet point could be modified to make it explicit that the access road should not create a severance between these facilities.
VC BAR2, 1.25	3934, 3952, 3956, 4042	Support	Support for the protection of the existing trees and hedgerows on the site boundaries and the bisecting tree line. Questions over what ecology surveys will be undertaken.	n/a	A number of the hedgerows around the site are covered by the 1997 Hedgerow Regulations and the proposed allocation policy clearly requires the protection of the trees and hedgerows as far as practicably possible. Also, any future planning applications will be tested against the Council's Development Management Policies, which seek to protect these assets, and will need to demonstrate Biodiversity Net Gain; as such, applications will need to be accompanied by the relevant surveys.	1818	None proposed.

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VC BAR2, 1.25	3920, 3964, 3970, 4075, 4088	Object	Concerns regarding the impacts on the wildlife supported by the trees/hedgerows and on the wider landscape. Need for more detailed ecology/wildlife surveys.	Remove VC BAR2. More detailed assessment of which trees and hedgerows can be removed and	A number of the hedgerows around the site are covered by the 1997 Hedgerow Regulations and the proposed allocation policy clearly requires the protection of the trees and hedgerows as far as practicably possible. Also, any future planning applications will be tested against the Council's Development Management Policies, which seek to protect these assets, and will need to demonstrate Biodiversity Net Gain; as such, applications will need to be accompanied by the relevant surveys. In terms of the wider landscape, the Landscape and Visual Appraisal for the site notes that the northern part of the site is more elevated and extends into the surrounding countryside, but concludes that the site is still screened by vegetation on the east and west boundaries and outside of the site, and that the impacts can be reasonably mitigated.	1819	Whilst the Council does not consider it a soundness issue, the fourth bullet point of the proposed policy could be expanded to specifically refer to enhancement of landscaping on the northern site boundary.
VC BAR2, 1.26	3871, 3921, 3965, 3971, 4025, 4041, 4066, 4076, 4094, 4158	Object	A number of concerns raised in relation to flood risk, which as been a ongoing issue in Barford over a number of years. (1) The current Barford Flood Alleviation Scheme relies on ditches in private, which may not be being adequately maintained and therefore not performing as they should. (2) Anglian Water has ongoing investigations into foul water flooding issues within the village. (3) Development of VC BAR2 will worsen existing flooding issues. (4) Can SuDS be used on the site?	Remove VC BAR2. More detailed investigation of the drainage network in the wider area. Resolve existing issues before development. A guarantee of compensation for anyone who is flooded as a direct consequence of developing this site.	(1) Owners of water courses have responsibilities in terms of their maintenance, details of which can be found on the Environment Agency and Norfolk County Council's website. Key amongst these is letting water flow naturally and removing any blockages. Maintenance of ditches and watercourses is an aspect property maintenance, which like all others, may incur a cost on the owner. (2) Anglian Water has responded to the Regulation 19 Addendum and, whilst it has raised a soundness objection to the policy wording, it has not objected in principle to the allocation of this site, and recognises the opportunity to improve flood risk from a site which is at the head of a surface water flow path. (3) The VCHAP is supported by Strategic Flood Risk Assessment (and Water Cycle Study), the SFRA does not identify the site itself as being at risk. However the size of the site (over 1.0ha) means that it will require a site-specific Flood Risk Assessment to accompany any planning application. In addition, the Lead Local Flood Authority has noted that the site is at the head of the surface water flow path, and development should therefore take the opportunity to reduce flood risk downstream. The development site can be used to attenuate flows and manage run off. The LLFA, Environment Agency and Anglian Water have all responded to the Regulation 19 Addendum, and no fundamental concern have been raised about this allocation in terms of increasing off-site risk. (4) In line with the NPPF, Policy 2 of the GNLP requires Sustainable Drainage Schemes unless there is 'clear evidence that this would be inappropriate'. This would be determined through any future planning application(s) for the site.	1820	Whilst it does not consider this a Soundness issue, the Council would not object to an additional criteria in Policy VC BAR2 to require a flood and drainage strategy to be submitted for the site, which should be supported by a recent pre-planning engagement assessment from Anglian Water.

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VC BAR2, 1.26	3953	Support	<p>Flooding and drainage issues have been ongoing for decades in the village. Housing, driveways and manicured gardens are not conducive to absorbing run-off. More pressure on the existing drains and gulleys once that field has been developed would be a disaster for the properties down from the village hall. Long term who would be responsible for flooding issues caused by this proposal.</p> <p>Drainage needs to go Northwards from the planned site.</p>	n/a	Note that whilst this representation was submitted as a 'support', a number of concerns are raised; these are addressed in responses to the objections to this paragraph.	1821	None proposed.
VC BAR2, 1.27	3954	Support	Current properties must be protected.	n/a	Comments noted.	1822	None proposed.
VC BAR2, 1.27	4077, 4084	Object	The historic curtilage of School Farmhouse (Listed) and associated buildings extends beyond the bisecting tree line on VC BAR2, parallel with the part of the site which is proposed for development, therefore impacting on the setting.	Remove VC BAR2. Proper engagement with Historic England. Further restrictions on development north of the bisecting tree line and further enhancement of the existing vegetation on site.	A Heritage Impact Assessment has been produced for VC BAR2, to a methodology agreed with Historic England. Historic England has also commented specifically on this site, and has welcomed the retention of the open space to the south, to protect the setting of the listed farmhouse and associated buildings. Where appropriate Historic England has visited proposed allocation sites. A more detailed assessment of the heritage issues would be undertaken at the planning application stage, which could consider the scale, massing and location of buildings, the use of landscaping etc.	1823	None proposed.
VC BAR2, 1.28	3955	Object	<p>Clearly previous comments by many have been ignored.</p> <p>The village does not have the road system to cope with further development so close to the school without creating additional hazards and much more traffic.</p> <p>See all previous comments - light pollution, drainage, risk of flooding and so forth.</p>	Remove VC BAR2.	Previous comments made at the Regulation 18 Focused Changes stage have been summarised and responded to in the Statement of Consultation which accompanied the Regulation 19 Addendum, specifically in Part 4, Appendix 5. Regarding the local roads, Norfolk County Council as highway authority has been consulted and no issues regarding highways safety have been identified, subject to the requirements set out in the proposed allocation policy.	1824	None proposed.
VC BAR2, 1.28	3972	Object	<p>The playing field area will in fact not be improved as it will be reduced by up to 40%.</p> <p>The site will be car and therefore carbon dependant which is contrary to planning policies.</p> <p>An increase of up to 90 cars in the villages country roads presents issues of safety when leaving the site onto Chapel St and Cock St. Navigating the existing parked cars out onto the B1108 is already a hazard for residents.</p> <p>Current flooding issues that effect many residents will be exacerbated by an increase of 30% of dwellings in the village.</p>	Remove VC BAR2.	These issues have been responded to in relation to the specific supporting text paragraphs relating to those topics and in response to the proposed allocation policy itself.	1825	None proposed.

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Policy VC BAR2: Land at Chapel Street	3957	Support	We support the text in this policy which specifies the retention, protection and enhancement of the existing tree line.	n/a	Support noted.	1826	None proposed.

Policy VC BAR2: Land at Chapel Street	3910, 3935, 4005, 4011, 4013, 4036, 4043, 4056, 4080, 4081, 4090, 4091, 4093, 4095, 4159, 4187, 4189	Object	A number of issues are raised with the proposed allocation of VC BAR2: (1) concerns regarding flood risk, which has been an ongoing issue within the village, including the maintenance and effectiveness of the Barford Flood Alleviation Scheme; (2) Lack of capacity in the foul water system and no response from Anglian Water to the Regulation 19 Addendum. (3) Scheme will diminish the playing field rather than improve it. (4) Length of lease on the current village hall and the wording of the lease which requires a vote within the community before it can be surrendered, and the agreement of the Charity Commission. Also a desire for not only the hall to be provided freehold to the community, but also associated car park and the playing field. (5) Concerns over highways safety at the site access and on the wider highways network (road widths, lack of footways, parked vehicles, junction visibility etc.). (6) Impact on wildlife/biodiversity. (7) The consultation process was overly complex. (8) Scale of development is disproportionate and will be car dependent, due to a lack of facilities in the village/cluster. (9) Impact of heritage assets within the village.	Remove VC BAR2. Ensure that the playing field area is maintained. Make it explicit that the village hall should not be severed from the play area/playing field by the new access road. Clarify where a 20mph speed limit would apply.	(1) The VCHAP is supported by Strategic Flood Risk Assessment (and Water Cycle Study), the SFRA does not identify the site itself as being at risk. However, the size of the site (over 1.0ha) means that it will require a site-specific Flood Risk Assessment to accompany any planning application(s). In addition, the Lead Local Flood Authority has noted that the site is at the head of the surface water flow path, and development should therefore take the opportunity to reduce flood risk downstream. The development site can be used to attenuate flows and manage run off. The LLFA, Environment Agency and Anglian Water have all responded to the Regulation 19 Addendum, and no fundamental concern have been raised about this allocation in terms of increasing off-site risk. Owners of water courses which form part of the local Flood Alleviation Scheme have responsibilities in terms of their maintenance, details of which can be found on the Environment Agency and Norfolk County Council's websites. Key amongst these is letting water flow naturally and removing any blockages. Maintenance of ditches and watercourses is an aspect property maintenance, which like all others, may incur a cost on the owner. (2) Anglian Water has responded to the Regulation 19 Addendum, and has confirmed that it considers there is capacity to accommodate the two proposed allocations in Barford, but requested that the policy text for VC BAR2 be updated to encourage early engagement with Anglian Water to ensure that subsequent windfall development has not significantly reduced that capacity. (3 & 4) Several responses at the Regulation 18 'Focused Changes' stage and to this Regulation 19 Addendum noted that the playing field is often water logged, therefore currently limiting its use. Whilst the development of the land to the north would require an access road along the western side of the playing field, and possible relocation of the village hall adjacent to the existing play park, the intention is to retain the current sports pitch and create a more useable space/facility for the longer term. Events are also able to make use of the adjacent Village Hall e.g. for catering, toilets etc. Whilst there is over 35 years currently left on the village hall lease, the shortening time period makes it increasingly difficult for the Village Hall Committee to secure grants for maintaining and improving to the facilities for the future. In terms of the lease, the proposed allocation policy makes it clear that there should be continuity of use between the current and new village halls, as such the site promoters do not consider that the clause in the lease requiring a community referendum would be invoked. Discussions have also commenced with the Charity Commission.	1827	Whilst the Council does not consider it to be a soundness issues, the allocation policy could be amended to clarify that the transfer of the freehold applies to the village hall and associated land, including the playing field. Also, the fourth bullet point of the proposed policy could be expanded to specifically refer to enhancement of landscaping on the northern site boundary. The Council considers the wording of bullet point 1 of the proposed allocation policy addresses the issue of the new village hall being located close to the play area, to facilitate their combined use; however, whilst the Council does not consider it a soundness issue, the bullet point could be modified to make it explicit that the access road should not create a severance between these facilities.
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Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
					<p>(5) Norfolk County Council as Highways Authority has not raised any concerns regarding either the access to the site or the network capacity/safety within the village, subject to the requirements set out in the proposed allocation policy. Existing issues should be addressed through appropriate channels. (6) The site is not identified as being of particular importance for wildlife and the proposed allocation policy seeks the retention of biodiversity features as far as possible, in any event any future application(s) will be tested against relevant national and local development management policies and will need to demonstrate biodiversity net gain (BNG). (7) The Regulation 19 process is, by its nature, formal and the Council needs to comply with the relevant Regulations and approach set out in the Statement of Community Involvement (SCI). Guidance notes and FAQs were prepared to assist with understanding the process and completing representations. Council officers were available throughout the 8-week publication period to offer help and support via email, telephone or in person at the Council offices. (8) No allocations in Barford have been developed through either the 2003 or 2015 Local Plans, as such Barford has seen little planned growth in comparison to other villages of a similar size, the proportion of development also needs to be seen in the context of the cluster as a whole and the fact that no planned growth is allocated to the other cluster settlements. Whilst the proportion of growth is higher than the average across the village clusters, it reflects the location of the available, suitable and deliverable sites. The level of services and facilities in Barford is typical of the Village Clusters, with Barford having a better public transport connection to Norwich than many, plus local employment opportunities. The Village Clusters approach has been endorsed through the examination and adoption of the Greater Norwich Local Plan, which directs 92% of new allocations to larger settlements, and alternative approaches to distributing sites across the South Norfolk Village Clusters is tested through the VCHAP Sustainability Appraisal. (9) A Heritage Impact Assessment has been produced to support the proposed allocation, to a methodology agreed with Historic England. Whilst Historic England has raised concerns over the wording of archeology criteria in the VCHAP, they have no fundamental objection to the allocation of VC BAR2.</p>		

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Policy VC BAR2: Land at Chapel Street	4123, 4166	Object	<p>Looking first at VC BAR2, Land at Chapel Street, Barford we note that the Parish Council has raised what appear to be significant concerns regarding the development of this potential allocation. In its response (representation ID 3910) to the Regulation 19 Addendum, the Council states:</p> <p>“The site is unlikely to be available within 5 years. There is a 99-year lease (36 years remaining) which requires (unlikely) agreement by the villagers and the Charity Commission before it is surrendered.”</p> <p>On the basis of the above, this proposed allocation could not be considered deliverable as defined by the NPPF. Whilst the Parish Council refer to development of the site not being achievable within 5 years, based on the information they have provided it is difficult to see how it could be considered capable of coming forward during the plan period at all.</p>	Consider reasonable alternatives not covered by the VCHAP process.	Responses to the concerns raised by Barford & Wramplingham Parish Council are covered in the response to their representation on proposed Policy VC BAR2. It is noted that that the sites promoted as alternative allocations in these representations are in a locations covered by the GNLP allocation process. As such the sites have already been assessed and tested as part of preparation of the GNLP. The GNLP makes a specific requirement, within the overall strategy for development, for at least 1,200 homes in the South Norfolk Village Clusters, which these sites would not help to fulfil.	1829	None proposed.
Policy VC BAR2: Land at Chapel Street	4134	Support	<p>Current data shows limited capacity at Barford Water Recycling Centre (WRC). While there may be some room for limited growth, the proposed allocations and resulting increase in foul water flows pose the potential risk of harm to the waterbody receiving treated effluent from Barford WRC.</p> <p>We therefore recommend including within policies VC BAR1 and VC BAR2 the requirement for developers of the site to enter into early engagement with Anglian Water in order to demonstrate there is sufficient capacity in the network and receiving WRC to accommodate foul flows from the development.</p>	Include a requirement for in VC BAR2 (and VC BAR1) for developers of the site to enter into early engagement with Anglian Water in order to demonstrate there is sufficient capacity in the network and receiving WRC to accommodate foul flows from the development.	Whilst capacity is identified at the Water Recycling Centre to accommodate the planned growth, the representation from Anglian Water has noted that windfall development within the catchment may erode this capacity over time.	1830	Whilst it does not consider this a Soundness issue, the Council would not object to an additional criterion in Policy VC BAR2 to require a flood and drainage strategy to be submitted for the site, which should be supported by a recent pre-planning engagement assessment from Anglian Water.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC BAR2: Land at Chapel Street	3986	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 revised Heritage Impact Assessment for the site. In particular we note that built development will now be limited to the northern part of the site with the southern area being retained as playing field, play area and village hall. This is reflected in the policy wording and supporting text of the Plan. This revised site layout will help to protect the setting of the farmhouse by providing breathing space around the asset.</p> <p>There is still no criterion in relation to archaeology in the policy. As previously advised there should also be a requirement for archaeological desk-based assessment to inform any planning application and investigation prior to commencement of development.</p>	Add criterion in relation to archaeology.	<p>The Council welcomes the broad support for Policy VC BAR2 regarding protecting the setting of the Listed School Farmhouse and associated buildings. In terms of archaeology, the Council considers the requirement for a desk-based assessment in the supporting text is sound. The Council's</p> <p>experience is that the need for field evaluation prior an application being</p> <p>determined is rare and can be required under NPPF paragraph 200 (December 2023 version) if necessary.</p>	1831	The Council does not consider this to be a soundness issue as it is already covered by the NPPF (para 200, December 2023 version). However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.
Policy VC BAR2: Land at Chapel Street	4171	Object	<p>The proposed additional site for 40 dwellings is within the catchment for Barford-Chapel Street Water Recycling Centre (WRC). Based on current data, whilst there is limited headroom based on dry weather flow at the WRC for future growth, there is currently capacity for the proposed growth (VC BAR1/BAR2). To take account of cumulative growth in the catchment, including additional dwellings that might arise through windfall developments, we would welcome the supporting text to encourage the developer to undertake early pre-planning engagement with Anglian Water to discuss network connections and network/WRC capacity.</p> <p>Anglian Water supports the requirement to alleviate flood risk given the site is identified at the head of a significant surface water flow path. The opportunities for providing overall betterment for the existing community should not be underestimated given the more frequent storms and intense rainfall experienced over the autumn and winter months (2023-24). Reducing surface water run-off can also help prevent ingress to our sewer networks and reduce the probability of surcharge events. Our experience over the winter of 2023-24 leading to the period between October 2022 and March 2024 was the wettest 18 months since records began - causing us to revise our expectations of the pace and scale at which climate change will impact our networks.</p>	The policy should be amended to require a flood and drainage strategy to be submitted for the site, which should be supported by a recent pre-planning engagement assessment from Anglian Water.	The Council notes Anglian Water's confirmation that the Barford-Chapel Street WRC has sufficient capacity to accommodate the proposed planned development in the VCHAP. However, the Council also notes the concerns regarding the potential cumulative impact of (windfall) development within the catchment of the WRC, although the need for relevant supporting text or a criterion in the proposed policy for the site was not previously raised at the Regulation 18 Focused Changes stage. The Council also notes the support for bullet point 5 of proposed Policy VC BAR2	1832	Whilst it does not consider this a Soundness issue, the Council would not object to an additional criterion in Policy VC BAR2 to require a flood and drainage strategy to be submitted for the site, which should be supported by a recent pre-planning engagement assessment from Anglian Water.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC BAR2: Land at Chapel Street	4110	Support	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).	n/a	Comments noted.	1833	None proposed.
Policy VC BAR2: Land at Chapel Street	4148	Object	Policy is inconsistent with paragraph 103 of the NPPF and Playing Fields Policy. The policy needs to ensure that the access road and replacement village hall shall not result in the loss of, or prejudice the use of, playing field unless it meets one of the exceptions in Sport England's Playing Fields Policy and paragraph 103 of the NPPF. The policy needs to ensure the replacement village hall and associated infrastructure will accord with exception 4 of our Playing Fields Policy, as well as according with criteria b of paragraph 103 of the NPPF.	<p>Submission of a masterplan that is incorporated into the site-specific policy which should demonstrate that the allocation will not lead to a loss of the playing field. In the event the site allocation results in a loss it is suggested that a criterion be added to the policy, stating that it must meet one or more of the five exceptions outlined in Sport England's Playing Fields Policy and paragraph 103 of the NPPF.</p> <p>Request that the first bullet point is revised as set out below:</p> <p>‘Delivery of a new village hall, prior to the loss of the existing village hall, (remove: close to the existing playground of a function) of equal or better quality and equivalent or greater quantity than the existing hall, in a suitable location with sufficient parking which does not prejudice the use of the playing field, and constructed to the latest environmental standards, and provided freehold to the community;’</p>	<p>The Council considers Policy VC BAR2 to be Sound.</p> <p>Several responses at the Regulation 18 'Focused Changes' stage and to this Regulation 19 Addendum noted that the playing field is often water logged, therefore currently limiting its use. Whilst the development of the land to the north would require an access road along the western side of the playing field, and possible relocation of the village hall adjacent to the existing play park, the intention is to retain the current sports pitch and create a more useable space/facility for the longer term. This has been included as a criteria in the policy.</p>	1835	None required.
Policy VC BAR2: Land at Chapel Street	3937	Support	Proposed sites in Barford and Swardeston will increase pressure on already constrained Humbleyard GP practice group. There are discussions currently ongoing between the Council and GP practices regarding mitigation. The ambulance service, EEASt, does not have capacity to accommodate the additional growth resulting from the proposed development combined with other developments in the vicinity. This development is likely to increase demand upon existing constrained ambulance services and nationally set blue light response times. The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth and demand generated by this development.	None specified. ICB encourages continued working with the LPA.	The Council welcomes the engagement from the Norfolk and Waveney Integrated Care System. The Council notes the potential impact the proposed development in the VCHAP on local healthcare provision. The Council also notes the current actions being taken to address potential capacity issues. The Council will continue to engage with the ICS as the VCHAP progresses and, where relevant, as site allocations progress through the planning application process.	1869	None required.

Bawburgh

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Services and Community Facilities, 2.3	3863, 3872, 3880, 3889, 4017	Object	<p>Council acknowledges that Bawburgh does not have a range of facilities.</p> <p>Bawburgh is not part of a village cluster. It is a village that stands in isolation from other villages in the district.</p> <p>Severely limited bus service with just one bus to Wymondham and back three times per week (Monday, Wednesday, and Friday), when it does run. Some respondents state this is weekly only.</p> <p>No evidence has been provided of an “on-demand service” for the village as claimed by the District Council.</p>	<p>Replace "a weekly bus service" with "an extremely limited bus service" or "There may be a single bus on one day in a week to Wymondham".</p> <p>Remove references to buses and on demand.</p>	<p>The Council does not consider the issues raised to relate to the Soundness of the Plan.</p> <p>The Council has amended the paragraph in question in response to the representations received during the initial Regulation 19 publication in 2023. The purpose of the VCHAP is to allocate development in rural villages to support the existing services and support their sustainability. While Bawburgh has been included by itself, this is because of the use of Primary School catchments to define the extent of Clusters.</p> <p>The amendments relating to access to public transport were also in response to representations during the previous Regulation 19 publication. The Council can find no evidence that the provision of bus services to Wymondham has changed and these services are still being advertised as outlined in the Plan.</p>	1834	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC BAW1REV: Land east of Stocks Hill	3875, 3883, 3893, 3898, 3904, 4016, 4162	Object	<p>The village cannot accommodate 35 dwellings which would increase the size of the village by more than 15% which is too large. No assessments have been undertaken.</p> <p>The density of housing would be twice that of recent developments, which are all bungalows and include social housing, and would be out of character with the rest of the village.</p> <p>The Parish Council has endorsed the need to reduce the number of dwellings to 15.</p> <p>The development would remove 1.97ha of Grade A agricultural land on a greenfield site.</p> <p>There are extremely limited public transport options in Bawburgh and very few facilities to warrant such a large increase in village.</p> <p>NPPF December 2023 has removed need for housing targets, therefore 1,200 homes is no longer required. This is now 'Advisory starting point' based on circumstances, therefore no basis for total number or buffer and could lead to oversupply.</p> <p>The type of houses proposed are inappropriate for a small village. In particular, the neo-Georgian and four/five bedroom houses would be obtrusive and out of keeping. Fifteen single-storey properties in a sympathetic style, similar to those in The Warren, should be the aim.</p>	<p>Reduce the site size to 1.4ha for 15 dwellings</p> <p>The justification for removing the Grade A land needs to be given.</p>	<p>The Council does not consider the issues raised to relate to the Soundness of the Plan and considers that these issues have been addressed in previous consultations.</p> <p>In summary, whilst there have been changes in national policy, local authorities are still expected to deliver housing in line with the Government's Standard Method. The GNLP has recently been adopted by the Council, including the requirement for at least 1,200 new homes in the South Norfolk Village Clusters.</p> <p>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 growth across Greater Norwich area, and therefore not considered disproportionate.</p> <p>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.</p> <p>The evidence base supporting the VCHAP has been reviewed and amended where appropriate where changes have been proposed as part of this Regulation 19 Pre-submission Addendum.</p> <p>The policy does include a requirement for any development on the site to make a positive contribution to the Bawburgh Conservation Area having regard for the Bawburgh Conservation Area Character Appraisal and Management Guidelines. The exact design of the dwellings on the site will be determined at the planning application stage in line with the Councils relevant Development Management policies and referred to guidelines.</p>	1873	None required.

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Policy VC BAW1REV: Land east of Stocks Hill	4172	Support	<p>Anglian Water notes the statement regarding potential phasing of this site beyond the early years of the Plan given that it is located within the catchment of Whitlingham WRC. Anglian Water has a proposed growth scheme to increase dry weather flow capacity at Whitlingham WRC within our PR24 Business Plan for delivery in AMP8 (2025-2030). However, this investment is subject to final determination of our Business Plan by our regulator, Ofwat, which is due in December 2024. Whitlingham WRC has been identified as a nutrient significant plant and will require phosphate and nitrogen removal upgrades to technically achievable levels (TAL) by 1st April 2030. An accelerated infrastructure delivery scheme will deliver the phosphate element of the upgrade to TAL by 31st March 2027. This will reduce the amount of nutrient mitigation required for developments occupied after these dates.</p> <p>It is noted that the policy requirement for early engagement with Anglian Water has been removed.</p> <p>Support the requirement for a drainage strategy in the policy – it should be clarified that this assessment should include details of both surface water and foul drainage and with details to be agreed with Anglian Water in addition to the Lead Local Flood Authority.</p> <p>There are no sewers within the proposed site allocation.</p>	The drainage strategy criteria should be clarified that this assessment should include details of both surface water and foul drainage and with details to be agreed with Anglian Water in addition to the Lead Local Flood Authority.	<p>The Council welcomes the support for the amendments made to Policy VC BAW1REV.</p> <p>The Council does not consider that the suggested amendment to the drainage strategy criteria is necessary for Soundness. However, should the Inspector be minded to include this amendment the Council would not object to its inclusion.</p>	1842	The Council does not consider that the suggested amendment to the drainage strategy criteria is necessary for Soundness. However, should the Inspector be minded to include this amendment the Council would not object to its inclusion.
Policy VC BAW1REV: Land east of Stocks Hill	4135	Support	Given the potential capacity issues around Whitlingham WRC, we request the requirement for early engagement between Anglian Water and the developer is retained in the policy text.	Request the requirement for early engagement between Anglian Water and the developer is retained in the policy text.	<p>The Council does not consider the issue raised to relate to the Soundness of the Plan.</p> <p>The requirement for early engagement with Anglian Water was removed following representations made by Anglian Water during the initial Regulation 19 publication as the requirement was not considered to be necessary. As part of this Regulation 19 publication, Anglian Water have raised concerns over its removal.</p>	1841	None required.
Policy VC BAW1REV: Land east of Stocks Hill	3846	Support	Support this revision to enable to deliver these policy objectives whilst retaining existing trees and shrubs as far as practical.	None stated.	The Council welcomes the support for the amendments made to Policy VC BAW1REV.	1840	None required.

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VC BAW1REV, 2.11	3874, 3882	Object	<p>The village is small and isolated. It cannot be clustered with another village.</p> <p>The NPPF has been removed and so there are no targets and gaps to be filled by VCHAP.</p> <p>The development would contravene the SBLZ.</p>	Remove the village from the cluster plan.	<p>The Council does not consider the issues raised to relate to the Soundness of the Plan and considers that these issues have been addressed in previous consultations.</p> <p>In summary, whilst there have been changes in national policy, local authorities are still expected to deliver housing in line with the Government's Standard Method. The GNLP has recently been adopted by the Council, including the requirement for at least 1,200 new homes in the South Norfolk Village Clusters.</p> <p>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.</p> <p>The Southern Bypass Protection Zone 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.</p>	1872	None required.
VC BAW1REV, 2.11	3865, 3892, 4019	Object	<p>The site is proposed to be increased from 1.4 hectares to 1.97 hectares (an increase of 41% to reflect a lower density in the village). The most recent development adjacent to the Village Hall was developed at 9 units per hectare and the new site is now promoted at 18 units per hectare – twice that previously approved. A development of 15 units could be achieved in the original 1.4 hectares at the previously approved density.</p> <p>Loss of highest grade agricultural land is contrary to planning policy.</p> <p>More development area equals greater flood risk from water run off due to more tarmac and concrete and loss of habitats/productive agricultural land</p>	Area of 1.4ha allocated for 15 dwellings.	<p>The Council does not consider the issues raised to relate to the Soundness of the Plan.</p> <p>The proposed increase in site area to reduce density on the site has been incorporated following the response received during the initial Regulation 19 publication where concerns were raised over the density on the site being too high. However, the Council must also balance the need to make effective use of land for development, and on balance the proposed density is considered to meet the planning balance.</p> <p>The site in question is noted as being Grade 3 agricultural land and is therefore not considered to be the highest quality land for agriculture. Any sites of high quality were discounted at the site assessment stage.</p> <p>The site is located within Flood Zone 1 and no concerns have been raised through the Strategic Flood Risk Assessment or by the Lead Local Flood Authority.</p>	1839	None required.

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VC BAW1REV, 2.11	3845	Support	Support this revision to deliver a larger site area to achieve lower density with high quality design and accentuate the view cone through the site in landscaping terms.	None stated.	The Council welcomes the support for this amendment to Policy VC BAW1REV.	1838	None required.
VC BAW1REV, 2.5	3864, 3873, 3881, 3891, 4018	Object	<p>Second access is opportunistic and unlikely to be supported by the police on health & safety grounds given its location and remoteness. A new footpath would need to be lit during winter to ensure safety of pupils. There is no indication of how such a footpath would be maintained, with such a proposal most likely to be unacceptable to the residents' management company for the site. It would require either the landowner or highway authority to maintain – there does not seem to be evidence of any such consultation or commitment to such a path.</p> <p>Unlikely to be much need for it for at least a decade as school is at capacity. Plus when children leave primary there is no public transport to secondary school.</p>	Remove reference to footpath.	<p>The Council does not consider the issues raised to relate to the Soundness of the Plan.</p> <p>The requirement for a second access to the primary school has been included following responses from the Norfolk County Council Education Team during the Regulation 18 Alternative Sites and Focused Changes consultation. The provision of this new access will provide further opportunities for pupils to access the school through sustainable means.</p> <p>No objections to this requirement have been raised by Norfolk County Councils Highways. Any issues relating to the lighting of the footpath and its maintenance will be determined through the planning application process.</p>	1837	None required.
VC BAW1REV, 2.5	3844	Support	Support this revision to enable to deliver a foot stroke cycle linked to primary school should they require.	None stated.	The Council welcomes the support for this amendment to VC BAW1REV.	1836	None required.

Ditchingham, Broome, Hedenham and Thwaite

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC DIT1 REV	3856	Object	Ditchingham Parish Council objected to the original proposal unless the access is changed from Hamilton Way. The Council repeats its objection with the extra proposed dwellings.	No more dwellings should access the site via Hamilton Way/Rider Haggard Way. Instead access should be via Waveney Road or Thwaite Road.	<p>The Council does not consider the issue raised to relate to the Soundness of the Plan.</p> <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 have included consideration of preferred allocation site alongside the permitted scheme at Hamilton Way (2018/0121 and 2019/1925) and have led to the site-specific policy criterion. During consideration of outline 2018/0121 the applicants advised that access from Waveney Road was not feasible due to land ownership issues. Norfolk County Council have expressed support for the site to be accessed via Hamilton Way and confirm that this is the appropriate access for this site.</p>	1843	None required.
VC DIT1 REV, 3.19	3958	Support	We strongly support the inclusion of this paragraph stating that any potential impacts on the CWS and SSSI will need to be mitigated.	None stated.	The Council welcomes the support for the inclusion of this paragraph.	1716	None required.
Policy VC DIT1REV: Land at Thwaite's and Tunneys Lane	4173	Support	<p>Anglian Water supports the policy requirement for early engagement for development at this site. There is limited dry weather flow permit headroom at the WRC to accommodate future growth in the catchment. As a result, the increase in the number of dwellings on the site, together with VC BRM1 and any additional windfall development coming forward, may cumulatively result in insufficient headroom being available at the WRC. Ditchingham WRC does not have an identified growth scheme for AMP8 (2025-2030) in our PR24 Business Plan. Therefore, should a growth scheme be required it would not be delivered until beyond 2030, and development would need to be phased accordingly.</p> <p>The additional area identified to increase capacity of the site, impacts on another sewer (surface water) crossing the site, in addition to the foul sewer and water main. The policy requirement is therefore essential to ensure the protection of our assets and that they are appropriately accommodated within the development layout design.</p>	None proposed.	The Council welcomes the support for this policy criteria and the continued engagement from Anglian Water throughout the preparation of the VCHAP.	1717	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC DIT1REV: Land at Thwaite's and Tunneys Lane	4136	Support	<p>As mentioned in our response to the VCHAP Alternative Sites & Focused Changes Regulation 18 Consultation, there are currently capacity issues at Ditchingham WRC. We are pleased to see the potential need for phasing to allow for upgrades to Ditchingham WRC due to the cumulative impact of recent and planned growth referred to in paragraph 3.18, although reference to potential phasing has been removed from the policy wording for VC DIT1REV.</p> <p>For consistency and clarity, we recommend the wording of VC DIT1REV regarding "Early engagement with Anglian Water" is changed to reflect the wording for VC BRM1.</p>	Recommend the wording of VC DIT1REV regarding "Early engagement with Anglian Water" is changed to reflect the wording for VC BRM1.	The Council welcomes the support for the policy but does not consider the issue raised to be a Soundness issue. The policy criteria referred to has been prepared to reflect the specific issues noted on the site and has been supported by Anglian Water through this publication.	1718	None required.
Policy VC DIT1REV: Land at Thwaite's and Tunneys Lane	4106	Support	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).	None proposed.	Criteria 5 of the policy includes a requirement for a flood risk strategy to inform the layout of the site. Specific requirements for the site should be identified through this at the planning application stage.	1719	None required.
Policy VC DIT1REV: Land at Thwaite's and Tunneys Lane	4009	Object	<p>The extension to site VC DIT1 REV is not a sound amendment to the VCHAP. The site extension leads to isolated homes, obstructed views and the proposed access is not appropriate</p> <p>Other sites such as the land adjoining Wildflower Way represent more sustainable allocations. The site is well related to services and the townscape, and has few constraints.</p> <p>Without consulting on wider sites to cover the projected housing land shortfall, we consider the plan unsound, and legally non-compliant and that it has not been prepared in compliance with the duty to cooperate.</p>	The extension to site VC DIT1 REV is not a sound amendment to the SNVC Housing Allocations Plan. Other sites such as the land adjoining Wildflower Way represent a more sustainable allocation. Without consulting on wider sites to cover the projected housing land shortfall, we consider the plan unsound, and legally non-compliant and that it has not been prepared in compliance with the duty to cooperate.	This representation relates to a site that is not included within this Regulation-19 pre-submission publication version of the VCHAP. In accordance with the agreed criteria used to assess all sites assessed as part of the preparation of the VCHAP, this site was assessed during earlier stages of the plan-making process and concluded that it was not suitable for inclusion in the VCHAP. It was concluded as part of the site assessment that the site would represent an extension into open countryside with limited screening to reduce impact. This is considered to have a detrimental impact upon the form and character of the settlement and landscape overall. The VCHAP currently allocates 1,330 dwellings, providing a buffer of 130 dwellings over the 1,200 requirement. Therefore, the Council considers that the VCHAP is sound and is not looking to allocate any further sites for allocation.	1720	None required.
Policy VC DIT1REV: Land at Thwaite's and Tunneys Lane	3987	Object	<p>We welcome the preparation of the HIA for the site and the reference to archaeological investigation prior to commencement of development on site in paragraph 3.20.</p> <p>The current reference to archaeology at criterion 6 is insufficient. We suggest that the wording is slightly amended to read: Norfolk's Historic Environment Service is consulted prior to application to determine the need for any archaeological assessments.</p>	We suggest that the wording is slightly amended to read: Norfolk's Historic Environment Service is consulted prior to application to determine the need for any archaeological assessments.	The Council welcomes the continued engagement from Historic England throughout the preparation of the VCHAP. In terms of archaeology, the Council considers that bullet point 6 is sound. Policy VC DIT1 REV 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 194 if necessary.	1721	The Council does not consider a modification to the policy to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC DIT1REV: Land at Thwaite's and Tunneys Lane	4020	Object	<p>Policy VC DIT1 REV is currently unsound; as it is inconsistent with national policy (NPPF paragraph 218), and the adopted Development Plan in Norfolk (policy CS16 of the Norfolk Minerals and Waste Core Strategy), in relation to mineral resource safeguarding. Proposed allocation VC DIT1 REV is over 2ha in size and underlain by a safeguarded mineral resource. Therefore, the allocation of the site for development without policy requirements to avoid needless sterilisation of the mineral is not consistent with national policy.</p> <p>Recognise that reference to underlain mineral resource has been included in the supporting text, however, we request inclusion of a requirement to avoid needless sterilisation of the mineral resource in the policy itself.</p>	<p>In order to include measures to avoid needless sterilisation of the safeguarded mineral resources, in accordance with paragraph 218 of the NPPF, the policy wording for this site should be amended to include the following as a policy requirement:</p> <p>‘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.’</p>	The Council notes the comment of the Mineral Planning Authority but does not consider this to be a soundness matter. The Council has included within the supporting policy text reference to the site being underlain, or partially underlain by safeguarded resources and has highlighted the need for development to comply with the relevant policy within the Minerals and Waste Local Plan. It is not considered necessary to repeat this information within the site-specific text as all development is required to comply with the requirements of the Local Plan, which includes the Minerals and Waste Local Plan.	1722	The Council does not consider the issues raised within the response of Norfolk County Council Mineral Planning Authority to be soundness matters however should the Inspector be minded to modify Policy VC DIT1 REV the Council suggests the following addition to the policy wording: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - ‘safeguarding’ (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority".
Policy VC DIT1REV: Land at Thwaite's and Tunneys Lane	3940	Support	<p>4 villages where most local GP practice is located across the local authority border in East Suffolk, of which 2 will be affected by any population increases. These practices are either currently working through a planning application for an extension funded by CIL or are in early discussions about a potential premises scheme via a potential application for CIL funding.</p> <p>The ambulance service, EEAST, does not have capacity to accommodate the additional growth resulting from the proposed development combined with other developments in the vicinity. This development is likely to increase demand upon existing constrained ambulance services and nationally set blue light response times. The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth and demand generated by this development.</p>	None specified. ICS would encourage continued working with LPA.	<p>The Council welcomes the engagement from the Norfolk and Waveney Integrated Care System.</p> <p>The Council notes the potential impact the proposed development in the VCHAP on local healthcare provision. The Council also notes the current actions being taken to address potential capacity issues.</p> <p>The Council will continue to engage with the ICS as the VCHAP progresses and, where relevant, as site allocations progress through the planning application process.</p>	1846	None required.
Policy VC DIT1REV: Land at Thwaite's and Tunneys Lane	3984	Object	The Highway Authority previously expressed support for access to the site via Hamilton Way to the south. The access from Hamilton Way through the consented development (2019/1925) does not extend to the allocation boundary, potential resulting in an undeliverable allocation.	The boundary of VCDIT1 requires modification to ensure it can be accessed from the estate road of application 2019/1925.	<p>The Council notes the representation however does not consider this to be a Soundness issue.</p> <p>Following from a similar representation being raised during the previous Regulation 19 Publication and this Addendum, the Council has contacted the landowner of this site and they have confirmed that they own the land that is being referred to and have provided the title to provide this as part of their Delivery Statement. The Council therefore does not view this as a risk to the delivery of the site.</p>	1876	None required.

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VC BRM1, 3.24	3975	Object	It is stated that the development would be required to deliver additional traffic calming features. These are unnecessary as traffic calming is already in place in the road next to the allocation. There are two traffic islands which force traffic onto a single carriageway road as shown in the photograph (see attachment). More traffic calming in the locality would be unnecessary and ineffective.	Remove allocation and allocate SN0346, or allocate SN0346 as well as current allocation to ensure that the plan is effective.	The Council considers the policy to be Sound. 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 have led to the criteria in the Policy, including the traffic calming measures.	1723	None required.
VC BRM1, 3.25	3974	Object	<p>The supporting text to the draft policy references an LVA submitted with the proposed allocation, without suggesting how the landscape impact of the proposal could actually be mitigated.</p> <p>It is not clear what is meant by a 'gateway' means or if this is appropriate in this landscape context for a settlement of this size. The development is unlikely to be more than one house deep fronting the road and this creates difficulty in creating a built gateway feature as the scope for development is limited.</p> <p>We do not consider that a landscape buffer is appropriate, because the introduction of new landscaping itself would represent a significant change in this open landscape. Landscaping is likely to be the responsibility of, or in the control of, individual householders making it more difficult to maintain landscaping in the long term.</p> <p>Consider that the landscaping clause (necessary to make this allocation acceptable) will be ineffective and in the long term any solution will be likely to fail.</p>	Remove allocation and allocate SN0346, or allocate SN0346 as well as current allocation to ensure that the plan is effective.	<p>The Council considers the policy to be Sound. As stated, an LVA has been prepared to support the allocation. While this does acknowledge there is the potential for some landscape impacts, it also states that views to</p> <p>the north are somewhat limited by the rising slope and to the south are limited by a house on a large plot. The supporting text and policy criteria 3 have been prepared to ensure that impacts on the open countryside are limited. The site will be developed at a relatively low density and therefore the Council considers there should be adequate scope for the provision of landscape mitigation. Detailed plans on the specific landscaping will be developed through the planning application process.</p>	1724	None required.
VC BRM1, 3.27	3900	Object	<p>Policy VC BRM1: Land west of Old Yarmouth Road</p> <p>The text says, 'The developer is therefore encouraged to enter into early engagement with AW regarding this matter'. This should be stronger – to say 'must'.</p>	<p>Policy VC BRM1: Land west of Old Yarmouth Road</p> <p>The text says, 'The developer is therefore encouraged to enter into early engagement with AW regarding this matter'. This should be stronger – to say 'must'.</p>	The Council does not consider the issue raised to be a Soundness issue. The policy criteria referred to has been prepared to reflect the specific issues noted on the site and has been supported by Anglian Water through this publication.	1731	None required.
Policy VC BRM1: Land west of Old Yarmouth Road	4174	Support	Anglian Water supports the policy requirement for early engagement for development at this site. There is limited dry weather flow permit headroom at the WRC to accommodate future growth in the catchment. As a result, this additional site, together with VC DIT1REV and any additional windfall development coming forward, may cumulatively result in insufficient headroom being available at the WRC. Ditchingham WRC does not have an identified growth scheme for AMP8 (2025-2030) in our PR24 Business Plan. Therefore, should a growth scheme be required it would not be delivered until beyond 2030, and development would need to be phased accordingly.	None proposed.	The Council welcomes the support for this policy criteria and the continued engagement from Anglian Water throughout the preparation of the VCHAP.	1725	None required.

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Policy VC BRM1: Land west of Old Yarmouth Road	4160	Support	On behalf of the landowner, Durrants can confirm that the land required to deliver VCBRM1 remains available. The site represents a sustainable location for development in Broome, following the recent completion of the properties adjacent. Importantly, it is positioned away from Broome Heath, a SSSI and County Wildlife Site, as well as benefiting from an existing footpath connection and traffic calming measures which are already in place. The allocation can be readily delivered, and the landowner remains committed to bringing the site forward for development.	None proposed.	The Council welcomes the support for Policy VC BRM1 and the confirmation that the site is available for allocation and development.	1726	None required.
Policy VC BRM1: Land west of Old Yarmouth Road	4109	Support	Major development - Byelaw 3 applies to any proposed discharge of surface water from the proposed site. All other Board Byelaws will also apply to this development.	None proposed.	Criteria 4 of the policy includes a requirement for a flood risk strategy to inform the layout of the site. Specific requirements for the site should be identified through this at the planning application stage.	1727	None required.
Policy VC BRM1: Land west of Old Yarmouth Road	3988	Object	<p>We welcome the preparation of the HIA. The HIA recommends that archaeological investigation should be required prior to development commencing. The recommendations of the HIA in relation to archaeology should be included in the policy requirements.</p> <p>The current reference to archaeology at criterion 6 is insufficient. We suggest that the wording is slightly amended to read:</p> <p>Norfolk's Historic Environment Service is consulted prior to application to determine the need for any archaeological assessments.</p>	<p>Amend criterion in relation to archaeology to read:</p> <p>Norfolk's Historic Environment Service is consulted prior to application to determine the need for any archaeological assessments.</p>	The Councils welcomes the continued engagement from Historic England throughout the preparation of the VCHAP. In terms of archaeology, the Council considers that bullet point 6 is sound. Policy VC BRM1 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 194 if necessary.	1728	The Council does not consider a modification to the policy to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.
Policy VC BRM1: Land west of Old Yarmouth Road	3959	Object	This allocation is in close proximity to Broome Heath County Wildlife Site (CWS)/Broome Heath Pit Site of Special Scientific Interest (SSSI) and as such could have an impact on these site. Impacts on these sites will need to be adequately mitigated. We recommend that text similar to that inserted at paragraph 3.19 are included in this policy.	This allocation is in close proximity to Broome Heath County Wildlife Site (CWS)/Broome Heath Pit Site of Special Scientific Interest (SSSI) and as such could have an impact on these site. Impacts on these sites will need to be adequately mitigated. We recommend that text similar to that inserted at paragraph 3.19 are included in this policy.	The Council does not consider the issue raised to be a Soundness issue. The site is some distance from the designated sites and the impact on these sites will be limited due to the small nature of the development. However, should the Inspector be minded to modify Policy VC BRM1 or the supporting text the Council would not object to the wording as recommended by Norfolk Wildlife Trust.	1730	The Council does not consider the issue raised to be a Soundness issue. However, should the Inspector be minded to modify Policy VC BRM1 or the supporting text the Council would not object to the wording as recommended by Norfolk Wildlife Trust.

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Policy VC BRM1: Land west of Old Yarmouth Road	4194	Object	Light pollution: The site is on the edge of a settlement. Particular care and attention need to be given to any proposals for external lighting as well as any design that has a lot of glazing. Lighting in such edge of settlement areas needs to be fully justified, serve a specific purpose, be of the right design and intensity so as to not affect dark skies, such as the intrinsic dark skies of the Broads. Reference to lighting being only needed if fully justified and well designed needs to be made in relevant policies, especially the following as they are close to, albeit separated from, the Broads. Also, design with lots of glazing need to be avoided unless there is going to be automated shades incorporated into the design.	We recommend that for sites on the edge of settlement you include wording such as: 'Given that this site is on the edge of the settlement, particular care and attention will be given to lighting of such schemes. This includes external lighting, as well as mitigation for designs with lots of glazing. Schemes will need to fully justify the need for lighting, provide detail of the design and ensure that lighting is on only when it is needed, and designed to not add to light pollution. Designs with a lot of glazing are required to provide mitigation in the form of automated shades that are shut between dusk and dawn.'	The Council does not consider this to be a Soundness issue. An LVA has been prepared to support this allocation and any mitigation measures relating to the wide landscape needed to make the policy Sound have been incorporated into the policy. Any issues relating to external lighting will be considered at the planning application stage through the application of South Norfolk Development Management Policy DM 3.13 Amenity, Noise and Quality of Life. A specific requirement relating to lighting is not considered to be appropriate by the Council and too prescriptive at this stage.	1732	None required.
Policy VC BRM1: Land west of Old Yarmouth Road	3903, 3976, 3977, 3978	Object	<p>Objects to the Allocation of Site VCBRM1 on the basis that it is not justified in view of a more sustainable alternative and the allocation is not consistent with national planning policy which sets a presumption in favour of sustainable development. Concerns that certain elements of the policy will not be effective and the allocation will not meet the 'test of soundness'.</p> <p>Allocation would harm rural character through extension into countryside and interrupting views. There is limited scope for integration.</p> <p>Site is a long distance from facilities. Other sites provide opportunities for sustainable access.</p> <p>Site SN0346 provides more opportunities for landscaping, BNG and more dwellings if necessary. Footway along Old Yarmouth Road which extends into village and is well located to existing village, Site is flat and free of constraints, with good visibility for access. Site is closer to local services and away from Conversation Areas and Listed Buildings, is fully within Flood Zone 1. Is part of Local Nature Reserve however the allocated land is arable.</p>	Continue to consider that SN0346 in the Ditchingham and Broome Cluster would be a more sustainable allocation and object to this site having been discounted without sufficient justification in favour of a less sustainable alternative. We do not consider that this is a decision which should be found to be 'sound'. Site SN0346 is more central in the village of Broome and is well related to the built-up area. Moreover, the development of site SN0346 would be less harmful to the character of the open countryside. Site SN0346 is more sustainable than the draft allocation site, since it is closer to facilities such as shops, bus services, and the Primary School.	<p>The Council considers the allocation VC BRM1 to be Sound. The site</p> <p>reflects the existing built form seen on Old Yarmouth Road and could contribute to the area becoming a gateway for the village. The footpath along the site frontage will provide access to local services and facilities.</p> <p>SN0346 was discounted at the site assessment stage due to the site being a designated Local Nature Reserve. The site also forms part of the setting of Broome Heath which is a County Wildlife Site, with access to the rear of the site. Development in this location is considered to have a detrimental impact upon the landscape and ecology and was therefore not considered a suitable option for development.</p>	1739	None required.

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Policy VC BRM1: Land west of Old Yarmouth Road	4124, 4167	Object	<p>At paragraph 3.18 there is reference to a potential constraint to development of this proposed allocation, as Anglian Water infrastructure crosses the site. It states that “the developer is encouraged to enter into earlier engagement with AW”. We note the objection from the Broads Authority (representation ID 3900) stating that wording should be strengthened such that a developer ‘must’ enter into early engagement with Anglian Water over this matter. Regardless, whether text states ‘should’ or ‘must’ it is unclear at this juncture from the Regulation 19 Addendum whether the proposed allocation is deliverable.</p> <p>Separately, we note an objection from Norfolk Wildlife Trust (representation ID 3959) in relation to the proposed allocation’s proximity to Broome Heath County Wildlife Site (CWS) and Broome Heath Pit Site of Special Scientific Interest (SSSI), and the potential impact of development on these.</p> <p>Whilst Norfolk Wildlife Trust recommend additional policy text is added to require mitigation of any impact, it is again not clear if development of the site as the current draft policy envisages and incorporating the requisite mitigation is deliverable.</p>	Reasonable alternatives such as GNLP3033, GNLP0321 and GNLP1032 clearly should have been considered. these are evidently sustainable sites for development. There is no evidence to suggest they are unsuitable.	<p>The Council considers Policy VC BRM1 to be Sound.</p> <p>Paragraph 3.18 referred to relates to VC DIT1 REV and therefore is not applicable to this allocation.</p> <p>The Council acknowledges the response from Norfolk Wildlife Trust but does not consider this to be a Soundness issue (see response ID 1730).</p> <p>Sites GNLP3033, GNLP0321 and GNLP1032 as stated in the attached reports are located within Long Stratton and Framingham Earl/Poringland respectfully, which are areas that do not form part of the VCHAP and have been included within the Greater Norwich Local Plan as a Key Service Centre/Village. Therefore these sites have not been considered for allocation as part of the preparation of the VCHAP.</p>	1741	None required.
Policy VC BRM1: Land west of Old Yarmouth Road	3941	Support	<p>4 villages where most local GP practice is located across the local authority border in East Suffolk, of which 2 will be affected by any population increases. These practices are either currently working through a planning application for an extension funded by CIL or are in early discussions about a potential premises scheme via a potential application for CIL funding.</p> <p>The ambulance service, EEASt, does not have capacity to accommodate the additional growth resulting from the proposed development combined with other developments in the vicinity. This development is likely to increase demand upon existing constrained ambulance services and nationally set blue light response times. The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth and demand generated by this development.</p>	None specified. ICS would encourage continued working with LPA.	<p>The Council welcomes the engagement from the Norfolk and Waveney Integrated Care System.</p> <p>The Council notes the potential impact the proposed development in the VCHAP on local healthcare provision. The Council also notes the current actions being taken to address potential capacity issues.</p> <p>The Council will continue to engage with the ICS as the VCHAP progresses and, where relevant, as site allocations progress through the planning application process.</p>	1847	None required.

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Policy VC BRM1: Land west of Old Yarmouth Road	4164	Object	<p>Object to allocation due to following reasons:</p> <ol style="list-style-type: none"> 1. Erodes remaining countryside between Broome and Ellingham. 2. Means loss of arable farm land. 3. Is building in open landscape. 4. Sets no maximum number of houses. 5. There is other land available within the developed area of Broome. 	Removal of the 12+ allocation of housing for Yarmouth Road, Broome	<p>The Council notes the concerns of Broome Parish Council but considers that these have been addressed in previous consultations and does not consider that any new issues that have not been previously addressed have been raised.</p> <p>In summary, 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. 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. Any development on the site will need to meet the site-specific criteria, including any impacts on landscape and the need for frontage development.</p>	1864	None required.

Earsham

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Policy VC EAR2: Land north of The Street	3960	Support	We are pleased to note that this policy includes a specification for the retention, protection and enhancement of the existing vegetation and trees	None proposed.	The Council welcomes the support for this policy.	1733	None required.
Policy VC EAR2: Land north of The Street	4111	Support	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).	None proposed.	Criteria 5 of the policy includes a requirement for a flood risk strategy to inform the development of the site. Specific requirements for the site should be identified through this at the planning application stage.	1734	None required.
Policy VC EAR2: Land north of The Street	4195	Object	Light pollution: The site is on the edge of a settlement. Particular care and attention need to be given to any proposals for external lighting as well as any design that has a lot of glazing. Lighting in such edge of settlement areas needs to be fully justified, serve a specific purpose, be of the right design and intensity so as to not affect dark skies, such as the intrinsic dark skies of the Broads. Reference to lighting being only needed if fully justified and well designed needs to be made in relevant policies, especially the following as they are close to, albeit separated from, the Broads. Also, design with lots of glazing need to be avoided unless there is going to be automated shades incorporated into the design.	We recommend that for sites on the edge of settlement you include wording such as: 'Given that this site is on the edge of the settlement, particular care and attention will be given to lighting of such schemes. This includes external lighting, as well as mitigation for designs with lots of glazing. Schemes will need to fully justify the need for lighting, provide detail of the design and ensure that lighting is on only when it is needed, and designed to not add to light pollution. Designs with a lot of glazing are required to provide mitigation in the form of automated shades that are shut between dusk and dawn.'	The Council does not consider this to be a Soundness issue. An LVA has been prepared to support this allocation and any mitigation measures relating to the wide landscape needed to make the policy Sound have been incorporated into the policy. Any issues relating to external lighting will be considered at the planning application stage through the application of South Norfolk Development Management Policy DM 3.13 Amenity, Noise and Quality of Life. A specific requirement relating to lighting is not considered to be appropriate by the Council and too prescriptive at this stage.	1736	None required.
Policy VC EAR2: Land north of The Street	3983	Object	<p>Policy VC EAR2 is currently unsound as it is inconsistent with national policy (NPPF paragraph 218), and the adopted Development Plan in Norfolk (policy CS16 of the Norfolk Minerals and Waste Core Strategy), in relation to mineral resource safeguarding.</p> <p>The proposed site allocation VC EAR2, is located within the consultation area for safeguarded mineral extraction site, Earsham Quarry, which is only 25m from the boundary of site VC EAR2 at the closest point. The quarry has permission for mineral extraction and processing until 2040. There is currently no reference to this in either the site assessment or the site policy.</p> <p>Proposed allocation site VC EAR2 also underlain by a safeguarded mineral resource, sand and gravel. However, as the site is less than 2 hectares in size, we do not consider that a policy requirement regarding investigation and prior extraction of mineral on the allocation site is necessary.</p> <p>However, the allocation of the site for development without policy requirements to protect the existing mineral extraction operation is not consistent with national policy. The agent of change principle (paragraph 193 of the NPPF) would also apply.</p>	<p>In order to include measures to avoid needless sterilisation of the safeguarded mineral resources, in accordance with paragraph 218 of the NPPF and consistency with the agent of change principle (paragraph 193 of the NPPF), the policy wording for this site should be amended to include the following as a policy requirement:</p> <p>'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 comment of the Mineral Planning Authority but does not consider this to be a soundness matter. The Council has included within the supporting policy text reference to the site being within proximity to Earsham Quarry but is separated from the mineral extraction site by the A143. It is not considered necessary to repeat this information within the site-specific text as all development is required to comply with the requirements of the Local Plan, which includes the Minerals and Waste Local Plan.	1737	The Council does not consider the issues raised within the response of Norfolk County Council Mineral Planning Authority to be soundness matters however should the Inspector be minded to modify Policy VC EAR2 the Council suggests the following addition to the policy wording: "The site is within the consultation area for a safeguarded mineral extraction site. Any future development on this site must not prevent or prejudice the use of the existing mineral extraction site unless suitable alternative provision is made, or the applicant demonstrates that the site no longer meets the needs of the aggregate industry".

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Policy VC EAR2: Land north of The Street	3989	Object	<p>We welcome the preparation of the HIA. The HIA recommends that archaeological investigation should be required prior to development commencing. The recommendations of the HIA in relation to archaeology should be included in the policy requirements.</p> <p>The current reference to archaeology at criterion 6 is insufficient. We suggest that the wording is slightly amended to read:</p> <p>Norfolk's Historic Environment Service is consulted prior to application to determine the need for any archaeological assessments.</p>	<p>Amend criterion in relation to archaeology to read:</p> <p>Norfolk's Historic Environment Service is consulted prior to application to determine the need for any archaeological assessments.</p>	The Council welcomes the continued engagement from Historic England throughout the preparation of the VCHAP. In terms of archaeology, the Council considers that bullet point 6 is sound. Policy VC EAR2 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 194 if necessary.	1738	The Council does not consider a modification to the policy to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.
Policy VC EAR2: Land north of The Street	4021	Support	<p>Additional information provided demonstrating that the frontage footpath and connection of the footpath to the existing can be delivered within the highway boundary and land owned by the County. There is also a triangular wooded area adjacent to the site that may require some trees/hedgerow cut back to facilitate the footpath. The title for this area is attached showing its owned by the County Council.</p> <p>Intend to submit a planning application for the site once the allocation is confirmed following undertaking all necessary supporting reports, surveys and design.</p> <p>Once permission is granted would look to be starting on site within 18 months. The delivery of the site should be two years from start.</p>	None proposed.	The Council welcomes the support for Policy VC EAR2 and the provision of evidence to show that the site is deliverable and achievable.	1742	None required.
Policy VC EAR2: Land north of The Street	4125, 4168	Object	<p>Note objection from Norfolk County Council (representation ID 3989) that this proposed allocation is located within the consultation area for the safeguarded mineral extraction site (Earsham Quarry), that this quarry is on 25m from the boundary of the proposed allocation, and that it has permission for mineral extraction and processing until 2040.</p> <p>The County Council requests additional policy text. However, it is not clear from the Regulation 19 Addendum if development of the site as the current draft policy envisages and incorporating the requisite mitigation is deliverable.</p> <p>Additionally, it is not clear what the impact of the existing quarry on the amenity of future occupiers of the proposed allocation would be, or whether this would be acceptable.</p>	Reasonable alternatives such as GNLP3033, GNLP0321 and GNLP1032 clearly should have been considered. these are evidently sustainable sites for development. There is no evidence to suggest they are unsuitable.	The Council considers Policy VC EAR2 to be Sound. The Council notes the objection from Norfolk County Council (ID 3983) but does not consider this to be a Soundness issue (see response ID 1737). The proximity to the quarry has been noted in the supporting text for the Policy.	1743	None required.

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Policy VC EAR2: Land north of The Street	4137	Support	Current data shows limited capacity at Earsham WRC. While there may be some room for limited growth, the proposed allocations and resulting increase in foul water flows pose the potential risk of harm to the waterbody receiving treated effluent from Earsham WRC. We therefore recommend including within policies VC EAR1 and VC EAR2 the requirement for developers of the site to enter into early engagement with Anglian Water in order to demonstrate there is sufficient capacity in the network and receiving WRC to accommodate foul flows from the development.	Recommend including within policies VC EAR1 and VC EAR2 the requirement for developers of the site to enter into early engagement with Anglian Water in order to demonstrate there is sufficient capacity in the network and receiving WRC to accommodate foul flows from the development.	The Council does not consider this to be a Soundness issue. Anglian Water have been engaged throughout the preparation of the VCHAP. At this stage they have acknowledged that there is sufficient capacity at the Earsham-Bungay Road WRC and that developers would need to engage with them as they normally would through the planning application process. Policy VC EAR1 was not subject to any proposed changes through the Pre-submission Addendum.	1758	The Council does not consider the issue raised to be a Soundness issue, however should the Inspector consider a modification is necessary to VC EAR2, the Council would not object to a modification to include the wording suggested by the Environment Agency.
Policy VC EAR2: Land north of The Street	4175	Support	The site is on the edge of the Earsham-Bungay Road WRC which has limited capacity. There is capacity for the proposed level of growth as there is sufficient dry weather flow headroom available at the WRC. The developer would need to engage with Anglian Water regarding connections for water supply and wastewater in the usual way. Support the need for a site-specific flood risk assessment because of the identified groundwater flood risk. There is a lack of legislation that governs this type of scenario and so Anglian Water have held multiple workshops and discussions about managing groundwater differently in the future.	None proposed.	The Council welcomes the support for this policy and the requirement for a site-specific flood risk assessment.	1759	None required.
Policy VC EAR2: Land north of The Street	3942	Support	4 villages where most local GP practice is located across the local authority border in East Suffolk, of which 2 will be affected by any population increases. These practices are either currently working through a planning application for an extension funded by CIL or are in early discussions about a potential premises scheme via a potential application for CIL funding. The ambulance service, EEAST, does not have capacity to accommodate the additional growth resulting from the proposed development combined with other developments in the vicinity. This development is likely to increase demand upon existing constrained ambulance services and nationally set blue light response times. The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth and demand generated by this development.	None specified. ICS would encourage continued working with LPA.	The Council welcomes the engagement from the Norfolk and Waveney Integrated Care System. The Council notes the potential impact the proposed development in the VCHAP on local healthcare provision. The Council also notes the current actions being taken to address potential capacity issues. The Council will continue to engage with the ICS as the VCHAP progresses and, where relevant, as site allocations progress through the planning application process.	1848	None required.

Gillingham, Geldeston, and Stockton

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VC GIL1REV, 5.12	3894	Object	The policy states: 'The boundary of the site incorporates areas at both surface and fluvial (Zones 2 and 3a) flood risk in the south-western corner and a remaining small area of tidal flooding in the southeast corner, which it is recommended are left undeveloped. Development of the site will require a site-specific Flood Risk Assessment (FRA) and strategy, to inform the layout of the site'. This should be made stronger and state 'which must be left undeveloped' as it is not acceptable to be allocating development in Zones 2 and 3a.	Policy should be made stronger and state to state the areas of flood risk 'which must be left undeveloped' as it is not acceptable to be allocating development in Zones 2 and 3a.	<p>The Council does not consider the issues raised to relate to the Soundness of the Plan.</p> <p>The site-specific policy states that "A site-specific Flood Risk Assessment (FRA) and strategy that has regard to the issues identified in the Stage 2 VC Strategic Flood Risk Assessment (SFRA), to inform proposals for the site and preparation of a Flood Warning and Evacuation Plan". The Council considers that this appropriately addresses the known flooding issues on the site and will ensure that areas of high flood risk are left undeveloped.</p> <p>However, should the Inspector be minded to, the Council would not object to amending the supporting text as suggested.</p>	1849	The Council does not consider the issues raised to relate to the Soundness of the Plan. However, should the Inspector be minded to, the Council would not object to amending the supporting text as suggested.
VC GIL1REV, 5.13	4196	Support	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).	None proposed.	The Council notes the proximity of the IDD and this has been acknowledged in the supporting text in paragraph 5.13. This paragraph also recommends early engagement with the IDB.	1746	None required.
VC GIL1REV, 5.14	3901	Object	It states; 'The developer of the site is recommended to enter into early engagement with Anglian Water...'. This should be stronger – to say 'must'.	It states; 'The developer of the site is recommended to enter into early engagement with Anglian Water...'. This should be stronger – to say 'must'.	The Council does not consider the issue raised to be a Soundness issue. Anglian Water have been engaged throughout the preparation of the VCHAP. Anglian Water have raised no concerns relating to this policy or the supporting as part of this publication.	1744	None required.
VC GIL1REV, 5.14	4176	Support	Anglian Water welcomes reference to the limited capacity of the Beccles-Marsh Lane WRC and the need for early engagement to determine whether there is sufficient capacity in the network and receiving WRC. Beccles-Marsh Lane WRC has been identified for investment in a growth scheme to increase dry weather flow capacity in the PR24 Business Plan for AMP8 (2025-2030). Our Business Plan is subject to final determination by our regulator, Ofwat – this is expected in December 2024.	None proposed.	The Council welcomes the support for Policy VC GIL1REV and the supporting text.	1745	None required.

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Policy VC GIL1REV: South of Geldeston Road and Daisy Way	4199	Object	<p>We welcome the preparation of the HIA. The HIA recommends that archaeological investigation should be required prior to development commencing. The recommendations of the HIA in relation to archaeology should be included in the policy requirements.</p> <p>The current reference to archaeology at criterion 7 is insufficient. We suggest that the wording is slightly amended to read:</p> <p>Norfolk's Historic Environment Service is consulted prior to application to determine the need for any archaeological assessments.</p>	<p>Amend criterion 7 to read:</p> <p>Norfolk's Historic Environment Service is consulted prior to application to determine the need for any archaeological assessments.</p>	The Councils welcomes the continued engagement from Historic England throughout the preparation of the VCHAP. In terms of archaeology, the Council considers that bullet point 7 is sound. Policy VC GIL1REV 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 194 if necessary.	1747	The Council does not consider a modification to the policy to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.
Policy VC GIL1REV: South of Geldeston Road and Daisy Way	3946	Support	<p>4 villages where most local GP practice is located across the local authority border in East Suffolk, of which 2 will be affected by any population increases. These practices are either currently working through a planning application for an extension funded by CIL or are in early discussions about a potential premises scheme via a potential application for CIL funding.</p> <p>The ambulance service, EEASt, does not have capacity to accommodate the additional growth resulting from the proposed development combined with other developments in the vicinity. This development is likely to increase demand upon existing constrained ambulance services and nationally set blue light response times. The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth and demand generated by this development.</p>	None specified. ICS would encourage continued working with LPA.	<p>The Council welcomes the engagement from the Norfolk and Waveney Integrated Care System.</p> <p>The Council notes the potential impact the proposed development in the VCHAP on local healthcare provision. The Council also notes the current actions being taken to address potential capacity issues.</p> <p>The Council will continue to engage with the ICS as the VCHAP progresses and, where relevant, as site allocations progress through the planning application process.</p>	1850	None required.
Policy VC GIL1REV: South of Geldeston Road and Daisy Way	4139	Support	We request changes to the policy wording of VC GIL1REV to include the requirement for early engagement with Anglian Water in order to demonstrate there is sufficient capacity in the network and receiving WRC to accommodate foul flows from the development.	We request changes to the policy wording of VC GIL1REV to include the requirement for early engagement with Anglian Water in order to demonstrate there is sufficient capacity in the network and receiving WRC to accommodate foul flows from the development.	<p>The Council does not consider the issue raised to relate to the Soundness of the Plan.</p> <p>Paragraph 5.14 of the Addendum document has been added to the supporting text of the policy which acknowledges the limited capacity at the WRC and recommends early engagement with Anglian Water.</p> <p>Anglian Water have expressed support for this as part of this Regulation 19 Addendum publication. The Council does not consider it necessary to include this as a specific criteria in the site-specific policy.</p>	1851	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC GIL1REV: South of Geldeston Road and Daisy Way	3886	Object	<p>Light pollution: The site is on the edge of a settlement. Particular care and attention need to be given to any proposals for external lighting as well as any design that has a lot of glazing. Lighting in such edge of settlement areas needs to be fully justified, serve a specific purpose, be of the right design and intensity so as to not affect dark skies, such as the intrinsic dark skies of the Broads. Reference to lighting being only needed if fully justified and well designed needs to be made in relevant policies, especially the following as they are close to, albeit separated from, the Broads. Also, design with lots of glazing need to be avoided unless there is going to be automated shades incorporated into the design.</p> <p>Our concern is incremental pressure and expansion of development around Gillingham. Again, one of the main concerns is lighting and so consideration of lighting is of particular reference to this policy.</p>	We recommend that for sites on the edge of settlement you include wording such as: 'Given that this site is on the edge of the settlement, particular care and attention will be given to lighting of such schemes. This includes external lighting, as well as mitigation for designs with lots of glazing. Schemes will need to fully justify the need for lighting, provide detail of the design and ensure that lighting is on only when it is needed, and designed to not add to light pollution. Designs with a lot of glazing are required to provide mitigation in the form of automated shades that are shut between dusk and dawn.'	The Council does not consider this to be a Soundness issue. An LVA has been prepared to support this allocation and any mitigation measures relating to the wide landscape needed to make the policy Sound have been incorporated into the policy. Any issues relating to external lighting will be considered at the planning application stage through the application of South Norfolk Development Management Policy DM 3.13 Amenity, Noise and Quality of Life. A specific requirement relating to lighting is not considered to be appropriate by the Council and too prescriptive at this stage.	1865	None required.
Policy VC GEL1: North of Kell's Way	4140	Support	<p>Current data shows limited capacity at Ellingham WRC. While there may be some room for limited growth, the proposed allocations and resulting increase in foul water flows pose the potential risk of harm to the waterbody receiving treated effluent from Ellingham WRC.</p> <p>We therefore recommend including within policy VC GEL1 the requirement for developers of the site to enter into early engagement with Anglian Water in order to demonstrate there is sufficient capacity in the network and receiving WRC to accommodate foul flows from the development.</p>	We therefore recommend including within policy VC GEL1 the requirement for developers of the site to enter into early engagement with Anglian Water in order to demonstrate there is sufficient capacity in the network and receiving WRC to accommodate foul flows from the development.	<p>The Council does not consider the issue raised to relate to the Soundness of the Plan.</p> <p>The Council engaged with Anglian Water throughout the preparation of the VCHAP. Anglian Water have not raised any concerns relating to this site or the Ellingham WRC at any stage, including during the initial Regulation 19 publication or this Regulation 19 Addendum publication. The Council therefore do not consider the suggested amendment to be necessary.</p>	1852	None required.

Mulbarton, Bracon Ash, Swardeston and East Carleton

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC SWA1, 6.16	4014	Support	The Site is identified as 'VC SWA1' within the South Norfolk VCHAP (Regulation 19) and is located immediately adjacent to the settlement boundary on the eastern side of Swardeston. The Site comprises of 1ha of brownfield land formerly occupied by a plant nursery, with redundant greenhouses and a former farm shop remaining on the Site. Only minor amendments are proposed to paragraph 6.16, the pre-amble to Policy VC SWA1. These minor amendments are not considered to have a material bearing on the interpretation of Policy VC SWA1.	None proposed.	The Council welcomes the support for Policy VC SWA1.	1749	None required.
Policy VC SWA1: Land off Bobbins Way	3991	Object	Amend archaeology criterion to read Norfolk's Historic Environment Service is consulted prior to application to determine the need for any archaeological assessments.	Amend archaeology criterion to read Norfolk's Historic Environment Service is consulted prior to application to determine the need for any archaeological assessments.	The Council welcomes the continued engagement from Historic England throughout the preparation of the VCHAP. In terms of archaeology, the Council considers that bullet point 4 is sound. Policy VC EAR2 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 194 if necessary.	1748	The Council does not consider a modification to the policy to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.
Policy VC SWA1: Land off Bobbins Way	3938	Support	Proposed sites in Barford and Swardeston will increase pressure on already constrained Humbleyard GP practice group. There are discussions currently ongoing between the Council and GP practices regarding mitigation. The ambulance service, EEAST, does not have capacity to accommodate the additional growth resulting from the proposed development combined with other developments in the vicinity. This development is likely to increase demand upon existing constrained ambulance services and nationally set blue light response times. The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth and demand generated by this development.	None specified. ICS encourage continued working with LPA.	The Council welcomes the engagement from the Norfolk and Waveney Integrated Care System. The Council notes the potential impact the proposed development in the VCHAP on local healthcare provision. The Council also notes the current actions being taken to address potential capacity issues. The Council will continue to engage with the ICS as the VCHAP progresses and, where relevant, as site allocations progress through the planning application process.	1853	None required.
Policy VC SWA2REV: Land on Main Road	3992	Object	Amend archaeology criterion to read Norfolk's Historic Environment Service is consulted prior to application to determine the need for any archaeological assessments.	Amend archaeology criterion to read Norfolk's Historic Environment Service is consulted prior to application to determine the need for any archaeological assessments.	The Council welcomes the continued engagement from Historic England throughout the preparation of the VCHAP. In terms of archaeology, the Council considers that bullet point 3 is sound. Policy VC SWA2REV 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 194 if necessary.	1750	The Council does not consider a modification to the policy to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.

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Policy VC SWA2REV: Land on Main Road	4177	Support	<p>The site is on the edge of the Swardeston Common WRC catchment. There is capacity for the proposed level of growth as there is sufficient dry weather flow headroom available at the WRC. The developer would need to engage with Anglian Water regarding connections for water supply and wastewater in the usual way. We have no objection to the removal of the policy requirement relating to wastewater capacity due to current capacity availability.</p> <p>Swardeston Common WRC has been identified as a nutrient significant plant and will require phosphate and nitrogen removal upgrades to technically achievable levels by 1st April 2030. This will reduce the amount of nutrient mitigation required for developments occupied after this date.</p>	None proposed.	The Council welcomes the support for Policy VC SWA2REV.	1751	None required.
Policy VC SWA2REV: Land on Main Road	4015	Support	<p>The Site is subject to planning application 2023/0908 (made by Bennett Homes) for full planning permission for a development of 43 new dwellings and associated external works.</p> <p>Bennett Homes fully supports the uplift in dwellings from approximately 30 to 40, and considers that the allocation of the Site supports the principle of application 2023/0908. Also justifies increase on VC SWA1.</p> <p>Bennett Homes maintain that the submitted application for 43 dwellings would have been acceptable under previous iterations of this policy and that the effect of the proposed amendment to Policy VC SWA2REV would not result in any increase in actual housing numbers in Swardeston.</p> <p>Bennett Homes also note that the Policy VC SWA2REV requires “The provision of a 2.0m wide footway along the site frontage...”. The site has a frontage with both Main Road and Gowthorpe Lane, but the provision of a footpath on the latter would not be necessary to facilitate the development of the Site. Accordingly, Bennett Homes suggest that the first bullet point is amended to read:</p> <p>“The provision of a 2.0m wide footway along the site frontage with Main Road...”</p>	<p>Bennett Homes suggest that the first bullet point is amended to read:</p> <p>“The provision of a 2.0m wide footway along the site frontage with Main Road...”</p>	<p>The Council welcomes the support for Policy VC SWA1.</p> <p>At the time of writing application 2023/0908 is still pending consideration and therefore it is not appropriate for the Council to comment on this.</p> <p>The number of dwellings and size of VC SWA1 is was not amended as part of the Addendum publication and therefore is not being considered for the VCHAP.</p> <p>The Council does not consider the suggested change to be a Soundness issue. The requirement for a footway along the frontage of the site has been outlined in paragraph 6.24 of the Addendum. The specific plans for these works will be determined at the planning application stage.</p>	1752	None required.

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Policy VC SWA2REV: Land on Main Road	3939	Support	<p>Proposed sites in Barford and Swardeston will increase pressure on already constrained Humbleyard GP practice group. There are discussions currently ongoing between the Council and GP practices regarding mitigation.</p> <p>The ambulance service, EEAST, does not have capacity to accommodate the additional growth resulting from the proposed development combined with other developments in the vicinity. This development is likely to increase demand upon existing constrained ambulance services and nationally set blue light response times. The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth and demand generated by this development.</p>	None specified. ICS would encourage continued working with LPA.	<p>The Council welcomes the engagement from the Norfolk and Waveney Integrated Care System.</p> <p>The Council notes the potential impact the proposed development in the VCHAP on local healthcare provision. The Council also notes the current actions being taken to address potential capacity issues.</p> <p>The Council will continue to engage with the ICS as the VCHAP progresses and, where relevant, as site allocations progress through the planning application process.</p>	1854	None required.
Policy VC SWA2REV: Land on Main Road	3985	Object	<p>Unsound when assessed against the tests for soundness set out in Paragraph 35, Criteria C: Effective and Criteria D: Consistent with National Policy of the National Planning Policy Framework (NPPF).</p> <p>Policy and its supporting text has no reference to surface water and flood risks associated with the site and any future development of it which is considered inconsistent with the approach adopted by SNDC as part of the Village Clusters Housing Allocations document for other proposed site allocations when compared to other sites with similar flood risk issues.</p> <p>Not objecting on the grounds of the principle of the development of the site, but on the level of information required within Policy SWA2REV relating to flood risk and the consideration of flood risk management.</p>	<p>An assessment within the supporting text of any flood risks associated with the site and the surrounding area.</p> <p>A requirement within the Policy Text for the submission of a site-specific Flood Risk Assessment (FRA) and strategy, to inform the layout of the site, which has regard to the requirements of the Stage 2 VC Strategic Flood Risk Assessment and the preparation of a Flood Warning and Evacuation Plan.</p>	<p>The Council notes the representation from the LLFA however it does not consider the issue raised to relate to the Soundness of the Plan.</p> <p>VC SWA2REV was included in the Groundwater Site Assessments report which supported the Alternative Sites and Focused Changes Regulation 18 Consultation. This report did not identify VC SWA2REV as being at risk of groundwater flooding. The site has also never been raised as being at risk as part of preparing the SFRA for the VCHAP. Therefore, the Council does not consider that it is necessary to include this as part of the supporting text or the policy.</p>	1875	None required.

Rockland St Mary, Hellington and Holverston

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC ROC1, 7.9	3851	Object	The infrastructure of the village already is unable to support the current population. The street is often double parked causing restrictions in the current traffic use and often used to bypass A146. The schools in the area are currently in demand from people who travel from Norwich. Telephone, sewage and other services are currently straining to deliver to the current population.	Reduce the number of dwellings proposed.	<p>The Council does not consider the issues raised to relate to the Soundness of the Plan.</p> <p>The Council has engaged with infrastructure and service providers throughout the preparation of the VCHAP, including Norfolk County Council and Anglian Water. Neither have raised concerns relating to this site in regards to highways, sewerage or education and any requirements suggested by them have been incorporated into the policy and supporting text where appropriate.</p>	1877	None required.
VC ROC1, 7.13	4098, 4099, 4100	Support	<p>The proposed additional text confirming that the trees on the eastern boundary are now the subject of a Tree Preservation Order is acknowledged and accepted.</p> <p>The Landowners note the proposed change to paragraph 7.13, suggesting that options for the retention of the oak tree on the site frontage should be considered. However, the tree has now been removed following an assessment of the tree's condition.</p> <p>The proposed additional text requiring the construction materials of the proposed footpath connection is acknowledged and accepted. The Landowners suggest that the construction materials will also need to be appropriate to its current and continued use as a field access.</p> <p>The Landowner highway advice confirms that a safe access into the site is possible and a Manual for Streets Compliant visibility splay and that a 2m width footway along the New Inn Site frontage can also be achieved.</p>	Removal of the reference in para. 7.13 to the "possible retention of the frontage tree" for factual reasons.	The Council welcomes the support for Policy VC ROC1. The Council acknowledges that the tree referred to in paragraph 7.13 of the Addendum has now been removed.	1753	Remove reference?

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VC ROC1, 7.14	4085	Object	<p>The proposed development at VCROC1 should not proceed. The council's HIA continues to be inaccurate and unsound. Building on this site would significantly erode the significance and understanding of the Old Hall Farmhouse and Farmstead, going against guidelines outlined in the NPPF i.e. its legality is questionable.</p> <p>The council's use of exemption sites as precedents in the justification of the use of this site is a contradiction. Finally, proceeding would be ignoring the concerns of over 70 people who objected during the Regulation 18, almost more than any other proposed site, further eroding trust in local government and its processes.</p>	In order to preserve views towards the heritage assets to the west of the proposed site, we cannot see how this can be achieved with any development which extends south of Eel Catcher's Close and propose that an extension of Eel Catcher's Close to the east (and not to the South) should be the limit of the development.	<p>The Council considers Policy VC ROC1 to be Sound. Both of the HIAs prepared by the Council and JB Heritage (attached to the representation) highlight that the significance of the heritage assets derive from their architecture and their grouping together rather than their setting.</p> <p>However, it is acknowledged that the allocation site could have an impact on the rural setting of the area and the connection the assets have to this, especially considering the historic connections the assets have to this area as not in both HIAs.</p> <p>Therefore the policy has been prepared to acknowledge this through both paragraph 7.14 and bullet point 5 of the policy to ensure that this is considered through the design of the site and ensuring that an area of open space is included within the design to maintain the connection with the wider rural area. The Council considers that this addresses the concerns raised in the JB Heritage HIA.</p> <p>Both HIAs also acknowledge that determining significance and appropriate mitigation is a professional judgement, hence the Council has consulted on the HIAs with both its internal Heritage Officers and Historic England. The Council considers that the development proposed for the site is moderate and would allow for appropriate mitigations to be designed into any development on the site.</p> <p>Historic England have been engaged throughout the preparation of the VCHAP. The Council acknowledged the issues raised by Historic England during the Regulation 18 Alternative Sites and Focused Changes consultation as referred to in the JB Heritage HIA and addressed these. As part of this publication they have welcomed the provision of the open space in the western part of the site and have raised no objections on this element of the policy.</p>	1754	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC ROC1, 7.14	4097	Support	The Landowner's heritage advice concurs with the Council Heritage Impact Assessment and confirms that a development of 25 dwellings can be accommodated on the site without an adverse impact on nearby heritage assets. The Landowners acknowledge and accept the provisions in the latest iteration of policy (Policy VC-ROC1, Reg. 19 Addendum version) to retain an area at the western end of the site free from development, to protect the setting of the nearby heritage assets. This will be specifically determined and designed through the planning application process.	None proposed.	The Council welcomes the support for Policy VC ROC1 and the proposed amendments related to the nearby heritage assets.	1755	None required.
Policy VC ROC1: Land south of New Inn Hill	4193	Object	<p>Three grade II listed buildings (Old Hall and two barns) lie around the western end of the site, therefore there are concerns about built development on the western end of the site.</p> <p>Welcome the preparation of the HIA. Welcome paragraph 7.14 of the supporting text and criterion 5 of the policy which seek to respect the setting of the heritage assets through the provision of open space and preservation of long views.</p> <p>Amend archaeology criterion to read</p> <p>Norfolk's Historic Environment Service is to be consulted prior to application to determine the need for any archaeological assessments.</p>	<p>Amend archaeology criterion to read</p> <p>Norfolk's Historic Environment Service is to be consulted prior to application to determine the need for any archaeological assessments.</p>	The Council welcomes the continued engagement from Historic England throughout the preparation of the VCHAP and the support for the amendments relating to the open space on the western side of the site. In terms of archaeology, the Council considers that bullet point 6 is sound. Policy VC ROC1 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 194 if necessary.	1756	The Council does not consider a modification to the policy to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.
Policy VC ROC1: Land south of New Inn Hill	4096	Support	<p>The landowners will continue to to promote the site through to the adoption of the VCHAP. A future developer will then prepare a planning application.</p> <p>The Landowners confirm that Site VCROC1 remains available for development. A Delivery Statement for the site has been completed and is submitted with this representation.</p> <p>The Landowners note and take seriously previously raised concerns over certain matters related to the site's allocation, particularly heritage impacts and highway safety, and have commissioned reports to address these.</p>	None proposed.	The Council welcomes the support for Policy VC ROC1 and the additional evidence prepared to address concerns.	1757	None required.
Policy VC ROC1: Land south of New Inn Hill	4142	Support	We request the requirement for "Early engagement with Anglian Water regarding the need to phase development within the catchment of Whitlingham Water Recycling Centre" is retained in the policy wording of VC ROC1.	We request the requirement for "Early engagement with Anglian Water regarding the need to phase development within the catchment of Whitlingham Water Recycling Centre" is retained in the policy wording of VC ROC1.	The Council does not consider this to be a Soundness issue. Anglian Water have been engaged throughout the preparation of the VCHAP. As part of this publication they have stated that they do not object to this criteria being removed from the policy. Early engagement with Anglian Water is referred to in paragraph 7.18 of the Addendum in the supporting text.	1760	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC ROC1: Land south of New Inn Hill	4178	Support	<p>Anglian Water notes the statement regarding potential phasing of this site beyond the early years of the Plan given that it is located within the catchment of Whitlingham WRC. Anglian Water has a proposed growth scheme to increase dry weather flow capacity at Whitlingham WRC, however, this is subject to final determination our Business Plan. An accelerated infrastructure delivery scheme will deliver the phosphate upgrade to TAL by 31st March 2027. This will reduce the amount of nutrient mitigation required for developments occupied after these dates.</p> <p>It is noted that the policy requirement for early engagement with Anglian Water has been removed from the policy and is only referred to in the text. We have no objection to the removal of this clause.</p>	None proposed.	The Council welcomes the support for Policy VC ROC1 and the information provided on the actions being taken to accommodate the development being proposed.	1761	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC ROC1: Land south of New Inn Hill	4108	Object	<p>The recent HIA appraisal carried out by the council is incorrect as it fails to recognise the presence, significance and positioning of a listed building which lies adjacent to the site. This is in contravention of the NPPF guidance. Decisions are therefore being made on the basis of an unsound evidence base. The "open space" being proposed is not sufficient to protect the heritage assets bearing in mind their relationship to the adjacent land. This is proven by attached evidence.</p> <p>The Small Barn will be obscured from sight and is not fully acknowledged for its significance. Its relationship with the wider landscape is integral to its listing. Impacts will not be minor. Proposed walkway will compromise privacy of Small Barn. Road access will be dangerous due to proximity to village playground.</p>	Removal of site allocation from Plan.	<p>The Council considers Policy VC ROC1 to be Sound. Both of the HIAs prepared by the Council and JB Heritage (attached to the representation) highlight that the significance of the heritage assets derive from their architecture and their grouping together rather than their setting.</p> <p>However, it is acknowledged that the allocation site could have an impact on the rural setting of the area and the connection the assets have to this, especially considering the historic connections the assets have to this area as not in both HIAs. Therefore the policy has been prepared to acknowledge this through both paragraph 7.14 and bullet point 5 of the policy to ensure that this is considered through the design of the site and ensuring that an area of open space is included within the design to maintain the connection with the wider rural area. The Council considers that this addresses the concerns raised in the JB Heritage HIA.</p> <p>The HIA prepared by the Council also directly acknowledges that the provision of the footway needs to be carefully considered in relation to the Barn, and that appropriate materials need to be used. This has also been incorporated into paragraph 7.13 of the Addendum.</p> <p>Both HIAs also acknowledge that determining significance and appropriate mitigation is a professional judgement, hence the Council has consulted on the HIAs with both its internal Heritage Officers and Historic England. The Council considers that the development proposed for the site is moderate and would allow for appropriate mitigations to be designed into any development on the site.</p> <p>Historic England have been engaged throughout the preparation of the VCHAP. The Council acknowledged the issues raised by Historic England during the Regulation 18 Alternative Sites and Focused Changes consultation as referred to in the JB Heritage HIA and addressed these. As part of this publication they have welcomed the provision of the open space in the western part of the site and have raised no objections on this element of the policy.</p>	1762	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC ROC1: Land south of New Inn Hill	3936	Object	Bramerton Parish Council agrees with the plan overall, however we have reservations as to the impact of the proposed plan locally, in particular the impact of the development on traffic problems through the village.	No changes to recommend.	<p>The Council notes the concerns of Bramerton Parish Council.</p> <p>Norfolk County Council (NCC) Highways team has been engaged throughout preparation of the VCHAP, with specific discussions on a number of sites. Those discussions have led to the criteria that has been specifically tailored for their respective sites where any issues have been identified.</p>	1855	None required.

Spooner Row and Sutton

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC SPO1REV, 8.6	3961	Support	We support the text in paragraph 8.6 specifying the need to retain hedgerows and trees.	None proposed.	The Council welcomes the support for this amendment.	1763	None required.
VC SPO1REV, 8.9	4001	Object	<p>The site lies immediately to the north east of the grade II listed property, The Orchards. Therefore, any development of this site has the potential to impact upon the significance of this heritage asset.</p> <p>We welcome the preparation of the HIA. We welcome paragraph 8.9 and the second bullet point of the policy.</p> <p>We suggest a slight amendment to the wording to read ‘...wider landscape and to protect the significance of the setting of The Orchards to the south of the site’ because it’s the significance of the asset, not its setting.</p>	We suggest a slight amendment to the wording to read ‘...wider landscape and to protect the significance of the setting of The Orchards to the south of the site’ because it’s the significance of the asset, not its setting.	The Council welcomes the support for Policy VC SPO1REV. The Council does not consider the issue raised to relate to the Soundness of the policy, however should the Inspector be minded to amend the policy and supporting text, the Council would not object to the wording submitted by Historic England.	1764	The Council does not consider the issue raised to relate to the Soundness of the policy, however should the Inspector be minded to amend the policy and supporting text, the Council would not object to the wording submitted by Historic England.
Policy VC SPO1REV: Land west of Bunwell Road	4144	Support	We are satisfied to see “Early engagement with Anglian Water (AW) regarding connecting to the local water recycling network” listed as a developer requirement in the policy text for VC SPO1REV and VC SPO2.	None proposed.	The Council welcomes the support for Policy VC SPO1REV.	1765	None required.
Policy VC SPO1REV: Land west of Bunwell Road	4179	Support	Due to the very small WRC at School Lane Spooner Row that is subject to a descriptive permit, and the limited capacity of these small works to accommodate significant growth, we agree with the need for early engagement to assess the feasibility of a wastewater connection. See also our commentary on the Water Cycle Study.	None proposed.	The Council welcomes the support for Policy VC SPO1 and the amendment relating to early engagement with Anglian Water.	1766	None required.

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Policy VC SPO1REV: Land west of Bunwell Road	4204, 4206, 4207	Support	<p>Outline planning application for up to 45 dwellings submitted in March 2024. This demonstrates the site is entirely suitable and deliverable, and can make a meaningful contribution to the council's immediate housing land supply.</p> <p>The site is not subject to any 'absolute constraints' and any 'Amber' constraints identified through the Site Assessment can be mitigated. Nutrient Neutrality does not present an obstacle to development.</p> <p>The proposed 35 units, while supported, would still result in an inefficient use of a sustainable site, whereas a development of approximately 45 units could be delivered and make a more efficient use of available land. Furthermore, the red line of the allocation should be expanded to include the adjacent areas of higher flood risk to the north-east of the site.</p> <p>The pre-application advice request and recently submitted planning application demonstrates that a larger allocation of 45 dwellings is entirely sound, appropriate and deliverable.</p>	The draft site specific policy should recognise that approximately 45 dwellings can be delivered.	<p>The Council welcomes the support for Policy VC SPO1REV and acknowledges the current application on the site.</p> <p>The Council considers that 35 dwellings allocated on the site is an appropriate level of development for the reasons outlined in the supporting text of the policy. Namely it will allow for mitigation of potential landscape and townscape impacts to integrate development on the site into the wider landscape.</p> <p>Any further development into areas of identified flood risk is not considered to be appropriate as these areas have been identified as Flood Zones 2 and 3a and are therefore much more likely to flood. Opportunities to improve the existing flood risk will also be expected as part of development. The Lead Local Flood Authority have confirmed that this is an appropriate approach for this site.</p> <p>The proposed extent of the site and the quantum of development being proposed is considered by the Council to make effective use of the land whilst addressing the issues outlined above and in the supporting text.</p>	1786	None required.
Policy VC SPO1REV: Land west of Bunwell Road	3943	Support	The ambulance service, EEASt, does not have capacity to accommodate the additional growth resulting from the proposed development combined with other developments in the vicinity. This development is likely to increase demand upon existing constrained ambulance services and nationally set blue light response times. The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth and demand generated by this development.	None specified. ICS would encourage continued working with LPA.	<p>The Council welcomes the engagement from the Norfolk and Waveney Integrated Care System.</p> <p>The Council notes the potential impact the proposed development in the VCHAP on local healthcare provision.</p> <p>The Council will continue to engage with the ICS as the VCHAP progresses and, where relevant, as site allocations progress through the planning application process.</p>	1856	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC SPO1REV: Land west of Bunwell Road	4022	Object	<p>Network Rail request the policy be changed and updated to include railway concerns, especially over safety at level crossings, proposed impact assessments undertaken from new housing developments, and that developer(s) provide a transport assessment to show blocking back across level crossings and other effects.</p> <p>It should not be assumed that development sites will not have any impact and thus should not be allocated favourable in policy for any residential or mix-use allocation with this assumption.</p> <p>NR believe the policy is unsound as it is not 'positively prepared' because there is no consideration of safety and other concerns. The plan is not 'justified' as there is no appropriate strategy or proportionate evidence to determine why these railway factors are discounted in policy.</p> <p>Challenge of 'soundness' is even more pertinent as there are considerations on highways and Anglia Water, yet there is no reflection of very similar railway requirements. This proposal does not demonstrate that the "area's objectively assessed needs" have been met regarding sustainable public transport.</p>	<p>Network Rail request the policy be changed and updated to include our railway concerns.</p> <p>Nearby Level Crossing(s), including Spooner Row – Impact Assessment(s) Required and Improvements Requests</p> <p>Developer(s) to provide a transport assessment to show blocking back across level crossings and other effects, including at Spooner Row.</p>	<p>The Council does not consider the issues raised to relate to the Soundness of the VCHAP.</p> <p>The sites in Spooner Row are subject to planning applications. However, any concerns relating to railway safety have not been raised through these. These concerns have also not been raised at any other stage of the VCHAP preparation process. The Council considers that these concerns could be addressed through the planning application process that is currently underway and that the requirement for impact and transport assessments should be raised through this process.</p> <p>The Council does not consider that it is necessary to amend the policies in order for them to be considered sound. However, should the Inspector be minded to, the Council would not object to the inclusion of wording as suggested by Network Rail.</p>	1881	The Council does not consider that it is necessary to amend the policies in order for them to be considered sound. However, should the Inspector be minded to, the Council would not object to the inclusion of wording as suggested by Network Rail.
Policy VC SPO2: South of Station Road	4105	Support	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).	None proposed.	The Council welcomes the support for Policy VC SPO2. Criteria 4 of the Policy makes specific reference to the need for a flood risk assessment and and strategy to inform the layout of the site.	1767	None required.
Policy VC SPO2: South of Station Road	4180	Support	Due to the very small WRC at School Lane Spooner Row that is subject to a descriptive permit, and the limited capacity of these small works to accommodate significant growth, we agree with the need for early engagement to assess the feasibility of a wastewater connection. See also our commentary on the Water Cycle Study.	None proposed.	The Council welcomes the support for Policy VC SPO2 and the amendment relating to early engagement with Anglian Water.	1768	None required.
Policy VC SPO2: South of Station Road	3944	Support	The ambulance service, EEAST, does not have capacity to accommodate the additional growth resulting from the proposed development combined with other developments in the vicinity. This development is likely to increase demand upon existing constrained ambulance services and nationally set blue light response times. The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth and demand generated by this development.	None specified. ICS would encourage continued working with LPA.	<p>The Council welcomes the engagement from the Norfolk and Waveney Integrated Care System.</p> <p>The Council notes the potential impact the proposed development in the VCHAP on local healthcare provision.</p> <p>The Council will continue to engage with the ICS as the VCHAP progresses and, where relevant, as site allocations progress through the planning application process.</p>	1857	None required.

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC SPO2: South of Station Road	4023	Object	<p>Network Rail request the policy be changed and updated to include railway concerns, especially over safety at level crossings, proposed impact assessments undertaken from new housing developments, and that developer(s) provide a transport assessment to show blocking back across level crossings and other effects.</p> <p>It should not be assumed that development sites will not have any impact and thus should not be allocated favourable in policy for any residential or mix-use allocation with this assumption.</p> <p>NR believe the policy is unsound as it is not 'positively prepared' because there is no consideration of safety and other concerns. The plan is not 'justified' as there is no appropriate strategy or proportionate evidence to determine why these railway factors are discounted in policy.</p> <p>Challenge of 'soundness' is even more pertinent as there are considerations on highways and Anglia Water, yet there is no reflection of very similar railway requirements. This proposal does not demonstrate that the "area's objectively assessed needs" have been met regarding sustainable public transport.</p>	<p>Network Rail request the policy be changed and updated to include our railway concerns.</p> <p>Nearby Level Crossing(s), including Spooner Row – Impact Assessment(s) Required and Improvements Requests</p> <p>Developer(s) to provide a transport assessment to show blocking back across level crossings and other effects, including at Spooner Row.</p>	<p>The Council does not consider the issues raised to relate to the Soundness of the VCHAP.</p> <p>The sites in Spooner Row are subject to planning applications. However, any concerns relating to railway safety have not been raised through these. These concerns have also not been raised at any other stage of the VCHAP preparation process. The Council considers that these concerns could be addressed through the planning application process that is currently underway and that the requirement for impact and transport assessments should be raised through this process.</p> <p>The Council does not consider that it is necessary to amend the policies in order for them to be considered sound. However, should the Inspector be minded to, the Council would not object to the inclusion of wording as suggested by Network Rail.</p>	1882	The Council does not consider that it is necessary to amend the policies in order for them to be considered sound. However, should the Inspector be minded to, the Council would not object to the inclusion of wording as suggested by Network Rail.
Policy VC SPO3: Land at School Lane	4024	Object	<p>Network Rail request the policy be changed and updated to include railway concerns, especially over safety at level crossings, proposed impact assessments undertaken from new housing developments, and that developer(s) provide a transport assessment to show blocking back across level crossings and other effects.</p> <p>It should not be assumed that development sites will not have any impact and thus should not be allocated favourable in policy for any residential or mix-use allocation with this assumption.</p> <p>NR believe the policy is unsound as it is not 'positively prepared' because there is no consideration of safety and other concerns. The plan is not 'justified' as there is no appropriate strategy or proportionate evidence to determine why these railway factors are discounted in policy.</p> <p>Challenge of 'soundness' is even more pertinent as there are considerations on highways and Anglia Water, yet there is no reflection of very similar railway requirements. This proposal does not demonstrate that the "area's objectively assessed needs" have been met regarding sustainable public transport.</p>	<p>Network Rail request the policy be changed and updated to include our railway concerns.</p> <p>Nearby Level Crossing(s), including Spooner Row – Impact Assessment(s) Required and Improvements Requests</p> <p>Developer(s) to provide a transport assessment to show blocking back across level crossings and other effects, including at Spooner Row.</p>	<p>The Council does not consider the issues raised to relate to the Soundness of the VCHAP.</p> <p>The sites in Spooner Row are subject to planning applications. However, any concerns relating to railway safety have not been raised through these. These concerns have also not been raised at any other stage of the VCHAP preparation process. It should also be noted that this specific site is carried forward from the previous Local Plan and this requirement was not considered necessary for the site to be 'sound' previously.</p> <p>The Council considers that these concerns could be addressed through the planning application process that is currently underway and that the requirement for impact and transport assessments should be raised through this process.</p> <p>The Council does not consider that it is necessary to amend the policies in order for them to be considered sound. However, should the Inspector be minded to, the Council would not object to the inclusion of wording as suggested by Network Rail.</p>	1883	The Council does not consider that it is necessary to amend the policies in order for them to be considered sound. However, should the Inspector be minded to, the Council would not object to the inclusion of wording as suggested by Network Rail.

Tacolneston and Forncett End

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC TAC1REV: Land to the west of Norwich Road	3927	Support	It is proposed to get a pre-application enquiry completed with AW in order to ensure there is adequate capacity, or capacity can be made in the local WRC. Additionally, a Site Promoter Delivery Statement Form has been completed in support of the Policy.	None proposed.	The Council welcomes the support for Policy VC TAC1REV and the submission of the Delivery Statement. The Council also welcomes and encourages the early engagement with Anglian Water as required by the Policy.	1769	None required.
Policy VC TAC1REV: Land to the west of Norwich Road	4145	Support	Current data shows limited capacity at Forncett End WRC. It is not clear why reference to this has been removed from paragraph 9.12. Nevertheless, we are satisfied that policies VC TAC1REV and VC TAC2 both include the requirement for “early engagement with Anglian Water (AW) to ensure that there is adequate capacity, or capacity can be made available, in the local Water Recycling Centre (WRC).”	None proposed.	The Council welcomes the support for Policy VC TAC1REV. The amendments to the Policy and Supporting Text have been made following discussions with Anglian Water. Anglian Water have raised no objections to these amendments.	1770	None required.
Policy VC TAC1REV: Land to the west of Norwich Road	4181	Support	<p>We support the policy requirement for early engagement with Anglian Water. As already identified in our response to the planning application currently pending decision on this site, there is currently headroom available at Forncett-Forncett End WRC to accommodate wastewater flows from the site.</p> <p>Forncett-Forncett End WRC has been identified as a nutrient significant plant and will require phosphate and nitrogen removal upgrades to technically achievable levels by 1st April 2030. This will reduce the amount of nutrient mitigation required for developments occupied after this date.</p>	None proposed.	The Council welcomes the support for Policy VC TAC1REV and the further information on the actions being taken to mitigate nutrient levels.	1771	None required.
Policy VC TAC1REV: Land to the west of Norwich Road	3962	Object	We object to the removal of the text around the protection of the horse chestnut tree.	We recommend that the text around the protection of the horse chestnut tree which has been deleted from this policy be reinstated.	The Council has updated the supporting text and amended the site specific wording to reflect the removal of the original tree from the site frontage. However, the existing tree adjacent to both 91 Norwich Road and the site remains and is subject to Tree Preservation Order. The amendments to the text reflect this position and the Council does not consider that any further action is required.	1788	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Policy VC TAC1REV: Land to the west of Norwich Road	4211	Object	<p>Whilst criterion 2 refers to boundary treatments to the south of the site, the HIA recommends planting along the eastern boundary of the development as mitigation for the non-designated heritage asset, Weaver's Cottage. We therefore recommend that the policy wording of criterion 2 is amended to read:</p> <p>'Appropriate boundary treatments to the south and east of the site...'</p>	<p>Amend criterion 2 to read:</p> <p>'Appropriate boundary treatments to the south and east of the site...'</p>	<p>The Council does not consider the issues raised to relate to the Soundness of the plan.</p> <p>This site is currently subject to a planning application. No concerns have been raised as part of this application relating to the Non-Designated Heritage Asset. This is also the case for the previous application for 3 self-build dwellings on the south-eastern boundary of the site (2016/2635).</p> <p>While the HIA prepared for the site did identify planting on the eastern boundary as a potential mitigation measure, this needs to be balanced with other needs for the site. This includes concerns raised by NCC Highways relating to visibility splays for the access to the site and the need to ensure clear visibility. It should be noted that the potential impact from the development without any mitigation was classed as 'minor'.</p> <p>On balance, the Council therefore take the view that it is not necessary for the policy to require planting on the eastern boundary.</p>	1880	None required.
Policy VC TAC2: Land adjacent The Fields	4182	Support	<p>We support the policy requirement for early engagement with Anglian Water. As already identified in our response to the planning application currently pending decision on this site, there is currently headroom available at Forncett-Forncett End WRC to accommodate wastewater flows from the site.</p> <p>Forncett-Forncett End WRC has been identified as a nutrient significant plant and will require phosphate and nitrogen removal upgrades to technically achievable levels by 1st April 2030. This will reduce the amount of nutrient mitigation required for developments occupied after this date.</p>	None proposed.	The Council welcomes the support for Policy VC TAC2 and the further information on the actions being taken to mitigate nutrient levels.	1772	None required.

Tasburgh

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC TAS1REV, 10.4	3852	Support	Supportive in the reduction from 25-20.	None proposed.	The Council welcomes the support for this amendment to Policy VC TAS1REV.	1777	None required.
VC TAS1REV, 10.10	3853	Support	No additional comments.	None proposed.	The Council notes that no comments have been made.	1778	None required.
Policy VC TAS1REV: North of Church Road	3993	Object	<p>Development has the potential to impact upon the significance of the heritage assets particularly on the Farmhouse, given its proximity.</p> <p>We welcome the preparation of the HIA.</p> <p>We note that the capacity of the site has been reduced from 25 to 20 dwellings which is welcomed.</p> <p>While it is not exactly as previously proposed, welcome change to Criteria 2 and recognise that this is helpful in signalling the importance of protecting the setting of the GII listed Old Hall Farmhouse.</p> <p>Broadly welcome criterion 4 which recognises the archaeological sensitivity of the area. We suggest a very slight amendment to read:</p> <p>Norfolk Historic Environment Service to be engaged at an early stage and planning applications supported by archaeological assessment, including the results of field evaluation where appropriate;</p>	<p>Amend criterion 4 to read</p> <p>Norfolk Historic Environment Service to be engaged at an early stage and planning applications supported by archaeological assessment, including the results of field evaluation where appropriate.</p>	<p>The Council welcomes the continued engagement from Historic England throughout the preparation of the VCHAP. The Council also welcomes the support for the proposed amendments to the Policy.</p> <p>In terms of archaeology, the Council considers that bullet point 4 is sound. Policy VC TAS1REV 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 194 if necessary.</p>	1779	The Council does not consider a modification to the policy to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider a modification is necessary, the Council would not object to wording submitted by Historic England.
Policy VC TAS1REV: North of Church Road	4183	Support	No comments.	None proposed.	The Council notes that no comments have been made.	1780	None required.
Policy VC TAS1REV: North of Church Road	4161	Object	<p>I object to the reduction of 5 in the numbers proposed, from the previous number proposed of 25.</p> <p>I object to the requirement to set aside land for the future expansion of Preston VC CE Primary School, as the Local Education Authority has stated they have no plans to expand the school and no requirement for additional land for that purpose.</p>	<p>Revert to the number previously proposed and allocate the land for approx. 25 dwellings.</p> <p>Remove the requirement to set aside land for the future expansion of Preston VC CE Primary School.</p>	<p>The justification for the proposed amendments to Policy VC TAS1REV have been outlined in the supporting text.</p> <p>As stated in paragraph 10.4, the reduction back to 20 dwellings has been proposed to ensure the safeguarding of the heritage asset adjacent to the site. Historic England have agreed as part of the publication that this will highlight the importance of the setting of this asset.</p> <p>The requirement for land to be set aside for the Primary School is set out in paragraph 10.9, However this, was not subject to any proposed changes and was therefore not subject to this publication.</p>	1781	None required.

Wicklewood

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC WIC1REV	3994	Support	Historic England comments: No comments	None required	The Council welcomes confirmation from Historic England that there are no outstanding heritage matters relating to this site.	1773	None required
VC WIC1REV	4184	Support	We support the addition of the clause to ensure early engagement with Anglian Water regarding our infrastructure within the site. Wymondham WRC has been identified as a nutrient significant plant and will require phosphate and nitrogen removal upgrades to technically achievable levels by 1st April 2030. This will reduce the amount of nutrient mitigation required for developments occupied after this date.	No changes proposed	The Council welcomes the comments of Anglian Water which respond to an additional criterion inserted into the policy, reflecting earlier discussions comments from this stakeholder. The additional information relating to the upgrades proposed to Wymondham WRC in relation to nutrient and phosphate is also welcomed.	1784	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC WIC1REV	3848, 3860, 3861, 3902, 3966, 4032, 4115, 4192	Object	<p>Summary of representations received in response to VC WIC1REV:</p> <ul style="list-style-type: none"> - impact on open countryside views; - village school is oversubscribed; - dangerous parking around the school; - in the current plan it states Hackford and Wymondham Roads benefit from extensive views of the surrounding countryside. This fact has been removed from Reg 19 statement. The landscape has not changed; - water from this site would threaten Wicklewood Mere, an SSI; - Milestone Lane is not on main sewer, additional ground water would impact their septic tanks; - concerns about the scale of the development in the village; - extra traffic on narrow lanes; - lack of facilities; - the increase in numbers proposed adds to villagers concerns about impact on the vista enjoyed by residents and those passing through; - destruction of green belt; - Other small estate - type developments stated are much smaller in comparison to the proposed 40 houses and were built within the village without taking away the village countryside; - development in the past has been turned down partly due to the views when approaching from the east; - need to ensure that surface water issues have been considered properly; and - increasing housing in a concentration of relatively small villages north of Wymondham over a relatively short time will have the potential to damage the rural character, important landscapes and nature of these communities. 	<p>Summary of changes proposed in response to VC WIC1REV:</p> <ul style="list-style-type: none"> - Housing allocation should be small scale, infill, development; - Allocate these dwellings to alternative less contentious sites that are better suited regarding the massive negative impact on the landscape; - Plenty of other sites within the village for infill house building rather than adding a mini estate and destroying the countryside; and - Removal of the development from the plan. 	<p>The Council recognises the concerns the concerns that have been submitted in response to the allocation of VC WIC1REV. However the Council considers that these matters have been responded to in full in its response to the Regulation 18 focused consultation in early 2024 and does not consider that any new matters have been brought to its attention at this time.</p> <p>In summary, the Council has consistently recognised the landscape sensitivities of the site and this is reflected in the site assessment, evidence base and the site-specific policy wording. The increased site area follows the natural field boundaries in order to avoid any additional visual impact arising from the allocation.</p> <p>The Council has engaged with relevant consultees throughout the production of the VCHAP, including Anglian Water and Norfolk Council in their roles as Lead Local Flood Authority, Highways Authority and Education Authority. Through these discussions and consultations the Council is satisfied that no objection has been raised to the allocation of this site and that any site-specific matters have been addressed within either the supporting text or the detailed policy wording.</p>	1785	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC WIC1REV	4209	Support	The ambulance service, EEASt, does not have capacity to accommodate the additional growth resulting from the proposed development combined with other developments in the vicinity. This development is likely to increase demand upon existing constrained ambulance services and nationally set blue light response times. The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth and demand generated by this development.	None specified. ICB encourages continued working with the LPA.	<p>The Council welcomes the engagement from the Norfolk and Waveney Integrated Care System.</p> <p>The Council notes the potential impact the proposed development in the VCHAP on local healthcare provision.</p> <p>The Council will continue to engage with the ICS as the VCHAP progresses and, where relevant, as site allocations progress through the planning application process.</p>	1858	None required.
VC WIC1REV, 11.6	3963	Support	<p>Representations in response to para 11.6:</p> <p>- We support the text starting “as well as the retention and the reinforcement of the existing natural boundaries to the north and south of the site”</p>	No changes proposed	The Council welcomes the comments of the Norfolk Wildlife Trust (NWT). The supporting text was amended at paragraph 11.6 to reflect the updated site boundaries and to provide appropriate landscaping of the site.	1776	No action required
VC WIC1REV, 11.6	4128	Object	<p>Representation in response to para 11.6:</p> <p>This recognises the site is within a prominent plateau. This stated, the revised plan will no longer equate to a smaller area of a larger agricultural field but to incorporate the eastern section of a larger agricultural field.</p> <p>Retention and the reinforcement of the existing natural boundaries would be essential but will not offer and protect the far reaching views this area currently provides.</p>	<p>The proposed development area is too large for its position in the village and countryside.</p> <p>Retention and the reinforcement of the existing natural boundaries would be essential but will not offer and protect the far reaching views this area currently provides.</p>	The Council considers that this comment relates to the expanded site area which correlates to the overall increase in numbers proposed. The Council recognises the landscape impact of this allocation site due to the local topography, and has sought to address this through the requirements for on-site landscaping and the need to integrate the site with the local landscape. The extended site area remains a smaller section of a wider agricultural field, the remainder of which is not proposed for allocation. When reviewing options for a site extension in this location, the Council considered alternative site layouts/ configurations but concluded that an extension of the site in a southerly direction would be more appropriate in the wider landscape context.	1783	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC WIC1REV, 11.6	3887, 4033, 4107	Object	<p>Development will have detrimental impact on wider landscape views even with mitigation. Site will not provide a gateway to the village and is detached from the rest of the village. Will also lead to loss of high grade agricultural land.</p> <p>Increase to 40 dwellings is disproportionate to the village as a whole and will make landscape impacts worse. Wicklewood has no shop, no Post Office and virtually no employment opportunities.</p>	<p>Removal from the plan. Any additional housing required should be planned as infills within the village.</p> <p>To suggest a further 10 houses on the proposed 30 homes indicates the opening for further housing to be added to this in the future. The field proposed for this development has further acreage that potentially could add even more homes.</p>	<p>The Council recognises the concerns the concerns that have been submitted in response to the allocation of VC WIC1REV.</p> <p>However the Council considers that these matters have been responded to in full in its response to the Regulation 18 focused consultation in early 2024 and does not consider that any new matters have been brought to its attention at this time. In summary, the Council has consistently recognised the landscape sensitivities of the site and this is reflected in the site assessment, evidence base and the site-specific policy wording. The increased site area follows the natural field boundaries in order to avoid any additional visual impact arising from the allocation.</p> <p>The increase in site area and dwelling numbers on the site will ensure that there is an effective use of the land in relation to the wider area as required by the NPPF. the extra dwellings proposed will assist with meeting the overall housing requirement set out for the VCHAP.</p>	1859	None required.
VC WIC1REV, 11.8	4034, 4102, 4112	Mixed	<p>Summary of comments received in response to para 11.8:</p> <ul style="list-style-type: none"> - Roads around the site flood when heavy rain falls; - How can flooding have been identified but not prevent development?; - The whole site has been subject to flooding in the last 6-12 months and will only get worse as the climate changes; and - 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). 	<ul style="list-style-type: none"> - Removal of the site from the Plan - Reconsideration of the site and number of houses proposed 	<p>Responses to para 11.8:</p> <p>The Council has engaged with technical stakeholders throughout the process and has also commissioned a Part 2 Strategic Flood Risk Assessment (SFRA) which considers in further detail the impact of allocating some sites, including revised site VC WIC1REV. The technical engagement, as well as the site specific SFRA, form part of the evidence base for the site selection and the Council is satisfied that the identified flood constraint does not preclude development of the wider site area. The final site-specific policy includes a requirement for a Flood Risk Assessment (FRA) to have regards to the Stage 2 SFRA prepared for the Council - this will inform the access arrangements and layout of the site. The developer of the site will be required to have regard to the comments of the Water Management Alliance when preparing a scheme for the site.</p>	1775	No action required

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
VC WIC1REV, 11.9	3849, 3866, 4103	Object	<p>Summary of comments received in response to para 11.9:</p> <ul style="list-style-type: none"> - the sewerage mains run behind the houses on the opposite side of the road -how would this access the mains?; - the local pumping station discharges into the river as it is unable to cope; - development will result in increased pressure on the pumping station; - capacity of the holding tank has not been improved since original construction circa 1980 but new properties connecting to it, including the village of Morley; - smells reported from the site; - frequent flooding in Wicklewood; and - addition of 40 dwellings will make the situation with the pumping station worse. 	Removal of the site from the plan	<p>The Council considers that these responses relate more specifically to the increase in housing numbers at VC WIC1REV and the potential impact of these on the pumping station.</p> <p>As noted in the Council's response to the Regulation-18 focused consultation, 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. Connection to utilities and infrastructure is not expected to be a barrier to</p> <p>development in this location. Comments relating to the capacity of the pumping station were repeated at earlier stages of consultation and the Council has previously contacted Anglian Water about this matter. AW 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</p> <p>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.</p>	1782	No action required
VC WIC1REV, 11.10	4104	Object	Original proposal was for 30 dwellings on 1.63ha but 40 dwellings is now proposed on 2.97ha - look at the maths again!	Check the site area again	The Council has previously noted in its response to the Regulation-18 focused consultation that an error in the site area for VC WIC1 had been published at the earlier Regulation-19 publication period. At that time the site area was incorrectly noted as being 1.63ha for 30 dwellings but it was subsequently noted that this should have been 2.5ha. This correction was noted in response to the Regulation-18 focused consultation, as explained in the Council's Statement of Consultation (Part 4, p102). VC WIC1REV has therefore subsequently been amended from 2.5ha for 30 dwellings to 2.97ha for 40 dwellings, as per the Regulation-19 Addendum and no further updates to the site area are necessary.	1774	No action required

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VC WIC1REV, 11.10	3890	Object	"This is considered a reasonable site area to ensure that landscaping of the site is appropriate to respond to the identified landscape constraints."? SNDC obviously recognise this is not really a suitable site! No amount of "appropriate " landscaping will make the destruction of a unique landscape anything but a tragedy to all those who currently enjoy such a special vista.	The plan needs to be cancelled.	The Council recognises the concerns the concerns that have been submitted in response to the allocation of VC WIC1REV. However the Council considers that these matters have been responded to in full in its response to the Regulation 18 focused consultation in early 2024 and does not consider that any new matters have been brought to its attention at this time. In summary, the Council has consistently recognised the landscape sensitivities of the site and this is reflected in the site assessment, evidence base and the site-specific policy wording. The increased site area follows the natural field boundaries in order to avoid any additional visual impact arising from the allocation.	1860	None required.
Policy VC WIC2: Land off Hackford Road	3945	Support	The ambulance service, EEASt, does not have capacity to accommodate the additional growth resulting from the proposed development combined with other developments in the vicinity. This development is likely to increase demand upon existing constrained ambulance services and nationally set blue light response times. The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth and demand generated by this development.	None specified. ICS would encourage continued working with LPA.	<p>The Council welcomes the engagement from the Norfolk and Waveney Integrated Care System.</p> <p>The Council notes the potential impact the proposed development in the VCHAP on local healthcare provision.</p> <p>The Council will continue to engage with the ICS as the VCHAP progresses and, where relevant, as site allocations progress through the planning application process.</p>	1861	None required.
Policy VC WIC2: Land off Hackford Road	4147	Support	We recommend both policies VC WIC1REV and VC WIC2 are amended to include a requirement for early engagement with Anglian Water in order to ensure that there is adequate capacity, or capacity can be made available, in the local Water Recycling Centre.	We recommend both policies VC WIC1REV and VC WIC2 are amended to include a requirement for early engagement with Anglian Water in order to ensure that there is adequate capacity, or capacity can be made available, in the local Water Recycling Centre.	<p>The Council welcomes the engagement from the Environment Agency.</p> <p>Policy WIC1REV has been amended to include a criteria requiring early engagement with Anglian Water, which has also been supported by Anglian Water as part of this publication.</p> <p>Reference to the WRC in relation to VC WIC2 is included in the supporting text and this has been supported by Anglian Water as part of the initial Regulation 19 publication. The potential need for phasing of the site is not considered to be an issue that will affect the delivery of the site.</p>	1862	None required.

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Policy VC WIC2: Land off Hackford Road	3867	Object	In the current plan it states Hackford and Wymondham Roads benefit from extensive views of the surrounding countryside. This fact has been removed from Reg 19 statement. The landscape has not changed. Accurate descriptions should not be changed. Concerns about the flooding potential. Water from this site would threaten Wicklewood Mere, an SSI. Milestone Lane is not on main sewer, additional ground water would impact their septic tanks. There are concerns about the scale of the development in a village of just 407 properties. Extra traffic on narrow lanes, lack of facilities and capacity at school.	Wicklewood Parish Council objects to this proposed allocation.	<p>The Council recognises the concerns the concerns that have been submitted in response to the allocation of VC WIC2.</p> <p>However the Council considers that these matters have been responded to in full in its response to previous consultations and does not consider that any new matters have been brought to its attention at this time. In summary, the Council has consistently recognised the landscape sensitivities of Wicklewood and this is reflected in the supporting text and the site-specific policy wording. The Council has engaged with relevant consultees throughout the production of the VCHAP, including Anglian Water and Norfolk Council in their roles as Lead Local Flood Authority, Highways Authority and Education Authority. Through these discussions and consultations the Council is satisfied that no objection has been raised to the allocation of this site and that any site-specific matters have been addressed within either the supporting text or the detailed policy wording.</p>	1863	None required.

Part 2 – Schedule of other major changes

Document Element	Representation IDs	Nature of Representations	Summary of Representations	Suggested Changes to Plan	South Norfolk Council Response	Response ID	Action Required
Part 2, Schedule of other major changes	3996	Support	We welcome the addition of reference to Bunwell Manor Hotel.	None proposed.	The Council welcomes the support for this amendment.	1789	None required.
Part 2, Schedule of other major changes	4152	Support	Current data shows limited capacity at Fornsett End WRC. It is not clear why the requirement for early engagement with Anglian Water to determine the capacity of the receiving WRC and the consequent potential need to for phasing is proposed for removal from VC BUN1 and VC BUN2.	None proposed.	The Council does not consider this to be a Soundness issue. During the initial Regulation 19 Publication held in 2023, Anglian Water responded to sites VC BUN1 and VC BUN2 stating that they support the requirement for early engagement but do not consider it necessary to state that the capacity at the WRC needs to be determined due to the small scale of the proposed development (Representation ID: 3230). the Council has therefore amended the policy wording in line with the recommendations made by Anglian Water.	1790	None required.
Part 2, Schedule of other major changes	4212	Object	<p>Our main remaining concern relates to the archaeology criterion for a number of sites. We recognise that the policy should be proportionate to the site size and heritage sensitivity.</p> <p>However, as currently worded the criterion is not really clear about who needs to be consulted and what assessment needs doing when. The policy also fails to provide for up-front assessment to inform the design and layout of sites to protect any sensitive archaeology.</p> <p>As currently drafted, the criterion could be read that an applicant simply has to look at the Historic Environment Record online and decide if they think it needs any further assessment prior to development.</p>	<p>We recommend use of the phrase ‘Historic Environment Service’ to make it clearer that the applicant needs to engage with the Service rather than simply look at the Historic Environment Record online. It will be for the Service to advise what if any archaeological work is needed and at what stage.</p> <p>We recommend that the consultation with the HES should take place ‘prior to application’. Then, if any assessment is needed (whether that be desk-based or field-evaluation) then the results of that can and should inform the design and layout of any application.</p> <p>Finally, we recommend using the word ‘assessments’ rather than ‘survey’ to cover both desk-based assessments and field-based assessments.</p>	The Council does not consider the issues raised to relate to the Soundness of the VCHAP. The Council has also responded to the representations that state similar issues for each site where this is relevant. The Council considers that the various criteria referred to are sound. They highlight 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 194 if necessary.	1879	The Council does not modifications to the policies to be necessary for soundness as it is already covered by NPPF paragraph 194. However, should the Inspector consider modifications necessary, the Council would not object to wording submitted by Historic England.
Part 2, Schedule of other major changes, Table at paragraph 1A.10:	3980	Support	<p>National Highways acknowledge that the proposed VCHAP allocates new sites for housing in South Norfolk’s villages and will become a material consideration in the determination of planning applications.</p> <p>We have reviewed the document and note the details of set out within the draft document and we offer No Comment at this stage.</p>	None proposed.	The Council acknowledges that no comments have been made.	1791	None required.
Part 2, Schedule of other major changes, Table at paragraph 1A.10:	4150	Support	Thank you for consulting East Suffolk Council. We have no comments to make.	None proposed.	The Council acknowledges that no comments have been made.	1792	None required.

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Part 2, Schedule of other major changes, Table at paragraph 1A.10:	4185	Object	<p>Many of the descriptive works are based on different descriptive standards that can apply to a much smaller population or cubic metres per day of flow that can restrict the capacity available. The descriptive permits for the following WRCs have a specification for a volume discharge which would equate to populations much lower than 250 and limits the feasibility of connections for proposed growth in these locations:</p> <p>School Lane Spooner Row WRC - 17.65 cubic metres per day,</p> <p>Haddiscoe-Mock Mile Terr WRC - 14.9 cubic metres per day</p> <p>Winfarthing - Chapel Close WRC - 10 cubic metres per day.</p> <p>It is noted that a number of WRCs are identified as exceeding headroom capacity once growth from the GNLP and SNVCHAP are factored in. Some of these have sufficient capacity for growth coming forward and will require subsequent growth investment in later AMPs, whereas WRCs such as Whitlingham and Beccles have already been identified for growth schemes to increase dry weather flow capacity.</p> <p>Anglian Water welcomes the further opportunity to engage with the plan preparation and will continue to liaise with the Council to support the plan and the relevant evidence base documents towards submission.</p>	None stated.	<p>The Council does not consider the issues raised to relate to the Soundness of the Plan.</p> <p>The methodology for the Water Cycle Study (use of 250 PE for viability relating to descriptive permits) was previously agreed with Anglian Water through the Regulation 18 consultation as well as during the preparation of the GNLP. It was not raised that the three WRCs had restricted descriptive standards and therefore the 250 PE was used.</p> <p>In Winfarthing, the amount of growth allocated in the VCHAP is less than assumed thorough the GNLP WCS, which used a worse case scenario. No objections were raised as part of the GNLP. IN Haddiscoe, it is estimated that there would still be capacity even with the quoted PE. In Spooner Row, there is the potential that the prosed development would exceed capacity, however the potential for a change in the permit has not been discounted and could be investigated.</p> <p>The Council does not consider the issues raised to affect the Soundness of the relevant allocations, However, should the Inspector be minded, the Council would not object to a criteria being included in the site-specific policies requiring early engagement with Anglian Water.</p>	1845	The Council does not consider the issues raised to affect the Soundness of the relevant allocations, However, should the Inspector be minded, the Council would not object to a criteria being included in the site-specific policies requiring early engagement with Anglian Water.

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Part 2, Schedule of other major changes, Table at paragraph 1A.10:	4165	Object	<p>Representation relates to VC THU2.</p> <p>Proposal would overdevelop the site and could overshadow features of long front gardens.</p> <p>Would require sewerage pumping station, bringing unwanted noise and smell and overflow could pollute Beck Stream and River Waveney.</p> <p>Lack of cycle ways and public transport will necessitate cars, up to 30 more on to dangerous Hall Farm and Beccles Road. Parking could be dangerous on road.</p> <p>Rights of access to Beccles Road from Poppyfields and Holly Cottage must be retained for septic tank access as stated in deeds.</p> <p>Surface Water Flooding is a risk and already causes issues at existing properties. Could be increased by impenetrable surfaces.</p> <p>Do not believe impacts on biodiversity will be mitigated by proposed landscaping and will impact local character.</p>	None stated.	<p>The Council does not consider the issues raised to relate to the Soundness of the Plan and considers that the issues have been addressed at previous stages of the plan preparation process.</p> <p>In accordance with paragraph 119 of the NPPF the Council must ensure that development makes effective use of land and the density proposed is considered to be acceptable within the context of the site.</p> <p>Norfolk County Council highways have been engaged throughout the preparation of the VCHAP and following engagement with them on this site they take the view that a comprehensive development on this site will benefit the site in terms of access and have raised no objections to it.</p> <p>The site-specific policy requires the protection and enhancement of Priority Habitats and the retention of significant trees and the on-site pond to the south of the site. The protection and enhancement of habitats within the site will be a priority when preparing a site layout and design and will be assessed in detail at the planning application stage.</p> <p>Detailed proposals for the site (including layout and technical drainage matters) will be submitted and assessed at the planning application stage. As set out in the Policy VC THU2, and in accordance with other policies within the Local Plan, the scheme will be expected to respond to the local context of the site, including the topography of the land and avoiding adverse impacts on adjacent properties.</p> <p>VC THU2 was assessed by the Lead Local Flood Authority (LLFA) as part of the technical consultation and these comments have been reflected in the supporting text of the policy which highlights the presence of the surface water flowpath to the west of the site. A drainage strategy will be required as part of the planning application.</p>	1878	None required.

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Part 2, Schedule of other major changes, Table at paragraph 1A.10:	4035	Object	<p>Representations relate to VC SPO4:</p> <p>Network Rail request the policy be changed and updated to include railway concerns, especially over safety at level crossings, proposed impact assessments undertaken from new housing developments, and that developer(s) provide a transport assessment to show blocking back across level crossings and other effects.</p> <p>It should not be assumed that development sites will not have any impact and thus should not be allocated favourable in policy for any residential or mix-use allocation with this assumption.</p> <p>NR believe the policy is unsound as it is not 'positively prepared' because there is no consideration of safety and other concerns. The plan is not 'justified' as there is no appropriate strategy or proportionate evidence to determine why these railway factors are discounted in policy.</p> <p>Challenge of 'soundness' is even more pertinent as there are considerations on highways and Anglia Water, yet there is no reflection of very similar railway requirements. This proposal does not demonstrate that the "area's objectively assessed needs" have been met regarding sustainable public transport.</p>	<p>Network Rail request the policy be changed and updated to include our railway concerns.</p> <p>Nearby Level Crossing(s), including Spooner Row – Impact Assessment(s) Required and Improvements Requests</p> <p>Developer(s) to provide a transport assessment to show blocking back across level crossings and other effects, including at Spooner Row.</p>	<p>The Council does not consider the issues raised to relate to the Soundness of the VCHAP.</p> <p>The sites in Spooner Row are subject to planning applications. However, any concerns relating to railway safety have not been raised through these. These concerns have also not been raised at any other stage of the VCHAP preparation process. It should also be noted that this specific site is carried forward from the previous Local Plan and this requirement was not considered necessary for the site to be 'sound' previously.</p> <p>The Council considers that these concerns could be addressed through the planning application process that is currently underway and that the requirement for impact and transport assessments should be raised through this process.</p> <p>The Council does not consider that it is necessary to amend the policies in order for them to be considered sound. However, should the Inspector be minded to, the Council would not object to the inclusion of wording as suggested by Network Rail.</p>	1884	The Council does not consider that it is necessary to amend the policies in order for them to be considered sound. However, should the Inspector be minded to, the Council would not object to the inclusion of wording as suggested by Network Rail.