

# Reg. 19 VCHAP Consultation - Supporting Statement

**Land south of Green  
Pastures, west of The  
Street, Tivetshall St  
Mary (SN3002SL)**



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## **Prepared for Clients:**

Mr Roger Pye



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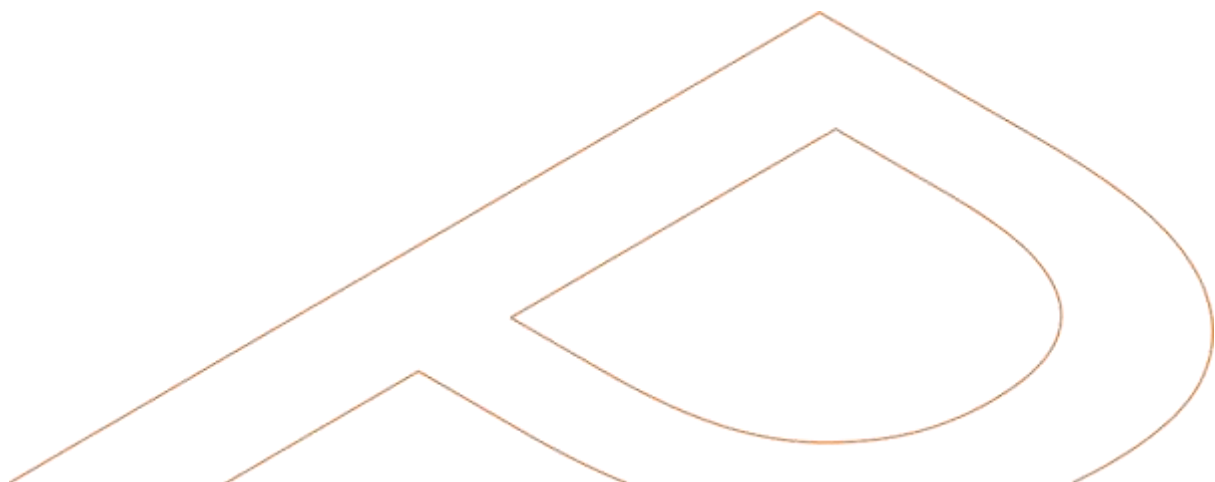
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<b>Date of Submission</b>	March 2023
<b>Consultation</b>	Regulation 19 South Norfolk Village Clusters Housing Allocations Plan (VCHAP).
<b>Local Planning Authority</b>	South Norfolk District Council (SNDC).
<b>Client</b>	Mr Roger Pye.
<b>Our Reference</b>	J3925
<b>Report Revision</b>	V1.0



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***Allocations and Settlement Limit Extensions***

***(SNDC, January 2023).***

## **1.0 Introduction**

**1.1** The South Norfolk Village Clusters Housing Allocations Plan (VCHAP) aims to deliver sustainable growth within the villages of South Norfolk. The VCHAP is being developed alongside the Greater Norwich Local Plan (GNLP) and in accordance with the Government's national planning policies and guidance.

**1.2** The sites within the Village Clusters are split into two categories:

- **New Allocations** - these are sites typically proposed for between 12 to 50 dwellings, which will go to meeting the 1,200-dwelling requirement in the GNLP,
- **Settlement Limit Extensions** - for sites smaller than 12 dwellings, these will not count towards the 1,200-dwelling requirement but will help ensure that the 'windfall allowance' in the 'over-arching' Greater Norwich Local Plan (GNLP) is achieved.

**1.3** My client's site known as land south of Green Pastures, (council ref. SN3002SL), has been included as an extension to the Tivetshalls settlement boundary in the context of the Reg. 19 version of the VCHAP that is currently the subject of a period of consultation prior to being submitted to the Secretary of State for examination purposes.

**1.4** This consultation stage provides an opportunity for the public and other stakeholders to make representations on whether the Plan is legally compliant and 'Sound'. The tests of **soundness** as set out in the National Planning Policy Framework (NPPF, 2021) are as follows:

- Positively prepared,
- Justified,
- Effective,
- Consistent with national policy.

**1.5 Section 2** of this this statement identifies the reasons why the VCHAP is considered 'sound' with the inclusion of my clients' within the Tivetshalls settlement boundary as it is being redrawn within the context of the emerging VCHAP. Section 2 of this statement should be read alongside our 'official' reg. 19 representation form and specifically section 5:



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

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## **2.0 Comments in respect of Section 5 of the VCHAP publication stage representation form.**

- 2.1 Para. 42.3 of the Reg. 19 version of the VCHAP identifies a minor addition to the Settlement Limit of the Tivetshalls incorporating an area of land west of The Street and immediately south of the existing Settlement Limit. *This area of land was promoted and assessed as part of the Plan process and considered appropriate for inclusion in the Settlement Limit.*
- 2.2 The land referred to above relates to my client's site south of Green Pastures (SNDC site ref. SN3002SL). My client supports the inclusion of their land within the settlement boundary and can confirm that the land remains available and appropriate for windfall development to contribute to meeting this element of housing delivery as identified within the context of the overarching Greater Norwich Local Plan (GNLP).
- 2.3 In respect of their own site assessment work, SNDC Officers have concluded as follows (see appendix B):

*The site is considered to be a reasonable extension to the existing settlement limit. It is located relatively close to the school and village hall and is immediately adjacent to the settlement limit to the north and opposite the settlement limit to the east.*

*The site is currently residential curtilage and already appears as part of the form of the village, albeit with a strong frontage hedge line which would need to be partially removed for access.*

*New development in this location would read as part of the existing village fronting The Street, mirroring the residential development directly opposite. It would be a rounding-off of the built form without incursion into open countryside as the southern boundary is delineated by a public footpath.*

- 2.4 My client concurs with these findings.
- 2.5 In respect of the Council's site assessment as this appears at appendix B, my client would like to make the following points for consideration within the context of the emerging VCHAP and the HELAA as an when this evidence

base document is next updated:

**Part 3 - Access to the site.** There is an existing gateway (access) onto The Street and approximately 6-8 meters from the sites Southern boundary. This was the original gateway for machinery etc. onto the field on the northern side of the footpath and can be reinstated to serve any development on the site. Furthermore, there is considered to be appropriate visibility both northwards and southwards along *The Street* from this point of access.

**Part 3 - Better Broadband for Norfolk** – It is identified that the site lies outside of the proposed fibre installation area. My client has a 'tail' into the B4RN fibre broadband network on the plot at the northern end and the main cable runs along the western fence line to the southern boundary.

**Part 3 - Utilities infrastructure** – My client was not aware that there were sewers crossing this site and indeed, considers this not to be the case.

2.6 Inclusion of my client's site will contribute to VCHAP 'soundness' on the following grounds:

**Positively prepared** – Ensuring that an appropriate growth strategy for the Tivetshalls, (and the wider VCHAP area) that meets objectively assessed needs. The NPPF (2021, para. 23), is clear insofar as Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.

**Justified** – Provides an appropriate strategy that is commensurate with this Village Cluster's status in the 'Spatial Strategy' and takes into account a site that is 'suitable' (sustainable) as evidenced by the VCHAP's supporting documentation.

**Effective** – Ensuring the VCHAP includes an extension to the settlement boundary that can deliver windfall development within the Local Plan period.



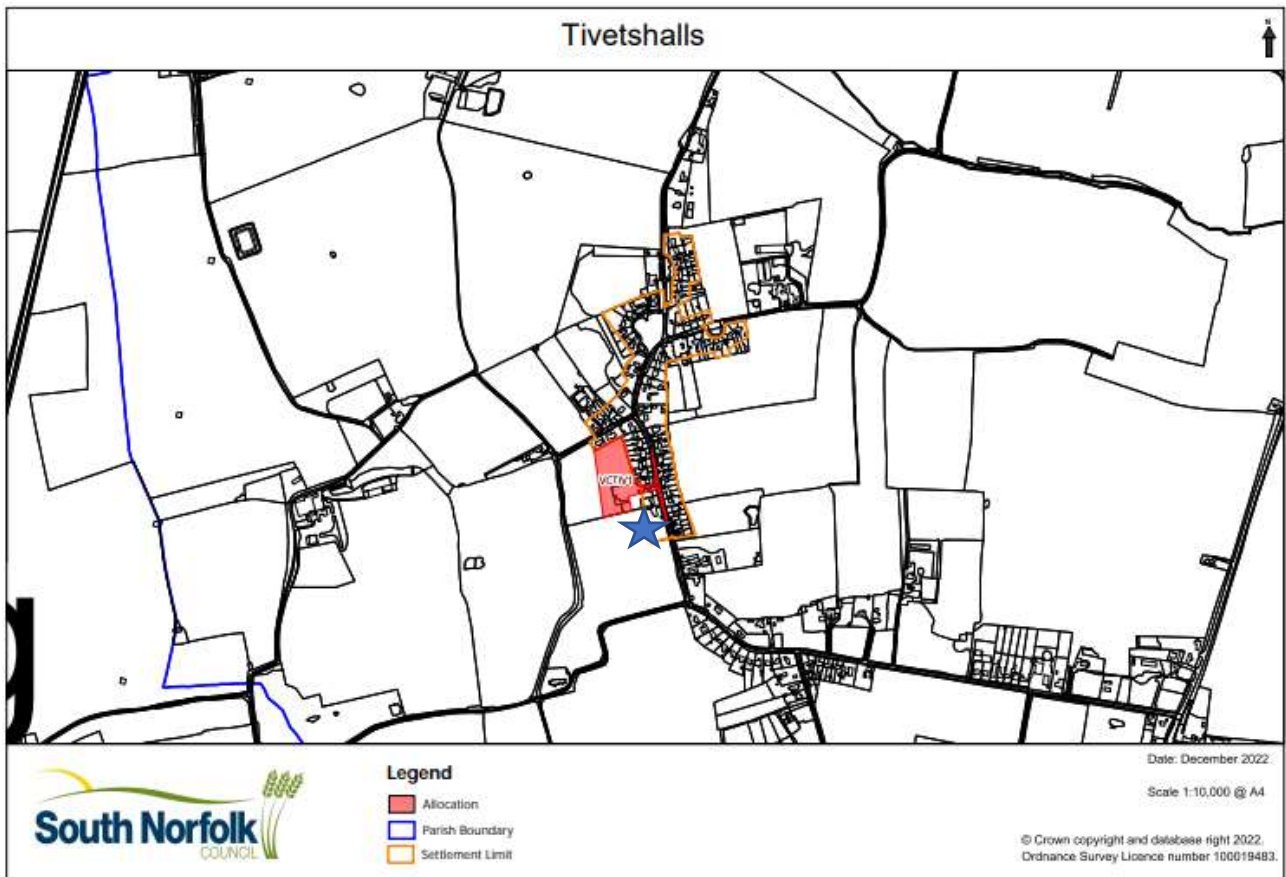
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**Consistent with national policy** – Meeting the 'tests' of the Framework insofar as plan-making is concerned including the requirements that plans are positively prepared.

2.7 Parker Planning Services would like to be kept up to date with the progress of the VCHAP and reserve the right to participate in the forthcoming Examination Hearings. For further information, or to discuss, please contact Magnus Magnusson on 01284 336119 or [magnus@parkerplanningservices.co.uk](mailto:magnus@parkerplanningservices.co.uk).



## Appendix A – Tivetshalls Reg. 19 Policy Map



**Position of my clients' site** ★

## Appendix B – VCHAP - Updated Site Assessments Allocations and Settlement Limit Extensions (SNDC, January 2023)

### 9. Tivetshall St Mary and Tivetshall St Margaret Cluster

#### SN Village Clusters Housing Allocations Document – Site Assessment Form

##### Part 1 - Site Details

Detail	Comments
Site Reference	SN3002
Site address	Land south of Green Pastures, west of The Street, Tivetshall St. Mary
Current planning status (including previous planning policy status)	Unallocated
Planning History	Historic approval & refusal for residential
Site size, hectares (as promoted)	0.18 ha
Promoted Site Use, including (aa) Allocated site (bb) SL extension	SL extension
Promoted Site Density (if known – otherwise assume 25 dwellings/ha)	Up to 4 dwellings = 22 dph (25 dph = 5 dwellings)
Greenfield/ Brownfield	Greenfield

##### Part 2 - Absolute Constraints

**ABSOLUTE ON-SITE CONSTRAINTS** (if 'yes' to any of the below, the site will be excluded from further assessment)

Is the site located in, or does the site include:	Response
SPA, SAC, SSSI, Ramsar	No
National Nature Reserve	No
Ancient Woodland	No
Flood Risk Zone 3b	No
Scheduled Ancient Monument	No

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Is the site located in, or does the site include:	Response
Locally Designated Green Space	No

**Part 3 - Suitability Assessment****HELAA Score:**

The RED/ AMBER/ GREEN score in the HELAA Score column below is based upon the assessment criteria set out in Appendix A of the 'Norfolk Housing and Economic Land Availability Assessment (July 2016)' methodology.

**Site Score:**

Where a HELAA Assessment has indicated either a RED or AMBER score, has the promoter of the site submitted any supporting evidence to indicate that the issues can be overcome (e.g., a Flood Risk Assessment, Contaminated Land Survey, Ecological Survey)? If yes, and if appropriate, note any changes to the HELAA score in the Site Score column. Additional criteria have been included under 'Accessibility to local services and facilities' and 'Landscape', which need to be reflected in the Site Score.

(Please note boxes filled with grey should not be completed)

**SUITABILITY ASSESSMENT**

Constraint	HELAA Score (R/ A/ G)	Comments	Site Score (R/ A/ G)
Access to the site	Amber	Existing access via adjoining host property as residential curtilage. New separate access would be needed onto The Street, could mirror those opposite.  NCC HIGHWAYS – Red. Limited frontage precludes safe access being provided. No footways in the village linking to the catchment primary school. The site is considered to be remote from services.  (Highways meeting: The road gets narrow further south along The Street. Potential to square up the frontage and reflect what is on the opposite side of the road. No real issues as a SL extension.)	Red

Constraint	HELAA Score (R/ A/ G)	Comments	Site Score (R/ A/ G)
Accessibility to local services and facilities  Part 1: = Primary School = Secondary school = Local healthcare services = Retail services = Local employment opportunities = Peak-time public transport	Amber	430m walk to primary school  Post office and limited employment opportunities within 1800m  Peak bus service within 1800m	
Part 2: Part 1 facilities, plus = Village/ community hall = Public house/ café = Preschool facilities = Formal sports/ recreation facilities		550m walk to Village hall, recreation ground and village groups  PH within 1800m	Green
Utilities Capacity	Amber	Wastewater capacity to be confirmed	Amber
Utilities Infrastructure	Green	Promoter advises water, foul drainage and electricity to site. D/H lines along eastern boundary. No UKPN constraints. AW advise sewers crossing this site.	Amber
Better Broadband for Norfolk		Site lies outside of the proposed fibre installation area.	Red
Identified ORSTED Cable Route		Unaffected by the identified ORSTED cable route or sub station	Green
Contamination & ground stability	Green	Unlikely to be contaminated and no known ground stability issues	Green
Flood Risk	Green	Site is at low risk of flooding	Green

Impact	HELAA Score (R/ A/ G)	Comments	Site Score (R/ A/ G)
SN Landscape Type (Land Use Consultants 2002)	N/A	Tributary Farmland	N/A
SN Landscape Character Area (Land Use Consultants 2002)		B4: Waveney tributary farmland ALC: N/A	
Overall Landscape Assessment	Green	Detrimental impacts may be reasonably mitigated through design. <b>SNC Landscape Officer</b> - no issues.	Amber
Townscape	Green	Detrimental impacts may be reasonably mitigated through design.	Amber
Biodiversity & Goodiversity	Green	Detrimental impacts could be reasonably mitigated.	Amber
Historic Environment	Amber	Development may have a detrimental impact on setting of HA to south. Impact may be mitigated. <b>HES</b> - Amber <b>SNC Heritage Officer</b> - No objection to settlement extension.	Amber
Open Space	Green	Development would not result in the loss of any open space	Green
Transport and Roads	Amber	NCC; the road gets narrow further along The Street. No real issues to SL extension.  NCC HIGHWAYS - Red. Limited frontage precludes safe access being provided. No footways in the village linking to the catchment primary school. The site is considered to be remote from services.  (Highways meeting: The road gets narrow further south along The Street. Potential to square up the frontage and reflect what is on the opposite side of the road, no real issues as a SL extension.)	Red

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Impact	HELAA Score (R/ A/ G)	Comments	Site Score (R/ A/ G)
Neighbouring Land Uses	Green	Agriculture/residential	Green

### Part 4 - Site Visit

Site Visit Observations	Comments	Site Score (R/ A/ G)
Impact on Historic Environment and townscape?	Well separated from HA to south on eastern side of The Street. Impacts of developing this site likely to be reasonably mitigated. If combined with adjacent parcels, cumulative impact should be carefully assessed.	N/A
Is safe access achievable into the site? Any additional highways observations?	Existing access shared with adjoining property. Appears that adequate visibility for a new access can be achieved onto The Street but will require loss of hedgerow.	N/A
Existing land use? (including potential redevelopment/demolition issues)	Amenity; residential curtilage.	N/A
What are the neighbouring land uses and are these compatible? (impact of development of the site and on the site)	Residential to north and east. Agricultural to west and south – compatible.	N/A
What is the topography of the site? (e.g. any significant changes in levels)	Generally flat.	N/A
What are the site boundaries? (e.g. trees, hedgerows, existing development)	Established hedgerow including trees in southern boundary. PRow along this boundary, but outside of site.	N/A
Landscaping and Ecology – are there any significant trees/ hedgerows/ ditches/ ponds etc on or adjacent to the site?	Established hedgerow including trees in southern boundary.	N/A
Utilities and Contaminated Land – is there any evidence of existing infrastructure or contamination on / adjacent to the site? (e.g., pipelines, telegraph poles)	O/H lines along eastern boundary.	N/A
Description of the views (a) into the site and (b) out of the site and including impact on the landscape	Site prominent in views along The Street. Visually contained form wider views from west and south.	N/A

Site Visit Observations	Comments	Site Score (R/ A/ G)
Initial site visit conclusion (NB: this is an initial observation only for informing the overall assessment of a site and does not determine that a site is suitable for development)	Site close to primary school and limited local services. Lack of continuous footpath which is characteristic of settlement. As promoted would reflect pattern of development on eastern side of The Street. Landscape impacts could be limited by planted boundaries to west and south. NCC to confirm traffic impacts on The Street and feasibility of safe access.	Amber

## Part 5 - Local Plan Designations

Local Plan Designations, including those in Neighbourhood Plans, should be noted in the table below (excluding Open Countryside which will apply to all sites promoted outside the Development Limits).

Local Plan Designations (UNIFORM)	Comments	Site Score (R/ A/ G)
		N/A
		N/A
		N/A
Conclusion	Development of the site does not conflict with any existing or proposed land use designations	Green

## Part 6 - Availability and Achievability

AVAILABILITY ASSESSMENT (in liaison with landowners)	Comments	Site Score (R/ A/ G)
Is the site in private/ public ownership?	Private	N/A
Is the site currently being marketed? (Additional information to be included as appropriate)	Approach by developers	N/A
When might the site be available for development?	Immediately	Green
Comments:		
ACHIEVABILITY (in liaison with landowners, and including viability)	Comments	Site Score (R/A/G)
Evidence submitted to support site deliverability? (Yes/ No) (Additional information to be included as appropriate)	Supporting statement from promoter	Amber
Are on-site/ off-site improvements likely to be required if the site is allocated? (e.g., physical, community, GI)	Yes, a new access onto The Street would be required.	Amber
Has the site promoter confirmed that the delivery of the required affordable housing contribution is viable?	No. It is under the size threshold.	Amber
Are there any associated public benefits proposed as part of delivery of the site?	No	



### Part 7 - Conclusion

#### Suitability

Suitable for SL extension as promoted as it rounds off development. This is subject to satisfactory access and design, landscaping to boundaries and re-location of utilities and taking account of the existing form and character of the village.

#### Site Visit Observations

Site close to primary school and limited local services. Lack of continuous footpath which is characteristic of settlement. As promoted would reflect pattern of development on eastern side of The Street. Landscape impacts could be limited by planted boundaries to west and south. NCC to confirm traffic impacts on The Street and feasibility of safe access.

#### Local Plan Designations

Open countryside.

#### Availability

Promoter has advised availability within plan period.

#### Achievability

Promoter has advised development achievable within 1-3 years.

#### OVERALL CONCLUSION:

The site is considered to be a reasonable extension to the existing settlement limit. It is located relatively close to the school and village hall and is immediately adjacent to the settlement limit to the north and opposite the settlement limit to the east. The site is currently residential curtilage and already appears as part of the form of the village, albeit with a strong frontage hedge line which would need to be partially removed for access. New development in this location would read as part of the existing village fronting The Street, mirroring the residential development directly opposite. It would be a rounding-off of the built form without incursion into open countryside as the southern boundary is delineated by a public footpath.

**Preferred Site:** Yes

**Reasonable Alternative:**

**Rejected:**

Date Completed: 03 December 2020

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