

South Norfolk Village Clusters Housing Allocations Plan – (Regulation 19 Pre-submission Draft) Consultation

Norfolk County Council Response

March 2023

1. Introduction

- 1.1. The County Council (CC) welcomes the opportunity to comment on the above consultation relating to the draft version of the South Norfolk Village Clusters Housing Allocations Plan (VCHAP).
- 1.2. The remainder of this note sets out more detailed comments in relation to the County Council's statutory roles and responsibilities:

Comments

2. Strategic Comments

- 2.1. The County Council supports the sustainable objectives set in the Plan in respect of:
 - Objective 1 - Meeting housing needs;
 - Objective 2 - Protecting village communities and supporting rural services and facilities; and
 - Objective 3 - protecting the character of villages and their setting.
- 2.2. If you have any queries regarding this response, please contact Stephen Faulkner (Principal Planner – Strategic Planning Team) by email at stephen.faulkner@norfolk.gov.uk or phone on 01603 222752.

3. Transport – Assessment of Sites

- 3.1. The following detailed site comments are made:
- 3.2. **VCELL1 Ellingham** - Road. Removal of the hedge at the south side of Mill Road would be required between house number 81 and the recreation ground to enable a satisfactory layout. It does not appear feasible to achieve acceptable visibility splays within the proposed narrow site access corridor.

To make the allocation sound, the Highway Authority will require that it is extended to include the full frontage of Mill Lane from number 81 to the recreation ground.

- 3.3. **VC ASH1 Ashwellthorpe** - The junction of New Road with Wymondham Road and The Street requires improvement to visibility to enable development traffic to be safely accommodated. This would need to be conditioned as off-site highway works and be delivered by the development. A proportional contribution to the required improvement would not be acceptable to the Highway Authority. The off-site highway works should also include improvement to the nearest bus stops to the site, along

with access to them. The stops are located at The Street.

The Highway Authority would request that Policy VC ASH1 is revised to remove reference to proportionate contribution to an upgrade of the existing New Road / The Street junction. The policy should be amended to require off-site highway works as follows: A) Improve visibility from New Road to Wymondham Road and The Street. B) Improve the nearest bus stops to the site, along with access to them. The stops are located at The Street.

- 3.4. **VCDIT1 Ditchingham** - 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.

- 3.5. **VC ROC2 Rockland St Mary** - The existing GP Surgery access is not sufficiently wide to enable it to be upgraded to an adoptable standard estate road. Visibility splays and footway improvements would also be necessary to enable safe access; these safety improvements require third party land, resulting in an undeliverable allocation. Access between 24 and 26 The Street may be appropriate subject to suitable design. However, there is concern that suitable visibility splays may not be achievable within highway and may require third party land resulting in an undeliverable allocation.

The Highway Authority would request that ROC2 is removed from the draft plan.

- 3.6. **TC TAC1 Tacolneston** - The site appears to be remote from the highway, the proposed allocation does not seem to include land required for required suitable and safe access along with highway improvements (as per paragraph 37.11). It has not been clearly demonstrated that an acceptable means of access can be provided, which will require land beyond the proposed extents of allocation and highway. The earlier Highway Authority comments supported allocation of site reference SN1057 that had significant frontage at B1113 Norwich Road and was considered able to deliver the required highway improvements and this is reflected in the current policy wording.

The Highway Authority would wish for the allocation area to be revised to include suitable direct access to the highway and frontage at the B1113 Norwich Road to provide the required visibility splays and footway. This would make the allocation area consistent with the policy wording.

- 3.7. **THU1 Thurlton** - The existing shared surface road at the end of Blacksmith Way is appropriate to serve a maximum of 25 dwellings. Presently 14 dwellings are accessed via the shared surface road, providing scope for a further 11 dwellings rather than the 12 described in Policy VC THU1. The proposed allocation area does not extend to the end of the road at Blacksmith's Gardens and requires revision to ensure the site could be accessed as per paragraph 40.9. The development must be laid out in such a way to prevent vehicles from accessing the existing public footpath Thurlton FP3.

The Highway Authority would request: Paragraph 40.9 is revised to allocate 11 dwellings. A policy requirement to prevent vehicles from VC THU1 accessing existing public right of way Thurlton FP3. The Thurlton & Norton Subcourse policy map is updated such that proposed allocation VC THU1 extends to meet the end of the Blacksmith's Gardens carriageway to ensure the site could be accessed as per paragraph 40.9.

- 3.8. If you have any queries regarding this response, please contact Richard Doleman richard.doleman@norfolk.gov.uk or David Wilson david.wilson@norfolk.gov.uk

4. **Minerals and Waste**

4.1. **Policy:** VC WOO1

Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy VC WOO1 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognises that underlain mineral resource has been included in the supporting text; however, we request inclusion of the text in the policy itself. The policy can be made sound by including the wording below, which was contained in the response by the Mineral Planning Authority, to the Regulation 18 consultation.

4.2. **Modification:**

Amend policy VC WOO1 to add the following wording as a policy requirement: '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.'

4.3. **Policy:** VC SWA2

Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy VC SWA2 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognises that underlain mineral resource has been included in the supporting text; however, we request inclusion of the text in the policy itself. The policy can be made sound by including the wording below, which was contained in the response by the Mineral Planning Authority, to the Regulation 18 consultation.

- 4.4. **Modification:**
Amend Policy VC SWA2 to add the following wording as a policy requirement:
'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.'
- 4.5. **Policy:** VC ROC1
Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy VC ROC1 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognise that underlain mineral resource has been included in the supporting text; however, we request inclusion of the text in the policy itself. The policy can be made sound by including the wording below, which was contained in the response by the Mineral Planning Authority, to the Regulation 18 consultation.
- 4.6. **Modification:**
Amend Policy VC ROC1 to add the following wording as a policy requirement:
'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.'
- 4.7. **Policy:** VC HAD1
Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy VC HAD1 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognise that underlain mineral resource has been included in the supporting text; however, we request inclusion of the text in the policy itself. The policy can be made sound by including the wording below, which was contained in the response by the Mineral Planning Authority, to the Regulation 18 consultation.
In addition, for your information: The land north of VC HAD1 (adjacent B1136) is proposed for mineral extraction through the emerging Minerals and Waste Local Plan (site reference MIN25). A planning application was submitted in December 2022 for the extraction of sand and gravel at this site (FUL/2022/0056).
- 4.8. **Modification:**
Amend Policy VC HAD1 to add the following wording as a policy requirement:
'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.'

- 4.9. **Policy:** VC EAR1
Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy VC EAR1 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognise that underlain mineral resource has been included in the supporting text; however, we request inclusion of the text in the policy itself. The policy can be made sound by including the wording below.
- 4.10. **Modification:**
Amend Policy VC EAR1 to add the following wording as a policy requirement:
'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.'
- 4.11. **Policy:** VC TAS1
Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy VC TAS1 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognises that underlain mineral resource has been included in the supporting text; however, we request inclusion of the text in the policy itself. The policy can be made sound by including the wording below.
- 4.12. **Modification:**
Amend Policy VC TAS1 to add the following wording as a policy requirement:
'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.'
- 4.13. **Policy:** VC SWA1
Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy VC SWA1 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognises that underlain mineral resource has been included in the supporting text, however, we request inclusion of the text in the policy itself. The policy can be made sound by including the wording below, which was contained in the response by the Mineral Planning Authority, to the Regulation 18 consultation.
- 4.14. **Modification:**
Amend VC SWA1 to add the following wording as a policy requirement:

'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.'

4.15. **Policy:** VC HAL1

Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy VC HAL1 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognise that underlain mineral resource has been included in the supporting text; however, we request inclusion of the text in the policy itself. The policy can be made sound by including the wording below, which was contained in the response by the Mineral Planning Authority, to the Regulation 18 consultation.

4.16. **Modification:**

Amend Policy VC HAL1 to add the following wording as a policy requirement: '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.'

4.17. **Policy:** VC ELL1

Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy VC ELL1 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognise that underlain mineral resource has been included in the supporting text; however, we request inclusion of the text in the policy itself. The policy can be made sound by including the wording below, which was contained in the response by the Mineral Planning Authority, to the Regulation 18 consultation.

4.18. **Modification:**

Amend policy VC ELL1 to add the following wording as a policy requirement: '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.'

4.19. **Policy:** VC DIT1

Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy VC DIT1 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding. The Mineral Planning Authority recognise that underlain mineral resource has been included in the supporting text; however, we request inclusion of

the text in the policy itself. The policy can be made sound by including the wording below, which was contained in the response by the Mineral Planning Authority, to the Regulation 18 consultation.

4.20. **Modification:**

Amend policy VC DIT1 to add the following wording as a policy requirement:
'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.'

4.21. **Policy:** Various

Norfolk County Council notes that the South Norfolk Village cluster plan has included supporting text regarding safeguarded mineral resources where sites are under the threshold of 1 ha and therefore the Minerals and Waste Policy CS16 (or any successor policy) does not apply. Therefore, the support text referring to "The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan" can be removed from the following sites:

Policy VC THU1: Land north of Blacksmiths Gardens – 0.57 ha

Policy VC THU2: Land adjacent to Holly Cottage, west of Beccles Road – 0.77 ha

Policy VC ELL2: Land at Florence Way – 0.51 ha

Policy VC SWA1: Land off Bobbins Way – 0.98 ha

Policy VC NEE1: Land north of High Road and east of Harmans Lane – 0.9 ha

Policy VC SEE1: West of Mill Lane – 0.53 ha

- 4.22. Remove "The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan" from the supporting text of the following sites:

Modification:

Policy VC THU1: Land north of Blacksmiths Gardens – 0.57 ha

Policy VC THU2: Land adjacent to Holly Cottage, west of Beccles Road – 0.77 ha

Policy VC ELL2: Land at Florence Way – 0.51 ha

Policy VC SWA1: Land off Bobbins Way – 0.98 ha

Policy VC NEE1: Land north of High Road and east of Harmans Lane – 0.9 ha

Policy VC SEE1: West of Mill Lane – 0.53 ha.

- 4.23. Representation Forms have been completed in respect of the above comments.

- 4.24. If you have any queries regarding this response, please contact Caroline Jeffery (Principal Planner, Minerals and Waste Policy) by email at caroline.jeffery@norfolk.gov.uk or telephone 01603 222193.

5. **Lead Local Flood Authority**

5.1. **The sites provided within the shapefile:**

5.2. The LLFA comments are as follows:

- The LLFA have already provided comments on these sites through previous regulation consultations and other technical consultations directly from the local planning authority.
- The LLFA trust that their comments and advice have been considered in forming the final policies proposed in the Regulation 19 Pre-submission Draft.
- The LLFA therefore have **no further comments** to make at this stage.
- If any of the polices proposed within the Regulation 19 Pre-submission Draft have not been scoped by the LLFA, we request that the local planning authority identify these sites to us so we can provide comments.

5.3. **The Regulation 19 Pre-submission Draft documents:**

5.4. The LLFA comments are as follows:

- It is noted that the South Norfolk Village Clusters - Level 2 Strategic Flood Risk Assessment has been referenced within the Regulation 19 Pre-submission Draft.
- Comments have recently been provided as part of a technical consultation directly from the allocated consultancy working on behalf of the local planning authority. LLFA Consultation Response Letter FW2022_1170 (**Dated: 16 January 2023 - please see attached**) highlights a number of concerns with the strategic assessment.
- The LLFA trust that the local planning authority have considered our advice and are working to address the concerns raised.

5.5. Should you have any further queries, please contact the Lead Local Flood Authority by email at llfa@norfolk.gov.uk.

6. **Environment**

6.1. **Landscape** - From a landscape perspective the County Council does not have any additional comments to make from the Reg 18 comments previously given, and there are no modifications felt necessary to make the plan legally compliant or sound in relation to landscape matters.

6.2. **Ecology** – the County Council is pleased to note that The Assessment of Sites was supported by a Technical Consultation with both internal and external consultees on environmental protection issues, including ecology.

As previously noted during the Regulation 18 consultation, Norfolk County Council is part of the County Wildlife Site (CWS) partnership. Where sites are within the vicinity of CWS and increased recreational pressure may be seen; Norfolk County Council may look to seek Planning Obligations and/ or use of Community Infrastructure Levy (CIL) funds in order to mitigate against these pressures, including any soft

landscaping design/ species selection to reflect the composition of the CWS.

- 6.3. Where adjacent to a CWS, a suitable buffer should be incorporated within the design. There may also be other pressures which will be assessed at the time of application which may lead to Green Infrastructure requests through Planning Obligations.
- 6.4. Norfolk County Council jointly manages, with Norfolk Wildlife Trust, a growing network of Roadside Nature Reserves (RNRs). Where proposals about an RNR, careful consideration would need to be given to the location of site access points and the application must demonstrate that the RNRs will not be adversely impacted by the proposal. If the site is adjacent to an existing or candidate RNR, opportunities to enhance the RNR should be incorporated into the scheme design or contributions discussed by means of Planning Obligations/ CIL.
- 6.5. HRA Report (Dec 2022): It is noted that water impacts were identified for a number of hydrologically connected Habitats sites and that policy wording in respect of nutrient neutrality issues at the Broads SAC and Broadlands Ramsar site has not yet been agreed and incorporated in the GNLP.

The report therefore concludes that it is not currently possible to rule out adverse impacts on the integrity of the Broads SAC and Broadland Ramsar site due to nutrient enrichment impacts without this policy in place, but that once the GNLP policy has been updated to address this issue, the VCHAP HRA will be updated to reflect this.

- 6.6. Should you have any queries with the above comments please contact Emily Smith (Principal Landscape Architect) on 01603 224492; OR James Fisher (Principal Ecologist) on 01602 365972

7. **Member Comments**

- 7.1. Barford Site (site BAR 1)- Cllr Margert Dewsbury (Hingham) has indicated that if the development is agreed there would be a need for a reduced speed limit and a pedestrian crossing of some sort.