

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 30th September 2024.

Completed forms should be posted to:

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

Email: localplan.snc@southnorfolkandbroadland.gov.uk

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

This form has two parts:

Part A – Personal Details: this only needs to be completed once.

Part B – Your Representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A – Personal Details

1. Respondent Details

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

Title / Name:	Sarah Luff
Job Title (if applicable):	Strategic Flood Risk Planning Officer
Organisation / Company (if applicable):	Norfolk County Council Lead Local Flood Authority (NCC LLFA)
Address:	Norfolk County Council County Hall Martineau Lane Norwich Norfolk
Postcode:	NR1 2DH
Tel No:	0344 8008020
E-mail:	llfa@norfolk.gov.uk

2. Agent Details (if applicable)

Title / Name:	N/A
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.	6.21 to 6.27	Policy No.	SWA2REV	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**

YES	NO
✓	
	✓
	✓

(Please tick as appropriate)

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.

The LLFA considers one element which forms part of this SNDC Village Clusters Housing Allocations Plan Regulation 19 Pre-submission Addendum consultation document (Policy SWA2REV: Land on Main Road, Swardeston) to be 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) for the following reasons:

- In Policy SWA2REV and its supporting text, there is an absence of references made to the consideration of surface water and flood risks associated with the site and any future development of it. Furthermore, the absence of the consideration of flood risk in the Policy text for SWA2REV 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. This means the Policy fails to support the principles set out in the NPPF (19th December 2023) in respect of the consideration of flood risk management.
- The LLFA are 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 and its supporting text that will guide the site's future deliverability.

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.

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)

- An assessment within the supporting text of any flood risks associated with the site and the surrounding area.
- 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.

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)	<input checked="" type="checkbox"/>
Yes, I wish to participate in hearing session(s)	<input type="checkbox"/>

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:

N/A

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.