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South Norfolk Village Clusters Housing Allocation Plan - Reg 18 Alternative Sites and Focused Changes Consultation

Our ref: 21_04871_P

2nd October 2024

Dear Sir/Madam,

RE: South Norfolk Village Clusters Housing Allocations Plan - Focused Regulation 18 Consultation on Alternative Sites and Focused Changes

Thank you for reconsulting the Water Management Alliance on the Focused Regulation 18 Consultation on Alternative Sites and Focused Changes for South Norfolk Council for the South Norfolk Village Clusters Housing Allocations Plan. Having reviewed the revised sites and site boundaries, the Board have the following comments to make. Please note that some of our comments have changed for some site allocations, and new comments have been included on relevant new site allocations.

Preferred Site	Within or outside IDD* boundary	Comments
SN0567 & SN2082/VCSP02, Station Road, Spooner Row Area: 1.67Ha	Outside the IDD boundary, within Norfolk Rivers IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
SN5029 & SN2121REVA/VCWOR2, Land at Mill High, High Road, Wortwell Area: 0.9Ha	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment.	Minor development – no further comments.
SN0262, Land North of Church Road, Woodton, South Norfolk	Outside the IDD boundary, within the Waveney, Lower	Major development - If surface water discharges within the



MEMBER INTERNAL DRAINAGE BOARDS

Broads (2006) IDB, East Suffolk IDB, King's Lynn IDB, Norfolk Rivers IDB.

South Holland IDB, Waveney, Lower Yare and Lothingland IDB In association with Pevensey and Cuckmere WLMB



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Area: 1.045Ha	Yare and Lothingland IDB watershed catchment.	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).
SN0373/VCDIT1REV, Land between Thwaite Road/Tunneys Lane, Ditchingham, South Norfolk Area: 2.53Ha	Adjacent to the Waveney, Lower Yare and Lothingland IDD.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
SN0552REVC/VCBAR1, Land at Cock Street and Watton Road, Barford, South Norfolk Area: 1.49Ha	Outside the IDD boundary, within Norfolk Rivers IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
SN4078/VCGIL1, Land south of GIL1 The Street, Gillingham Area: 2.92Ha	Adjacent to the Waveney, Lower Yare and Lothingland IDD.	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).
SN2065REV, High Road, Needham, Harleston Area: 0.96Ha	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment.	Major development - A riparian watercourse is located to the north of the proposed site which feeds into a Main River within 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).
SN4051/VCBB1, Land Corner of Bell Road and Norwich Road, Barnham Broom Area: 1.433Ha	Outside the IDD boundary, within Norfolk Rivers IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
SN2036, Low Road, Low Street, Wortwell, Harleston Area: 0.52Ha	Within the Waveney, Lower Yare and Lothingland IDD.	A Board maintained watercourse is located to the east of the proposed site boundary. Byelaw 3 applies to any proposed discharge of surface water from the proposed site. All other Board Byelaws will also apply to this development.
SN0274REVA, The Street, Gillingham, South Norfolk Area: 1.24Ha	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
SN0432REVB/VCBR01, Norwich Road, Brooke, South Norfolk Area: 2.47Ha	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
SN4055/VCWIN2, The Street, Winfarthing	Site is adjacent to the Waveney, Lower Yare and Lothingland IDD.	Major development - If surface water discharges within the watershed catchment of the

Area: 0.91Ha		Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
SN0308/VCHAL1, Between Briar Lane and Yarmouth Road, Hales Area: 2.42Ha	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
SN1052REV/VCPSM1, Norwich Road, Pulham St Mary, South Norfolk Area: 2.77Ha	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
SN4069SL, White House Farm, Scole Road, Brockdish, South Norfolk Area: 0.172Ha	Within the Waveney, Lower Yare and Lothingland IDD.	There are a series of riparian watercourses to the south of the proposed site. Byelaw 3 applies to any proposed discharge of surface water from the proposed site. All other Board Byelaws will also apply to this development.
SN0274REVB, The Street, Gillingham, South Norfolk Area: 0.90Ha	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment.	Minor development – no further comments.
SN3019SL, School Road, Poplar Farm Area: 0.51Ha	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment.	A riparian watercourse runs adjacent to the southern site boundary which 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).
SN2183, Wymondham Road, Wreningham, Hethel, South Norfolk Area: 1.23Ha	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment.	A number of riparian watercourses are located to the east and south of the proposed site. 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).
SN2118, Sneath Road, Sneath Common Area: 0.54Ha	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment.	Minor development – no further comments.
SN1015, The Street, Hempnall, South Norfolk Area: 1.19Ha	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
SN0488, School Lane, Little Melton, Norwich Area: 1.27Ha	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
SN0400/VCALP1, Church Meadow, Alpington Area: 1.85Ha	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).

SN0348, South of Old Yarmouth Road, Kirby Cane Area: 1.13Ha	Partly within the Waveney, Lower Yare and Lothingland IDD.	Several riparian watercourses are located to the south of the proposed site which feeds into a Board maintained watercourse within the Waveney, Lower Yare and Lothingland IDD. Byelaw 3 applies to any proposed discharge of surface water from the proposed site. All other Board Byelaws will also apply to this development.
SN0242 & SN0017SL/VCASH1, Land west of New Road, Ashwellthorpe Area: 0.89Ha	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
SN4020, Land west of Old Yarmouth Road, Broome Area: 0.76Ha	Partly within Waveney, Lower Yare and Lothingland IDD.	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.
SN0433, Land South of Wheel Road, Alpington Area: 1.0Ha	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
SN055, Land east of Spur Road and south of Norwich Road Area: 1.0Ha	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for

		sustainable drainage systems (SuDS).
VC SPO1 REV, Land west of Bunwell Road, Spooner Row Area: 2.34Ha	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
VCBAR2, Land at Chapel St, Barford Area: 4.94Ha	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
VCBAW REV, Land east of Stock Hill, Bawburgh Area: 1.97Ha	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
VCEAR1, Land east of School Rd, Earsham Area: 1.3Ha	Within the Waveney, Lower Yare and Lothingland IDD.	A Board Maintained watercourse lies to the East of the proposed site. Byelaw 3 applies to any proposed discharge of surface water from the proposed site. Byelaw 10 may also apply for any proposed works within 9 metres of this watercourse. All other Board Byelaws will also apply to this development.
VCEAR2, Land north of The Street, Earsham Area: 1.4Ha	Outside the IDD boundary, within the Waveney, Lower Yare and Lothingland IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).

VCGIL1 REV, South of	Outside the IDD boundary,	Major development - If surface
Geldeston Rd/Daisy Way,	within the Waveney, Lower	water discharges within the
Gillingham	Yare and Lothingland IDB	water discharges within the
Gillingham	watershed catchment.	Board's IDD, we request that
Area, 2.0211a	watershed catchinent.	·
Area: 2.92Ha		this discharge is facilitated in
		line with the Non-statutory
		technical standards for
		sustainable drainage systems
		(SuDS).
VCMUL1, Land east of Bluebell	Outside the IDD boundary,	Major development - If surface
Rd/north of The Rosery,	within the Norfolk Rivers IDB	water discharges within the
Mulbarton	watershed catchment.	watershed catchment of the
		Board's IDD, we request that
Area: 1.5Ha		this discharge is facilitated in
		line with the Non-statutory
		technical standards for
		sustainable drainage systems
		(SuDS).
VCSWA2 Rev, Land on Main	Outside the IDD boundary,	Major development - If surface
Rd, Swardeston	within the Norfolk Rivers IDB	water discharges within the
	watershed catchment.	watershed catchment of the
Area: 2.7Ha		Board's IDD, we request that
		this discharge is facilitated in
		line with the Non-statutory
		technical standards for
		sustainable drainage systems
		(SuDS).
VCROC1, Land south of New	Outside the IDD boundary,	Major development - If surface
Inn Hill, Rockland St Mary	within the Waveney, Lower	water discharges within the
,	Yare and Lothingland IDB	watershed catchment of the
Area: 1.47Ha	watershed catchment.	Board's IDD, we request that
		this discharge is facilitated in
		line with the Non-statutory
		technical standards for
		sustainable drainage systems
		(SuDS).
VCSPO1, Land west of Bunwell	Outside the IDD boundary,	Major development - If surface
Rd, Spooner Row	within the Norfolk Rivers IDB	water discharges within the
	watershed catchment.	watershed catchment of the
Area: 2.3Ha		Board's IDD, we request that
		this discharge is facilitated in
		line with the Non-statutory
		technical standards for
		sustainable drainage systems
		(SuDS).
VCTAC REV, Land west of	Outside the IDD boundary,	Major development - If surface
Norwich Road, Tacolneston	within the Norfolk Rivers IDB	water discharges within the
	watershed catchment.	watershed catchment of the
Area: 1.08ha		Board's IDD, we request that
		this discharge is facilitated in
		line with the Non-statutory

		technical standards for sustainable drainage systems (SuDS).
VCTAS1 REV, Land north of Church Rd, Tasburgh 1.2Ha	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that
		this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
VCWIC REV, Land south of Wicklewood Primary School, Wicklewood	Outside the IDD boundary, within the Norfolk Rivers IDB watershed catchment.	Major development - If surface water discharges within the watershed catchment of the Board's IDD, we request that
Area: 2.97Ha		this discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).

Notes:

*Internal Drainage District

Comments are restricted to the information provided for the 24 sites only.

Comments are either divided into: Major development (sites larger than 1 hectare) or Minor developments (sites smaller than 1 hectare). Please note, the Board will also classify sites that are smaller than 1 hectare which include the development of 10 or more dwellings as major developments. However, this information has not been provided as part of this consultation.

The Board will comment on all major developments that are within the watershed catchment of each of its Internal Drainage Districts, should a planning application be received.

We have provided details about riparian and Board maintained watercourses near each proposed development site. However, this information should be further investigated and confirmed by the applicant when applying for planning permission.

In order to reduce potential conflict between the planning process and the Board's regulatory regime and consenting process please be aware of the points set out below.

Surface water discharge:

If a surface water discharge is proposed to a watercourse within the IDD as part of any
new development, then the proposed development will require land drainage consent
in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely
be conditional, pending the payment of a Surface Water Development Contribution

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fee, calculated in line with the Board's charging policy (https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).

• If surface waters from the new developments are to be disposed of via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency. If (following testing) a strategy wholly reliant on infiltration is not viable and a surface water discharge is proposed to a watercourse, then the proposed development will require land drainage consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy (https://www.wlma.org.uk/uploads/WMA Table of Charges and Fees.pdf).

 Any proposed discharge of surface water to a sewer from new developments should be in line with the drainage hierarchy (as per best practice) and is viable at the proposed location.

Discharge of treated foul effluent

• The discharge of treated foul water to a watercourse within the IDD requires land drainage consent in line with the Board's byelaws (specifically byelaw 3).

Alterations to a Board maintained watercourse

For any Board maintained watercourses within the IDD, the following points are of relevance:

- Any works within 9 metres (7 metres for Waveney Lower Yare and Lothingland IDB)
 of a Board maintained watercourse will require consent to relax Byelaw 10 (no
 obstructions within 9 metres (7 metres WLYL IDB) of the edge of drainage or flood risk
 management infrastructure).
- If development proposals involve works to alter a Board maintained watercourse, consent is required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).
- Within the Waveney, Lower Yare and Lothingland IDB, if any development proposes
 to install services or make excavations within or alter the banks of a Board maintained
 Watercourse, consent is required as per Byelaw 17 of the Board's Byelaws.

Alterations to riparian (ordinary) watercourses

- Should any development include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4). The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.
- Within the Waveney, Lower Yare and Lothingland IDB, should any development involves installing services or making excavations within a Board maintained

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Watercourse, or altering its banks, consent is required as per Byelaw 17 of the Board's Byelaws.

Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such we strongly recommend that developers seek the necessary consent prior to determination of a planning application. The Board's officers are available to respond to queries and provide advice.

Yours sincerely,

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Phillipa Nanson Sustainable Development Officer Water Management Alliance

How to Apply for Land Drainage Consent

To apply for Land Drainage Consent please complete an application form.

Application forms, application fees and 'Frequently Asked Questions' can be found on the 'Development' section of the Board's website.

For any additional help please call us on 01553 819600 or email planning@wlma.org.uk.

Byelaws

Waveney, Lower Yare and Lothingland IDB Byelaws can be found via the following link: https://www.wlma.org.uk/uploads/WLYLIDB_Byelaws.pdf

Norfolk Rivers IDB Byelaws can be found via the following link: https://www.wlma.org.uk/uploads/NRIDB Byelaws.pdf

Mapping

Mapping of the Waveney, Lower Yare and Lothingland IDB district can be viewed via the following link:

https://www.wlma.org.uk/uploads/WLYLIDB_Index_Map.pdf

Mapping of the Norfolk Rivers IDB district can be viewed via the following link: https://www.wlma.org.uk/uploads/179-NRIDB_Index.pdf

Planning and Byelaw Strategy

The Board's Planning and Byelaw Strategy seeks to provide:

- Guidance on how (and why) the Board will review and comment on planning applications.
- Information on the policies against which the Board will assess and determine applications.
- Guidance to riparian (waterside) landowners regarding watercourse maintenance.

The Planning and Byelaw Strategy can be found via the following link: https://www.wlma.org.uk/uploads/WMA Planning and Byelaw Policy.pdf

Arterial Watercourses

Maps on the Board's website show which watercourses are designated as Arterial Watercourses by the Board. You may also have heard these watercourses referred to as 'Main Drains' or 'Maintained Watercourses'. The designation is an acknowledgement by the Board that the watercourse is of arterial importance to the Internal Drainage District and as such will normally receive maintenance from the IDB using the Board's Permissive Powers. Although the Board opts to proactively maintain this arterial network, there is no change in the ownership or liability associated with the watercourse resulting from this designation.