



Village Clusters Housing Allocations Plan
(Reg. 18 Consultation on Alternative Sites
and Focused Changes)

Frequently Asked Questions

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What is the South Norfolk Village Clusters Housing Allocations Plan?

The South Norfolk Village Clusters Housing Allocations Plan (VCHAP) is a document that seeks to allocate a series of smaller sites across the villages within the South Norfolk District in order to accommodate a minimum of 1,200 new homes.

The VCHAP has been prepared by South Norfolk Council and is being developed alongside the Greater Norwich Local Plan (GNLP).

The GNLP is being produced by Broadland District Council, Norwich City Council and South Norfolk Council working together with Norfolk County Council through the Greater Norwich Development Partnership (GNDP). The GNLP plans for the housing and jobs needs of the area to 2038. The GNLP sets out the requirement for the number of homes that need to be delivered as part of the VCHAP.

Who is making the VCHAP?

The Village Clusters Plan has been prepared by South Norfolk District Council. The development of the plan is overseen by the Stronger, Greener Economy Policy Committee.

How do the GNLP and the VCHAP relate to one another?

The Greater Norwich Local Plan (GNLP) has been produced by Broadland District Council, Norwich City Council and South Norfolk Council working together with Norfolk County Council through the Greater Norwich Development Partnership (GNDP). The Broads Authority is also part of the GNDP but produces a separate local plan.

The GNLP identifies the homes, jobs and infrastructure that needs to be planned for across the South Norfolk, Broadland and Norwich between now and 2038. The GNLP also provides updated strategic policies to help guide and shape development. The GNLP is consistent with Government's planning policies as set out in the National Planning Policy Framework (NPPF).

The GNLP was submitted to the Secretary of State for independent examination in July 2021. Following the examination, the Main Modifications consultation ran between the 25th October and 6th December 2023. This consultation was hosted by the GNLP. The representations will be considered by the planning inspectors prior to completion of their report. Following receipt of the Inspectors' Report, adoption of the GNLP is anticipated in early to mid-2024.

In South Norfolk, the GNLP sets out areas for future development in the parishes situated in the Norwich fringe (such as Costessey, Cringleford and Trowse), the market towns and the larger villages (such as Hethersett and Poringland), as well as all non-housing developments. The VCHAP deals solely with housing growth in the smaller rural settlements in the South Norfolk.

Policies 7.1 to 7.4 of the GNLP set out the policies for the distribution of growth across Greater Norwich. Specifically, Policy 7.4 sets out the level of housing growth in the village clusters, including what is already permitted and what needs to be allocated. It notes that a separate South Norfolk Village Clusters Housing Allocations Local Plan will be produced to include sites for a minimum of 1,200 homes. This is in addition to the 1,187 homes either completed between 2018/19 and 2021/22 or already committed (with permission or already allocated) in the South Norfolk village clusters at 1 April 2022.

How does the VCHAP relate to the existing Local Plan documents?

The emerging GNLP and VCHAP documents have been prepared in the context of the existing Local Plan documents.

The current Local Plan documents in South Norfolk include:

- The Joint Core Strategy for Broadland, Norwich and South Norfolk (2014), which sets out the strategic planning policies covering the three Districts;
- The South Norfolk Site Specific Allocations and Policies Document (2015), which sets out allocations for housing and other uses; and
- The South Norfolk Development Management Policies Document (2015) which sets out a number of non-site-specific policies (covering issues such as highways, parking, design, landscaping, neighbour amenity etc.) applicable to many types of development, as well as criteria based policies for various different types of development and policies applying to particular landscape designations.

When adopted the GNLP will replace the existing Joint Core Strategy (JCS) and will also replace those parts of the South Norfolk Site Specific Allocations and Policies Document which relate to the market towns, other larger settlements and the Norwich urban fringe in South Norfolk. The VCHAP will replace the remainder of the Site-Specific Allocations and Policies Document. The 2015 Development Management Policies Document will remain current.

How does the VCHAP relate to both existing and emerging Neighbourhood Plans?

Some Town and Parish Councils have adopted Neighbourhood Plans in place whilst others are continuing to work on the production of their Neighbourhood Plans. These Neighbourhood Plan documents sit alongside the Local Plan and when adopted are also taken into account in determining planning applications. Most of these Neighbourhood Plans include more detailed Development Management policies that aim to shape development proposals to better reflect local circumstances.

Neighbourhood Plans can also allocate housing sites. The Diss and District Neighbourhood Plan (which includes the Village Cluster parishes of Burston, Roydon and Scole) was 'made' on 16th October 2023 and includes a number of site allocations across the Neighbourhood Plan area. The emerging Dickleburgh & Rushall Neighbourhood Plan is also proposing housing allocations.

Where emerging Neighbourhood Plans have proposed housing allocations, these allocations have been considered during the preparation of the VCHAP and the approach to the relevant 'village clusters' was outlined in the pre-submission Regulation-19 version of the VCHAP ([South Norfolk District Council - South Norfolk Village Clusters Housing Allocations Plan \(Reg. 19 Pre-submission Draft\) \(oc2.uk\)](#))

Decisions relating to the allocation of sites in Neighbourhood Plans are undertaken through the relevant Neighbourhood Plan process. Sites promoted to SNC within these areas were forwarded to the Neighbourhood Plan Steering Groups for their review.

What is a 'Village Cluster'?

A 'village cluster' is a group of villages that share a range of services and facilities. Village clusters have been defined largely on the basis of primary school catchment areas, which are considered to provide a benchmark for social sustainability.

A total of 48 village cluster areas have been identified throughout South Norfolk. The parishes that fall in each cluster were set out in the pre-submission Regulation-19 version of the Plan ([South Norfolk District Council - South Norfolk Village Clusters Housing Allocations Plan \(Reg. 19 Pre-submission Draft\) \(oc2.uk\)](#)).

The market towns, larger villages and the parishes situated in the Norwich urban fringe do not form part of a village cluster. These areas are being dealt with separately through the Greater Norwich Local Plan (GNLP); however, some Village Clusters are centred around a Primary School which is located in one of those larger settlements.

How much more housing is being planned and why?

The principal aim of the Village Cluster Housing Allocation Plan (VCHAP) is to allocate a series of smaller sites to accommodate a minimum of 1,200 new homes across the villages within the South Norfolk, in accordance with the requirements of the GNLP. The GNLP requirements derive from the Government's method for calculating Local Housing Need for the area. This approach has been tested through the GNLP Examination.

Locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services. The provision of a range of relatively small allocation sites is also an expectation of the National Planning Policy Framework. This approach helps to support small and medium size builders, providing choice for the market and helping to ensure the delivery of housing in popular village locations.

The allocations proposed also aim to provide a range of sizes and tenures of new homes to meet needs of current and future residents in village clusters, including the provision of affordable housing.

In addition, people's recent experience of the Covid-19 pandemic has driven an increased interest in homes in rural locations, which have easy access to the countryside. This increased interest is also fuelled by changing patterns of work, including an increased desire for, and understanding of, the opportunity for remote home working enabled by improved communications, meaning that this increased demand for more rural locations could be set to continue well into the future.

What will be the impact on the countryside?

The majority of the sites being considered for the Village Cluster Housing Allocation Plan (VCHAP) are undeveloped sites on the edges of existing villages. The plan seeks to protect the countryside by choosing development sites that are well related to existing development as opposed to being in remote open countryside. The Plan also takes care to protect important landscapes, plants (e.g. trees and hedgerows), wildlife and heritage assets. Sites have been subject to Landscape Visual Appraisals, which identify potential risks to the landscape and potential mitigation measures to respond to these.

There are not enough GPs at the local medical centre – how will they cope if more houses are built?

The NHS has programmes in place to address the current pressures on healthcare services. This includes new ways of working, use of new technology, and recruiting more clinical staff. Locally too, NHS organisations coordinated by the Norfolk and Waveney Integrated Care Systems (ICS) are finding ways to help keep people well, expand healthcare services, and to ensure services are better coordinated.

The Norfolk Health Protocol is a collaboration and engagement protocol between local planning authorities and healthcare providers which seeks to plan for future growth and to promote wellbeing. By working together with local planning authorities NHS organisations can be clear about the locations and timing of new housing and jobs, and this enables informed decision-making about how and when to expand health facilities.

Will infrastructure and services be able to cope with the additional development?

Most of the allocations proposed within the South Norfolk Village Cluster Housing Allocations Plan (VCHAP) are relatively small scale. Therefore, in many instances this type of development is unlikely to have a significant impact on existing infrastructure and services. Some services like shops and pubs may benefit from additional customers.

The Council has engaged with service providers as part of the production of the plan, including the NHS, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. Detailed discussions have taken place to ensure that infrastructure issues have been identified and understood as part of the plan making process. The feedback obtained from these discussions has helped to inform the site selection process. Infrastructure upgrades that are necessary for sites to be developed have been identified within the VCHAP consultation documents.

All of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.

What do the titles ‘Regulation 18’ and ‘Regulation 19’ mean?

The regulation numbers come from the Town and Country Planning (Local Planning) (England) Regulations 2012. This is one of the main laws controlling plan making, which dictates the processes we must follow to prepare a local plan. The plan also has to be consistent with the National Planning Policy Framework (NPPF), which sets out the government’s planning policies for England.

The Regulation 18 requires that the public, and a range of other stakeholders (e.g. parish councils, regulatory bodies, utility providers, developers/landowners etc.) be notified that the Council is preparing a Plan and that they are invited to comment about what that Plan ought to contain. An initial Regulation 18 consultation took place between 7th June 2021 and 2nd August 2021. This current consultation is also being held under Regulation 18, but is focussed on a few specific sites and focussed changes.

Regulation 19 is a more formal stage that follows on from Regulation 18. Regulation 19 is not a consultation per se but rather allows stakeholders to submit representations in respect

of whether the plan is: 1) legally and procedurally compliant; 2) Sound*; and 3) in compliance with the Duty to Cooperate. Representations made at Regulation 19 will be considered as part of any the independent examination into the Plan. The Regulation 19 publication took place between 23rd January and 8th March 2023. A further Regulation 19 consultation on the final choice of sites from this current consultation will be published during 2024.

*Soundness is defined in paragraph 35 of the NPPF and requires a Local Plan to be positively prepared, justified, effective and consistent with national policy.

Where are we now and how do I comment?

Following the close of the Regulation 19 publication period one of the preferred sites, VC ROC2 for 25 dwellings at Rockland St Mary, was no longer considered to be achievable as a suitable vehicular access cannot currently be delivered. Furthermore, discussions with Historic England resulted in the loss 5 units from VC TAS1 at Tasburgh. A loss of 30 units means the VCHAP would not deliver the minimum 1,200 dwellings required under the GNLP.

To ensure that the VCHAP meets its minimum requirements the Council is now consulting on a series of eleven sites which could replace the losses and potentially make a modest increase to the numbers in the VCHAP. The rationale for the eleven sites and some of the background text for the relevant village clusters are included in the Regulation 18 Consultation on Alternative Sites and Focused Changes consultation document. Two further sites are included in the consultation, which promote boundary changes in response to representations received at the January 2023 Regulation 19.

It should be noted that this consultation only relates to the thirteen sites detailed. The remainder of the January 2023 Regulation 19 document is (a) not part of this consultation and (b) will be taken forward to be submitted to the Secretary of State once decisions on the additional sites have been made. The Council has addressed the representations made at the Regulation 19 stage, and a summary of the representations and the Council's responses can be found in the December 2023 Statement of Consultation which is available in the Supporting Documents for this Focused Regulation 18 consultation. The Council is also not seeking the submission of any additional sites at this stage.

The Regulation 18 Consultation on Alternative Sites and Focused Changes consultation document can be viewed 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: 8.30am-5pm)
- **The Octagon** – Mere Street, Diss, Norfolk, IP22 4AH (open Mon-Fri: 9am-5pm)
- **The following libraries** –
 - Hethersett
 - Loddon
 - Long Stratton
 - Millennium Library, Norwich
 - Poringland
 - Wymondham

Please visit the Norfolk County Council website for details of your local branch (www.norfolk.gov.uk/libraries-local-history-and-archives)

Anyone wishing to submit a consultation response may do so **before 5.00pm on 5 February 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. Completed hard copy forms should be posted to the Place Shaping Team at the South Norfolk Council office address listed above.

Respondents submitting comments online will be asked to select either 'Support', 'Object' or 'Comment' before writing comments. For Question 1 and part 'b' questions (e.g. 2b, 3b etc.) respondents should select the 'Comment' option and complete the associated text box. For the remaining part 'a' questions (e.g. 2a, 3a etc.) respondents should use either the 'Support', 'Object' or 'Comment' option and complete the associated text box.

Further background and supporting material relating to the VCHAP is also available through our **Virtual Exhibition**, which can be accessed at <https://vchap.exhibition.app>

What happens next?

Following this Regulation 18 consultation all of the responses received will be analysed. The responses will then inform the final selection of sites from this consultation that will be included in the version of the VCHAP that the Council intends to submit for examination, within the remainder of the January 2023 Regulation 19 document. There will be a further opportunity to comment on the 'soundness' and legal compliance of the final choice of sites from this consultation when a Regulation 19 document of Focused Changes to the previous draft plan is published during 2024.

Why must I give my name and contact details? What about data protection?

It is important to comply with data protection responsibilities under the General Data Protection Regulations (GDPR) when exercising planning functions. Any personal details you supply will solely be used for the purposes of correspondence relating to the Village Clusters Housing Allocations Plan. Personal details will be retained for one year following the date of adoption of the Village Clusters Housing Allocations Plan.

The information you provide as part of this consultation (including your name) will be available for public scrutiny as part of the process of preparing the Village Clusters Housing Allocations Plan. Full details of privacy relating to this Plan are available at <http://www.southnorfolkandbroadland.gov.uk/vchap> or on request by contacting the Place Shaping Team at: localplan.snc@southnorfolkandbroadland.gov.uk or (01508) 533805.

What evidence has been used to determine which sites are included?

Over 500 sites have been promoted to the Council for consideration for inclusion within the VCHAP. The starting point for all of the site assessments was the Norfolk-wide Housing and Economic Land Availability Assessment (HELAA) Methodology (2016). This was agreed as part of the Norfolk Strategic Planning Framework process and is considered to be consistent with Government guidance; it also formed the basis of the GNLP site assessments.

Whilst assessment against the HELAA methodology provided a starting point, the full site assessment was a more detailed process which included consideration of the planning history of the site, a site visit and applying some more detailed and criteria specific to the VCHAP. The detailed criteria used to assess sites was agreed by the members of South Norfolk's former Regulation and Planning Policy Committee in May 2020.

The assessment of sites was supported by a technical consultation with both internal and external consultees. This consultation included a wide range of stakeholders who provided their expertise on matters such as highways, education, flood risk, minerals and waste, utilities and infrastructure capacity, landscape, heritage and environmental protection issues. Where necessary subsequent detailed discussions with technical consultees took place to ensure that site specific issues and opportunities, as well as any wider matters of concern were explored. These discussions have continued following the conclusion of the Regulation 19 consultation.

The Council has also taken into account the wider responses made during the Regulation 18 and Regulation 19 consultations, by members of the public, site promoters etc.

Full details supporting the inclusion of the thirteen sites in this consultation are included within the Regulation 18 Consultation on Alternative Sites and Focused Changes consultation document and the full new and updated Site Assessments of all sites included in the consultation can be found in the Supporting Documents. The Selection of Sites for the Focused Regulation 18 Consultation Note and Table, also included in the Supporting Documents, outlines the rationale for sites that were not included within this consultation.

[What are the supporting documents to the Regulation 18 Consultation on Alternative Sites and Focused Changes?](#)

The documents listed below have been prepared to support this consultation and are available to review as part of the evidence base published alongside this Regulation 18 Consultation on Alternative Sites and Focused Changes. The evidence base justifies the content of the consultation.

Sustainability Appraisal (SA) Interim Report

The scope of the Sustainability Appraisal was established with the specified bodies in accordance with legal requirements in autumn 2020. SA commentaries have been used consistently as part of the decision-making process throughout the preparation of the Plan. An update to the SA has been produced for this Focused Regulation 18 consultation and is available for comment as part of the Supporting Documents.

Habitat Regulation Assessment (HRA)

The Habitat Regulations Assessment (HRA) has been prepared to identify European sites within or near the Village Cluster area that may be directly, or indirectly, affected by the allocations within this Plan and concludes on whether there are any significant effects likely as a result of the Plan proposals. All but one of the sites in this Focused Regulation 18 consultation (SN6000 at Barford) were already preferred or shortlisted at previous stages; as such they were considered in earlier versions of the HRA.

The HRA prepared to accompany the 2021 Regulation 18 document (available at <https://southnorfolkandbroadland.oc2.uk/document/2>) 'screened in' all of the preferred and

shortlisted sites for further consideration, as such it is assumed that this would be the case for the new/amended sites in this consultation.

The HRA accompanying the Regulation 19 consultation (available at: <https://southnorfolkandbroadland.oc2.uk/document/13>) did not identify any significant impacts at a site-specific level, but did identify cumulative impacts, for which suitable mitigation could be implemented. It is therefore reasonable to assume this will also be the case for new/amended sites in this consultation. As such, an update to the HRA is not considered necessary at this stage, but will be prepared for the next Regulation 19 Pre-Submission publication.

Site Assessment Booklets and Maps

The Site Assessment Booklets contain the site assessment forms that have been prepared for the sites considered for the Regulation 18 focused consultation. These are presented in two different Site Assessment Booklets within the Supporting Documents, separated between those that have and have not been included in the consultation.

Maps of the sites included in the consultation are available on the interactive map that is part of the virtual exhibition room throughout this publication period. Maps of each relevant settlement covering the thirteen sites have been prepared to support the consultation and include the proposed sites, any sites already included in the Regulation 19 Plan and the defined Settlement Limits.

An update to the Carried Forward Allocations Review has also been published and included within the Supporting Documents.

The Equalities Impact Assessment (EqIA) Addendum

Local authorities are required to undertake an EqIA under The Equality Act 2010; this stems from the duty placed on local authorities to eliminate unlawful discrimination in carrying out their functions, and to promote equality of opportunity.

The EqIA addendum builds upon the Equality Impact Assessment (EqIA) published in January 2023 to accompany the Regulation 19 VCHAP Pre-Submission version. It reviews the Regulation 18 Focused Consultation document to assess any potential impacts on equalities resulting from the thirteen possible site-specific housing allocations identified in the consultation.

Statement of Consultation

Local Plan documents are required to have undergone suitable community and stakeholder involvement in their preparation, as required by the Town and Country (Local Planning) (England) Regulations 2012. The details of who will be involved in the process of local plan document production, using different methods and at different stages, is set out in South Norfolk Council's Statement of Community Involvement (SCI), adopted in 2017 (with amendments in 2019 and 2020).

This Statement of Consultation (Part 3) details the methodologies and results of the most recent Regulation 19 consultation. Principally, it provides details of the number of representations made and a summary of the main issues raised within those representations, as required by Regulation 22(c) of the Town and Country (Local Planning) (England) Regulations 2012. The report also provides a response by South Norfolk Council to each of the main issues raised.

Parts 1 and 2 of the Statement of Consultation were published as part of the Regulation 19 Consultation. Part 1 of the Statement of Consultation set out the earlier stages of the work that was undertaken by the GNLP, prior to the decision by South Norfolk to produce an independent VCHAP document. Part 2 was published as part of the Regulation 19 Consultation and set out the details the methodologies and results of the consultations that have been undertaken by South Norfolk Council in the development of the VCHAP; specifically the Technical Consultation (June-July 2020) and the Regulation 18 Consultation (June-August 2021). Both Parts 1 and 2 can be viewed on the Councils website ([South Norfolk District Council - South Norfolk Village Clusters Housing Allocations Plan \(Reg. 19 Draft\) - Supporting Documents \(oc2.uk\)](https://www.south-norfolk.gov.uk/consultation/south-norfolk-village-clusters-housing-allocations-plan-reg-19-draft-supporting-documents-oc2-uk))

Strategic Flood Risk Assessment (Stage 2)

Stage 2 Strategic Flood Risk Assessments (SFRAs) specifically focusing on sites within the South Norfolk Village Clusters area were undertaken to both inform the choice of sites and help develop the policies in the January 2023 Regulation 19 document. The SFRA was updated following legislative changes made in Autumn 2022 and this work is ongoing to inform the selection of sites in this consultation and the site-specific policy wording for those sites that go forward into the final draft of the Plan. The latest SFRA documents can be found as part of the Supporting Documents.

Water Cycle Study

The South Norfolk Water Cycle Study (WCS) builds upon the WCS produced to support the production of the GNLP. The South Norfolk addendum provides specific information relating to the sites within the Village Cluster Plan area, taking into account existing commitments and development outside the Plan area that connects to Water Recycling Centres (WRC) within the Village Cluster Plan area. This work will be updated as part of the final choice of sites following this Focussed Regulation 18 consultation.

Heritage Impact Assessments

Following advice received from Historic England, Heritage Impact Assessments (HIA) have been prepared for selected sites which may impact on heritage assets (Listed Buildings, Conservation Areas, archaeological remains etc.). The HIAs have helped to shape the site selection process and informed the detailed allocation policies for the preferred sites in the January 2023 Regulation 19 document. New or updated HIAs have been prepared for 11 of the sites in this focussed consultation and are available to view as Supporting Documents. These will be used to shape policies for those relevant sites that go forward into the final version of the Plan.

Landscape Visual Appraisals

Following the 2021 Regulation 18 consultation it was determined that the site selection process would benefit from Landscape Visual Appraisals (LVAs) to consider in greater detail the potential landscape and visual impact of developing rural sites, often on the edge of a settlement. LVAs were completed for all of the January 2023 Regulation 19 preferred sites with the findings being used to inform the site-specific policies where appropriate. LVAs have now been completed or updated for the thirteen sites in this consultation and are available as Supporting Documents. These will be used to inform the site-specific policies for those sites that go forward into the final draft of the Plan.

Viability Appraisal (VA)

An updated Viability Appraisal (VA) was prepared to support the January 2023 Regulation 19 Village Clusters Plan. This included looking at the potential impact of addressing Nutrient Neutrality (see also below). The purpose of the South Norfolk VA was firstly to confirm that the small-scale sites in the South Norfolk Village Clusters locations remain viable taking into account the latest data, including increased building costs, and secondly to identify whether the development typologies identified would generate sufficient surplus, over and above a normal developer profit, to cover any increased costs associated with Nutrient Neutrality. This document is available in the Supporting Documents for the Regulation 19 consultation at: <https://southnorfolkandbroadland.oc2.uk/document/13>.

Health Impact Assessment

The Health Impact Assessment considers the impact of the Plan on the health and wellbeing of existing and future residents and explores potential opportunities for enhancement and/or mitigation measures. The report has been verified for relevance and included alongside this Regulation 18 focused consultation.

Can I promote a new site for assessment at this stage?

The Council is not formally accepting the submission of new sites at this stage.

How does nutrient neutrality impact on the VCHAP?

A modification to emerging Policy 2 of the GNLP has been prepared to address this matter; however, the acceptability of the VCHAP will depend upon the acceptance of that modification.

In terms of the implications for individual site allocations, please see the Council's webpage (<https://www.southnorfolkandbroadland.gov.uk/planning-applications/apply/2>) for details of the areas affected by nutrient neutrality as well as up to date information relating to the ongoing measures being taken to allow development to demonstrate nutrient neutrality.

How have the comments submitted during the Regulation-19 consultation been addressed?

Following the close of the Regulation 19 consultation all of the representations that were received were reviewed in detail by the Council. The Statement of Consultation (available within the Supporting Documents) is a record of the Council's responses to the comments submitted during Regulation 19 and includes the details of any actions arising from the consultation responses.