



# Village Clusters Housing Allocations Plan (Reg. 19 Pre-submission Addendum)

## 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 in accordance with the Greater Norwich Local Plan (GNLP).

South Norfolk Council recently adopted the Greater Norwich Local Plan (GNLP), produced jointly with Broadland District and Norwich City Councils, which identifies how many homes need to be built between 2018 and 2038 across the three Council areas. 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 Planning and Economic Growth 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). 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 (such as Wymondham and Diss) 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 in the South Norfolk village clusters that already been built, had planning permission or were identified as an allocation as of 1 April 2022.

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

The current Local Plan documents in South Norfolk include:

- The Greater Norwich Local Plan (2024) which plans for the housing and job needs of Broadland, Norwich and South Norfolk to 2038 and includes strategic policies to guide future development and plans to protect the environment;

- The South Norfolk Site Specific Allocations and Policies Document (2015), which sets out allocations for housing and other uses. The majority of the document is now superseded by the adoption of the Greater Norwich Local Plan except for the villages, which will be addressed through the VCHAP; and
- The South Norfolk Development Management Policies Document (2015) which sets out a number of non site-specific policies applicable to many types of development (highways, parking, design, landscaping, neighbour amenity etc.), as well as criteria based policies for various different types of development and policies applying to particular landscape designations.
- Two Area Action Plans for Long Stratton and Wymondham.

The GNLP has recently been adopted and now forms part of the Development Plan for the Greater Norwich area. The GNLP has replaced the Joint Core Strategy (JCS) and 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, as well as all non-housing sites.

The VCHAP will replace the remainder of the Site-Specific Allocations and Policies Document.

The 2015 Development Management Policies Document will remain current until those policies are subject to review.

### 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 & District Neighbourhood Plan (covering the villages of Burston, Scole and Roydon) was recently adopted by the Council and allocated sites for 125 dwellings. The emerging Dickleburgh & Rushall Neighbourhood Plan is also proposing housing allocations. 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. This means that in some instances a 'cluster' may only cover one parish to which that catchment extends.

A total of 48 village cluster areas have been identified throughout the District. The parishes that fall in each cluster were set out in the pre-submission Regulation-19 version of the Plan.

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 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 District, 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.

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 within the VCHAP 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 experience during the Covid-19 pandemic has also 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 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 with 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

## 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 doctors. Locally too, NHS organisations coordinated by the Norfolk and Waveney Integrated Care Systems 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 (up to 50 dwellings). 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 a number of 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 and, where appropriate, is reflected in the site-specific policy requirements.

The development of certain sites will require some local infrastructure upgrades, for example an extension of a footway to link the site to the village.

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 local infrastructure effectively supports growth.

### What do the titles 'Regulation 18' and 'Regulation 19' mean and what happens next?

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. This consultation took place between 7<sup>th</sup> June 2021 and 2<sup>nd</sup> August 2021.

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 are considered as part of any the independent examination into the Plan. The first Regulation 19 publication on the VCHAP took place between 23<sup>rd</sup> January and 8<sup>th</sup> March 2023.

\*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.

Following the completion of the Regulation 19 publication, it was found that that one of the proposed sites was no longer deliverable (VC ROC2 in Rockland St Mary) and that another site should be slightly reduced in numbers to address heritage concerns (VC TAS1 in Tasburgh). This led to a shortfall in the number of homes that would be delivered by the VCHAP, which is required by the GNLP to be a minimum of 1,200 homes.

Therefore, the Council undertook a further Regulation 18 Alternative Sites and Focused Changes consultation between 11<sup>th</sup> December 2023 and 5<sup>th</sup> February 2024 on alternative site options in order to address the shortfall in numbers, as well as other focused changes.

This current publication follows the Regulation 18 Alternative Sites and Focused Changes consultation and is being held under Regulation 19. The published Addendum only deals

with the changes that are being proposed to the Regulation 19 VCHAP document that was published in 2023.

Following this further Regulation 19 stage the Council will submit its final version of the VCHAP to an Inspector for independent examination including the amendments being proposed in the Addendum. The Inspector will assess whether the Plan has met the three tests noted above. Following the examination, the Inspector will advise whether or not the Plan can be adopted, and whether any modifications need to be made to the Plan.

### Where are we now and how do I comment?

The Council has published its Regulation 19 Pre-submission Addendum to the Village Clusters Housing Allocation Plan. The proposed Addendum includes the alternative and amended sites proposed for allocation within the VCHAP when it is submitted to the Planning Inspectorate for examination. The document also includes a number of other focused changes to the proposed VCHAP. The published document only deals with the changes that are being proposed to the Regulation 19 VCHAP document that was published in 2023. The purpose of this consultation is to provide an opportunity for representations to be made on the Addendum prior to the VCHAP's submission to the Secretary of State for examination in public by an independent planning inspector. As part of this examination the planning inspector will consider all comments that are 'duly made' within this consultation period.

This stage of the process tests whether the Local Plan has been prepared in a **legally compliant** and **sound** way. If responding you will need to tell us **why** the Plan does not meet one or more of the specific tests and **how** it should be changed so that it does. Guidance notes for making representations are available within the online consultation system.

The proposed VCHAP can be viewed at the following locations:

- Online at - [www.southnorfolkandbroadland.gov.uk/vchap](http://www.southnorfolkandbroadland.gov.uk/vchap)
- **South Norfolk Council offices** – The Horizon Centre, Broadland Business Park, Peachman Way, Norwich, NR7 0WF (open Mon-Fri: 9am-5pm)
- **The Octagon** – Mere Street, Diss, Norfolk, IP22 4AH (open Mon-Fri: 9am-5pm)
- **Libraries in South Norfolk** – visit the Norfolk County Council website for details of your local branch ([www.norfolk.gov.uk/libraries-local-history-and-archives](http://www.norfolk.gov.uk/libraries-local-history-and-archives))
- **Millennium Library** - The Forum, Millennium Plain, Norwich NR2 1AW (open Mon-Fri: 10am-7pm; Sat: 9am-5pm; Sun: 10.30am-4.30pm)

Anyone wishing to submit a formal representation on the content of the plan may do so, **in writing, and before 5.00pm on 7<sup>th</sup> October 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. This will help ensure that submitted representations are in the prescribed format and can be taken into account in the examination of the plan. Completed hard copy forms should be posted to the South Norfolk Council office address listed above.

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 publication period, the Council will consider all representations received and decide whether the Plan is sound and ready for examination. If the Council resolves that the Plan is ready for examination then it will submit the proposed Plan, including the changes being proposed in the Addendum, the supporting evidence and the representations received to the Secretary of State for independent examination.

### 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. Representations at Regulation 19 must be 'made available' in line with the regulations. This includes publication on South Norfolk Council's website, and we must make the names of anyone who comments at this stage available to the Planning Inspector. However, the address or other contact details of those who have made representations will not be published but will be used by the Programme Officer to contact participants and administer the examination. In some cases, in order to run virtual events by means of video or telephone conference, the Planning Inspectorate may need to know the e-mail address and/or telephone number of those making representations.

### What evidence have you based your decisions on?

Over 500 sites were promoted to the Council for consideration. 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 criteria, specific to the VCHAP. The detailed criteria used to assess sites were agreed by the members of South Norfolk's 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 could be explored further prior to the site selection process.

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



## What are the supporting documents to the VCHAP?

The documents listed below have been prepared to support this Plan and are available to review as part of the evidence base published alongside this Regulation 19 Addendum. The evidence base justifies the content of the Plan and as such whilst representations are not made on the evidence base documents themselves, representations relating to the plan can address the adequacy of that evidence.

### Sustainability Appraisal (SA) Report Update

The SA is an appraisal of the economic, environmental and social effects of a plan, prepared from the outset of the preparation process and supporting each stage, including the decision making process. It supports that the selection of allocation sites accord with sustainable development. An update to the SA has been produced to consider the addendum sites in the context of the Plan as a whole.

### Habitat Regulation Assessment (HRA)

Councils are required by law to prepare an HRA that assesses the impact of a local plan on sites that are protected under the Conservation of Habitats and Species Regulations 2017, these are known as “Habitat Sites”. The legislation requires that an ‘appropriate assessment’ is carried out for plans or project that are likely to have a significant effect on a Habitat Site or Sites. This process requires detailed consideration of the potential for the plan or project, taking account of the mitigation proposed, to affect the conservation objectives of the site(s) concerned, to ensure no significant impact will occur.

The HRA has been updated to reflect the final choice of sites included in this addendum document, as well as taking on board the adoption of the GNLP and the proposed approach to Nutrient Neutrality (see below).

### Site Assessment Booklets and Maps

The Site Assessment Booklet included in the Supporting Documents for this publication contains the site assessment forms for the sites included in the Addendum, as well as the assessments for the remaining sites in the VCHAP, the sites that were not taken forward following the Regulation 18 Alternative Sites and Focused Changes consultation and other site assessments that had been amended since the Regulation 19 publication.

The Site Assessments for all of the sites that were considered for allocation but not taken forward were previously published at the Regulation 19 Publication in 2019. These Site Assessments can be found on the Councils website:

<https://southnorfolkandbroadland.oc2.uk/document/15>

Maps of each settlement within the village clusters have been prepared to support the Plan and are included in the supporting documents.

### The Equalities Impact Assessment (EqIA)

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 its functions, and to promote equality of opportunity.

The updated EqIA assesses any potential impact on equalities that may arise from the changes being proposed in the Regulation 19 Addendum.

## Statement of Consultation

Local Plan documents are required to have undergone suitable community and stakeholder involvement in their preparation, as required by Regulation 18 of 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 updated Statement of Consultation (Part 4) details the 'Alternative Sites and Focused Changes' consultation that was undertaken by South Norfolk Council in the development of the VCHAP. A summary of the main issues raised and how these have been considered by the Council has also been included.

Part 1 of the Statement of Consultation set out the earlier stages of the work that was undertaken as part of 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). Part 3 was published as part of the Regulation 18 Alternative Sites and Focused Changes consultation and details the methodologies and results of the Regulation 19 publication undertaken in 2023. 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, 2 and 3 can be viewed on the Councils website (<https://southnorfolkandbroadland.oc2.uk/>)

## Greater Norwich Water Cycle Study Addendum

The Water Cycle Study (WCS) forms an important part of the evidence base and has helped to determine the most appropriate allocation sites for development (with respect to water infrastructure and the water environment).

Planned future development throughout the study area has been assessed with regards to water supply capacity, wastewater capacity and associated environmental capacity. Any water quality issues arising, water infrastructure upgrades and potential constraints have subsequently been identified and reported, wherever possible. This WCS then provides information at a level suitable to demonstrate that there are workable solutions to key constraints to deliver future development.

This work has been updated as part of the final choice of sites for this Addendum, including re-engagement with stakeholders and use of the latest information from Anglian Water.

## Strategic Flood Risk Assessment

Level 1 and 2 Strategic Flood Risk Assessments (SFRAs) have been published to support the Regulation 19 Addendum. The Level 1 Report provides a comprehensive and robust evidence base on flood risk issues to support the review and update of the VCHAP. The Level 2 Report forms an addendum to the Level 2 SFRA completed in 2021 and involves an

assessment of 23 of the proposed development sites as well as incorporating recent changes to national and local planning policy and considers the cumulative impact VCHAP development.

### Viability Appraisal (VA)

This updated Viability Appraisal has been prepared to support the Village Clusters Plan and has been updated to consider the potential impact of addressing nutrient neutrality and increased building costs. The purpose of this document is to demonstrate whether the sites being allocated through the Village Clusters Plan can continue to be viably delivered with the relevant supporting infrastructure and affordable housing. Given the length of time that has elapsed since the previous version of the VA, and the continued volatility of the development sector, a June 2024 update has been produced.

### Heritage Impact Assessments (HIAs)

The Heritage Impact Assessments (HIAs) assess the impact of proposed development on designated and non-designated heritage assets on a number of preferred and shortlisted sites. These documents assisted in the site selection process and the writing of policies.

Relevant new or updated HIAs have been prepared for six of the sites in this Addendum and are available to view as Supporting Documents. In addition, several other HIAs have been prepared or updated in response to previous representations received and/or to reflect the most up-to-date information available.

The HIAs have informed the site selection process and helped shape the detailed allocation policies for the preferred sites in both the January 2023 Regulation 19 document and this Addendum.

### Landscape Visual Appraisals (LVAs)

Landscape Visual Appraisals (LVAs) informed the site selection process and consider the impact of development on the landscape as well as the visual impact of development in these locations. The recommendations set out in these documents also informed the detailed allocation policies for preferred sites. LVAs have been completed for all of the sites in this Addendum, with the findings being used to inform the site-specific policies where appropriate.

### 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. This has been updated to reflect the position of the Addendum.

### [Why have some site assessments been updated?](#)

Where necessary updates to the site assessments previously published for the Regulation-18 consultation, Regulation 19 Publication and Regulation 18 Alternative Sites and Focused Changes Consultation have been made to reflect further technical advice received after these consultations, factual and typographical corrections/ updates and/or the submission of additional information during the consultations which was of relevance to the assessment. Site assessments have also been updated if the status of the site has been amended.

For those sites included in this Regulation 19 Pre-submission Addendum the concluding page of these site assessments have been updated (if necessary) to reflect the final status of the site, the scale of allocation proposed and a summary of the Council's reasons for preferring the site.

### Why aren't there any Core Policies in this version of the VCHAP?

Following a review of the representations received through the Regulation-18 consultation the Council determined that the inclusion of the proposed Core Policies would duplicate existing planning policies within the Local Plan and as such it was considered that they should not be included in the VCHAP.

### 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. If you have a new site you wish to promote it will be necessary to demonstrate that the inclusion of the site is necessary to make the Plan 'sound'. Appropriate supporting information and evidence will be required to support such a decision.

### How does nutrient neutrality impact on the VCHAP?

Policy 3 of the GNLP, which now forms part of the development plan for South Norfolk, requires evidence to be submitted to show that mitigation has been secured to achieve nutrient neutrality.

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-18 consultation, Regulation 19 Publication and Regulation 18 Alternative Sites and Focused Changes consultation been addressed?

Following the close of the previous consultations all of the representations that were received were reviewed in detail by the Council. The Statement of Consultation (available within the evidence base supporting the Plan) is a detailed record of the Council's responses to the comments submitted at all consultation stages and includes the details of any actions arising from the consultation responses.

### Why have some Settlement Limits been amended?

As part of the VCHAP a review of existing settlement limits (or 'development boundaries') has been undertaken. Settlement Limits have been updated to reflect development that has been approved or has been completed since the 2015 Local Plan where this development relates well to the existing defined settlement limits. In addition, a number of sites promoted for assessment were smaller than the threshold for allocation but were considered to be suitable additions to the Settlement Limit. These sites will enable windfall development sites

to come forward through the Plan period and the Settlement Limit has been amended to incorporate these where appropriate.