



# Village Clusters Housing Allocations Plan (Main Modifications Consultation)

## Frequently Asked Questions

# Contents

|                                                                                                                                                                                                                                    |    |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| Contents.....                                                                                                                                                                                                                      | 2  |
| What is the South Norfolk Village Clusters Housing Allocations Plan? .....                                                                                                                                                         | 3  |
| Who is making the VCHAP? .....                                                                                                                                                                                                     | 3  |
| How do the GNLP and the VCHAP relate to one another? .....                                                                                                                                                                         | 3  |
| How does the VCHAP relate to the existing Local Plan documents?.....                                                                                                                                                               | 3  |
| How does the VCHAP relate to both existing and emerging Neighbourhood Plans? .....                                                                                                                                                 | 4  |
| What is a ‘Village Cluster’?.....                                                                                                                                                                                                  | 4  |
| How much more housing is being planned and why? .....                                                                                                                                                                              | 5  |
| What will be the impact on the countryside?.....                                                                                                                                                                                   | 5  |
| There are not enough GPs at the local medical centre – how will they cope if more houses are built? .....                                                                                                                          | 5  |
| Will infrastructure and services be able to cope with the additional development? .....                                                                                                                                            | 5  |
| What has happened so far? .....                                                                                                                                                                                                    | 6  |
| Where are we now and how do I comment? .....                                                                                                                                                                                       | 7  |
| What constitutes ‘legal compliance’ in local plans? .....                                                                                                                                                                          | 7  |
| What constitutes ‘soundness’ in local plans? .....                                                                                                                                                                                 | 7  |
| What happens next? .....                                                                                                                                                                                                           | 8  |
| What needs to be done to formally adopt a local plan? .....                                                                                                                                                                        | 8  |
| Why must I give my name and contact details? What about data protection? .....                                                                                                                                                     | 8  |
| What evidence have you based your decisions on? .....                                                                                                                                                                              | 9  |
| What are the supporting documents to the VCHAP Main Modifications?.....                                                                                                                                                            | 9  |
| Why aren’t there any Core Policies in the VCHAP? .....                                                                                                                                                                             | 10 |
| Can I promote a new site for assessment at this stage? .....                                                                                                                                                                       | 10 |
| How does nutrient neutrality impact on the VCHAP? .....                                                                                                                                                                            | 11 |
| How have the comments submitted during the Regulation-18 consultation, Regulation 19 Publication, Regulation 18 Alternative Sites and Focused Changes consultation and Regulation 19 Pre-submission Addendum been addressed? ..... | 11 |
| Why have some Settlement Limits been amended? .....                                                                                                                                                                                | 11 |

## 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).

In 2024 South Norfolk Council 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 have 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 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 or are superseded by the proposed Decision-Making Policies in the NPPF (currently in draft).

### 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. 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 has happened so far?

The regulations that the VCHAP are being prepared under are the Town and Country Planning (Local Planning) (England) Regulations 2012. This was one of the main laws controlling plan making, which dictated the processes we must follow to prepare a local plan. The plan also has to be consistent with the relevant version of the National Planning Policy Framework (NPPF), in this case the December 2023 version, which sets out the government's planning policies for England.

The Regulation 18 consultation 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 (December 2023) 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.

Following the Regulation 18 Alternative Sites and Focused Changes consultation, a further Regulation 19 Pre-submission Addendum publication was held. The published Addendum only dealt with the changes that were being proposed to the Regulation 19 VCHAP document that was published in 2023. This was held between 12<sup>th</sup> August and 7<sup>th</sup> October 2024.

The South Norfolk Village Clusters Housing Allocations Plan (VCHAP) was submitted on 4<sup>th</sup> August 2025 to the Secretary of State for Housing, Communities and Local Government for independent examination by a Planning Inspector. Public hearings were held in January 2026 and the Inspector has been considering the issues raised during these sessions.

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

The Inspector has proposed a schedule of Main Modifications in response to the issues raised during the public hearings that he believes are necessary in order for the VCHAP to be sound and legally compliant. The Inspector is inviting comments on these Main Modifications.

As the Plan has already been subject to full consultation, **comments are only sought on the specific changes contained in the Schedule of Main Modifications**. Your comments should address 'legal compliance' and 'soundness' only (see definitions below). **Comments should relate only to those modifications set out in the published schedule and should not raise new issues on other parts of the Plan. There is no need to repeat or re-submit any previously submitted comments as these are already before the Inspector.**

### What constitutes 'legal compliance' in local plans?

The legislative requirements for plan making are contained in the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

The Inspector considered this as soon as the examination commenced. This includes the Duty to Cooperate. The Inspector needed to be satisfied that, within reason, all the various bodies have been given an adequate opportunity to influence the Plan and have not just been consulted on it. The Inspector concluded that the VCHAP met the legal requirements.

### What constitutes 'soundness' in local plans?

To be sound, plans need to be:

- a) **Positively prepared:** The plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- b) **Justified:** The plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.
- c) **Effective:** The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

- d) **Consistent with national policy:** The plan should enable the delivery of sustainable development in accordance with the policies in the National Policy Framework.

The proposed Main Modifications and supporting documents 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)
- **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 comments on the content of the plan may do so, **in writing, and before 5pm on 26<sup>th</sup> October 2026**. These can be submitted online, via the website listed above or using a hard copy Comments Form which are available at the locations listed above. Completed hard copy forms should be posted to the South Norfolk Council office address listed above.

### What happens next?

Following this consultation period, the Inspector will consider all comments received and come to a final decision on the Main Modifications that are needed for the VCHAP to be sound. The Inspector will produce a final report on the VCHAP with his finalised Main Modifications and the Examination will officially close.

### What needs to be done to formally adopt a local plan?

Once the examination process is complete, adoption is the final stage of putting a local plan in place. This requires confirmation by a full meeting of the Council. On adopting a local plan, the local authority has to make publicly available a copy of the plan, an adoption statement and its Sustainability Appraisal and Habitats Regulation Assessment.

While the local authority is not legally required to adopt its local plan following examination, it will have been through a significant process locally to engage communities and other interested bodies in discussions about the future of the area, and it is to be expected that the authority will proceed quickly with adopting a plan that has been found sound.

### 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. Comments are published on South Norfolk Council's website, however the plan is still under examination and therefore we must make the names and details 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 on the website.

## 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, Regulation 18 Alternative Sites and Focused Changes and Regulation 19 Pre-submission Addendum consultations, by members of the public, site promoters etc.

## What are the supporting documents to the VCHAP Main Modifications?

The documents listed below have been updated in response to the proposed Main Modifications and are available to review as part of the supporting documents. Whilst representations are not made on the documents themselves, representations relating to the plan can address the adequacy of these documents.

### 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. An update to the SA has been produced to consider the Main Modifications and their impacts on the Plan.

### 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 Main Modifications being proposed.

### Strategic Flood Risk Assessment

Level 1 and 2 Strategic Flood Risk Assessments (SFRAs) have been published to consider the proposed Main Modifications. 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.

The SFRA has been updated to reflect the Main Modifications being proposed.

#### 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 seven sites in response to the proposed Main Modifications and are available to view as Supporting Documents. All other HIAs remain unchanged from Submission.

#### 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 nine sites in response to the Main Modifications and are available to view as Supporting Documents. All other LVAs remain unchanged from Submission.

#### Other evidence

Other evidence studies have been prepared and updated throughout the preparation of the VCHAP. However, it has not been considered necessary to update all of them in response to the proposed Main Modifications.

Other evidence includes the Equalities Impact Assessment (EqIA), Statement of Consultation, Greater Norwich Water Cycle Study Addendum, Viability Appraisal (VA), Health Impact Assessment and Site Assessments.

#### [Why aren't there any Core Policies in 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?](#)

New sites are not being formally accepted 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, Regulation 18 Alternative Sites and Focused Changes consultation and Regulation 19 Pre-submission Addendum 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.

Changes to some of the Settlement Limits in the VCHAP have been included as part of the Main Modifications.