

Sustainability Appraisal (SA) of the South Norfolk Village Clusters Housing Allocations Plan (VCHAP)

SA Report Addendum

September 2026

Quality information

Prepared by	Checked by	Approved by
Mark Fessey Associate Director	Ian McCluskey Associate Director	Nick Chisholm-Batten Technical Director

Prepared for:
South Norfolk District Council

Prepared by:
AECOM Limited
Aldgate Tower
2 Leman Street
London E1 8FA
United Kingdom
aecom.com

© 2026 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited (“AECOM”) in accordance with its contract with South Norfolk District Council (the “Client”) and in accordance with generally accepted consultancy principles and the established budget. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

Table of contents

Non-technical summary.....	1
1 Introduction.....	2
2 The proposed main modifications.....	2
3 Reasonable alternatives	6
4 Appraisal of Main Modifications	8

Non-technical summary

This report presents an appraisal of the current proposed Main Modifications (MMs) to the South Norfolk Village Clusters Housing Allocations Plan (VCHAP), as previously submitted in 2024.

The focus of the report is on: A) introducing the proposed MMs (Section 2); and then B) presenting an appraisal (Section 4). Also, consideration is given to the possibility of defining / appraising reasonable alternatives (Section 3), but the conclusion reached is that there are no reasonable alternatives at the current time.

It is important to be clear that this is an “addendum” report and does not aim to supersede the SA Report Update (2024) which is Examination document A.3.1. However, consideration is given to whether conclusions presented within the SA Report Update now require adjustment in light of the appraisal set out in this addendum.

The appraisal presented in Section 4 concludes as follows:

The proposed changes to sites (deletions, one site capacity reduction and a number of site capacity increases) mostly give rise to modest implications for sustainability objectives, but there are important conclusions reached under several of the topic headings, most notably:

- Accessibility – “...accessibility objectives have had a strong influence... Several sites are flagged where the decision can be questioned, from an accessibility perspective, but in most cases there are no major concerns. There is a need for ongoing scrutiny of: A) the effect of reduced growth at any villages gives rise to a concern in terms of maintaining village services / facilities; B) the proposal to delete BAR2 where the proposal was for development to deliver a replacement village hall; and C) whether the effect of increased growth at any villages gives rise to an opportunity to realise additional planning gain...”
- Landscape – “... landscape objectives have had a strong influence... There are limited concerns with the proposed increases to site capacities. However, with regards to the site deletions a small number could warrant ongoing scrutiny in the knowledge that: A) Landscape and Visual Appraisals (LVAs) have been completed for all sites in the Submission VCHAP; and B) pressure for future growth may well lead to a different balance being struck between landscape impact and the need to deliver housing and support local community facilities and services.”

With regards to the VCHAP as a whole, the conclusions reached for ‘the VCHAP plus proposed MMs’ are consistent with those previously reached within the SAR Update for Submission VCHAP with one exception, namely climate change mitigation where the conclusion is now slightly more favourable, as a result of the new proposed emphasis on directing growth to more accessible / better connected villages.

The next step is for the Planning Inspector to consider responses to this consultation on MMs before finalising the VCHAP (i.e. making any further modifications) and writing a report on soundness and legal compliance. Assuming that the VCHAP is ultimately determined to be sound and legally compliant, then the intention will be for South Norfolk District Council to formally adopt the VCHAP such that it becomes part of the South Norfolk Local Plan that is in place to guide growth and inform decision-making on planning applications, alongside the Greater Norwich Local Plan (GNLP, 2024) and several other previously adopted plans (see the Council’s website [here](#)).

1 Introduction

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging South Norfolk Village Clusters Housing Allocations Plan (VCHAP) being prepared by South Norfolk District Council (SNDC). The VCHAP aims to allocate smaller sites across Village Clusters (VCs) in South Norfolk (there are 48 VCs within South Norfolk), to accommodate at least 1,200 homes in total.
- 1.1.2 The formally required SA Report was published alongside proposed submission version of the VCHAP in 2023 under Regulation 19 of the 2012 Local Planning Regulations, and then an SA Report Update was published as alongside an 'VCHAP Regulation 19 Addendum' in 2024. The aim of the SA Report (2023) was essentially to present an appraisal of the VCHAP and reasonable alternatives. With regards to the SA Report Update (2024), this sought to do two things: 1) present an appraisal of the VCHAP Regulation 19 Addendum and reasonable alternatives; and 2) present an appraisal of the VCHAP as updated by the Reg 19 Addendum and reasonable alternatives, thereby superseding the SA Report (2023).
- 1.1.3 The VCHAP was then submitted to the Government for Examination in Public in 2025 alongside the SA Report Update (2024) and all representations received at the two preceding Regulation 19 stages.
- 1.1.4 The appointed Planning Inspector oversaw hearings in January 2026 before publishing a Post Hearings Letter in March 2026 (Examination doc. ref IN11). Overall, the Inspector concluded that *"the Council has complied with the duty to cooperate ... and there are no legal or procedural impediments to prevent adoption"*. However, a number of issues were raised with specific allocations to be addressed through Main Modifications (MMs).
- 1.1.5 The situation now is that a schedule of MMs to the submitted VCHAP is published for consultation, and this SA Report Addendum aims to present an appraisal of the proposed MMs and reasonable alternatives.
- 1.1.6 The aim is to inform the current consultation which – it is important to be clear – is focused only on MMs. This report does not re-present information from the SA Report Update (2024) that is not relevant to the current consultation and, in turn, does not supersede the SA Report Update (2024).
- 1.1.7 This report is structured as follows:
 - **Section 2** – presents a summary of the proposed MMs.
 - **Section 3** – considers the question of reasonable alternatives.
 - **Section 4** – presents an appraisal of the proposed MMs.

2 The proposed main modifications

- 2.1.1 The VCHAP is focused specifically on allocating smaller sites distributed across a large rural area, as well as setting a policy approach to bringing forward each of the sites. Numerous potential sites can be considered and debated, in terms of: the case for allocation (including arguments for alternatively allocating 'omission sites'); the precise site boundaries; and the policy approach at each of the sites, for example in terms of capacity, layout and access. Also, there is important context in that there is scope for small sites to come forward as planning applications without an allocation, particularly where the presumption in favour of sustainable development is in force (NPPF paragraph 11), as is currently the case for South Norfolk due to the lack of a five year housing land supply. Adopting the VCHAP will not have the effect of securing a five year housing land supply for South Norfolk, rather, the aim of the emerging Greater Norwich Local Plan 2045 will be to secure a five year housing land supply.
- 2.1.2 Numerous changes have been made to the VCHAP over the course of the plan-making process, including changes informed by SA and consultation: two consultations were held under Regulation 18, in addition to the two Regulation 19 stages introduced above, with an SA report published at each of these stages.
- 2.1.3 The latest proposed changes (MMs) reflect the recommendations made in the Inspector's letter of 23 March 2026, which can be summarised as follows:

- Ten allocations in the submission version of the VCHAP to be deleted;
- One Submission allocation to be halved;
- Three Submission allocations to be increased in size;
- The Council to investigate extending another six of the allocations and look at the potential to increase density across all of the remaining allocations;
- Two small areas of proposed Settlement Limit extension to be deleted, but the Council to define new areas of Settlement Limit for a number of other villages.¹

2.1.4 With regards to the ten proposed deletions, Table 2.1 presents a summary.

Table 2.1: The ten sites proposed to be deleted

Allocation	Summary of Reason
VC BAP1 – Former Batching Plant, Bergh Apton	Poor accessibility to services and facilities. Lack of testing for alternative employment uses & general lack of employment land in rural areas
VC BAR1 – Cock Street/ Watton Road, Barford	Brownfield element would result in the loss of a well-used local garage and local employment opportunities. The greenfield element would encroach on the rural character of Back Lane.
VC BAR2 – Chapel Street, Barford	Questions over the deliverability, due to the need to get local support for using part of the existing recreation ground for an access road.
VC BB1 – Norwich Road/ Bell Road, Barnham Broom	Encroachment into undeveloped land which is part of the character of the village. Not convinced about the need for junction improvements at the cross-roads requiring land within this site. Therefore, alternative submitted sites may be preferable.
VC BRM1 – Old Yarmouth Road, Broome	Undue visual intrusion and overly extended linear form.
VC ROC1 – New Inn Hill, Rockland St Mary	Adverse impact on the significance of Listed Buildings west of the site and visual impact on the rural landscape in the setting of the Broads.
VC SEE1 – Mill Lane, Seething	Consolidates an already intrusive development. Lack of footway to the centre of the village.
VC BUR1 – Staithe Road, Burgh St Peter	Poor access to services and facilities, particularly the primary school and shops. Impact on the rural character of the area.
VC WIC1 – South of the Primary School, Wickelwood	Major encroachment into the rural landscape. Alternatives within the built form should be investigated, although access may be challenging.
VC ASH1 – New Road, Ashwellthorpe	Unduly suburbanising and poor accessibility to services and facilities.

2.1.5 With regards to the one site where the proposal is to half its capacity – see Table 2.2.

¹ Settlement Limits can alternatively be described as defined settlement boundaries. The defined settlement limit/boundary is an important consideration when judging 'windfall' planning applications, i.e. applications for sites not allocated in a local plan. Specifically, that is the case because policies in local plans are typically more restrictive of development outside of settlements (i.e. in the countryside) relative to development within settlements.

Table 2.2: One site proposed for a halving of its capacity

Allocation	Summary of Reason
VC BRO1 – B1332 Norwich Road, Brooke	Development on both sides of the B1332 ' <i>represents an unduly confused strategy for the village</i> '. Therefore a reduction to 25 dwellings west of the B1332 is proposed.

2.1.6 With regards to the three sites to be increased in size, these are set out in Table 2.3. Specifically, the table sets out both the Inspector's recommendation and the response of Officers, as informed by technical evidence gathering and liaison with key stakeholders, for example Norfolk County Council (NCC).

Table 2.3: Three sites where the Inspector recommends extension

Allocation	Inspector's Recommendation	Proposed Main Modification
VC DIT1REV – Thwaite's Lane & Tunneys Lane, Ditchingham	Increase from 45 to 70 dwellings, to make use of the full field, and investigation of a second point of access.	NCC has confirmed a second access is <u>unlikely</u> to be possible, and that the allocation should be limited to 65 dwellings from the single access. Updated SFRA shows continued issues with developing the eastern part of the site. Provisional TPO applied to the boundary tree belts. Taking into account the above: increase allocation from 45 to 65 dwellings, or approx. 70 dwellings if a second access can be achieved.
VC SPO1REV – Bunwell Road, Spooner Row	Increase from 35 to 45 dwellings, extend the allocation to the whole field, but Policy to preclude development within the area at flood risk.	Agreed. Updated SFRA supporting revised Policy wording. Taking into account the above: increase allocation from 35 to 45 dwellings.
VC TAC2 – The Fields, Tacolneston	Increase from 21 to 31 dwellings to make efficient use of the whole field.	Agreed. Increase allocation from 21 to 31 dwellings.

2.1.7 With regards to the six sites to be reassessed with a view to a possible extension, these are discussed in Table 2.4. Specifically, the table sets out the outcome of work undertaken by Officers.

Table 2.4: Three sites reassessed with a view to possible extension

Allocation	Issues and recommendation to the Inspector
VC EAR2 – The Street, Earsham	Earsham is well located for access to services and facilities in Bungay and therefore has the potential for an increase in allocation. The updated SFRA has identified more pronounced surface water flood risk on the original Submission allocation section of the site, in an area also at risk from groundwater flooding. Moving development to the western part of the site will be more visually prominent, however not to the extent that it makes development unacceptable. This also allows the access to be moved away from the area of flood risk. Taking into account the above: increase allocation from 25 to 50 dwellings.

Allocation	Issues and recommendation to the Inspector
VC PSM1 – Norwich Road/Poppy's Lane, Pulham St Mary	The Pulhams have a good range of services, accessible by a continuous footway between the villages. The Submission allocation was part of a larger field, and could be extended west to mirror the extent of development on the south of Norwich Road. Taking into account the above: increase allocation from 50 to 75 dwellings.
VC SPO2 – Station Road, Spooner Row	Spooner Row has two carried-forward 2015 allocations, plus the extended VC SPO1REV allocation recommended by the Inspector (see Table 2.3 above). Extending this site as well would give Spooner Row the biggest allocation in the VCHAP, which is not justified by the level of services and facilities available. Extending the site would also encroach on the distinct group of dwellings at Top Common. Taking into account the above: no change.
VC ELL1 – Mill Road, Ellingham	Whilst there would appear to be an opportunity to join the VC ELL1 allocation to the existing recreation ground to the west, this area has been deliberately left out of the site to protect the route of a high-pressure pipeline, and also to retain long distance views of the Grade I Listed St Mary's Church, to the south. Extending the allocation to the south would encroach further into the setting of the Broads Authority and Conservation Area. Taking into account the above: no change.
VC SWA1 – Bobbins Way, Swardeston	The Inspector suggested during the hearings that this site could be extended to the field boundary to the east, defined by an established hedge. In isolation this would have created a development which projected out from the existing Bobbins Way development to the south and the carried forward VC SWA2 allocation to the north. However, the Inspector has asked the Council to consider extending both VC SWA1 and VC SWA2, which would give a more consistent development edge. Officers have some concerns about the reliance of Swardeston on services and facilities in Mulbarton, or access to Norwich. However, on balance, the location of Swardeston and provision of better bus services than many VCHAP locations, a modest increase in development can be supported. Taking into account the above: increase allocation from 20 to 30 dwellings.
VC SWA2 – Main Road, Swardeston	Officers have been through the same considerations as VC SWA1 above. Taking into account the above: increase allocation from 40 to 55 dwellings.

2.1.8 The Inspector was also concerned that, in general, planning applications were coming forward on submitted allocations for slightly larger numbers than proposed in the VCHAP, and has made modest increases to several sites to reflect those applications. In light of this, the Inspector also requested that the Council review all of the remaining allocations, for potential increases in density. Officers have identified two sites where modest increases in density could be achieved – see Table 2.5.

Table 2.5: Two sites with a proposed capacity increase following review.

Allocation	Proposed Main Modification
VC ALP1 – West of Church Meadow, Alington	Increase allocation from 25 to 30 dwellings.

Allocation	Proposed Main Modification
VC LM1 – School Lane/Burnthouse Lane, Little Melton	Increase from 35 to 45 dwellings.

2.1.9 The net effect of the proposed main modifications set out above is that allocations in the VCHAP exceed the 1,200 homes requirement set out in the Greater Norwich Local Plan (GNLP) by at least 55 homes, which compares to a figure of 130 homes at the point of submission.

2.1.10 Lastly, is the matter of defined Settlement Limits. Numerous possible extensions have been considered, but many are ultimately determined to be inappropriate due to impacts on heritage and landscape, restricted highways, or poor access to services and facilities. The outcome is that the Inspector has identified a number of changes to be included in the Main Modifications consultation, most significantly:

- Hapton – new Settlement Limit
- Wacton – new Settlement Limit
- Arminghall – new Settlement Limit
- Hempnall Green – new Settlement Limit
- Fornsett St Peter – new areas of Settlement Limit at Hunts Mead and Mill Road
- Ellingham – new area of Settlement Limit at Old Yarmouth Road
- Tivetshalls – new areas of Settlement Limit at Rectory Road.

3 Reasonable alternatives

3.1.1 Detailed work to consider site options and reasonable alternatives (where the terms ‘alternatives’ is used where there is a mutually exclusive choice between options) has been undertaken at numerous points over the course of the plan-making process, in summary:

- **Late 2020 to early 2021** – Because of the large number of site options, and the large number of village clusters in contention for one or more allocations, a staged approach to site selection was pursued, led by the Council. A key aspect involved a series of five informal non-public meetings between Officers and Councillors in late 2020 and early 2021, with each meeting dealing with a tranche of circa ten village clusters, such that all 48 village clusters were covered across the series of meetings. At each meeting Councillors were presented with a list of the Officers’ preferred allocations and a shortlist of omission sites based upon the findings of the detailed site assessment process, with a view to confirming a list of the most preferable allocations to take forward. At each meeting Councillors were also presented with an SA ‘Note’ prepared by AECOM, which sought to present a commentary on the favoured allocations under each of the 12 SA framework headings, as well as a commentary on shortlisted omission sites. The five SA Notes were presented as appendices to the Interim SA report published in May 2021.
- **May 2021** – an Interim SA Report published alongside the Regulation 18 Draft VCHAP aimed to present an appraisal of the plan and reasonable alternatives, as well as explaining the reasons for selecting the alternatives dealt with. Part 1 of the report explained how reasonable alternatives were arrived at, including with reference to: A) the early work over the period late 2020 to early 2021, including work set out in the aforementioned series of five SA Notes; and B) GIS analysis of all site options. Part 2 of the report then presented an appraisal of the preferred approach alongside two reasonable alternatives (such that three reasonable alternatives were appraised in total). Specifically, it appraised:
 - Option 1 – the emerging preferred approach, referred to as ‘striking a balance’.
 - Option 2 – a more ‘accessibility led’ approach to growth.
 - Option 3 – a more ‘dispersal led’ approach to growth.

- **May 2022** – Following the assessment of new and amended sites submitted during the Regulation 18 consultation and the reassessment of some previously preferred/shortlisted sites in light of consultation responses and emerging evidence (such as the Stage 2 SFRA and Heritage Impact Assessments), in May 2022 AECOM prepared a further SA Note for elected members. The aim was to present a commentary on emerging proposed changes, both to preferred allocations and shortlisted sites.
- **January 2023** – the SA Report was published alongside the Regulation 19 VCHAP that aimed to present an appraisal of the plan and reasonable alternatives, as well as explaining the reasons for selecting the alternatives dealt with. Part 1 of the report dealt with work to define, appraise and feed-back on reasonable alternatives, whilst Part 2 of the report presented an appraisal of the plan as a whole. Focusing on Part 1, Section 5 explained the process leading to the definition of reasonable alternatives, with reference to past work (as discussed above) and detailed work to consider alternatives for all 48 of the Village Clusters (with VCs without any sites realistically in contention screened out as an initial step). The process led to two reasonable alternatives:

- Option 1 – the emerging preferred approach.
- Option 2 – a greater emphasis on accessibility.

It should be noted that Option 2 was defined in quite specific terms, with 11 VCs identified as potentially suitable for higher growth and 14 VC identified as potentially suitable for lower growth.

- **November 2023** – The Regulation 19 version of the VCHAP (January 2023) allocated sites with a total capacity of 1,228 homes. However one of the proposed allocations was subsequently determined to be not developable and at another site it was determined that capacity must be reduced by five homes. The loss of this supply (30 homes in total) resulted in a total remaining supply slightly below the required 1,200 homes from the GNLP (which is a minimum), such that the Council held a Regulation 18 consultation on options for boosting supply. Specifically, there were 11 options comprising: 1 site that was new to the Council, i.e. had not previously been considered; 5 sites that were not previously proposed allocations but had previously been 'shortlisted'; and 5 previously proposed allocations where there was considered to be the option of boosting capacity.² This consultation also looked at expanding two sites, *without* increasing capacity i.e. lowering the density. The Interim SA Report published as part of the consultation sought to do two things: 1) explain the reasons for arriving at the shortlist of 13 options (including with reference to other potential options); and 2) appraise the 13 options.
- **June 2024** – Following the consultation the Council decided to take forward 8 of the 11 options for boosting supply (as well as the two options for expanding site boundaries without boosting supply). Specifically, the proposed approach was to allocate three new sites (the new site submitted in 2023 and two previously shortlisted sites) and to boost capacity at five sites (which in four cases involves an extension to the site). This proposed approach was published as a 'Regulation 19 Addendum' with an SA Report Update published alongside that had to do two things: 1) present an appraisal of the Regulation 19 Addendum and reasonable alternatives; and 2) present an appraisal of the VCHAP as a whole, as updated by the Reg 19 Addendum, and reasonable alternatives. With regards to (1), the approach taken was to present an updated appraisal of the 11 options for boosting supply that were previously appraised in November 2023. With regards to (2), the approach taken was to present an updated appraisal of the two alternatives previously appraised in January 2023.

- 3.1.2 In light of the discussion above, there is a need to make a decision regarding whether or not there is a need to formally define, appraise and consult on reasonable alternatives at the current time.
- 3.1.3 The context is that the latest proposed approach, as introduced above, is considered to be quite firmly justified, given plan-making work prior to submission, detailed scrutiny through the examination process (leading to the recommendations set out in the Inspector's letter) and subsequent officer-led technical work and liaison with key stakeholders.
- 3.1.4 With regards to the possibility of deleting allocations at this stage, or adjusting the capacity of sites, these are matters that have been carefully considered through the examination, as discussed above, such that there is no clear case for defining and appraising further options / alternatives at the current time.

² Also, there were two options boundary extensions without a boost to capacity.

- 3.1.5 With regards to the possibility of additional allocations, the Inspector's letter explains: *"In the circumstances there would be little benefit in delaying adoption of the plan to identify further suitable sites; resources would be better spent progressing the GNLP review."*
- 3.1.6 On this basis, there are not considered to be reasonable alternatives at the current time. However, there do remain ongoing choices 'at the margins' that the Inspector may wish to consider when finalising the plan subsequent to the current MMs consultation. For example, and in particular, ongoing consideration can be given to the possibility of extending the two sites listed in Table 2.4 where Officers have reached a conclusion that, in their view, an extension would not be appropriate.
- 3.1.7 These potential choices 'at the margins' can be explored through the appraisal in Section 4, rather than through a formal appraisal of alternatives, given the importance of focusing on 'significant effects'.
- 3.1.8 In **conclusion**, there are no reasonable alternatives at this current stage.

4 Appraisal of Main Modifications

4.1 Introduction

- 4.1.1 The primary aim of this section is to present an appraisal of the proposed MMs under the SA Framework (see Section 3 of the SA Report Update), at the core of which is a list of 12 sustainability topics.
- 4.1.2 There are 70 MMs in total, but the aim is not to appraise each systematically (i.e. appraise each under the SA framework), but rather to present a targeted appraisal, with a view to a focus on 'significant effects'.
- 4.1.3 The appraisal is presented across 12 sections – one for each of the sustainability topics.
- 4.1.4 Within each section there is a primary focus on proposed changes to sites (as introduced in Section 2), with a view to a focus on significant effects, but changes to site-specific policies are also appraised.
- 4.1.5 It can be noted that a lengthier discussion is presented under two of the topic headings – accessibility and landscape – as these are key matters that are a focus of the Inspector's letter, which concludes:
- "In some cases the conclusions [in respect of changes to sites] reflect Option 2 in the Sustainability Appraisal of the plan – an alternative approach with a greater emphasis on accessibility. In others the impact of the proposed housing on the character and form of the village has not been sufficiently taken into account. On the other hand, where suitable sites have been identified, the scope for housing has not always been optimised by making the most efficient use of the available land."*
- 4.1.6 Finally, under each topic heading there is a need to reach a conclusion on the merits of both:
- The proposed MMs (recalling that only MMs are a focus of consultation).
 - The VCHAP as a whole as amended by proposed MMs (thereby updating the SA Report Update, 2024).

4.2 Accessibility

- 4.2.1 This is a key issue that has been a focus of the SA process to date, as discussed, and has also been a focus of the examination, as understood from the Inspector's letter.
- 4.2.2 The Inspector's letter presents the following contextual discussion:
- "... in Broadland the GNLP allocated new sites in only 12 of the 25 clusters, in each case in good sized settlements with primary schools nearby. In South Norfolk, the [VCHAP] site selection process has resulted in proposals for allocations in 33 of the 48 clusters. There may well be differences in the settlement patterns of Broadland and South Norfolk which affect the relative availability of suitable site allocations, but the separate examination processes have not allowed these to be explored."*

With the passing of time since adoption the GNLP itself needs to be updated and reviewed. The process is already underway... The GNLP review will necessarily involve revisiting the overall strategy for Greater Norwich and the role of the village clusters in providing housing alongside that of the larger settlements and Norwich itself. The review will therefore shortly revisit the need for allocations in the village clusters of South Norfolk and the merits of individual sites. In relation to the current [VCHAP] examination, this means that further allocations may be made in due course, but also that the allocations made now should not unduly prejudice the role, character or form of individual villages as these issues will need to be revisited in any event in the imminent GNLP review process."

- 4.2.3 In short, the Inspector is highlighting that there is a broad strategic case for taking a cautious approach through the VCHAP in respect of directing growth to sites and VCs that are challenging in accessibility terms. However, it can also be noted that the matter of directing growth to VCs in support of accessibility objectives is complicated by the need to also factor in the accessibility case for growth in areas with poor accessibility credentials with a view to supporting existing village services and facilities.
- 4.2.4 Having made these introductory remarks, set out below is a discussion under the following sub-headings:
- Deletions or capacity reduction
 - Capacity increase
 - Conclusion

Deletions or capacity reduction

- 4.2.5 All twelve of the sites discussed above in Tables 2.1 and 2.2 are discussed in turn below.
- 4.2.6 Beginning with **BAP1** (Former Batching Plant, Bergh Apton; 25 homes), this is a key site of note, in that accessibility challenges have been acknowledged over the course of the plan-making process, but there was support for allocation on balance with a view to making good use of a brownfield site. However, the situation now is that the Inspector gives weight to the potential importance of the site in terms of the rural economy / employment and, having done so, reaches the conclusion that the site should be deleted. The Inspector explains: *"... the site is accessed by a narrow rural lane without plans for footways linking the site back to The Street, which itself has no footways linking it to the other parts of Bergh Apton. Alington, with the nearest primary school and other facilities, is over 2 km away via narrow country lanes..."*
- 4.2.7 The three other sites where the Inspector's reasons for deletion relate strongly to accessibility are:
- **SEE1** (West of Mill Lane, Seething; 12 homes) – the Inspector states: *"The site is also a relatively remote location within the village for new residents, at the end of a 300 m long rural lane with no footways until the junction with Brooke Road is reached. Whilst the school is somewhat closer, the village hall/recreation ground and post office are nearly 1 km away and the far end of the village 1.6 km."* The SA Report (SAR) Update had similarly flagged this site as *"another example of a site where the situation in respect of footpath connectivity is not ideal."* It is understood that there is the potential to walk along the road as there are wide verges and there is good visibility, and there is understood to be precedent in respect of this being an acceptable means of movement/access in rural areas where necessary; however, overall there is support for deletion of this proposed allocation in terms of accessibility.
 - **BUR1** (Staithe Road, Burgh St Peter; 12 homes) – the Inspector states: *"The village is small and relatively isolated... The school is about 6 km away... and, whilst there are some roadside type facilities... the nearest shops are in Beccles a full 8 km away. The village has a village hall and recreation ground, public house, infrequent bus service and some employment, but the overall accessibility of the site to services and facilities is poor. Indeed, the village was defined as an 'Other Village' in the JCS where only infilling within defined settlement boundaries was permitted 'due to the rural nature of the area and limited facilities'."* The SAR Update considered the alternative of lower growth in this VC and described the alternative as *"specifically involving no growth at Burgh St. Peter"*.
 - **ASH1** (New Road, Ashwellthorpe; 15 homes) – the Inspector states: *"The settlement has a village hall, recreation ground and pre-school provision, but only a limited bus service and the primary school is about 3.6 km away at Wrenningham via rural lanes with no footways. The village thus scores relatively poorly in terms of accessibility to services and facilities."* This is not a location or a site that was previously flagged as challenging in accessibility terms within the SAR Update.

4.2.8 Overall, there is tentative support for deletion of these three sites from an accessibility perspective, recalling the potential counter argument that there is an accessibility case for growth in rural areas with a view to maintaining village services and facilities, and more generally village vitality.

4.2.9 Next is **ROC1** (New Inn Hill, Rockland St Mary; 25 homes) where the Inspector does not cite accessibility as a key reason for the proposed deletion and, indeed, highlights that: *“There are a range of services including a primary school, shop, parish room, playing field, GP surgery and occasional bus services.”* The site is associated with an opportunity to deliver a footpath, but overall there is an accessibility case to be made for this proposed change, noting the following from the SAR Update [emphasis added]:

*“Rockland St. Mary is a linear settlement... in quite close proximity to Norwich. The village benefits from a better range of services than many, with a shop/Post Office, GP surgery, village hall, primary school, pub and public transport access to Norwich. Maintaining the viability of this local offer potentially serves as a significant argument in support of growth. The proposed strategy of two allocations for a total of 50 homes was unchanged following the draft plan stage. However, one of the sites for 25 homes was then deleted following the Regulation 19 publication stage (2023)... The remaining proposed allocation is less well-related to the primary school and the peak time bus service to Norwich, **hence is overall considered to perform quite poorly from an accessibility perspective.** In this light the SA Report (2023) flagged Rockland St Mary as potentially being suited to lower growth, from an accessibility perspective. However, this argument is clearly now much less strong given the loss of one of the two sites.”*

4.2.10 The following five proposed deletions are then more questionable, from an accessibility perspective:

- **BAR1** (Cock Street / Watton Road, Barford; 20 homes) – the Inspector explains: *“Barford is a compact settlement well-connected by the B1108 and regular bus services to Norwich with a primary school, village hall & recreation ground, public house, garage and a small industrial estate.”* Similarly, the SAR Update highlighted Barford as a village where there is a case for higher growth given good links to Wymondham and Norwich,³ and it was also noted that the B1108: *“... is also shared with Little Melton, which comes into consideration as a potential location for growth. Also, Barnham Broom and Bawburgh are linked to this B-road corridor (which relates to the Yare Valley). As such, there could be a growth-related opportunity around enhancing bus services.”*
- **BAR2** (Chapel Street, Barford; 40 homes) – the SAR Update stated that this site: *“... represents an excellent example of the potential to direct growth in such a way that secures planning gain. This new site was promoted through the January 2023 Regulation 19 publication for 25 dwellings, a relocated village hall and an improved sports pitch. Subsequent discussions then led to a scheme involving 30 homes plus additional community land. Latest understanding is now that the site is likely to require the delivery of 40 homes in order to viably deliver the community infrastructure that is needed. It is also the case that the site is well-located within the village in terms of relationship to existing services.”*

However, the Inspector’s letter considers this matter in detail, as follows:

“A majority of the Village Hall Committee support a replacement hall and thus the housing scheme, but the entirely separate Parish Council and, judging by a petition, a large number of residents, do not. Some dispute the need for a new hall, others the impact of the development. Whatever the objective merits of the scheme, local support is essential. The Village Hall Committee are subject to re-election annually and any land transaction requires majority support at a meeting of parishioners.

This may be because the details of the scheme are still unclear. The small scale ‘sketch proving layout’ only shows an indicative 2,500 sq m village hall, no detailed design or specification, and the implications of a smaller recreation ground, reduced due to the access road, for its current and potential future uses have not been fully worked through. In the absence of such detail local support is unlikely and the estimated £0.5 m cost to build the new village hall may be inadequate affecting scheme viability.”

Overall, this is potentially a site that warrants ongoing scrutiny, given the importance of directing growth in such a way that funds become available to deliver on targeted community infrastructure benefits (‘planning gain’). The submission policy was clear that the housing scheme would only come forward alongside a replacement hall, and the context of a recent ministerial letter on the importance of pragmatism when dealing with uncertain viability at the local plan-making stage can also be noted.

³ In particular, an alternative strategy involving higher growth at Barford was flagged in the SAR (2023). By the time of the SAR Update (2024), the report explained that the case for an alternative higher growth strategy was less clear, because the preferred approach at the time involved higher growth relative to 2023.

- **BB1** (Corner of Norwich Road and Bell Road, Barnham Broom; 40 homes) – the SAR Update stated that this site: *“... is the most significant example of a site where development will help to secure a notable highways improvement and, in turn, increase the potential to safely access village services and facilities.”* However, the Inspector is not convinced about the need for junction improvements at the cross-roads requiring land within this site,⁴ and has wider concerns with the site (landscape-related).
 - **BRO1** (B1332 Norwich Road, Brooke) is the one instance of a site where the proposal is to reduce the site capacity, specifically from 50 to 25 homes. This can be questioned from an accessibility perspective, in that the SAR Update stated that a potential higher growth strategy: *“... is supported in accessibility terms, as Brooke is a relatively large village, located on a B-road and less than 3km from Poringland.”* However, the proposal was for a scheme either side of a B-road, alongside a new crossing point to allow for a safe pedestrian route to the primary school, which is perhaps not ideal in accessibility terms. Also, it is noted that whilst the proposal in the submission VCHAP was for a roundabout as a traffic calming feature at the entrance to the village, the Inspector finds that this would not be a financially viable.
 - **WIC1** (South of the Primary School, Wicklewood; 40 homes) – Wicklewood was not flagged in the SAR Update as a settlement with a clear case for higher growth on accessibility grounds, but the report did state that the proposed level of growth: *“... is broadly supported, from an accessibility perspective, given very good links to Wymondham, including by a regular bus service, and given that the village primary school is adjacent to [the site]. Wicklewood also links closely to the B1108 corridor to Norwich, via Barford and Little Melton.”* The report also stated that: *“...there should nonetheless be ongoing scrutiny of the appropriate scale of growth with a view to securing benefits beyond new homes...”*
- 4.2.11 **BRM1** (Land west of Old Yarmouth Road, Broome; 12 homes) is then the final site, although there are not necessarily any significant concerns from an accessibility perspective. The village falls within the Ditchingham VC, and the SAR Update (2024) stated: *“Ditchingham... is relatively well served in terms of services and facilities, and the higher order settlement of Bungay is nearby. However [BRM1] is not very well located in terms of walking to village services, with the primary school at Ditchingham ~1.5km distant. The question therefore is whether additional growth at Ditchingham is preferable to... this site at Broome.”*

Capacity increase

- 4.2.12 The 11 sites listed across Tables 2.3 to 2.5 are discussed in turn below, grouped by settlement and with settlements discussed in alphabetical order.

N.B. the discussion also covers the two sites where the Inspector recommended that consideration be given to an extension but the outcome of officer-led work is a decision to main the current site extent.

Alpington

- 4.2.13 The proposal is to increase the capacity of **ALP1** (now VC ALP1REV, West of Church Meadow, Alpington) from 25 to 30 homes (without extending the site).
- 4.2.14 The SAR Update stated that this site: *“...has been highlighted throughout... as potentially more marginal, despite comprising a brownfield site with current use that is not well suited to its location (with significant landscape impacts and generating HGV traffic on rural roads), on the basis that it is circa 400m from the Bergh Apton settlement boundary, and 2km from the primary school at Alpington.”*
- 4.2.15 However, it also stated that the site: *“... is one of numerous... examples of [where] the proposed policy includes a focus on highways requirements that could potentially lead to a benefit to the existing local community. The supporting text explains: “For highways safety, and to encourage sustainable transport options, offsite highways works will include: localised widening of Church Road, particularly in the vicinity of the Church Meadow junction; an improved crossing point between Church Meadow and Alpington with Yelverton Village Hall; and formalising the currently unmarked bus stops on Church Road...”*
- 4.2.16 Furthermore, the SAR stated: *“It is also one of several examples of policies that include a clear focus on ensuring connection to (and potentially improving connectivity to) the local network of public footpaths...”*

⁴ The submission allocation sought to deliver a realignment of Bell Road and a new staggered junction to address a concern with regards to visibility at the Bell Road/Norwich Road crossroads. However, the Inspectors letter states: *“Certainly, visibility to the left when leaving Bell Road is restricted by the building hard up to the corner. However, no accident record has been produced and no evidence that other lesser measures have been explored which might improve the position, for example traffic calming... and/or building out the footway at the corner so the stop line is further forward.”*

Ditchingham

- 4.2.17 The proposal is to extend **DIT1REV** (now VC DIT1REVA, Thwaite's Lane & Tunneys Lane, Ditchingham) from 45 to 65 homes, or approx. 70 homes if a second access can be achieved.
- 4.2.18 The site was flagged in the SAR Update as having 'accessibility' merit such that: *"... consideration has been given to further boosting its capacity such that the field in question is allocated in its entirety, and given the village benefits from very good connectivity to Bungay, and a primary school is near adjacent..."*
- 4.2.19 However, a second access may not be possible, and the concern with a single point of access for 65 homes relates to pressure on an existing road that becomes busy at school drop-off and pick-up times.
- 4.2.20 Finally, it is noted that there is a new proposed requirement in respect of offsite highways improvement works *"to include localised improvements to footways and junction crossings to enable improved pedestrian access to local bus stops and play facilities."*

Earsham

- 4.2.21 The proposal is to extend **EAR2** (now VC EAR2REV, The Street, Earsham) and increase capacity from 25 to 50 homes.
- 4.2.22 This supported in accessibility terms, as Earsham is well located for access to services and facilities in Bungay (along with other VCs in the Waveney Valley), and well as other towns linked by the Waveney Valley bus routes. The SAR Update stated in respect of Earsham that: *"... there is a need to consider the appropriate extent of the site boundary in order to avoid piecemeal growth leading to opportunities missed in terms of securing benefits to the village."* In turn, there is a question as to whether the additional homes will deliver additional benefits.

Ellingham

- 4.2.23 The proposal is **not** to increase capacity at ELL1 (Mill Road, Ellingham; 25 homes).
- 4.2.24 The SA Report Update stated: *"The [site as extended at the Regulation 19 Addendum stage] would make better use of the available land, and... is close to a primary school. However, Kirby Cane / Ellingham is potentially less well-connected than is the case for Ditchingham / Broome to west (in proximity to Bungay) and Gillingham to the east (in proximity to Beccles)."*
- 4.2.25 The SA Report Update noted the site comprises part of a field, but Officers explain: *"Whilst there would appear to be an opportunity to join the VC ELL1 allocation to the existing recreation ground to the west, this area has been deliberately left out of the site to protect the route of a high-pressure pipeline, and also to retain long distance views of the Grade I Listed St Mary's Church, to the south. Extending the allocation to the south would encroach further into the setting of the Broads Authority and Conservation Area."*

Little Melton

- 4.2.26 The proposal is to increase the capacity of **LM1** (now VC LM1REV, South or School Lane and East of Burnthouse Lane) from 35 to 45 homes (without extending the site).
- 4.2.27 Little Melton was highlighted throughout the SA process as a village where there is a strategic case for growth in accessibility terms, given very good proximity to Norwich and Hethersett. The SA Report also flagged the site as relating very well to the village core, with the primary school adjacent. However, the SA Report also stated: *"Little Melton is a good example of a village where there is a need to ensure a strategic and long term perspective, with a view to ensuring new housing growth delivered alongside commensurate investment in infrastructure."* Also, further context discussed was: *"Much development has occurred in Little Melton due to a previous lack of 5YHLS."* This is understood to be a site that can deliver targeted infrastructure improvements, including in terms of cycle connectivity, and so the question arises as to whether the additional homes will deliver additional benefits.

Pulham St Mary

- 4.2.28 The proposal is to extend **PSM1** (now VC PSM1REV, Norwich Road/Poppy's Lane, Pulham St Mary) and increase capacity from 50 to 75 homes.

- 4.2.29 The Pulhams have a good range of services, accessible by a continuous footway between the villages, but the SAR Update (2024) stated: “... the villages are... in a fairly rural location, with Harleston 5+km distant... The SAR Update also highlighted the possibility of delivering benefits to the villages (beyond new homes) and, in this regard, it is noted that whilst there was uncertainty regarding access at the time of submission, and a concern that access from Poppy’s Lane would have landscape impacts, the proposal now is for the creation of a new priority route through the site, from Norwich Road to Goldsmiths Way, which will reduce existing traffic flow along Poppy’s Lane.

Swardeston

- 4.2.30 The proposal is to extend and increase the capacity of two sites, namely **SWA1** (now VC SWA1REV, Bobbins Way, Swardeston; 20 to 30 homes) and **SWA2REV** (now VC SWA2REVA, Main Road, Swardeston; 40 homes to 55 homes).
- 4.2.31 These two sites are adjacent, and the SAR Update (2024) highlighted Swardeston as a village that benefits from proximity to Norwich, but where there is a concern regarding sub-optimal piecemeal growth, with the suggestion being that there might be a focus on comprehensive growth (e.g. to deliver a primary school, although current falling roles mean that new primary schools, other than as part of strategic growth proposals, are highly unlikely) or, alternatively, reduced growth alongside increased growth at Mulbarton.
- 4.2.32 The SAR Update also stated that the two adjacent sites would ideally “come forward... as a single comprehensive scheme, also noting that an adjacent site is under construction and another delivered within the past ten years.” The proposed site extensions serve to reduce concerns regarding further piecemeal expansion, and Swardeston has a relatively good bus service, but there are some concerns about the need to rely on services and facilities in Mulbarton or Norwich.

Spooner Row

- 4.2.33 The proposal is to extend **SPO1REV** (now VC SPO1REVA, Bunwell Road, Spooner Row) and increase capacity from 35 to 45 homes.
- 4.2.34 Spooner Row has been highlighted throughout as a village where there is a broad strategic case for growth in accessibility terms given that there is a rail station (albeit there is a very limited service, likely with no potential for improvement in the context of the current plan) and given proximity to Wymondham and Attleborough, although bus services are mainly along the B1172, rather than through village itself. However, growth at the village was then increased in 2024, which reduced the case for higher growth.⁵
- 4.2.35 Also, the proposal is **not** to increase the capacity of SPO2 (Station Road, Spooner Row; 25 homes), with Officers explaining: “*Spooner Row has two carried-forward 2015 allocations, plus the extended VC SPO1REV allocation recommended by the Inspector... Extending this site as well would give Spooner Row the biggest allocation in the VCHAP, which is not justified by the level of services and facilities available. Extending the site would also encroach on the distinct group of dwellings at Top Common.*”
- 4.2.36 The SAR Update (2024) also stated:
- “One option could feasibly be to expand the [site] which is notably adjacent to the village primary school. However, it is noted that the primary school is small, seemingly having expanded little from its original Victorian or Edwardian extent.”
 - “Spooners Row is one example of a village where the potential for higher growth to consolidate the built form, and potentially deliver on place-making objectives, might be envisaged. However, this is highly uncertain, as there is a need to give weight to protecting the existing character of the settlement, which is clearly associated with open spaces between groups of dwellings.”

Tacolneston

- 4.2.37 The proposal is to extend **TAC2** (now VC TAC2REV, The Fields, Tacolneston) and increase capacity from 21 to 31 homes.

⁵ The SAR Update (2024) stated: “... the proposal is to support a 35 home scheme, rather than a 15 home scheme [as per the Reg 19 stage]. The extended site boundary would leave a small portion of the field in question undeveloped, however, this part of the field is subject to flood risk. Moving forward, there should be ongoing scrutiny of... maximising the benefits of development. For example, the site might be suited to delivering a new children’s play area and/or accessible green space.”

- 4.2.38 This is potentially questionable from an accessibility perspective, as the SAR Update (2024) highlighted the village as distant from a higher order centre and with a limited bus service.

Conclusion

- 4.2.39 In conclusion, accessibility objectives have had a strong influence on proposed changes to sites. Several sites are flagged where the decision can be questioned, from an accessibility perspective, but in most cases there are no major concerns. There is a need for ongoing scrutiny of: A) the effect of reduced growth at any villages gives rise to a concern in terms of maintaining village services / facilities; B) the proposal to delete BAR2 where the proposal was for development to deliver a replacement village hall; and C) whether the effect of increased growth at any villages gives rise to an opportunity to realise additional planning gain. In respect of (C), the primary instances of increases to capacity having enabled additional site-specific requirements to the benefit of local communities are DIT1REVA and PSM1REV.
- 4.2.40 With regards to the VCHAP as a whole, the SAR Update at the point of submission predicted a **significant positive effect** and this conclusion holds true having accounted for proposed MMs.

4.3 Biodiversity

- 4.3.1 There are relatively few significant issues or opportunities to discuss at the current stage.
- 4.3.2 With regards to sites proposed for deletion, BRM1 (Old Yarmouth Road, Broome) is notable as Broome is closely associated with Broome Heath, which is locally designated as a County Wildlife Site, and potentially sensitive as a highly accessible heathland. Also, at ROC1 at Rockland St. Mary is close to the internationally designated River Yare.
- 4.3.3 With regards to sites proposed for an increase to capacity, the following sites are potentially associated with a degree of constraint but there are not thought to be any major concerns:
- DIT1REV (now VC DIT1REVA, Thwaite's Lane & Tunneys Lane, Ditchingham) – the village is closely associated with Broome Heath, which is locally designated as a County Wildlife Site, and potentially sensitive as a highly accessible heathland. Also, a provisional TPO has been applied to the boundary tree belts.
 - EAR2 (now VC EAR2REV, Land north of The Street, Earsham; 25 homes) – there is a small copse adjacent that would likely be enclosed by development and includes a mature oak. It is not shown on historic mapping but is shown as the intersection of two field boundaries. The oak is referenced in supporting text, and site specific policy refers to *“protection, retention and enhancement of trees and hedges on the site boundary including those outside the site itself.”*
 - ALP1 (now VC ALP1REV, West of Church Meadow, Alington) – is another example of a site with a need to give careful consideration to trees and hedgerows, including a veteran tree. The supporting text explains that *“the protection and enhancement of the existing boundary hedgerows and trees surrounding the site will be required. The Veteran Tree in the northeast corner of the site is protected by a Tree Preservation Order, and development of the site should protect and enhance its setting.”*
 - LM1 (now VC LM1REV, South of School Lane and East of Burnthouse Lane, Little Melton) – is notable for protected species. The supporting text explains: *“The listed barn has the potential to contain bat roosts and the site is also within an amber zone for great crested newts. As such appropriate ecological surveys would be required with any planning application, covering, but not limited to, the habitats provided by the existing features onsite and the connectivity to wider ecological features...”*
- 4.3.4 With regards to site specific policies, there are not considered to be any significant proposed changes.
- 4.3.5 In conclusion, whilst biodiversity constraint is a consideration for several of the sites proposed for an increase in capacity, there are no clear concerns. In broad terms there is potentially a degree of support for the proposed new emphasis on larger sites at more accessible locations.⁶

⁶ The SAR Update stated tentative support an alternative strategy with a greater focus on ‘accessibility’ assuming: A) a shift of focus away from ‘Broads edge’ villages towards nearby transport corridors; B) a possible increased focus of growth along other river valleys / transport corridors, with a view to realising strategic biodiversity enhancement opportunities; and C) an increased emphasis on larger sites, which might give rise to additional biodiversity opportunity.

- 4.3.6 With regards to the VCHAP as a whole, the SAR Update at the point of submission predicted a **moderate or uncertain positive effect** and this conclusion holds true having accounted for proposed MMs.

4.4 Climate change adaptation

- 4.4.1 Flood risk is not recorded as an issue within the Inspector's letter for any of the sites proposed for deletion, although the SAR Update flagged a degree of flood risk affecting one of the sites, namely BRO1 (East and West of the B1332, Norwich Road, Brooke), where there is a degree of surface water flood risk.
- 4.4.2 With regards to sites proposed for an increase to capacity, there is a degree of flood risk constraint affecting several of these sites:
- SPO1REV (now VC SPO1REVA, Bunwell Road, Spooner) – the Inspector's letter explains: *"... a current planning application demonstrates how up to 45 could be accommodated outside the flood zone together with a suitable area of public open space... In addition, for effectiveness, the whole field should be included in the allocation with the policy precluding development in the areas of flood risk."*
 - DIT1REV (now VC DIT1REVA, Thwaite's Lane & Tunneys Lane, Ditchingham) – the SAR Update stated: *"...surface water flood risk in this area is an issue, also noting that the surface water flowpath that directly constrains the site also feeds an off-site flowpath. There are limited concerns associated with the option of supporting an additional 10 homes but supporting further homes beyond this... could prove challenging in flood risk terms."* Updated SFRA evidence (2026) shows continued issues with developing the eastern part of the site, but there is an expectation that this can be suitably addressed at the planning application stage.
 - ALP1 (now VC ALP1REV, West of Church Meadow, Alington) – the SAR Update stated that this site: *"... is an example of a site where the proposed site capacity... takes account of flood risk."* Similarly, supporting text in the submission plan stated: *"... the allocation is for approximately 25 dwellings, reflecting the scale and density of the adjoining Church Meadow development and the need to address flood risk issues."* Again, there is an expectation that flood risk can be suitably addressed at the planning application stage.
 - EAR2 (now VC EAR2REV, Land north of The Street, Earsham) – the updated SFRA has identified more pronounced surface water flood risk on the original Submission allocation part of the site, and groundwater flooding is also an issue. The implication is that the proposal is both to increase site capacity and focus development on the western part of the site (to avoid flood risk), leading to a more visually prominent scheme. New proposed site specific policy states: *"avoid development at the eastern end of the site, where there is a combination of surface water and groundwater flood risk."*
 - VC PSM1 (now VC PSM1REV, Norwich Road/Poppy's Lane, Pulham St Mary) – new proposed supporting text explains: *"A balance will need to be struck between enhancing highway safety by the partial or complete removal of the frontage hedgerow on Norwich Road to allow frontage development, and setting back development from the southern boundary to avoid areas of surface water flood risk."*
- 4.4.3 Finally, with regards to proposed changes to Settlement Limits, the new proposal at Needham is to include an area previously excluded on flood risk grounds.
- 4.4.4 In conclusion, several of the sites proposed for an increase to capacity are affected by a degree of flood risk but there is little reason to suggest that this cannot be suitably addressed at the planning application stage, i.e. addressed in such a way that there is not a need to reduce site capacity (which could then affect site viability) or otherwise compromise on wider objectives. The Environment Agency and LLFA may wish to comment further through the current consultation, drawing upon the SFRA evidence.
- 4.4.5 With regards to the VCHAP as a whole, the SAR Update at the point of submission predicted a **neutral effect** and, on balance, this conclusion holds true having accounted for proposed MMs.
- 4.4.6 Finally, with regards to wider climate change adaptation considerations it is not clear that there are any major implications. There is potentially a degree of support for growth at villages in order to take the pressure off large urban areas where heatwaves can be a particular challenge, and because sites at villages will tend to be associated with strong development viability such that homes can be delivered to a high standard in terms of thermal efficiency and ventilation. As discussed, Ditchingham is closely associated with a small heathland, but there is little reason to suggest any specific wildfire risk, and the site proposed for extension at the current time is not directly adjacent to the heathland.

4.5 Climate change mitigation

- 4.5.1 None of the proposed MMs have direct implications for climate change mitigation objectives. However, there is potentially a degree of support for the new increased emphasis on accessibility, and also the new focus on larger sites, as economies of scale could potentially assist with development viability, such that there is increased potential to deliver schemes that achieve energy / carbon standards over-and-above the minimum requirement set out in building regulations. At several of the sites proposed for extension there would otherwise be a risk of sub-optimal piecemeal expansion with opportunities potentially missed.
- 4.5.2 With regards to the VCHAP as a whole, the SAR Update at the point of submission predicted a moderate or uncertain negative effect on balance; however, it is now considered appropriate to predict a **neutral** effect having accounted for proposed MMs.

4.6 Communities

- 4.6.1 Key issues have already been discussed above, under the 'accessibility' heading, including: A) the matter of balancing a desire to focus growth at better served and better connected villages with a desire to maintain existing village services/facilities and more general village vitality; B) BAR2 as a key site proposed for deletion where the proposal was for development to deliver a replacement village hall; and C) sites where road safety is a consideration, e.g. due to traffic affecting school pick-up / drop-off areas and instances where lack of footpaths could necessitate walking along road verges.⁷
- 4.6.2 The other key matter discussed above under the 'accessibility' heading is the question of whether the effect of increasing capacity at sites will be to generate economies of scale / boost site viability such that there is added opportunity to require measures or development contributions aimed at securing community benefits (over-and-above new homes, to include affordable homes).
- 4.6.3 With regards to the VCHAP as a whole, the SAR Update at the point of submission predicted a **moderate or uncertain positive effect** and this conclusion holds true having accounted for proposed MMs. As part of this, an important consideration is that there is the potential for small sites at villages to come forward without there being an allocation, particularly due the current lack of a five year housing land supply, and so there is clear merits to adopting the VCHAP with a view to ensuring plan led growth.

4.7 Economy and employment

- 4.7.1 The proposed MMs have very limited implications for 'economy and employment' objectives, but two sites proposed for deletion are of note:
- BAP1 (Former Batching Plant, Bergh Apton) – has been discussed above. The Inspector's letter states: *"The site is occupied by utilitarian buildings and open storage/scrap and appears little used but may conceivably have continuing or alternative employment uses if these are explored."*
 - BAR1 (Cock Street / Watton Road, Barford) – the Inspector's letter explains: *"The commercial garage occupies a prominent corner site and with its large high-level canopy, utilitarian buildings, concrete forecourt with cars for sale and adjacent car park comprises an unattractive, arguably intrusive feature in the village. However, the site has been used for business purposes for at least 50 years and is thus a well-established part of the street scene. The site provides suitable accommodation for some four businesses with about a dozen employees in total... The current business leases may be short but there is no reason they cannot be renewed as in the past... There is no evidence that these businesses or jobs would be relocated to the nearby Barford Industrial Estate."* It is noted, however, that whilst 2025 Local Plan policies seek to protect sites for employment use, this does not equate to being able to protect the specific uses on a site. The proposal had been for development of the garage site in conjunction with development of adjacent greenfield land, and so there is a need to highlight a risk of a sub-optimal scheme coming forward through the planning application process without a local plan allocation.

⁷ The SAR Update quoted the following from the submission Consultation Statement: *"It is recognised that due to the rural nature of the District the ability to achieve pedestrian footways can be limited. Within this rural context it is considered reasonable that on occasion the only possible solution will be pedestrian links along quiet rural roads with stepping off places available. It is also accepted that it may not be possible to connect a site via pedestrian footways with all existing facilities and services within a settlement/cluster."*

- 4.7.2 With regards to the VCHAP as a whole, the SAR Update at the point of submission predicted a **neutral effect** and, on balance, this conclusion holds true having accounted for proposed MMs. The SAR Update concluded: “... *there is broad support for dispersing growth so as to support rural industries, plus employment in rural services/facilities, plus small sites are suited to smaller, local housebuilders.*”

4.8 Historic environment

- 4.8.1 One of the proposed deletions is at least partially on historic environment grounds, namely ROC1 (Land south of New Inn Hill, Rockland St Mary). Whilst this site was not flagged as constrained in the SAR Update, the Inspector's letter sets out in detail a concern regarding impacts to a cluster of listed buildings associated with a historic farm complex.

- 4.8.2 However, another one of the proposed deletions can be questioned from a historic environment perspective, namely BAR1 (Cock Street / Watton Road, Barford). The Inspector's letter states: “*Whilst redevelopment of the site would result in a visual improvement and would enhance the setting of the Crazy Cow Public House, a non-designated heritage asset opposite, the proposal would result in the loss of a well-used local garage facility, some other services and a number of valuable local job opportunities.*”

- 4.8.3 With regards to sites proposed for an increase to capacity, the primary site of note is LM1 (now VC LM1REV, South or School Lane and East of Burnthouse Lane, Little Melton), which the SAR Update highlighted as “*subject to significant constraint*”. The supporting text within the plan document explains:

“The main constraint within the site is the presence of a Grade II listed barn in the southeast section, which links the two main elements of the site on School Lane and Burnthouse Lane. It will be important to protect the setting of the listed building, particularly the open aspect to the south/southeast and the connection to the wider countryside which makes an important contribution to its significance as an agricultural barn. The Historic Impact Assessment (HIA) which supports this plan identifies an area which should be kept clear of development; as such it is proposed that this part of the site should be set out as informal open space that will integrate with the wider countryside... The HIA identifies additional areas adjacent to this where the design and layout of development should respect the setting of the listed building and ensure that its significance is not diminished. As the site cannot be accessed from Burnthouse Lane, vehicular and pedestrian access will be required across this open space; however, this should be designed sympathetically to avoid a formal layout/design which would urbanise the environment. The barn itself has undergone some renovation and is used partly used for storage but requires further repair/renovation. Applications for the development of the site should also include proposals which secure the long-term future of the listed barn, which is currently used for storage...”

- 4.8.4 The supporting text within the Submission VCHAP had concluded: “... *allocation is limited to approximately 35 dwellings, which reflects the need to keep the south-east section of the site clear of development to protect the setting of the listed barn, the protection of existing biodiversity features on site and the provision of a small off-carriageway parking area associated with the school.*”

- 4.8.5 However, the latest situation is that proposed site specific policy states: “*The access road must be situated as far as practicable from the barn and be appropriately landscaped to ensure a suitable setting for the listed building is maintained.*”

- 4.8.6 Also, a second site of note is EAR2 (now VC EAR2REV, Land north of The Street, Earsham), where the proposal is to extend the site to the west and double the site capacity, rather than allocating half of a field (which might have given rise to a risk of suboptimal piecemeal growth in time). The SAR update noted that there is currently a brief view from the A143 across the part of the field now proposed for allocation towards the Grade I listed parish church (~450m distant to the east, located at the edge of Stow Fen).

- 4.8.7 Finally, the proposal is to bolster site-specific policy for several sites:

- BRE1 (Bressingham) – a new proposed requirement is that consideration should be given to “*the design of the car park to ensure that the Grade II listed Pine Tree Cottage... is conserved and enhanced.*”
- BUN2 (Bunwell) – a new proposed requirement is that a Heritage Impact Assessment should be submitted to “*identify the impact of development on the heritage assets... (in particular Lilac Farm and Bunwell Manor Hotel), and to inform the scale, layout and design of development.*”
- HAL1 (Hales) – a new proposed requirement relates to: “... *views of the Grade II listed Hales Hospital from Briar Lane through careful layout, design and landscaping, especially in the northeast of the site.*”

- WIN2 (Winfarthing) – a new proposed requirement is for: “*Site design to have consideration to the local vernacular and distinctiveness, especially materials, with reference to the Conservation Area Appraisal.*”

4.8.8 In conclusion, the proposed changes to sites are associated with pros and cons, but it is clear that historic environment considerations have fed in strongly. Historic England may wish to comment further through the consultation. There is then support for the proposed changes to site-specific policy.

4.8.9 With regards to the VCHAP as a whole, the SAR Update at the point of submission predicted a **moderate or uncertain positive effect** and this conclusion holds true having accounted for proposed MMs. For context, the SAR Update concluded broad support for the package of proposed allocations:

“... mindful that the strategy that has emerged over time in light of detailed consideration of the historic environment evidence. It is recognised that certain concerns were raised by Historic England through the draft plan consultation, but the Council responded to these concerns by undertaking detailed work including Heritage Impact Assessments (HIAs) and feeding this into site-specific policy. It is also important to recall that the baseline situation is one whereby there is relatively unplanned growth.”

4.9 Housing

4.9.1 As discussed in Section 2, the net effect of the proposed changes is that allocations in the VCHAP exceed the 1,200 homes requirement set out in the Greater Norwich Local Plan (GNLP) by at least 55 homes, which compares to a figure of 130 homes at the point of submission. The Inspector’s letter further stated:

“The above site by site conclusions mean that ten allocations are deleted from the plan and five more clusters are without allocations. It is appreciated that the Council may be disappointed that the intention of the plan to ensure a wider distribution of housing provision across the rural parts of the district has not been more fully realised. However the plan, together with the Diss & District Neighbourhood Plan, still allocates sites in 31 of the 48 clusters and an average of 24 dwellings per cluster. The scope for further allocations can also be revisited through the GNLP review.”

4.9.2 Further context comes from the SAR Update, which stated strong support for:

“... the preferred strategy of dispersing growth across smaller sites, whilst also striking a balance, in terms of recognising the merits to supporting larger sites (e.g. up to ~50 homes) where appropriate (on the basis of site of village-specific considerations), even though the implication is that there is reduced argument for allocating any sites at certain village clusters (given an overall target figure of ‘at least 1,200 homes’). The appraisal presented within the Interim SA Report (2021) encouraged consideration of larger sites from a number of respects, including from a ‘housing’ perspective, specifically recommending larger sites: “... with a view to securing a proportion of on-site affordable housing in-line with policy and a good housing mix, potentially to include bungalows (a low density form of housing, often not favoured by developers) and potentially even specialist accommodation...”

4.9.3 In conclusion, the proposed modifications overall can be said to generate a tension with housing objectives, given the deletion of sites from some village clusters where modest growth would support delivery in settlements that have had limited recent growth, increasing choice in the housing market, and facilitating affordable dwellings. However, and as discussed above, there will be the potential to allocate sites in the near future through the GNLP review, which will need to address potential changes in Government Policy and increasing housing requirements across Norfolk.

4.9.4 With regards to the VCHAP as a whole, the SAR Update at the point of submission predicted a **moderate or uncertain positive effect** and this conclusion holds true having accounted for proposed MMs.

4.10 Land, soils and resources

4.10.1 With regards to the proposed changes to sites there is support for allocating fields in full rather than allocating parts of fields, on the assumption that allocating parts of fields could lead to a situation whereby the remaining part becomes unsuitable for productive agricultural uses.

4.10.2 It is also important to note that the proposal is to delete two allocations that sought to make optimal use of brownfield land. However, in both cases the Inspector concludes that the existing commercial / employment uses of the sites likely represent a good use of the land.

- 4.10.3 The only other point to note here is that the proposed modifications include two new site-specific requirements for investigation and assessment of a safeguarded mineral resource, potentially followed by prior extraction, to ensure that needless sterilisation of viable mineral resource does not occur.
- 4.10.4 With regards to the VCHAP as a whole, the SAR Update at the point of submission predicted a **neutral effect** and this conclusion holds true having accounted for proposed MMs.

4.11 Landscape

- 4.11.1 As discussed, this is a key consideration that has factored into proposed changes to sites.
- 4.11.2 Having accounted for the evidence / analysis set out in the Inspector's letter, the following site deletions are likely or potentially supported from a landscape perspective:

- BAR1 (Land at Cock Street and Watton Road, Barford) – the proposal had been for development of a commercial garage site in conjunction with development of adjacent greenfield land, but the Inspector's letter states: *"The grass field with hedgerow boundaries is attractive in itself and its development would unduly encroach upon the otherwise unspoilt rural character of Back Lane."*
- BRO1 (East and West of the B1332, Norwich Road, Brooke) – the proposal here is to half the size of the allocation by deleting land to the east of the B1332. The Inspector's letter explains that land to the east is: *"... more exposed in the landscape, a corner of a large arable field which forms part of an extensive area of open countryside..."* The Inspector also states: *"Should the allocation [i.e. the remaining part of the allocation to the west of the B1332] be the forerunner of larger scale development in the future, the area further west is broken up by more landscape features and would provide better opportunities to link to the centre of the village without affecting its conservation area."*
- ROC1 (Land south of New Inn Hill, Rockland St Mary) is in close proximity to the Broads Authority Area, with supporting text in the Submission VCHAP having stated: *"The site is within a sensitive location at a crest in the landscape, requiring careful design and landscaping to contain the visual impact. Furthermore, both PROWs have clear views towards the site and landscaping of the site will need to take into consideration the visual impact of the development from these vantage points..."*

The Inspector's letter states: *"...the site is in a prominent and sensitive location on a crest in the landform before the land drops down towards Rockland Broad and the Yare Valley in the Broads National Landscape, thus forming part of the national landscape's setting. The new housing would project about 100 m further into this transitional area and encroach into the narrow undeveloped gap between the main village and the detached low-density group of housing around the New Inn and Rockland Staithe. The proposal would have a significant visual impact on the rural landscape, unduly increasing that of Eel Catcher Close, and would overly extend the linear built form of the existing village which is already about 1.5 km long with the main services grouped at the far end."*

- BUR1 (Land north of Staithe Road, Burgh St Peter) – was discussed in the SAR Update as "a notable rural site, in fairly close proximity to the confluence of the Rivers Yare and Waveney." The supporting text in the Submission VCHAP stated: *"Whilst the site is currently well contained within the immediate landscape it is visible from the Broads Area and as such appropriate landscaping to the north of the site will be required to minimise the visual impact of the development. To complement the existing form of ribbon development in this location, linear development only along Staithe Road will be acceptable. In order to avoid retain the rural character of the area development should be set back from the road frontage. There is an existing mature hedgerow along the site frontage however in order to facilitate safe access into the site it is possible that it will be necessary to remove this hedgerow either in part or full. Consideration should be given to shared accesses, to minimise hedgerow loss..."*

The Inspector's letter states: *"The proposal would also adversely affect the existing rural character of the area. At present the unspoilt grass fields on the northern side of Staithe Road bring the open countryside into the centre of the village and allow attractive long distance rural views to the northeast towards Burgh Marshes. These characteristics would be lost..."*

- BB1 (Corner of Norwich Road and Bell Road, Barnham Broom) – the Inspector's letter states: *"The two parts of the village are separated by a substantial undeveloped gap... This brings the countryside into the heart of the village and forms an important part of its character with attractive views to the south when walking along the footway that connects the two parts of the settlement. The plan proposes to allocate a 1.4 ha field... within this undeveloped gap... Whilst [there would be some benefit], the new housing would form a highly visible encroachment into the undeveloped area at the heart of the village, fundamentally altering its rural character. The grazed meadow with its central clump of trees is attractive in itself and there are pleasant views across to the countryside beyond which would be lost."*

Also at Barnham Broom, the proposal is to delete two parts of the Settlement Limit boundary, with the Inspector's letter stating: *"The site south of Norwich Road (SN2110) comprises the front strip of a large field that forms part of the attractive undeveloped gap in the heart of the village and should be retained unspoilt. The site north of Norwich Road (SN0018) is an attractive grass field with open countryside opposite and housing here would unnecessarily extend the village...."*

- BRM1 (Land west of Old Yarmouth Road, Broome) – the Inspector's letter states: *"The SNSAP allocation has already intruded into the countryside with its row of substantial houses, road and footway widening and village gateway/traffic calming feature. This feature would need to be relocated further north. The additional allocation would unduly increase the visual intrusion into the rural landscape and overly extend the linear built form of the village which is already about 1.5 km long."*
- SEE1 (West of Mill Lane, Seething) – the Inspector's letter states: *"The line of houses is already over 300 metres long and this would be extended by about a further 100 m. Whilst a plantation a little to the west and the copse to the north would help provide some screening, the new housing would still appear unduly intrusive in the open countryside and an odd modern consolidation of a clearly mid-20th century form of rural housing."*
- WIC1 (South of the Primary School, Wicklewood) – the Inspector's letter states: *"... whilst [the site] is well related to the school, the field concerned is a highly prominent feature on the southern side of the village and the new housing estate would extend some 200 m across the full width of the field to its southern boundary. Although there is a hedgerow here, the site is wide open to The Green and there is no physical boundary to the west either. The site is overexposed in the open agricultural landscape and a substantial new estate, however well landscaped, would be unduly intrusive in its setting and would fundamentally change the nature of the village... projecting into the countryside to the south."*⁸
- ASH1 (New Road, Ashwellthorpe; 15 homes) – the Inspector's letter states: *"The proposal would also significantly affect the rural character of this part of the village. There has been some cul-de-sac development off The Street, the main part of the village to the east, but Mill Road lies well away from this, a lane without footways lined by frontage properties on both sides leading to the open countryside. The proposal would introduce a cul-de-sac estate beyond the frontage housing on the west side, extending both further back than their rear garden boundaries and to the south opposite an arable field well beyond the extent of the frontage housing on the east side. The result would be an incongruous addition to the village, unduly suburbanising the attractive rural character of the lane."*

4.11.3 Finally, BAP1 (Former Batching Plant, Bergh Apton) is then the one site where the proposed deletion can clearly be questioned, from a landscape perspective. The Inspector's letter states in respect of the current commercial use of the site: *"With only modest hedgerow boundaries the site does have some adverse visual impact in the rural landscape, for example when seen from Lower Kiln Lane."*

4.11.4 Moving on to sites proposed for an increase in capacity, at numerous sites the proposal is to make full use of an agricultural field, as opposed to allocating part of a field such that there may be a risk of suboptimal development creep over time. This is broadly supported from a landscape perspective.

4.11.5 Specifically, the following capacity increases are supported:

⁸ Supporting text within the Submission VCHAP had explained: *"The site is within a prominent plateau landform and forms a smaller area within a larger agricultural field. As such it is recognised that there are landscape and visual impacts associated with development of this site. However, an assessment of the context of the site has confirmed that with careful landscaping and layout this site offers an opportunity to create a key gateway entrance to the village, as well as reinstate previously lost hedgerow landscape features. To achieve these objectives there will be a particular emphasis on the soft landscaping, on-site tree planting and the layout and design of the site. This landscape focus is reinforced by the organic boundaries of the site. An area of open space in the north east corner of the site will form a visual focal point around the existing village sign..."*

- DIT1REV (now VC DIT1REVA, Thwaite's Lane & Tunneys Lane, Ditchingham) – the Inspector's letter states: *"The site is separated and well screened from the adjacent countryside by a thick tree belt running along its western and northern boundaries and this will minimise the visual impact of the development. As submitted 2.53 ha of the field is allocated up to an arbitrary line but there are no proposals for the remainder. This inefficient use of suitable land is not justified and the whole field up to the treebelt should be allocated..."*
 - TAC2 (now VC TAC2REV, The Fields, Tacolneston) – the Inspector's letter states: *"... the allocation only includes about two-thirds of the single field concerned up to an arbitrary line, and there are no proposals for the remainder..."*
 - EAR2 (now VC EAR2REV) at Earsham, PSM1 (now VC PSM1REV) at Pulham St Mary and SWA1/SWA2 (now VC SWA1REV/VC SWA2REVA) at Swardeston are the other sites where the proposal is to extend the sites to draw upon existing physical features on the ground.
- 4.11.6 The next consideration is the two sites where the decision is *not* to extend the site boundaries to make use of an entire field, namely ELL1 at Ellingham and SPO2 at Spooner Row. In the former case this is partly on the basis of landscape considerations, but in the latter case the decision is taken with a view to avoiding over-allocation at Spooner Row, hence there potentially remains a landscape case for extension.
- 4.11.7 With regards to sites where the proposed capacity increase can be questioned on landscape grounds:
- LM1 (now VC LM1REV, South or School Lane and East of Burnthouse Lane, Little Melton) – the SAR Update stated that this: *"... is another site where there is a need to account for a characteristic rural lane, plus there is a need to account for an important landscape gap to the neighbouring settlement."*
 - EAR2 (now VC EAR2REV, Land north of The Street, Earsham) – as discussed, the proposal is both to increase site capacity and focus development on the western part of the site (to avoid flood risk), leading to a more visually prominent scheme. There following is a new proposed site-specific requirement: *"... the existing tree belt along the west boundary of the site will need to be retained and enhanced to reduce the visual impact of the site, and the impact of the adjacent A143."*
 - VC PSM1 (now VC PSM1REV, Norwich Road/Poppy's Lane, Pulham St Mary) – the SAR Update records that consideration was previously given to a site extension but Officers at the time were of the view that this would increase visual impact given that the site is prominent in the landscape. However, extending the allocation would mirror the extent of development on the opposite side of the road. Finally, there are some notable considerations in respect of site-specific policy:
 - Whilst there was uncertainty regarding access at the time of submission, and a concern that access from Poppy's Lane would have landscape impacts, the proposal now is for the creation of a new priority route through the site that will reduce existing traffic flow along Poppy's Lane.
 - There are new proposed requirements for reinforcement of the existing hedgerow to reduce the visual impact of the development on Poppy's Lane, and planting of a boundary along the northwest boundary to minimise the impact of the development on the setting of Hill Farmhouse to the north.
- 4.11.8 Landscape considerations also factor strongly into proposed changes to Settlement Limits, notably:
- Barford – new supporting text explains: *"To preserve the character of the settlement, an intervening ribbon of development between Malthouse Farm and Stable Lodge has been excluded..."*
 - Thurton – new supporting text explains: *"A second area of Settlement Limit has been introduced... An area of separation is maintained between the main Settlement Limit and this addition in order to retain the gap in the built form which provides local character."*
 - Tivetshalls – new supporting text explains: *"Development both north and south of Rectory Road is included in new ribbons of Settlement Limit, with intervening parcels of land excluded to retain the character of the settlement. These changes result in three areas of Settlement Limit in The Tivetshalls, reflecting the clusters of development that have evolved in a linear form."*
 - Wacton – new supporting text explains: *"Areas excluded from the Settlement Limit include All Saints Church and the land to the south, as well as the undeveloped parcel of land at the junction of Hall Lane and Wash Lane. These areas are excluded to retain the character of the settlement."*

4.11.9 Finally, there are a number of notable proposed additional site-specific requirements:

- GIL1REV (now VC GIL1REVA)– *“having particular regard to the views to- and from the site from the Broads Authority area...”*
- GEL1 – *“including minimising the visual impact of the development on the Broads Authority area...”*
- ELL1 – *“having particular regard to the visual impact... on the nearby Broads Area.”*
- ELL2 – *“Preparation of a Landscape Visual Impact Assessment (LVIA) to be submitted alongside any planning application to ensure that the design, layout and landscaping of the site pays appropriate attention to the proximity of the site to the Broads Authority area.”*
- WOR2 – *“Enhance landscaping along the west boundary, particularly behind the village green.”*

4.11.10 In conclusion, landscape objectives have had a strong influence on the proposed changes to sites. There are limited concerns with the proposed increases to site capacities. However, with regards to the site deletions a small number could warrant ongoing scrutiny in the knowledge that: A) Landscape and Visual Appraisals (LVAs) have been completed for all sites in the Submission VCHAP; and B) pressure for future growth may well lead to a different balance being struck between landscape impact and the need to deliver housing and support local community facilities and services.

4.11.11 With regards to the VCHAP as a whole, the SAR Update at the point of submission predicted a **moderate or uncertain positive effect** and this conclusion holds true having accounted for proposed MMs.

4.12 Transport

4.12.1 Key issues have already been discussed above, under the ‘accessibility’ heading. There is broadly support for the proposal to adjust the site allocations such that there is a greater focus on villages with stronger accessibility and connectivity credentials, albeit there is also a need to factor in the importance of maintaining services and facilities at those villages where allocations are proposed for deletion. There are also two instances of sites where the proposal to increase capacity leads to additional opportunities in terms of delivering new or upgraded transport infrastructure, namely DIT1REV (now VC DIT1REVA) and PSM1 (now VC PSM1REV).

4.12.2 With regards to the VCHAP as a whole, the SAR Update at the point of submission predicted a **moderate or uncertain positive effect** and this conclusion holds true having accounted for proposed MMs.

4.13 Water

4.13.1 The key point to note here is that for five of the proposed allocations there is a new site-specific requirement for early engagement with Anglian Water in respect of the sewage network and/or capacity at the local water recycling centre (WRC). There are understood to be some potential capacity constraints at WRCs, which could have implications for the timing of when certain sites can come forward.

4.13.2 With regards to the VCHAP as a whole, the SAR Update at the point of submission predicted a **moderate or uncertain positive effect** and this conclusion holds true having accounted for proposed MMs.

4.14 Overall conclusions

4.14.1 The proposed changes to sites (deletions, one site capacity reduction and a number of site capacity increases) mostly give rise to modest implications for sustainability objectives, but there are important conclusions reached under several of the topic headings, most notably:

- Accessibility – “...accessibility objectives have had a strong influence... Several sites are flagged where the decision can be questioned, from an accessibility perspective, but in most cases there are no major concerns. There is a need for ongoing scrutiny of: A) the effect of reduced growth at any villages gives rise to a concern in terms of maintaining village services / facilities; B) the proposal to delete BAR2 where the proposal was for development to deliver a replacement village hall; and C) whether the effect of increased growth at any villages gives rise to an opportunity to realise additional planning gain...”
- Landscape – “... landscape objectives have had a strong influence... There are limited concerns with the proposed increases to site capacities. However, with regards to the site deletions a small number could warrant ongoing scrutiny in the knowledge that: A) Landscape and Visual Appraisals (LVAs) have been completed for all sites in the Submission VCHAP; and B) pressure for future growth may well lead to a different balance being struck between landscape impact and the need to deliver housing and support local community facilities and services.”

4.14.2 With regards to the VCHAP as a whole, the conclusions reached for ‘the VCHAP plus proposed MMs’ are consistent with those previously reached within the SAR Update for Submission VCHAP with one exception, namely climate change mitigation where the conclusion is now slightly more favourable, as a result of the new proposed emphasis on directing growth to more accessible / better connected villages.