

South Norfolk Council
The Horizon Centre
Peachman Way
Broadland Business Park
Norwich NR7 0WF

*Mr David Reed, Planning
Inspector
c/o Annette Feeney,
Programme Officer*

By email only

Tel: 01508 533805

Email: localplan.snc@southnorfolkandbroadland.gov.uk

XX 2026

Dear Mr Reed

South Norfolk Village Clusters Housing Allocations Plan (VCHAP) Main Modifications

Introduction

Following publication of the proposed Main Modifications to the South Norfolk Village Clusters Housing Allocations Plan (VCHAP) on 14 September 2026, officers have reviewed the Modifications and sought comments from the 29 September Planning and Economic Growth Committee.

The following response has been agreed with the Portfolio Holder for Planning and Economic Growth.

Members of the Committee were keen to emphasise the importance of the Examination process, including the evidence submitted by all parties and the testing of various aspects of each site during the hearing sessions themselves. In doing so, the Committee recognises the role of the Inspector in evaluating the evidence and coming to a conclusion.

Officers are largely supportive of the Main Modifications, including those which increase the capacity of selected sites, add clarity to the allocation policies for future decision makers, and provide additional areas of Settlement Limit for modest future growth. However, specifically taking account of the reasoning set out in your letter of 23 March 2026, there are points of clarity that the Council considers merit further consideration, before the completion of your Inspector's Report of the Examination. These points, due to the procedural processes of the Main Modifications stage, will be made where appropriate as objections.

Main Modification MM4 – Deletion of VC BAP1 and the supporting text in paragraphs 2.14 to 2.19.

The Council acknowledges that the site has not been through a formal process of marketing for alternative employment uses. However, South Norfolk Local Plan Policy DM2.2 does not require evidence regarding alternative employment uses where it is considered there is an overriding environmental benefit of redevelopment. The Council considers that the Local Plan process should positively plan for the area and that the allocation of this site for housing not only allows for visual enhancement of the area, utilising brownfield land (as supported by Policy S5 (d) of the 2026 NPPF), but also limits the potential for the reinstatement of past, lawful employment uses with associated traffic which is not suited to the local road network.

Main Modification MM7 – Deletion of VC BAR1 and the supporting text in paragraphs 4.13 – 4.19.

The Council notes the Inspector's findings at paragraphs 20 to 23 of his letter dated 23 March 2026.

Regarding the brownfield element of the site, the primary concern appears to be the loss of the garage to the local community, with reference to Policy DM2.2 of the South Norfolk Development Management Policies Document. Whilst the Council acknowledges the loss of a valued local service, the specific use would not be protected by DM2.2, as the site would only need to be marketed for '*alternative business purposes*', not for the current use. DM2.2 also allows for the loss of employment land where the environmental and/or community benefit of redevelopment outweighs the benefit of the current lawful use continuing. In this case the environmental benefit of removing a former filling station and canopy, plus the community benefit of housing in a village which has had no new allocated development completed for over three decades, was considered to outweigh the limited employment on site, which the site promoter has indicated is time-limited due to the nature of the current leases.

In terms of general employment land, Barford is one of the better served settlements in the village clusters, with a small industrial estate and Barford Van Hire close to this site, and it also benefits from one of the most regular bus services which stops a short distance from the site, thereby giving reasonable non-car access to other employment opportunities. The Council agrees that the '*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*' (letter of 23 March, para 21). However, the Council disagrees that the length of time that these features have been in place is a reason to perpetuate visual harm in a prominent location, opposite a non-designated heritage asset, and it

considers that redevelopment for housing is likely to be the most viable way to enhance the site.

Regarding the greenfield element, the Council considers that the visual amenity of the grass field is currently limited, due to its enclosure by trees and hedges (which have been planted in a more formal/suburban style), and that with appropriate protection and reinforcement, the hedge and tree line on Back Lane would provide a natural edge to Barford. Indeed, Historic England made no objection to the impact developing this site would have on the rural setting of the Listed Sayers Farmhouse, whilst in contrast objecting in strong terms to development to the west of Back Lane.

Main Modification MM8 – Deletion of Policy VC BAR2 and the supporting text in paragraphs 4.20 to 4.28.

The Council notes the Inspector's findings at paragraphs 24 to 27 of his letter.

Deletion of this site centres on its deliverability. It is notable that the 23 March letter (para 68) set out a plan in which 1,201 dwellings was considered sufficient to meet the requirements of the GNLP, and in doing so was relying on estimated numbers coming forward on several Settlement Limit extensions, for which no evidence of deliverability had been sought. Subsequently, the process of developing the Main Modifications has proposed a plan which increases the number of allocated dwellings to at least 1,256, with no reliance on windfall units on Settlement Limit extensions. The Council agrees that, as with all Local Plan allocations, there is no certainty that VC BAR2 would be delivered. However, the prospect of a new village hall, which *'would be a significant benefit'* (letter of 23 March, para 27) is justification for making an allocation, particularly as the dwelling numbers would not be relied upon to meet the GNLP requirements. The Council recognises the strength of local opposition to the scheme, but this may in part *'be because details of the scheme are still unclear'* (letter of 23 March, para 26); however, it is often the case that more detail only becomes available at the pre-application or planning application stage, once the site promoter has the confidence of an allocation. In this context, the Council considers there is a reasonable prospect the allocation could be delivered within the timeframe of the VCHAP, as required under the tests of soundness.

Main Modification MM10 – Deletion of Policy VC BB1 and the supporting text in paragraphs 5.7 to 5.12.

The Council notes the Inspector's findings at paragraphs 28 to 34 of his letter.

The Inspector's reappraisal of this site hinges on whether the junction improvements, which can only be achieved by using land within this site, are necessary for any further allocation-scale development to occur in the

vicinity. Throughout the process of developing the VCHAP, Norfolk County Council as Highway Authority has consistently maintained this to be the case. Objectors to this site, and the proposers of alternative sites, have had multiple opportunities to challenge this position and provide alternative evidence that adequate improvements can be made through developer-funded speed management measures and physical measures within the existing highway; however, none has been forthcoming. Whilst the Council acknowledges that this site is an attractive field which forms part of the separation between elements of the settlement (although other open areas would remain), the site is more central to the services in the village (primary school, village hall, and pub) than others proposed, and it has not been demonstrated that development of any of the alternative sites submitted for consideration would be acceptable in highways terms without the junction improvements. In addition, the proposed removal of two areas of Settlement Limit within the village as part of the Main Modifications, highlights the challenges of finding alternative options for further development in Barnham Broom.

Main Modification MM14 – Amendments to Policy VC BRO1 and the supporting text in paragraphs 8.7 to 8.13.

The Council understands the reasons for focussing development either west or east of the B1332 Norwich Road, given the complexities of delivering a suitable junction for the Submission allocation, and the uncertainty this would create about the future direction of growth. However, the Council is concerned about limiting the allocation on the west to 25 dwellings only. Brooke is regarded as one of the most sustainable settlements in the VCHAP, with a good range of local services (primary school, well used village hall, two pubs, shops, garage, and local employment area) plus excellent public transport connections on the main Norwich/Poringland/Bungay bus route. During the Examination hearing sessions, the site promoter put forward an option for retaining the 50 dwellings on the west side of Norwich Road. Given that the Main Modifications propose extending sites in what are arguably less sustainable locations, the Council would wish to see 50 dwellings retained in Brooke, to the west of the B1332.

Main Modification MM43 – Deletion of Policy VC ROC1 and the supporting text in paragraphs 29.8 to 29.19.

Throughout the process of developing the Submission VCHAP the Council has been mindful of the potential heritage implications of developing this site. As such, a Heritage Impact Assessment (HIA) was completed, to a format agreed with Historic England, at an early stage in the process. Representations made at the initial Regulation 19 stage led the Council to visit the site with Historic England, in order to get expert heritage advice over and above that already provided by the Council's own Senior

Heritage and Design Officer. Subsequently the HIA was revisited and updated prior to including the site in the Submission VCHAP; crucially no objection was received to the inclusion of the site by Historic England. The Council is therefore disappointed that the letter of 23 March does not reference the HIA, or any of the expert evidence, in concluding there would be harm to the significance of the heritage assets. Similarly, whilst the Broads Authority has raised concerns about several sites in terms of potential impact on the 'Protected Landscape', no concerns were raised about this site by the Broads Authority, and the measures outlined in the evidence base Landscape Visual Assessment have been incorporated into the Policy. The Council is also therefore disappointed at the conclusions reached in the 23 March letter (para 44).

A concern has also been raised about the distance to local services: whilst the primary school and village hall are at the far end of the settlement, the shop and GP surgery (itself unusual for a village cluster settlement) are nearer the centre of the village, less than 1km away, and the New Inn pub is less than 400m away. Indeed, Rockland is notably better served with facilities than other settlements where allocations are being extended through the Main Modifications (e.g. Swardeston) and is closer to those services than some of the allocation extensions and new Settlement Limits being promoted in the Main Modifications.

Main Modification MM44 – Deletion of Policy VC SEE1 and the supporting text in paragraphs 33.6 to 33.11.

Whilst the Main Modification proposes the deletion of the allocation, it does not require deletion of the adjoining area of new Settlement Limit. As such, this would make site VC SEE1 a potential location for an affordable exceptions site or self and custom build housing under GNLP Policy 7.5. Whilst the allocation was designed to make best use of the remaining land between existing housing and the copse to the north (itself screening Anglian Water infrastructure), applications under other Development Plan policies could result in more piecemeal development. It is also not clear why development of the allocation would appear an '*odd modern consolidation*' (letter of 23 March, para 47), when detailed proposals for the site are currently not known and other national and local policies are in place to ensure appropriate design. It is also worth highlighting that since the close of the Hearings, the Council has also adopted a Design Code Supplementary Planning Document that would also serve to ensure an appropriate form of development is achieved on the site.¹² Lastly, the issue of distance to services is relative, with other Main Modifications proposing extensions to

^[1] [South Norfolk and Broadland Design Code SPD | Broadland and South Norfolk](#)

allocations and new areas of Settlement Limit which are further from their nearest facilities.

Main Modification MM45 – Policy VC SPO1REV and the supporting text in paragraphs 34.4 to 34.11

Following consideration of a parallel planning application on this site, the Council does not object to an increase to 45 dwellings within the site area promoted in the Submission VCHAP. However, the Council remains concerned about the inclusion of land identified as being at risk of flooding as non-developable land within the allocation. The land is included within the current planning application for the site, primarily as a way of addressing Nutrient Neutrality. Whereas this is one specific solution, there are alternative ways of addressing this issue which do not rely on the additional land, and therefore that land is not considered integral to the allocation. In the event an alternative nutrient neutrality mitigation scheme is approved, the area of land identified as flood zone 2 and flood zone 3 would not be suitable for development and the Council is therefore unclear about its purpose within the allocation.

Main Modification MM57 – Deletion of Policy VC BUR1 and the supporting text in paragraphs 43.27 to 43.33.

Regarding visual intrusion, the adjacent crossroads and the roads leading away from it are characterised by a variety of house types, in terms of age, density, layout/orientation, and design. At present no detailed proposals have been presented for the site, and both the Submission VCHAP policy, and national and local Development Management policies (including the Council's recently adopted Design Code SPD), exist to ensure an appropriate scale, form, and design of dwellings is achieved. Whilst the site affords some longer-distance views of the wider landscape, this is true not only of many VCHAP allocations, but of many greenfield allocations generally. It is not clear what is particularly important or distinctive about the views across this site, which in any event are partly obscured by frontage hedgerow.

Subject to other representations submitted through this consultation, the Council is supportive of modifications to the VCHAP. Doing so increases the capacity of other sites, as this would enhance the robustness of the Plan, help meet the increased housing requirements under the new standard method, and assist in addressing the current lack of a five-year housing land supply in Greater Norwich.

Regarding the remaining allocations deleted by Main Modifications MM18 (Allocation VC BRM1 at Broome), MM59 (Allocation VC WIC1 at Wicklewood), and MM67 (Allocation VC ASH1 at Ashwellthorpe), the Council still considers that these were 'sound' proposals in the submitted VCHAP. However, the Council feels that the Main Modifications have subtly moved the VCHAP away from its original goal of

wider dispersal on sites of circa 25 dwellings, and through the proposed extension of several allocations, has introduced more concentration and a slightly larger scale of development. Bearing this in mind, the Council accepts the deletion of these three sites, on the following basis:

- **Main Modification MM18 – Deletion of Policy VC BRM11 and the supporting text in paragraphs 13.23 to 13.29**

The letter of 23 March 2026 (paragraph 40) notes that the allocation would extend visual intrusion into the countryside in a village already approximately 1.5km in length. The Council acknowledges this concern and accepts that development of the site would have some effect on the settlement's relationship with the surrounding countryside. However, Broome is not uncharacteristic of many South Norfolk villages which have evolved along rural lanes within a wider, relatively flat arable landscape. It is also noted that the loss off this site is offset by MM17 which extends Allocation VCDIT1REV at Ditchingham, within the same cluster.

- **Main Modification MM59 – Deletion of Policy VC WIC1 and the supporting text in paragraphs 45.5 to 45.10**

Throughout the preparation of the Plan, the Council has acknowledged the local landscape concerns around VC WIC1 but considered that the connectivity of the village, the services available within the settlement itself, and the landscape enhancements proposed through the allocation, meant that the planning balance weighed in favour of this site. Whilst the Council accepts the conclusions in the letter of 23 March for VC WIC1, it is concerned about the suggestion that other sites within the centre of the village may provide alternative locations to support its future growth. As discussed at the Hearing sessions, through the site assessment process the local Highways Authority maintained that access into the sites referred to at para 55 of the letter of 23 March would not be achievable for highway safety reasons. Therefore, whilst the sites themselves have a stronger relationship to the existing built form of the settlement, they are not considered to be feasible reasonable alternatives due to the constraints identified.

- **Main Modification MM67 – Deletion of Policy VC ASH1 and the supporting text in paragraphs 48.7 to 48.14**

Since the submission of the VCHAP, a change of site ownership has raised questions about its delivery within the plan period. This is added to the concerns raised in the letter of 23 March (para 58) regarding the comparatively poor access to local services and the suburbanising effect of in-depth development.

Concluding Comment

The Council welcomes this opportunity to comment on the proposed Main Modifications and trusts that these observations from both the Planning and

Economic Growth Committee and officers will assist in the preparation of the final report into the Examination. The VCHAP is a particularly important plan that will shape the future character of, and communities within, many South Norfolk villages for the next decade and beyond. The Council therefore recognises the importance of ensuring that all representations are fully and carefully considered and is content that the Inspector takes the time necessary to arrive at a well-reasoned final set of Modifications and conclusions on the VCHAP.

Yours sincerely

Adam Banham
Place Shaping Manager