Representations in Response to the South Norfolk Village Clusters Housing Allocations Plan – Main Modification Consultation

20th October 2026

Comments on Paragraph A.1 – Approach to amendments to settlement limits

We welcome the amendments made to settlement limits through the Main Modifications, including changes to reflect development that has occurred, has been permitted or forms part of an allocated site in accordance with government guidance (NPPF, 2026). However, a number of broader amendments have been made to the policies maps supporting the Plan to capture built form that was previously excluded from the settlement limits. These are summarised in more detail below for context:

- Arminghall (Paragraph 35.11) – Introduction of a new Settlement Limit to preserve the rural character of the settlement whilst enabling infill development should the opportunity arise.
- Colton (Paragraph 4.12) – Settlement Limit amended to include existing built form east of The Street and south of Marlingford Road.
- Forncett St Mary and Forncett St Peter (Paragraph 15.3) – Settlement Limit amended to include built form at the junction with Mill Road and Gilderswood.
- Hapton (Paragraph 39.8) – Introduction of a new Settlement Limit to preserve the rural character of the settlement whilst enabling infill development should the opportunity arise.
- Kirby Cane and Ellingham (Paragraph 22.3) – Settlement Limit amended to include existing built form at Yarmouth Road to the west of the main settlement.
- Spooner Row (Paragraph 34.3) – Settlement Limit amended to include existing built form at Chapel Loke.
- Thurton and Ashby St Mary (Paragraph 41.4) – Settlement Limit amended to include existing built form at the Cooke's Road/White Heath Road junction.
- Tivetshalls (Paragraph 42.3) – Settlement Limit amended to include existing built form at The Street, School Road and Thwaites Oak Close.

These examples demonstrate that the Main Modifications take a flexible approach to settlement limits, including recognising existing built form outside previously defined boundaries and introducing new limits for smaller settlements. In some instances, the stated purpose is to preserve rural character whilst allowing appropriately located infill development. We consider that the same principles should be applied consistently when reviewing Newton Flotman's settlement limits, taking account of the actual settlement pattern, the relationship between existing development and local services, and the potential for appropriate infill development. This does not mean that settlement

limits must be identical in their approach in every village, rather, differences in approach should be supported by clear, site-specific justification.

With regard to Newton Flotman, paragraph 27.4 confirms that the Settlement Limit excludes the village hall, rectory, church, animal feed mill and all housing to the east of Ipswich Road. The blanket exclusion of these areas of existing built form raises questions regarding the consistency and accuracy of the boundary, particularly where the Plan seeks to reflect the main built form of settlements and ensure appropriate development opportunities are incorporated within designated boundaries for ease of delivery to support a clear and effective planning framework in response to housing need.

There is limited justification provided for why this area of built form and wider services and facilities associated with the village have been excluded from the Settlement Limit. We acknowledge that paragraph 27.1 identifies the A140, the attractive Tas Valley landscape and the enlarged Shotesham Conservation Area as relevant considerations in this part of Newton Flotman. However, paragraph 27.4 does not explain in detail how the exclusion of all housing east of Ipswich Road, together with the other identified built form, has been assessed against the approach to settlement limits elsewhere in the Plan. We therefore consider that the boundary warrants a more detailed, specific review, taking account of the landscape sensitivities and the existing settlement pattern, services and development opportunities.

This is particularly important when considering the development opportunities that exist in this area of Newton Flotman. Previously developed land at Lowlands, Newton Flotman has historically been promoted for the delivery of up to 30 residential units and is the subject of a forthcoming application for approximately 26 residential units. Further, an application is ongoing for an infill unit and consent has previously been secured for 2 self-build units in the area. The current approach risks restricting opportunities for appropriate small and medium-sized development and does not fully recognise the contribution that previously developed and under-utilised land can make to sustainable rural growth.

The presence of existing residential development and the history of proposals in this part of Newton Flotman indicate that the relationship between the Settlement Limit and the existing built form merits further consideration. In addition, the proximity of local services and facilities, together with public transport links along the A140, should be taken into account when assessing the area's relationship with the wider settlement. Recognising an area within a Settlement Limit would not, in itself, establish the acceptability of any particular development proposal, future proposals would remain subject to assessment against relevant planning policies and site-specific constraints including landscape impacts. However, a more clearly justified boundary could better reflect the existing settlement pattern and provide an appropriate framework for considering suitable infill, redevelopment and other development opportunities in response to need.

Change sought

We request that the Council and Inspector reconsider the approach to the Newton Flotman Settlement Limit, including the wording of paragraph 27.4 and the associated settlement limit plan,

to ensure that the boundary appropriately reflects the existing built form and the characteristics of the area. This review should expressly consider the Council's approach to settlement limits elsewhere in the Main Modifications, the relationship of the existing built form to local services and public transport, and the specific landscape considerations affecting land east of Ipswich Road. This would provide a more consistent and justified approach to settlement limits, support the effective use of previously developed land and provide greater flexibility for sustainable development in Newton Flotman.

Comments on Paragraph A.10 – Approach to addressing reductions in housing numbers

The Main Modifications respond to the Inspector's recommendations following the January 2026 examination hearings, which identified a number of soundness issues requiring changes to the Plan before it could be adopted. The Inspector recommended the deletion of ten housing allocations and identified five additional village clusters without allocations, while also recognising that housing provision could be increased by reviewing the capacity and boundaries of suitable existing sites where this could be achieved without significant adverse effects (paragraphs 60 and 70 of the Inspector's letter, dated 23 March 2026). To address the resulting shortfall, it is noted the main modifications look to increase the capacity of a number of allocations in line with the Inspectors comments. Whilst we recognise the Council's efforts to maintain the Plan's housing provision, the changes highlight the importance of ensuring that the Plan provides a robust, flexible and deliverable supply of housing throughout the plan period.

The revised figures in paragraph A.10 identify between 1,084 and 1,089 dwellings to be delivered via Village Cluster Plan allocations, alongside carried-forward allocations and Neighbourhood Plan provision, producing a total of between 1,256 and 1,261 dwellings. This represents a reduction from the Submission Plan and leaves the overall strategy more dependent upon the successful delivery of the remaining allocations.

The revised approach relies substantially upon increasing the capacity of existing allocations to address the reductions in housing numbers throughout the examination process. For example, the following sites are proposed to deliver more housing that originally proposed:

- West of Church Meadow (Policy VC ALP1) – 25 to 30 dwellings (+5)
- Land off Church Road, Aslacton (Policy VC ASL1) – 35 to 36 dwellings (+1)
- Land at Thwaite's and Tunneys Lane, Ditchingham (Policy VC DIT1REV) – 45 to 65–70 dwellings (+20 to +25, depending on access arrangements)
- Land north of The Street, Earsham (Policy VC EAR2) – 25 to 50 dwellings (+25)
- South of Geldeston Road and Daisy Way (Policy VC GIL1REV) – 40 to 44 dwellings (+4)
- Land off Briar Lane, Hales (Policy VC HAL1) – 35 to 39 dwellings (+4)
- South of School Lane and East of Burnthouse Lane, Little Melton (Policy VC LM1) – 35 to 45 dwellings (+10)

- Land at Norwich Road, Bracon Ash (Policy VC BRA1) – 20 to 23 dwellings (+3)
- Land off Bobbins Way, Swardeston (Policy VC SWA1) – 20 to 30 dwellings (+10)
- Land on Main Road, Swardeston (Policy VC SWA2REV) – 30 to 55 dwellings (+25)
- Land adjacent Alan Avenue, Newton Flotman (Policy VC NEW2) – 30 to 31 dwellings (+1)
- Land north of Norwich Road and west of Poppy's Lane, Pulham St Mary (Policy VC PSM1) – 50 to 75 dwellings (+25)
- Land west of Bunwell Road, Spooner Row (Policy VC SPO1REV) – 35 to 45 dwellings (+10)
- Land to the west of Norwich Road, Tacolneston (Policy VC TAC1REV) – 25 to 29 dwellings (+4)
- Land adjacent The Fields, Tacolneston (Policy VC TAC2) – 21 to 31 dwellings (+10)
- Land at Hackford Road, Wicklewood (Policy VC WIC3) – 6 to 9 dwellings (+3)
- Land west of Hall Road, Winfarthing (Policy VC WIN1) – 20 to 21 dwellings (+1)

Whilst the Inspector considered whether additional sites should be identified to increase housing provision, it is noted they ultimately concluded that delaying adoption of the Plan to identify further sites would offer limited benefit. Nevertheless, the Main Modifications demonstrate the importance of maintaining a robust, flexible and deliverable supply of housing throughout the Plan period. Whilst increasing the capacity of existing allocations may contribute towards this objective, increasing densities or extending existing allocations should not be regarded as the only means of maintaining housing provision. Such changes must remain sensitive to the rural character, landscape setting and infrastructure constraints of individual settlements. We therefore consider that a more balanced strategy should combine appropriate, site-specific increases in capacity with opportunities to identify additional allocations in suitable locations, where these can be shown to be deliverable and consistent with the Plan's objectives. A broader portfolio of sites would improve flexibility, reduce reliance on individual allocations and provide greater resilience against potential delays or under-delivery, helping to ensure that the Plan's housing requirements can be met throughout the plan period. Importantly, this approach need not delay the adoption of the Plan, as consideration could be given to suitable sites that have already been submitted and promoted through the plan-making and examination process, allowing the Council to draw upon existing evidence and site information rather than commencing a new site identification exercise.

Change sought

We request that paragraph A.10 and the associated housing strategy be reconsidered to ensure that the response to reductions in housing numbers does not rely disproportionately upon increasing the scale or density of existing allocations. The Council and Inspector should consider whether additional, appropriately located sites can provide a more balanced and deliverable approach.

In particular, Lowlands, Newton Flotman, should be considered as an additional allocation, subject to the necessary assessment and procedural requirements. This would improve the flexibility of the

Plan and provide additional housing capacity in a settlement with existing services, facilities and public transport connections.

Comments on Policy VC NEW2REV – Land adjacent to Alan Avenue, Newton Flotman

The Main Modifications provide for a limited increase in housing capacity at Newton Flotman, comprising an increase of one dwelling at the carried-forward allocation at Land adjacent to Alan Avenue. Whilst this change is noted, the opportunity to provide additional housing within the village should not be limited to a marginal increase in the capacity of an existing allocation.

The revised Plan should consider whether further capacity can be accommodated through a separate, appropriately located allocation. This is particularly relevant given the reduction in overall housing provision following the examination and the importance of maintaining a flexible supply of deliverable sites.

Lowlands, Ipswich Road, provides a credible opportunity to make this contribution. The site was previously promoted through the VCHAP process under reference SN0594 for residential development of up to 30 dwellings. Previous representations were supported by a transport technical note and landscape and visual appraisal, which addressed the principal reasons given for rejecting the site. The previous submission also identified the potential for a pedestrian connection towards Smockhill Common as a public benefit.

Lowlands comprises approximately 1.24 hectares of land, including existing buildings and under-utilised land, immediately adjoining Newton Flotman. It is well related to the village's existing built form and benefits from access to local services, facilities and public transport. It is also the subject of a forthcoming outline application, demonstrating the site availability and ability to deliver homes quickly. The outline application proposes housing alongside public open space, landscaping, sustainable drainage and a pedestrian and cycle connection to Smockhill Common.

These characteristics provide a reasonable basis for the site to be considered alongside the existing allocations. Its potential contribution is not simply a matter of increasing housing numbers, it would broaden the range of sites within the Plan, make more effective use of previously developed land and offer opportunities for environmental and community benefits.

We recognise that any additional allocation would need to be supported by appropriate evidence and assessed against relevant planning considerations, including access, landscape, drainage, ecology, nutrient neutrality and infrastructure capacity. However, these matters should be considered through a proportionate site-specific assessment rather than the site being excluded without full consideration of its potential.

The current modification to VC NEW2REV does not, in itself, address the opportunity presented by Newton Flotman. A further allocation would provide a more meaningful contribution to housing capacity in Newton Flotman and help ensure that the Plan makes appropriate use of the available development opportunities.

Change sought

We request that the Inspector and Council consider a further modification to identify Lowlands, Ipswich Road, Newton Flotman, as an additional housing allocation, with an appropriate site-specific policy and capacity informed by the current planning proposals and supporting technical evidence. The proposed increase of one dwelling at VC NEW2REV should not be treated as exhausting the potential for additional housing provision in Newton Flotman.