

# **Written Statement: South Norfolk Village Clusters Housing Allocations Plan (SNVCP) Examination**

**Submitted by:**

Councillor Richard Elliott, Wicklewood Ward

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As the District Council Ward Member representing the electorate in clusters 4, 5, and 45—which cover the parishes of Barford, Barnham Broom, and Wicklewood—I have a direct responsibility to reflect the views and concerns of my constituents in this submission to the South Norfolk Village Clusters Housing Allocations Plan (SNVCP) Examination. Over the course of the plan’s development, I have received widespread and consistent concern from residents, parish councils, and community groups across my Ward regarding the scale, distribution, and impact of the proposed housing allocations.

It is important to stress that early engagement in the SNVCP consultation process was significantly hampered by Covid-19 regulations. This was not a fault or omission of South Norfolk Council, who have endeavoured to engage fully and transparently with the community throughout the process. However, it should be noted that, due to these unprecedented circumstances, a vital period for local consultation, engagement and most importantly understanding, was lost or delayed. As a result, the full implications of the VCHAP proposals—including a thorough understanding of the proposals and response requirements—were not always evident to residents and parish councils in practice, and many have only recently participated fully and voiced their concerns.

## **Matter B: Consistency with the GNLP, Distribution of Allocations, and Settlement Limits**

Matter B of the Examination considers whether the SNVCP is consistent with the requirements of the Greater Norwich Local Plan (GNLP), whether the process for allocating sites between and within clusters is justified by the evidence, whether the plan would deliver the necessary number of dwellings, and whether the criteria for defining settlement limits are justified and have been consistently applied. [\[South Norf...Questions | PDF\]](#)

Given the acute level of local concern and the significant implications for the villages I represent, the focus of my submission is on the three clusters covering Barford, Barnham Broom, and Wicklewood. Drawing on site assessments, census data, and the evidence base, I will demonstrate that the SNVCP, as currently drafted, departs from the GNLP's intent for balanced, sustainable rural growth. I will highlight the disproportionate allocations in these villages, the lack of robust justification for site selection and settlement limit changes, and the risks posed to rural character, infrastructure, and community cohesion. The submission concludes with recommendations for a more balanced, evidence-led, and community-focused approach to ensure the plan is sound, justified, and consistent with both local and national policy.

**MIQ B1: Does the submitted SNVCP fulfil the task envisaged by GNLP Policy 7.4?**

**Objection:**

The SNVCP departs from GNLP Policy 7.4's principle of small-scale, proportionate, and dispersed development within village clusters. Instead, it allocates large-scale (by rural village standards) housing sites in Barford, Barnham Broom, and Wicklewood, undermining the policy's intent to maintain rural character and support local needs.

**Evidence:**

GNLP Policy 7.4: *"Small-scale housing allocations will be made in village clusters to support local needs and maintain rural character."*

SNVCP allocates 60 dwellings to Barford, 40 to Barnham Broom, and 52 to Wicklewood, while eleven clusters receive no allocations at all.

The average allocation per cluster (with 48 clusters and a minimum of 1,200 dwellings) would be 25, yet these three villages are allocated more than double the average.

**MIQ B2-B4: Is the distribution of development justified? How does the cluster classification affect distribution? Is the absence of allocations in 11 clusters justified?**

**Objection:**

The process for allocating sites has resulted in a highly uneven distribution, with Barford, Barnham Broom, and Wicklewood receiving allocations that are disproportionately high relative to their size, services, and infrastructure capacity.

**Evidence:**

Site assessment booklets and the VCHAP show that Barford (60), Barnham Broom (40), and Wicklewood (52) are among the highest allocations in the district, with many clusters receiving 0-20 dwellings.

The GNLP's original classification (red, amber, green) suggested most clusters could accommodate 12-20 homes, with only a few "green" clusters suitable for 50-60. The actual allocations exceed these guidelines for the three villages in question.

The absence of allocations in 11 clusters is not justified by the evidence, and the rationale for concentrating growth in these three villages is not robustly set out.

**MIQ B5: How have sites within each cluster been selected? Are the selections justified by the evidence?**

**Objection:**

Site selection has prioritized large, contiguous sites in Barford, Barnham Broom, and Wicklewood, rather than smaller, dispersed sites, contrary to the GNLP's intent.

**Evidence:**

Site assessments for all three villages highlight that the selected sites are outside existing boundaries, require significant infrastructure upgrades, and are not the only available options.

The selection process does not adequately justify why these villages should absorb such a high proportion of the district's rural growth.

## **Methodology and Its Consequences for Village Character and Infrastructure**

The methodology used in the SNVCP appears to have systematically prioritized sites that could accommodate large numbers of houses over small-scale sites, despite the original concept of the village clusters scheme and the requirements of GNLP Policy 7.4. This approach is evident in the way site assessments and allocations were made:

Smaller, more integrated sites—which could have been accommodated within existing development and settlement limits and would have been less detrimental to rural character—were passed over in favour of fewer, larger sites.

The rationale for this approach seems to be that larger sites more easily and quickly meet the plan's requirement for 1,200 homes ( now 1,320 homes) in village clusters.

While this logic may be understandable from a delivery perspective, it fundamentally flies in the face of the original concept of the village clusters idea, which was rooted in a small-scale, integrated approach that would help preserve village character and place less pressure on already poor and inadequate infrastructure.

The impact for Barford, Barnham Broom, and Wicklewood is particularly acute:

Site allocations that would have been more in keeping with the rural context and less damaging to village character were not selected.

Instead, the plan's methodology has led to the concentration of growth in large, edge-of-settlement sites, increasing the risk of urbanization, loss of rural identity, and unsustainable pressure on local services and infrastructure.

**MIQ B9: Should further sites be allocated to allow for non-delivery, or does the GNLP already include sufficient flexibility?**

**Objection:**

The SNVCP applies a 10% buffer (120 houses) to housing allocations without transparent evidence or justification, inflating the numbers in already heavily loaded clusters such as Barford, Barnham Broom, and Wicklewood.

**Recommendation:**

The buffer should be reduced to the minimum necessary to provide flexibility for non-delivery, and only retained where there is clear, robust, and transparent evidence that such a buffer is required to meet objectively assessed needs. If such evidence cannot be provided, the buffer should be removed entirely. The use of a buffer should not be a default or arbitrary figure. It must be proportionate, justified by local delivery evidence, and not used to justify excessive or unsustainable allocations in a small number of villages. Any reduction in the buffer would also give some headroom to reconsider reducing the number of houses at the higher density sites or preferably removing them.

**MIQ B11-B13: What criteria have been used to define settlement limits?  
Are these criteria justified and consistently applied?**

**Objection:**

Settlement limits have been expanded in Barford, Barnham Broom, and Wicklewood to accommodate large-scale sites, eroding rural character and setting a precedent for further expansion.

**Evidence:**

Site assessments show that settlement limits have been extended beyond the existing form and character of these villages, contrary to GNLP objectives.

The expansion is not matched by equivalent growth in other clusters, leading to an inequitable and unsustainable pattern.



## **Conclusion**

In summary, the South Norfolk Village Clusters Housing Allocations Plan (SNVCP), as currently drafted, fails to deliver a sound, sustainable, and equitable approach to rural housing growth. The allocations for Barford, Barnham Broom, and Wicklewood are not only disproportionately high in relation to their existing size and infrastructure but also raise profound questions about their deliverability and compliance with both local and national planning policies.

The evidence demonstrates that these three villages are being asked to absorb a scale and density of development that is neither justified by local needs nor supported by robust evidence of infrastructure capacity or community consent. The concentration of allocations in a handful of locations undermines the GNLP's core principle of small-scale, proportionate, and dispersed growth, and risks setting a precedent for unsustainable expansion that could irreversibly damage the rural character and social fabric of these communities.

Moreover, the deliverability of several key sites is highly uncertain, with unresolved legal, practical, and infrastructure barriers that have not been adequately addressed in the plan's evidence base. The application of a significant buffer, without transparent justification, further inflates allocations in already heavily loaded clusters, compounding the risk of overdevelopment and under-delivery elsewhere.

If adopted in its current form, the SNVCP would not only fail to meet the requirements of GNLP Policy 7.4 and national policy on sustainable development but would also expose the Council to the risk of unimplemented allocations, community opposition, and potential legal challenge. It would further undermine public confidence in the planning process and jeopardize the long-term sustainability and distinctiveness of South Norfolk's rural villages.

## **Matter B: Consistency with the GNLP, Distribution of Allocations, and Settlement Limits**

A more balanced, evidence-led, and locally responsive approach is urgently needed. This should include:

- Reassessing allocations to ensure they are genuinely proportionate and dispersed;
- Reducing or robustly justifying any buffer applied to housing numbers;
- Prioritizing smaller, better-integrated sites within existing settlement boundaries;
- Ensuring that all allocations are demonstrably deliverable, with clear evidence of infrastructure capacity, legal certainty, and community support;
- Protecting the rural character, landscape, and social cohesion of South Norfolk's villages for current and future generations.

Only by addressing these fundamental issues can the SNVCP be made sound, justified, and consistent with the principles of sustainable rural development.