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23 September 2025

Dear Mr Reed

South Norfolk Village Clusters Housing Allocations Plan Examination

Thank you for your letter of 15 September.

We note the timetable set out in your letter and can confirm that rooms have been booked at The Horizon Centre for the Examination Hearings for the three weeks indicated.

In response to your specific questions:

1. We can confirm that this is correct.
2. We can confirm that this is correct.
3. It is correct that the clusters are based on the catchments of 48 primary schools. For the purposes of assessing and allocating sites, those catchments have been snapped to the nearest parish boundary, so that whole parishes are considered together. It should be noted that for several clusters, the primary schools are located within the higher order settlements listed in Q1.

The background to the Village Clusters approach can be found in the Greater Norwich Local Plan (GNLP) '*Topic Paper - Policy 7.4 Village Clusters*', which is document D3.12 of the GNLP Document Library. The GNLP Document Library is linked under B.12.1 of the VCHAP Evidence Library. Please let us know if you think that this Topic Paper needs to be given greater prominence as a separate document in the VCHAP Evidence Library. Please note that the approach to school capacity, set out in paragraph 35 of the Topic Paper, was not applied in the same way for the VCHAP. By the time this plan was in preparation, it had become apparent that numbers on school roles were declining and that new/expanded primary schools in higher order settlements (either already delivered, or planned to meet future demands), had reduced the pressure on

some rural schools. As such, proposed levels of development in the VCHAP were part of an ongoing discussion with Norfolk County Council Children's Services, see page 95 of the '*Duty to Co-operate Statement*' (document ref. A.6.1).

4. The audit of services and facilities has not been formally published. The Council has not explicitly used the audit to influence the allocation of sites between different clusters. However, access to services is a key element of the site assessment process, and therefore sites in clusters with more services are likely to have performed better in this regard than those in clusters with more limited services. Similarly, proximity to services was a key factor in the Sustainability Appraisal (document ref. A.3.1), particularly in terms of assessing Accessibility, Climate Change Mitigation, and Transport.

In some clusters there were no sites submitted which the Council assessed as suitable, even where there is a range of services and facilities. Consequently, numbers increased in other locations, and this tended to be clusters where the available sites had better access to services and facilities.

5. Document B.1.48 sets out the assessment criteria for Parts 3 (Suitability Assessment) and 6 (Availability and Achievability) of the site assessment forms. The assessment forms also include: Part 1 – Site Details; Part 2 – Absolute Constraints; Part 4 – Site Visit Observations; Part 5 – Local Plan Designations; and, Part 7 – Conclusion. The assessments themselves are set out in Documents B.1A for all of the sites included in the submitted Plan, and B.1.1 to B.1.47 for the reasonable alternative and rejected sites.
6. 33 clusters have allocations made in the VCHAP. A further 3 clusters have allocations made in the adopted Diss and District Neighbourhood Plan (October 2023):
 - Burston, Shimpling and Gissing (25 dwellings);
 - Roydon (25 dwellings); and
 - Scole (new allocation of 50 dwellings and an uplift of 10 dwellings on a 2015 allocation).

The Dickleburgh and Rushall Neighbourhood Plan is due to make an allocation of 25 dwellings for that cluster. The examination hearing for the Neighbourhood Plan is due to take place on 16 October. As such, 11 clusters have no proposed allocations:

- Alburgh and Denton
- Forncett St Mary and Forncett St Peter
- Heywood (primary school in Diss)
- Keswick and Intwood (primary school in Cringleford)
- Ketteringham (primary school in Hethersett)
- Morley and Deopham
- Saxlingham Nethergate
- Surlingham, Bramerton, and Kirby Beydon

- Tharston, Hapton, and Flordon
 - Thurton and Ashby St Mary
 - Wacton (primary school in Long Stratton)
7. There are no proposals to remove any settlement limits from villages or hamlets which have a limit in the 2015 Local Plan. Page 9 of the '*List of Additional Modifications and Potential Main Modifications ...*' (document ref. A.6.2) notes a section of settlement limit to be removed around the 2015 Local Plan allocation at Barford, which is now considered undeliverable. Mill Lane, Seething is the only completely new area of settlement limit proposed in the submission VCHAP.
8. No Regulation 19/Regulation 19 Addendum representations specifically promoted the addition of settlement limits around villages or hamlets which do not currently have one. Several sites were promoted in settlements without defined limits, which imply that those settlements should have a limit, however only two of these were followed up with Regulation 19 representations. These can be found in document ref. A.8.1 as:
- Representation ID 3007, page 420, re. Wacton; and
 - Representation ID 3099, page 257, re. East Carleton.
9. There are no separate published criteria for determining settlement limits. As noted in the response to Q10 below, the Council updated settlement limits to take account of existing development. In addition, the Council considered extensions to limits to accommodate new growth, but only where a site had been actively promoted for inclusion in the Local Plan. These were assessed using the same assessment criteria/form as the proposed allocations. Some of these assessed sites were too small to consider for allocation, whilst others are smaller parts of larger sites promoted for allocation.
10. Assuming the three amendments to the Seething settlement limits (SN0406SL, SN0587SL and SN0588SL) are being treated as one change, then the total number of changes that could facilitate small development is 11. The remainder of the settlement limit changes reflect existing development, either permitted since the 2015 Local Plan (e.g. rural exceptions sites, sites permitted due to a lack of 5 Year Housing Land Supply), or where a submitted VCHAP allocation makes an extension to the settlement limit pragmatic.

If you require any further clarification on these points, or have any additional questions, please do not hesitate to let us know.

Yours sincerely

Adam Banham

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