

# **South Norfolk Village Clusters Housing Allocations Plan Examination**

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Dear Mr Banham

## **SOUTH NORFOLK VILLAGE CLUSTERS HOUSING ALLOCATIONS PLAN EXAMINATION**

### **Introduction**

1. Following the hearings held in January, I am now able to write with my findings as to the soundness issues raised by the plan and to set out the next steps. Firstly however can I thank the Council for the arrangements which enabled the hearings to run smoothly and effectively, particularly to yourself and the other officers who explained the thinking behind the plan and its allocations, to Annette Feeney for all her work behind the scenes as programme officer and Steve Feeney for his invaluable assistance on sitting days. Can I also thank the other participants who contributed to the discussions to enable a full debate to take place.
2. I am also grateful for the Council's views on the various possible changes to settlement limits that were discussed, document H.9.4.
3. As advised at the end of the hearings, in preparing the plan the Council has complied with the duty to cooperate, to be abolished shortly in any event, and there are no legal or procedural impediments to prevent adoption. However, there are a number of soundness issues which need to be addressed by suitable main modifications (MMs) before the plan can be adopted.

### **Background and Context for the Examination**

4. The South Norfolk Village Clusters Housing Allocations Plan (SNVCP or VCHAP) is a subsidiary plan needed to complement the Greater Norwich Local Plan (GNLP) adopted in 2024. The GNLP sets the overall strategy for the combined South Norfolk, Norwich City and Broadland area for the plan period 2028-38 and represents a further achievement for the now well-established joint working between the three constituent Councils. The Councils adopted one of

the first joint local plans, the Joint Core Strategy (JCS) back in 2011, following which the three Councils each produced a Site Allocations Plan, that for South Norfolk being adopted in 2015 (the SNSAP) alongside a Development Management Policies Document (the DMPD).

5. The GNLP, in reviewing the JCS, went one stage further, and comprised two documents, The Strategy setting the overall strategy, and The Sites Plan making site allocations. However, part-way through the preparation process, in late 2019, housing allocations in the 'village clusters' of South Norfolk were delegated to a separate subsidiary plan. This has resulted in the preparation of the SNVCP, now under examination, as opposed to allocations in the village clusters of Broadland which were made through the GNLP.
6. The inevitable consequence of this is that the allocations in South Norfolk village clusters have not been examined in the same process as those in Broadland, nor in the same process as the allocations made in the higher order settlements of South Norfolk. This approach has meant that the examination of the SNVCP has been undertaken in isolation from that of the wider issues and this has affected the ability to demonstrate the soundness of some of the allocations.
7. GNLP Policy 1 sets an overall requirement for 40,541 additional dwellings over the plan period 2028-38 based on the standard method for assessing housing needs applicable at the time. Against this, provision is made for the delivery of about 45,041 dwellings, a surplus of about 4,500 dwellings or 11% to allow for non-delivery or other contingencies. This total includes a minimum of 1,200 dwellings on sites to be allocated in the village clusters of South Norfolk through the SNVCP and 442 dwellings which are allocated in the village clusters of Broadland by the GNLP. Policy 7.4 reiterates the requirement and provides some further detail.
8. The concept of 'village clusters' is a change made to the settlement hierarchy in Greater Norwich by the GNLP compared to that included in the earlier JCS. Whilst the higher order part of the hierarchy, the Norwich urban area, the main towns and key service centres remain unchanged, the three lower tiers, namely Service Villages, Other Villages and Smaller Rural Communities & the Countryside have been combined into a single tier of village clusters. As explained in GNLP Topic Paper 7.4, these are groups of villages based on the premise that neighbouring villages share services and that villages or hamlets with few or no services could be considered suitable for growth if services could be readily accessed in neighbouring settlements. Primary school catchment areas have been used as a proxy for such groups of villages.
9. Thus, whereas in the JCS the three lower tiers of the settlement hierarchy had defined roles in the distribution of housing development, the advent of village clusters covering by definition all the rural parts of the district has removed these distinctions. This potentially allows for a wider distribution of housing allocations across more rural settlements but the criteria for distributing such sites are inevitably less clear. Nevertheless, Topic Paper 7.4 states that the intention is for allocated sites to have good access to a primary school via a

safe route within 2-3 km and that every cluster should accommodate an allocation of some scale if an appropriate site is available.

10. The GNLP allocated sites for 442 dwellings in the 25 clusters in Broadland, an average of 18 dwellings per cluster, and specified that sites for a minimum of 1,200 dwellings should be allocated in the 48 clusters in South Norfolk, an average of 25 dwellings per cluster. The 1,200 dwelling figure was included in the Regulation 19 consultation on the GNLP in February 2021 following which potential sites and alternatives were the subject of public consultation in a Regulation 18 version of the SNVCP in June 2021. The latter was said to demonstrate that the figure was appropriate.
11. In the event 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 SNVCP 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.
12. With the passing of time since adoption the GNLP itself needs to be updated and reviewed. The process is already underway with a call for potential housing sites. The latest April 2025 assessment of housing land supply, which is undertaken on a Greater Norwich basis, demonstrates 4.85 years supply, 299 dwellings short of the five-year supply expected. The shortfall is likely to increase substantially in July 2026 when the required supply increases to reflect the national requirement for additional housebuilding<sup>1</sup>. Given the numbers involved, allocations in the SNVCP will not rectify this problem. In addition, the standard methodology for assessing local housing needs introduced in December 2024 increases the requirement for new housing in Greater Norwich by 34% from 1,929 to 2,590 homes per annum, another reason that a review is necessary.
13. 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<sup>2</sup>. In relation to the current SNVCP 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.

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<sup>1</sup> The buffer added to the five-year housing land supply requirement increases from 5% to 20% in accordance with paragraph 78(c) of the National Planning Policy Framework.

<sup>2</sup> The current intention is not to prepare another separate SNVCP.

## The Allocations

14. The plan as submitted proposes net additional dwellings as set out in the following table, thus aiming to meet the GNL policy requirement to allocate sites for a minimum of 1,200 dwellings with a modest surplus. The figures come from tables 1-4 on pages 222-225 of the plan:

Dwellings on new allocations	1,204
Dwellings on neighbourhood plan allocations	135
Additional dwellings on carried forward SNSAP sites	4
Less SNSAP allocations not carried forward	-13
<b>Total 1,330 dwellings</b>	

15. Taking full account of the context set out above, the background evidence, the representations submitted to date, the hearing discussions and my site visits, the various allocations in the plan are sound subject to the following deletions and/or modifications. In some cases as set out in Appendix A, minor changes to the wording of allocation policies are necessary in the interests of effectiveness.

### BAP1 Former Batching Plant, Church Road, Bergh Apton

16. Development within the parish of Bergh Apton is small scale and scattered with four distinct areas of linear, frontage housing on The Street, Cooke's Road, at the Mill Road/Threadneedle Street crossroads and at the Church Road/The Street junction. The SNSAP only allocated two small sites for further frontage development in these areas. The village is only accessed by narrow country lanes and is poorly served by facilities, just a village hall and small recreation ground on Cooke's Road, with a post office and farm shop at the far end of Mill Road near the closest regular bus services along the A146. Other services including the local primary school, a shop and public house are provided in the nearest village, Alington, to the north-west.
17. The plan proposes to allocate a 1.65 ha brownfield site on Church Road, at one time a concrete batching plant, for up to 25 dwellings, which would take the form of a medium sized cul-de-sac or single loop estate. 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. 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. However, 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. The accessibility of the site to services and facilities falls below the standard necessary for an allocation in the submitted plan.
18. Policy DM 2.2 of the DMPD seeks to safeguard land and buildings currently or last used for employment purposes, including outside settlement boundaries, to help ensure good access to a range of jobs, not least in the rural parts of

the district where there is often a shortage of employment land. Whilst the motivation to allow redevelopment is understood, and Policy DM 2.2 allows for this where there are overriding benefits, the process of exploring alternative uses as required by the policy has not been carried out nor the suitability of the site for housing been sufficiently considered given its poor accessibility.

19. In the light of these concerns the proposal for housing is not sufficiently justified to be afforded an allocation in the plan and thus should be deleted.

BAR1 Land at Cock Street/Watton Road, Barford

20. 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. The plan proposes to allocate a 0.76 ha site on the corner of Cock Street and Watton Road for about 20 dwellings. The site is in two distinct halves, the eastern brownfield half occupied by a commercial garage and to the west, beyond a hedgerow boundary, a grass field rising gently up to Back Lane.
21. 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, in particular a vehicle repair/servicing workshop with 7-8 employees, a second-hand car sales business and one or two small offices. The current business leases may be short but there is no reason they cannot be renewed as in the past.
22. 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. There is no evidence that these businesses or jobs would be relocated to the nearby Barford Industrial Estate. In this instance, given the longstanding business use of the site and its continuing contribution to the local economy, the environmental and housing benefits of the proposal do not outweigh the benefit of the current lawful use continuing. The allocation thus conflicts with Policy DM2.2 of the DMPD and is not justified.
23. Housing on the western part of the site is only proposed in conjunction with the garage. 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. The allocation of this part of the site is not justified either and therefore the whole allocation should be deleted from the plan.

## BAR2 North of Recreation Ground, Chapel Street, Barford

24. Whilst not identified in the first Regulation 19 version of the plan, following its promotion, this allocation was included in the Regulation 19 addendum and then the submitted version. The proposal is for a housing development of about 40 dwellings on the field to the north of Barford Sports Ground with its long access road running along the western side of that open space. The sports field, together with the village hall on the site and a children's play area, is held on a 99-year lease with about 35 years remaining by a charity administered by the Village Hall Committee for the benefit of the residents of the combined parishes of Barford and Wramplingham. The proposal, in consideration of permission for the access road, would include the provision of a new village hall and the existing leasehold land would be gifted freehold to the villages. These benefits would be secured as part of the land transaction.
25. The existing village hall, a modest brick building with a low pitched felt roof, appears rather old and tired and lacks some useful facilities, for example changing rooms to allow team sports on the recreation ground. 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. The site promoter's claim that the lease can be circumvented seems doubtful given its terms and the complexities of charity law, and efforts to secure local support for the scheme have clearly been ineffective to date.
26. 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.
27. Unusually, the deliverability of this allocation is dependent on the agreement of a local charity controlled by the parishioners of Barford and Wramplingham. Whilst a new village hall would be a significant benefit, strong opposition due to the perceived impact of the proposal on the character of the village and its landscape is apparent and likely to continue. With insufficient evidence of the necessary local support at this time, the allocation is unlikely to be deliverable and is not justified as an allocation in the plan.

## BB1 Corner of Norwich Road/Bell Road, Barnham Broom

28. Barnham Broom has a primary school, village hall and recreation ground, public house and occasional bus services to Norwich and Wymondham. The village is divided into two distinct sections, the Mill Road/Bell Road area of

small cul-de-sac estates to the west and an eastern section of primarily frontage development on Norwich Road. The two parts of the village are separated by a substantial undeveloped gap which comprises woodland on one side and open fields either side of Manor Farm on the other. 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.

29. The plan proposes to allocate a 1.4 ha field on the corner of Bell Road and Norwich Road for about 40 dwellings within this undeveloped gap. This would include realigning Bell Road to form a staggered junction with Norwich Road, Mill Road and Honingham Road, replacing the current crossroads, improving visibility at the junction, and creating an open space on the corner as a focal point in the village opposite the old shop.
30. Whilst these aspects would have 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.
31. The SNSAP allocated part of a large arable field further down Bell Road for housing, now Bankside Way, which includes a ready-made access to more of the field beyond. This area, together with a part of the field to the north, has been promoted for inclusion in the SNVCP and housing here would not impact on the character of the wider village, only being seen from adjacent housing.
32. This more suitable site, and maybe others, have been discounted due to the highway authority view that visibility at the Bell Road/Norwich Road crossroads is substandard and needs improvement prior to any further development in the village. 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 with a 20-mph speed limit on the Mill Road approach, and/or building out the footway at the corner so the stop line is further forward.
33. The argument that the realignment of Bell Road and a new staggered junction is essential to allow further housing in the village has not been sufficiently made out, and as a result the case to develop the Bell Road/Norwich Road site to secure this has not been proven. Given the significant visual impact of the proposal and its effect on the character of the village the allocation is not justified and should be deleted.
34. The plan also proposes two changes to the settlement limits of Barnham Broom which would allow frontage development at either end of the eastern section of the village. 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. Neither of these changes to the settlement limits are justified and they should therefore be deleted from the plan.

#### BRO1 East and West of the B1332, Norwich Road, Brooke

35. Brooke is one of the larger villages in the rural area. The plan proposes an allocation of 2.47 ha for 50 dwellings in two equal sized parcels of agricultural land either side of the B1332 Norwich Road just to the north of the built-up area. The development would adjoin the linear frontage housing to the south but would take the form of two cul-de-sac estates on each side of the road accessed by a large four-arm roundabout, a traffic calming feature at the entrance to the village. However, this would not be a financially viable form of development. A staggered junction would be necessary, and the proposal would potentially open up further land on both sides for longer-term larger scale development.
36. The site to the west has some screening from the surrounding countryside due to the tree cover around Brooke Lodge to the north and a few trees along the western boundary. In comparison, that 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 to the north and east. Should the allocation 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.
37. The allocation of land on both sides of the B1332 for two cul-de-sac estates as submitted represents an unduly confused strategy for the village. It would lead to an unfortunate staggered junction and have a significant impact on the open landscape to the northeast. Considering the two parcels individually, the allocation to the east of the B1332 is not justified and should be deleted from the plan. Any further development beyond 25 dwellings to the west should be a matter for future consideration, perhaps during the GNLP review.

#### DIT1REV Land at Thwaite's and Tunneys Lane, Ditchingham

38. Ditchingham provides a good range of services and facilities and the single arable field between Thwaite Road and Tunneys Lane is suitable for a housing allocation being an extension of the recent development at Hamilton Way. 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 in the plan, increasing the capacity of the site from 45 dwellings to about 70 dwellings. A second point of access would need to be provided.

### BRM1 Land west of Old Yarmouth Road, Broome

39. Broome is a long linear village with few facilities but is closely related to those of Ditchingham. The plan proposes a linear allocation of 0.62 ha on the west side of Old Yarmouth Road at the northern end of the village, adjacent to a row of nine frontage properties built as a result of a similar allocation in the SNSAP. The new allocation would be for at least 12 more dwellings in a similar form to the existing row, delivering a line of road frontage housing presumably accessed from service roads like those to the south. Like the previous allocation, the site comprises a linear section of a large open arable field and would involve a further extension of the village into the open countryside. Opposite the site is a gappy hedgerow with a field behind and one property, Bridge House, but the allocation projects beyond this with no physical feature to determine its extent.
40. 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. The allocation is therefore not justified and should be deleted from the plan.

### ROC1 Land South of New Inn Hill, Rockland St Mary

41. Rockland St Mary is a long linear village comprising frontage housing along both sides of The Street with some limited development in depth at either end around St Margarets Way and Bee-Orchid Way, the latter extended with an allocation in the SNSAP. There are a range of services including a primary school, shop, parish room, playing field, GP surgery and occasional bus services. The SNVCP originally proposed two allocations, but the other site behind the GP surgery was dropped due to the lack of suitable access.
42. The proposal at New Inn Hill is to allocate 1.47 ha for about 25 dwellings on a L shaped parcel of agricultural land alongside and running behind Eel Catcher Close, the final row of properties at the eastern end of the village. This is a housing association scheme of affordable dwellings exceptionally allowed in 2009 outside the then settlement limits to address identified local housing needs. The proposal would mean housing extending further east along the road frontage as far as a field boundary with a line of trees but also involve a cul-de-sac with development in depth on the field and wrapping round behind Eel Catcher Close.
43. The proposal would have an adverse impact on the significance of three Grade II listed buildings just to the west of the site. The Old Hall farmhouse dating from the 17th century together with a barn/hayloft to the northeast and a barn to the northwest, both dating from the 19th century and now converted into dwellings, represent an historic farm complex whose significance is partly derived from its historic agricultural setting. This has been much eroded by modern development on three sides, and the proposal would result in further

encroachment. It is proposed to mitigate this by retaining an open space at the western end of the site to maintain views to and from the farmland to the southeast. However, any development in depth on the site would erode the setting of the farm buildings to some degree, harming their appreciation and significance.

44. In addition, 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. Given these concerns and the impact on the listed buildings the allocation is not justified and should be deleted from the plan.

#### SEE1 West of Mill Lane, Seething

45. Seething has developed a long linear form along Seething Road and School Road towards Seething Old Hall. This has been consolidated by an allocation in the SNSAP for 5 dwellings at the southern end of Seething Road and further infilling is now proposed in other gaps on Seething Road through extended settlement limits.
46. There is also a long detached row of houses on Mill Road to the northeast of the main village described in the SNSAP as 'ribbon development comprising council housing set in open countryside'. This consists of about 30 semi-detached houses dating from the 1950s to the 1970s on the western side of the road, a straight rural lane with no footways. This area has not hitherto been included in the settlement limits of the village, but the plan proposes an allocation of 0.53 ha at the far end to extend the row by about 12 more dwellings up to a small copse.
47. The row is a well-established feature in the landscape but nevertheless an intrusive one. The existing dwellings face open countryside to the east with no screening; to the rear some vegetation has grown up within back gardens but the row is still easily seen across the fields. 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. 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. Overall, the proposed housing would be unduly intrusive in the landscape and

detached from the village. Given these concerns the allocation is not justified and should be deleted from the plan.

SPO1REV Land west of Bunwell Road, Spooner Row

48. Spooner Row is a somewhat fragmented settlement with a primary school, public house, some other facilities and railway/bus services. The SNSAP allocated two housing sites and the SNVCP proposes two more. A 2.31 ha site in the angle between Bunwell Road and Queen's Street is allocated for about 35 dwellings, but 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. The inefficient use of suitable land is not justified and the site capacity should be increased to the higher figure. In addition, for effectiveness, the whole field should be included in the allocation with the policy precluding development in the areas of flood risk.

TAC2 Land adjacent The Fields, Tacolneston

49. Tacolneston together with Forncett End have a good range of services and facilities. The SNSAP allocated a 0.95 ha site with access off The Fields, an existing cul-de-sac, and this is carried forward into the current plan. However, 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. This inefficient use of suitable land is not justified. The whole field should be allocated in the plan, increasing the capacity of the site from about 21 dwellings to (pro-rata) about 31.

BUR1 Land north of Staithe Road, Burgh St Peter

50. The plan proposes the allocation of 0.56 ha of farmland on the northern side of Staithe Road in Burgh St Peter for at least 12 dwellings. The village is small and relatively isolated, falling within a group of dispersed settlements served by the Glebeland Community Primary School on the A143 between Haddiscoe and Toft Monks. The school is about 6 km away from the village by rural lanes without footways and, whilst there are some roadside type facilities at the A143/A146 junction, 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'.
51. 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 with the introduction of a row of new frontage dwellings on the northern side of the road. This would also negate the existing soft edge to the village in this location which is formed by the deep front gardens with houses set well back on the southern side of the road.

Considered overall, the proposal is not justified due to its intrusive visual impact and the poor level of accessibility to services and facilities. It should therefore be deleted from the plan.

#### WIC1 Land south of Primary School, Wicklewood

52. Wicklewood has a primary school, village hall and recreation ground, public house, some employment and regular bus services to Watton, Wymondham and Norwich. The village has developed around a network of roads, namely Low Street, High Street, Church Lane, Hackford Road and Wymondham Road, the latter four encompassing some undeveloped land within the physical confines of the settlement.
53. The SNSAP allocated two sites, land fronting High Street, now Mill View Way, and a site at Hackford Road, now with planning permission for nine dwellings. The SNVCP proposes two more. 0.89 ha is allocated for at least 12 dwellings off Hackford Road to the north of the school (Site WIC2). This site comprises two discrete grass fields separated by some housing on Milestone Lane from the open countryside with the school playing fields to the south and properties on Hackford Road to the east. Whilst there would be some localised visual impact, the site is well-enclosed within the existing framework of the village and is suitable for development.
54. The second proposal however, WIC1, is to allocate 2.97 ha to the south of the school for up to 40 dwellings, increased from 1.63 ha for 30 dwellings in the first Regulation 19 version of the plan. This site is thus much larger than the other allocations and would represent a major encroachment of the village into its rural surroundings. The allocation comprises the eastern third of a large, single, featureless arable field forming a highly visible plateau between Milestone Lane and The Green.
55. The overall form of the village is unusual in that there are substantial pockets of undeveloped land within the physical confines of the settlement where new housing would have minimal impact on the wider countryside, most obviously redevelopment of the glasshouses site but also adjacent open land to the northwest. Whilst securing access to these sites may be challenging, the area provides good opportunities for future housing development.
56. By contrast, whilst allocation WIC1 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 with a substantial enclave of new housing projecting into the countryside to the south. Considered overall, the allocation is not justified and should be deleted from the plan.

## ASH1 Land west of New Road, Ashwellthorpe

57. The plan proposes the allocation of 1.09 ha of farmland on the western side of New Road in Ashwellthorpe for up to 15 dwellings. 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 Wreningham via rural lanes with no footways. The village thus scores relatively poorly in terms of accessibility to services and facilities.
58. 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. The proposal is not justified due to this visual impact and the generally poor level of accessibility to services and facilities. The allocation should therefore be deleted from the plan.

## Adjustments to the capacity of other allocations

59. A few of the allocations in the plan are the subject of planning applications or permissions which demonstrate a higher capacity over that assumed in the policy. In the interests of effectiveness, the capacities of these allocations should be adjusted accordingly.

## **Overall Conclusion**

60. 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.
61. In some cases the conclusions 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.

## **Implications for housing provision**

62. The implications of the above modifications and adjustments in terms of dwelling numbers, compared to the submitted plan, are as follows:

	Losses	Gains
<u>New Allocations</u>		
BAP1 Former Batching Plant, Church Road, Bergh Apton	25	
ASL1 Land off Church Road, Aslacton		1
BAR1 Land at Cock Street/Watton Road, Barford	19	
BAR2 North of Recreation Ground, Chapel Street, Barford	40	
BB1 Corner of Norwich Road/Bell Road, Barnham Broom	40	
BRO1 Site East of the B1332, Norwich Road, Brooke	25	
DIT1REV Thwaite's Road/Tunneys Lane, Ditchlingham		25
BRM1 Land west of Old Yarmouth Road, Broome	12	
GIL1REV South of Geldeston Road/Daisy Way, Gillingham		4
HAL1 Land off Briar Lane, Hales		4
SWA2REV Land on Main Road, Swardeston		3
ROC1 Land South of New Inn Hill, Rockland St Mary	25	
SEE1 West of Mill Lane, Seething	12	
SPO1REV Land west of Bunwell Road, Spooner Row		10
TAC1REV Land west of Norwich Road, Tacolneston		4
BUR1 Land north of Staithe Road, Burgh St Peter	12	
WIC1 Land south of Primary School, Wicklewood	40	
WIN1 Land west of Hall Road, Winfarthing		1
ASH1 Land west of New Road, Ashwellthorpe	15	
<i>Totals (net loss 213)</i>	<i>265</i>	<i>52</i>
<u>Carried forward SNSAP Allocations</u>		
BRA1 Land at Norwich Road, Bracon Ash		3
NEW2 Land adjacent Alan Avenue, Newton Flotman		1
TAC2 Land adjacent The Fields, Tacolneston		10
WIC3 Land at Hackford Road, Wicklewood		3
<i>Totals (net gain 17)</i>		<i>17</i>
<u>Overall Totals (net loss 196)</u>	<u>265</u>	<u>69</u>

### New dwellings arising from amended Settlement Limits

63. Although not a requirement of the GNLP, the SNVCP has quite properly taken the opportunity to review the settlement limits defined in the 2015 SNSAP. Many changes simply update the boundaries to take account of recent development, but in some cases they allow scope for some modest infilling or the justifiable 'rounding off' of settlements. Whilst too small to be considered allocations, the additional dwellings that will arise from these changes are a consequence of the SNVCP and should be counted as part of its provision.
64. Discounting the sites south and north of Norwich Road, Barnham Broom for the reasons set out in paragraph 34 and including the site south of Sneath

Road, Sneath Common (see Appendix B), the additional provision arising from extensions to settlement limits is estimated to be about 34 dwellings<sup>3</sup>.

65. The 'village clusters' approach amalgamating the three lower tiers of the JCS settlement hierarchy requires a wider review of settlement limits throughout the district to ensure the plan is positively prepared. This exercise has identified a number of settlements and groups of dwellings which should be distinguished by settlement limits from the surrounding countryside. This may allow further, albeit unquantified, opportunities for infilling. The locations concerned are listed in Appendix B.

#### New dwellings arising from Neighbourhood Plan allocations

66. It is clear from the housing provision table in GNLP Policy 1 that the South Norfolk village clusters comprise the district outside the Norwich urban area, the main towns of Wymondham, Diss (with part of Roydon), Harleston and Long Stratton, and the key service centres of Hethersett, Hingham, Loddon/Chedgrave and Poringland/Framlingham Earl. Allocations made by finalised neighbourhood plans outside these areas thus contribute towards the 1,200 dwelling requirement.
67. To date, just one neighbourhood plan makes housing allocations in the village clusters of the district, the Diss & District Neighbourhood Plan 2023. This allocates sites for 25 dwellings in Burston, 25 dwellings in Roydon and 122 dwellings in Scole taking account of the recent planning permission for site DDNP10. The neighbourhood plan thus provides for 172 dwellings in the village clusters of the district.

#### Revised level of housing provision

68. Compared to the housing provision made in the plan as submitted, set out in paragraph 14 above, taking all the above adjustments to the allocations into account together with the extensions to settlement limits and neighbourhood plan allocations, the housing provision would be as follows:

Dwellings on new SNVCP allocations	991
Dwellings on Neighbourhood Plan allocations	172
Additional dwellings on carried forward allocations	17
Dwellings resulting from extended settlement limits	34
less 2015 allocations not carried forward	-13
<b>Total 1,201</b>	

### **Conclusion and Next Steps**

69. This total only just reaches the GNLP requirement for a minimum of 1,200 dwellings to be provided in the village clusters in the district. However, it is sufficient for the plan to meet the tests of soundness in this case. The GNLP

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<sup>3</sup> Document H.9.3 taking account of planning applications and adjusted for Barnham Broom and Sneath Common.

itself provides for a surplus of about 4,500 dwellings above its identified housing needs. An early review is underway. The letter from the Minister of State for Housing and Planning dated 9 October 2025 is also relevant, this encourages the examination of the final set of local plans coming forward within the current system to be undertaken with the appropriate degree of flexibility. 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.

70. However, to potentially increase the housing provision in the plan it would be beneficial for the Council to review the capacity of the suitable sites that have been identified and to increase this wherever possible without significant adverse effects. This could be by increasing the density of development in some cases or by extending the boundary of the allocation in others where these are unnecessarily restrictive. Sites in the latter category may include allocations EAR2 at Earsham, PSM1 at Pulham St Mary, SPO2 at Spooner Row, ELL1 at Ellingham and SWA1/SWA2 at Swardeston where boundaries are not defined by physical features on the ground.
71. Assuming the Council wish to proceed towards adoption, the next step for the SNVCP is for a schedule of draft MMs to be prepared to address the various soundness issues raised above and any changes to the policies in the plan that have been identified since submission in the interests of effectiveness, for example those drawn up in continued joint working with consultees. The draft MMs should also include any proposals to increase housing provision as suggested in the previous paragraph.
72. The Council is now invited to draw up a detailed schedule of draft MMs for my approval via the programme officer prior to a further round of consultation. The starting point for the MMs is the version of the plan submitted in August 2025. The MMs should only include changes necessary for soundness. The Council may also make additional modifications (AMs) to the plan but these must not materially affect its policies. AMs should therefore only be of a minor, explanatory or factual nature and are entirely a matter for the Council.
73. I attach as Appendix A to this letter a preliminary list of the MMs that are necessary for soundness. This takes account of the Council's latest schedule of suggested changes to the plan. Full reasons for all MMs will be provided in my final report. MMs should be numbered MM1, MM2 etc and each should cover an allocation, including any changes to the policy criteria. Any changes to the descriptive sections should be covered by AMs together with any consequential changes to the plan, renumbering of paragraphs etc.
74. The Policies Map is a geographic illustration of where the various policies in the plan apply and certain amendments are necessary to it for the geographic application of the policies to be justified and effective. Where the Policies Map needs to be amended from that submitted with the plan, the proposed changes should be published in a set of plans alongside the draft MMs and form part of the consultation. These changes include deleted sites and

amended allocation boundaries, also the changes to settlement limits. A preliminary list is attached as Appendix B to this letter.

75. Although the Council is not invited to make representations on the contents of this letter and its appendices, if there are any omissions, inconsistencies or ambiguities any requests for clarification should be made through the programme officer. Comments from interested parties are not invited and will not be accepted at this stage as there will be a full six week consultation exercise on the draft MMs in due course.
76. Given the changes to the distribution of allocations in the plan the MMs may need to be subject to sustainability appraisal and you should seek advice from AECOM accordingly. The habitats regulations assessment may also need to be updated or an addendum produced to take them into account. Any revised documents should be published alongside the draft MMs in due course for the assistance of consultees.
77. A copy of this letter and appendices should be placed on the examination website for information. Once the Council has been able to consider its contents a reply would be helpful to advise how it wishes to take the plan forward and the likely timescale.

Yours sincerely

*David Reed*

INSPECTOR

## APPENDIX A

### SNVCP: PRELIMINARY LIST OF MMs NECESSARY FOR SOUNDNESS

MM	Cluster	Allocation	Issues
1	2	ALP1	Criterion re FRA
2	2	BAP1	Delete
3	3	ASL1	Amend capacity to 36; Criterion re Anglian Water
4	4	BAR1	Delete
5	4	BAR2	Delete
6	5	BB1	Delete
7	6	BAW1REV	Criteria re Historic Environment & Anglian Water
8	7	BRE1	Criteria re Pine Tree Cottage & Historic Environment
9	8	BRO1	Delete Site East of B1332; Criteria re FRA & Historic Environment
10	9	BUN2	Criteria re Lilac Farmhouse & HIA
11	11	CAR1	Criterion re Plough Inn
12	13	DIT1REV	Amend boundary & capacity to 70; Criteria re FRA, Minerals & Historic Environment
13	13	BRM1	Delete
14	14	EAR1	Criterion re Historic Environment
15	14	EAR2	Criteria re FRA, Quarry & Historic Environment
16	16	GIL1REV	Amend capacity to 44, Criteria re FRA, Historic Environment Landscape Assessment & Anglian Water
17	16	GEL1	Criteria re Landscape Assessment & Historic Environment
18	17	HAL1	Amend capacity to 39; Criteria re FRA, Historic Environment & Hales Hospital
19	18	HEM1	Criterion re Historic Environment
20	22	ELL1	Criterion re southern boundary
21	22	ELL2	Criterion re Landscape Assessment
22	23	LM1	Criteria re Anglian Water, Historic Environment & Listed Barn
23	25	SWA1	Criterion re Historic Environment
24	25	SWA2REV	Amend capacity to 43; Criteria re Historic Environment, FRA & Minerals
25	25	BRA1	Amend capacity to 23; Criterion re Historic Environment
26	26	NEE1	Criteria re Anglian Water, Historic Environment & FRA
27	26	WOR1	Criterion re FRA
28	26	WOR2	Criteria re Historic Environment & western boundary
29	27	NEW1	Criterion re Anglian Water
30	27	NEW2	Amend capacity to 31
31	28	PSM1	Criterion re FRA
32	29	ROC1	Delete
33	33	SEE1	Delete
34	34	SPO1REV	Amend boundary & capacity to 45; Criteria re The Orchards, FRA & Historic Environment
35	34	SPO2	Criterion re FRA
36	37	TAC1REV	Amend capacity to 29
37	37	TAC2	Amend boundary & capacity to 31; Criterion re Historic Environment
38	38	TAS1REV	Criterion re Historic Environment
39	40	THU1	Amend capacity to 12; Criterion re Historic Environment
40	40	THU2	Criterion re FRA
41	43	HAD1	Criterion re Historic Environment
42	43	BUR1	Delete
43	45	WIC1	Delete
44	45	WIC2	Criterion re heritage asset
45	45	WIC3	Amend capacity to 9; Criterion re Church

46	46	WIN1	Amend capacity to 21
47	46	WIN2	Criteria re FRA & conservation area appraisal
48	47	WOO1	Criterion re Anglian Water
49	48	ASH1	Delete

## **APPENDIX B**

### **SNVCP: PRELIMINARY LIST OF CHANGES TO POLICIES MAP**

#### Deleted Allocations:

BAP1  
 BAR1  
 BAR2  
 BB1  
 BRM1  
 ROC1  
 SEE1  
 BUR1  
 WIC1  
 ASH1

#### Amended boundaries:

BRO1 (Delete Site to East of B1332)  
 DIT1REV  
 SPO1REV  
 TAC2

#### Settlement Limits

##### Deletions:

South of Church Lane, Barford (allocation in SNSAP)  
 South of Norwich Road, Barnham Broom (SN2110)  
 North of Norwich Road, Barnham Broom (SN0018)

##### Additions:

Boundary Villa, Aslacton  
 Eastern quarter of SN2118 South of Sneath Road, Sneath Common  
 Colton – extension to south  
 Mill Road, Forncett St Peter  
 Hunts Mead, Forncett St Peter  
 Alburgh Road, Hempnall Green  
 Keswick (error)  
 Ketteringham – extension to east  
 Old Yarmouth Road, Ellingham  
 Eastern end of School Lane, Little Melton  
 The Ridings, Spooner Row  
 Arminghall Lane, north of Poringland  
 Hapton  
 White Heath Road, Thurton  
 Tivetshall St Mary  
 Wacton

Any other settlement limit anomalies identified by the Council