

South Norfolk Village Clusters Housing Allocations Plan

Topic Paper

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Chapter 1: Introduction

Purpose of the topic paper

1. This topic paper has been produced to accompany the submission of the South Norfolk Village Clusters Housing Allocations Plan (VCHAP) to the Secretary of State for examination.
2. The intention of the topic paper is to provide background information and context for decision making: it does not contain any policies, proposals or site allocations. Chapters within this topic paper consider relevant national and local policies, as well as the evidence and feedback that has informed the site selection process. References to documents within the submission document library have been included where appropriate.
3. The main areas covered by this topic paper are:
 - The relationship between the Village Clusters Housing Allocations Plan and the Greater Norwich Local Plan and the emergence of the distribution strategy for allocations within the South Norfolk village clusters;
 - Infrastructure;
 - Affordable housing;
 - Rural transport;
 - Nutrient Neutrality; and
 - Heritage and landscape considerations.

Policy context

National context

4. [National Planning Policy Framework](#): Policies within the Local Plan must be positively prepared, justified, effective and consistent with national policy and legislation. The National Planning Policy Framework (NPPF) sets out the overarching planning policy framework, supported by National Planning Practice Guidance (NPPG). During the preparation of the Village Clusters Plan, there have been a number of updates to the National Planning Policy Framework, most recently in December 2024. For clarification, where reference is made within this topic paper to the NPPF this relates to the December 2024 version of that document.
5. Chapter 3 of the NPPF sets out the approach to plan-making. This includes the need for plans to be contributing towards sustainable development, positively prepared, shaped by early, proportionate and effective engagement, contain clearly written policies, be accessible and serve clear purpose (paragraph 16). Preparation of the Village Clusters Housing Allocations Plan has been informed by this approach to plan-making.
6. The national approach to ensuring the delivery of a sufficient supply of homes is outlined in Chapter 5 of the NPPF. Paragraph 72 states that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and economic viability.
7. The government's approach to rural housing, as set out in paragraphs 73 and 83 of the NPPF, underpins the VCHAP. This includes the important contribution that small and medium sized sites can make to meeting the housing requirement of an area, including the critical role of Small and Medium Enterprise (SME) housebuilders in the timely delivery of sites.¹
8. Critically, paragraph 83 of the NPPF sets out that:

To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

This national approach to delivering housing within rural areas, including on smaller sites, was instrumental in informing both the objectives of the Plan and the spatial distribution strategy that emerged throughout its preparation.

Local context

9. [Greater Norwich Local Plan](#): In March 2024 South Norfolk Council adopted the Greater Norwich Local Plan (GNLP). This strategic Local Plan document was produced jointly between Broadland District and Norwich City Councils and identifies how many homes need to be built between 2018 and 2038 across the three Council areas. Within the overall housing requirement, the GNLP sets a target for a minimum of 1,200 homes on new allocations across 48 Village Clusters in South Norfolk ([Policy 7.4](#)). The VCHAP has been prepared to meet this requirement, as well as to provide a small buffer to these minimum numbers.
10. Chapter 2 of this topic paper sets out in further detail the relationship between the Greater Norwich Local Plan and the Village Clusters Housing Allocations Plan.
11. [Neighbourhood Plans](#): Neighbourhood Planning enables Neighbourhood Forums and Parish Councils to develop a plan that sets out a local vision and planning policies for their designated neighbourhood area. Those 'Neighbourhood Plans' which are successfully adopted form part of the statutory development plan for the area that they cover. Where a Neighbourhood Plan is adopted or emerging before an up-to-date Local Plan is in place, the local planning authority should take it into account when preparing Local Plan policies.
12. At the time of preparing this topic paper there were a total of 13 adopted Neighbourhood Plans within the South Norfolk District, as well as a further 9 emerging Neighbourhood Plans and 2 Neighbourhood Plans under review. Of these, 9 Neighbourhood Plans relate to either market towns or Norwich urban fringe areas that are included within the Greater Norwich Local Plan area and therefore do not relate to the village clusters included in the VCHAP.
13. One adopted Neighbourhood Plan and one emerging Neighbourhood Plan include (or propose to include) housing allocations. The Diss and District Neighbourhood Plan (DDNP) was adopted in October 2023. This multi-parish, cross-boundary Plan includes both the market town of Diss and (within South Norfolk) the surrounding parishes of Burston and Shimpling, Roydon and Scole. Housing allocations made within the Plan reflect the requirements set out for the DDNP by the Greater Norwich Local Plan. The VCHAP does not seek to make additional housing allocations in these areas. In addition, the Dickleburgh & Rushall Neighbourhood Plan is in preparation and proposes the allocation of housing sites within the Neighbourhood Plan area to meet the minimum housing requirement of 25 homes identified for the village. A pre-submission Regulation 16 consultation for the Dickleburgh & Rushall Neighbourhood Plan was undertaken between 24th February and 7th April 2025 and the Neighbourhood Plan is now under examination.
14. Three adopted Neighbourhood Plans relate to areas that include site allocations contained within the VCHAP. Those Neighbourhood Plans are: Tivetshalls Neighbourhood Plan (adopted in

December 2022), Mulbarton Neighbourhood Plan (adopted in February 2016) and Tasburgh Neighbourhood Plan (adopted July 2024).

Evidence Base

15. The Council has prepared a detailed evidence base to support the development of the Plan and the identification of preferred allocation sites. A summary of each document included within the evidence base is set out at paragraphs A.28 – A.36 of the main submission document. The key documents are listed below and are referred to throughout this topic paper as appropriate:

- Sustainability Appraisal (SA, Library Ref. A.3.1);
- Habitats Regulation Assessment (HRA, Library Ref. A.4.1);
- Heritage Impact Assessment (HIA, Library Ref. B.4.1 and B.4.2);
- Landscape and Visual Appraisal (LVA, Library Ref. B.5.1);
- Level 1 and Level 2 Strategic Flood Risk Assessments (SFRA, Library Ref. B.8.1 to B.9.25);
- South Norfolk Village Clusters Water Cycle Study Addendum (WCS, Library Ref. B.7.1);
and
- South Norfolk Village Clusters Viability Appraisal (VA, Library Ref. B.6.1).

Chapter 2: The Greater Norwich Local Plan

Introduction

1. The South Norfolk Village Clusters Housing Allocations Plan (VCHAP) has been developed alongside the Greater Norwich Local Plan (GNLP). Once adopted, it will form part of the development plan for the Greater Norwich area alongside the GNLP.
2. This section of the topic paper provides further context on the relationship between the VCHAP and GNLP and how they will work together.

National Context

3. Government planning policy is set out in the National Planning Policy Framework (NPPF). Regarding rural housing, paragraph 83 states that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities and should support local services. It also states that, where there are groups of smaller settlements, development in one area may support others.
4. Paragraph 73 notes the importance of small and medium sized sites, up to 1 hectare, in contributing to local housing need, particularly in delivering these sites quickly. It also encourages councils to support windfall development on non-allocated sites especially within existing settlements.

Greater Norwich Local Plan

5. In the Greater Norwich area, Broadland District Council, South Norfolk Council and Norwich City Council have worked together to produce the [Greater Norwich Local Plan](#) as the joint strategic plan for the area. Norfolk County Council and the Broads Authority have also been closely involved, however the Broads Authority creates a separate Local Plan for their area.
6. The GNLP identifies the strategy for growth for the Greater Norwich area, running from 2018 to 2038. It proposes a broad locational strategy in relation to homes, jobs and infrastructure. The GNLP provides updated strategic policies to help guide and shape development, covering issues such as the economy, environment and design. It also allocates specific sites for development across the Greater Norwich area.
7. The basis for calculating the future requirements in the GNLP is the Government's December 2020 'standard method' for identifying local housing need which was tested as part of the Examination of the GNLP.
8. The GNLP is consistent with Government's planning policies as set out in the National Planning Policy Framework. The GNLP was adopted by South Norfolk Council on 25th March 2024.

Greater Norwich Local Plan Strategy

Policy 1 The Sustainable Growth Strategy

9. Policy 1 of the GNLP outlines the overall strategy for the Greater Norwich area. It states that the area has a requirement for 40,550 dwellings, however it makes provision for 45,041 to allow a buffer.

10. The GNLP strategy focuses most of the planned growth in areas with the best access to jobs, services and existing planned infrastructure. This includes the strategic growth area that covers the Broadland Growth Triangle to the north-east of Norwich, Norwich itself and its wider urban area and the A11 corridor, otherwise referred to as the Cambridge Norwich Tech Corridor. The GNLP also allocates further growth beyond these strategic areas, including five main towns and the larger key service centre villages to support a vibrant rural economy.
11. In South Norfolk, the GNLP sets out areas for future housing development in the parishes situated in the Norwich Fringe (such as Costessey, Cringleford and Trowse), the market towns (such as Wymondham and Diss) and the larger villages (such as Hethersett and Poringland). It also allocates land for non-housing developments.
12. The GNLP also requires some development to occur on smaller sites in the Village Clusters at an appropriate scale. This has been proposed to help support local services whilst balancing the need to protect the character of the rural villages.

Policy 7.4 Village Clusters

13. Policy 7.4 of the GNLP outlines the overall strategy for the Village Clusters in Broadland and South Norfolk.
14. The Village Clusters are based on primary school catchments, which provide a proxy for social sustainability. Locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services.
15. The provision of relatively small allocation sites, as required by the National Planning Policy Framework, means this approach also has the benefit of supporting small-scale builders, providing choice for the market and helping to ensure the delivery of housing in popular village locations.
16. A minimum of 3,883 dwellings, as set out in Policy 1, were allocated to the Village Clusters in both Broadland and South Norfolk. Part of this requirement was met through existing commitments and housing delivered between 2018/19 and 2021/22 in Broadland (1,054) and South Norfolk (1,187). 442 dwellings have also been allocated on sites included in the GNLP in the Broadland Village Clusters.
17. The policy states that a minimum of 1,200 dwellings must be delivered in the South Norfolk Village Clusters and that this will be delivered by the VCHAP.
18. The policy also states that additional homes may be provided in the Village Clusters through windfall development within the settlement boundaries and affordable housing exceptions.

South Norfolk Village Clusters Housing Allocations Plan

19. Overall, 5.5% of the growth in the GNLP has been assigned to the Village Clusters in South Norfolk. South Norfolk has twice as many parishes as Broadland, more market town catchments (including around Beccles and Bungay in Suffolk), significantly less urban fringe, and a substantially larger rural territory.
20. Consequently, it was determined that South Norfolk would prepare a separate and complimentary village clusters plan covering sites for small-scale housing in the rural parishes of

South Norfolk. This plan needs to be in accordance with the overall strategy of the GNLP as outlined above.

21. The South Norfolk Village Clusters Housing Allocations Plan aims to deliver sustainable growth within the villages of South Norfolk in accordance with the strategy outlined by the GNLP.
22. The VCHAP allocates a series of smaller sites, typically with the range of 12 to 50 dwellings, across the 48 Village Clusters in South Norfolk to accommodate at least 1,200 dwellings as required by the GNLP.
23. The VCHAP also defines the Settlement Limits for the villages within these clusters, making provision for further smaller sites and incorporating revisions to reflect development that has occurred or been permitted since the boundaries were last updated. This will provide opportunities for the windfall development outlined in Policy 7.4 of the GNLP.

Chapter 3: Site distribution through the South Norfolk village clusters

Introduction

1. This chapter of the topic paper explores the distribution of sites allocated in the Village Clusters Housing Allocations Plan, making reference to the background evidence base.
2. This chapter should be read within the context of Policies 1 and 7.4 of the Greater Norwich Local Plan (GNLP), as well as the [GNLP Topic Papers](#) for each of these policies.

National Planning Policy Framework (NPPF)

3. Government policy is laid out in the National Planning Policy Framework. This framework sets out the government's position relating to rural housing, as well as the considerations for assessing the suitability of sites for development.
4. Paragraph 83 of the NPPF underpins the Village Clusters Plan. It states:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”
5. The Village Clusters Plan has considered settlements both individually, but also as part of a ‘cluster’ of settlements which can support and share local services and facilities.—
6. The important role small- and medium sized sites, as well as windfall sites, have in meeting local housing requirements is set out clearly in paragraph 73 of the NPPF. Within this paragraph, section 73(a) requires the identification of at least 10% of land identified through the development plan to be on sites no larger than one hectare in size, unless there are clear reasons that this cannot be achieved.
7. Overall, small- and medium sites are noted for being essential to small- and medium sized builders, and for the ability of these sites to be delivered quickly.
8. The scale of sites identified through the Village Clusters Plan, including the modest extension to settlement limits to enable the delivery of windfall development, meets the national requirements set out above.
9. National planning policies promote an effective use of land whilst balancing the need for housing delivery with environmental and social considerations. The rural, predominantly greenfield, context of the VCHAP allocation sites generally favours lower density housing to ensure compatibility with the existing surrounding patterns of development which are typically of a lower density. Reflecting this context, the Council's initial assessment of promoted sites was based on a standardised density of 25dph (as used in the Norfolk HELAA Methodology), with the individual site densities of shortlisted sites then adjusted following preparation of the technical evidence base as well as a review of the surrounding context. This has resulted in a range of site densities being included within the VCHAP – a full list of VCHAP site densities is set out in Appendix 1 of this document.

10. A list of sites VCHAP sites no larger than one hectare in overall site area is set out in Appendix 2.

Greater Norwich Local Plan (GNLP)

11. The [Greater Norwich Local Plan](#), adopted in 2024, established the role of village clusters in the delivery of the identified housing requirements as part of the overall growth strategy for the Greater Norwich area.
12. The primary focus of growth is at Norwich, the Norwich fringe areas and higher order settlements - around 9% of the total growth identified for the Greater Norwich area has been allocated to village clusters in Broadland and South Norfolk, proportionately less than may be expected in a large geographic area. Allocations on village cluster sites within Broadland are included in the GNLP. Paragraph 386 of the GNLP aligns with the national policy position regarding the scale and mix of housing developments.
13. Policy 7.4 of the GNLP requires the allocation of a minimum of 1,200 homes through the South Norfolk Village Clusters Housing Allocations Local Plan. Further context on the relationship between the VCHAP and GNLP is provided in Chapter 2 of this Topic Paper.

Village Clusters

14. The GNLP established the village cluster approach to rural development, focusing on primary school catchment areas and taking these as a proxy for social sustainability. However, reflecting the rurality of the South Norfolk area, the Council also recognised the importance of many other facilities to local communities and, at the outset of the process, undertook an audit of other facilities and services within the clusters in order to inform site selection.
15. As part of this audit, the Council contacted each parish within the VCHAP area in early 2020 and requested the completion of a form providing information about local facilities and services at a parish level. A copy of this form is included as Appendix 3.
16. In total, 74% of parishes provided data in response to this information request, and this was used to prepare a record of local services and facilities within South Norfolk parishes. For those parishes who did not respond to this request earlier information collated for the GNLP was consulted, and an online desktop review of services and facilities undertaken.
17. This information contributed to the assessment of sites, particularly the sustainability of a village cluster. However, the Council recognised the limitations of this information, especially that it provided a static picture of services and facilities. As respondents made the Council aware of changes to facilities and services throughout the consultation stages, the Council sought to reflect these accordingly in the relevant village cluster chapters in the Plan, thereby updating the information held as far as was reasonably practicable.
18. 48 village clusters were identified within the area covered by the South Norfolk Village Clusters Housing Allocations Plan. Within these, 58 allocations have been made in 33 village clusters via the VCHAP. During the site assessment process, it became clear that the allocation of a site in every village cluster could not be achieved. This was due to a combination of reasons including the availability of promoted sites, the overall sustainability of the village cluster and/or on-site or local technical constraints that precluded development at this time in particular locations.

Settlement Limit Boundaries

20. The Council recognises the important contribution smaller sites make to the growth of the District and as such has taken the opportunity to review the defined settlement boundaries via the VCHAP.
21. Amendments to the settlement limits include:
 - the inclusion of approved and completed sites located adjacent to settlement limits within revised settlement limit boundaries, thereby regularising previous decisions;
 - the addition of sites falling below the VCHAP site area threshold that were assessed as having a strong relationship to the existing boundaries of the settlement and no clear site constraints that would prevent development of the site; and
 - the removal of a small section of settlement limit at Barford.
22. The Council has not prepared site-specific policies for these sites, and it will be necessary for the developer of the site to demonstrate the acceptability of these areas at the planning application stage should they be subject to planning applications in the future.
23. These settlement limit revisions provide an opportunity for pockets of development to come forward in a sustainable manner, in accordance with the requirements of the Local Plan policies.

Evidence Base

Site Assessments

24. The Council undertook detailed site assessments for each site promoted. The site assessment was primarily based upon the agreed county-wide '[Housing and Employment Land Availability Assessment](#)' (HELAA) however a small number of amendments were made to the assessment criteria, in conjunction with Members, to better reflect the geographical context in which the site assessments were to be made. A copy of the 2020 updated South Norfolk site assessment criteria is included in the document library (Library Ref. B.1.48).
25. Officers undertook these site assessments as well as site visits following which the Council reached a conclusion about the possible suitability of a site for further consideration. Sites were categorised as: preferred a reasonable alternative site or a rejected site. These initial site assessment forms were updated as appropriate in response to additional information being provided and/or new evidence becoming available throughout the progression of the VCHAP. Changes to site conclusions and its status are also clearly set out in the final site assessments which are included within the evidence base to the Plan (Library Refs. B.1.1 – B.1.47).
26. The site evaluation process was fair and transparent and, based upon this detailed appraisal, the Council was able to select the most appropriate sites for inclusion in the VCHAP balancing the findings of the supporting evidence base and the public consultations alongside these evaluations.

The Sustainability Appraisal

28. The Council commissioned AECOM to undertake the Sustainability Appraisal (SA) to support the production of the VCHAP (Library Ref. A.3.1). The key function of the SA is to present an appraisal of the Plan, alongside reasonable alternative scenarios, with a view to minimising its adverse effects and maximising the benefits that can be achieved. Preparation of the SA has been an iterative process (as evidenced by the revisions to the SA as the VCHAP progressed through production) which, alongside the wider evidence base, has informed the site assessment and selection process.
29. It is not the intention of this chapter to repeat the findings of the Sustainability Appraisal however, in summary, the Sustainability Appraisal identified the following three options for the distribution of sites via the VCHAP:
 - Option 1 – Striking a balance
 - Option 2 – Greater emphasis on accessibility
 - Option 3 – Greater emphasis on dispersal
30. The SA highlighted that Option 1 broadly outperformed Option 3 in all areas, with the exception of Housing. Whilst Option 3 would disperse housing growth across all village clusters it could however also lead to the allocation of sites in the least sustainable areas, or in areas that perform less well in terms of site-specific constraints (for example, landscape, heritage or access constraints).
31. A comparison between Option 1 and Option 2 had a more finely balanced outcome. However, overall Option 1 presented opportunities to support local communities in terms of addressing rural housing need and focusing on the delivery of smaller sites. This approach to growth is supported by both the NPPF (paragraph 89, December 2024) and the Greater Norwich Local Plan (paragraph 386) and was identified as a key objective for the Plan from the outset.
32. Throughout the evolution of the Plan, the Council has been aware of the tensions that exist between certain sustainability objectives (such as accessibility to higher order settlements). These tensions are explored in detail in the Sustainability Appraisal. The Council has also been cognisant that a number of the effects of the preferred site allocations were considered to be neutral as opposed to positive. To address these impacts the Council has prepared detailed site-specific policies to realise the benefits and opportunities of the selected sites, and to seek to avoid the potential negative impacts of development.

Conclusion

33. Taking into account all of the above considerations, the Council concluded that allocating sites across a wide range of settlements would be the most appropriate option (i.e. Option 1 of the Sustainability Appraisal).
34. Within this context, it is important to recall that the sites allocated within the VCHAP are just one element of the significantly larger Greater Norwich Local Plan, which directs the majority of growth within this area towards Norwich and its urban fringe, as well as the higher order settlements within the Greater Norwich area.
35. The growth planned for the South Norfolk rural villages will help these communities grow and thrive; providing an appropriate mix of housing for residents and supporting existing local facilities and services.

36. The site allocations within the VCHAP recognise the constraints and opportunities identified within the wider evidence base and through the site assessment process. The sites selected for allocation will support existing local facilities and services whilst also meeting the requirement to disperse development across the villages. Any potential opportunities to provide improvements to local areas have also been considered and the site site-specific policy requirements reflect these.
37. The Council is satisfied that the final suite of sites allocated via the Village Clusters Housing Allocations Plan will deliver the housing requirements set out in the Greater Norwich Local Plan whilst ensuring that the unique character of the District is protected and that the benefits associated with the developments are delivered to local communities.

Chapter 4: Infrastructure

Introduction

1. Access to key infrastructure is an integral consideration when allocating sites for development. This is especially apparent when considering allocating sites in rural areas where infrastructure and services may not be as prevalent as in more urban areas. The Council has considered the availability of infrastructure and services throughout the preparation of the VCHAP, from the initial site assessments through to the preparation of site-specific policies. Where the need for new infrastructure has been identified, this has also been incorporated into the Plan where appropriate.
2. This chapter of the topic paper provides further context about how the Council has considered access to infrastructure during the preparation of the VCHAP and the engagement the Council has conducted with key infrastructure providers throughout the process.

Planning policy context

National context

3. National Planning Policy Framework: Paragraph 7 of the NPPF states: *“The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner”*.
4. To meet the requirement to achieve sustainable development, the Council has ensured the identification and coordination of the provision of infrastructure has been considered at all stages in accordance with paragraph 8(a) of the NPPF.
5. To do this, the Council has conducted *“early, proportionate and effective engagement between plan-makers and infrastructure providers and operators and statutory consultees”* as required by paragraph 16(c).
6. The Council has applied the information provided through the site assessment process and the engagement with key infrastructure providers to set out what will be required from development in the site-specific allocation policies, including noting constraints as well as locations where new infrastructure provision is required (paragraph 34).
7. Paragraph 108 states *“Transport issues should be considered from the earliest stages of plan-making and development proposals”*. This is to ensure that any potential improvements or opportunities can be considered as part of the development of a site. Transport matters have been considered since the site assessment stage of the VCHAP and any identified issues and opportunities have been incorporated into the Plan where appropriate. Chapter 6 of this topic paper relates to issues around rural transport options.
8. Policies that include transport related matters have been prepared with active engagement with the local highways authority and other relevant stakeholders to ensure any transport improvements proposed are deliverable (paragraph 110(b)).
9. The Council has also considered the provision and accessibility of communications infrastructure from the site assessment stage to help determine potential appropriate sites for development (paragraph 118).

Local context

10. Greater Norwich Local Plan: Policy 4 of the Greater Norwich Local Plan sets out the strategic approach to ensuring that appropriate infrastructure is provided to support new development. This includes strategic approaches to the delivery of transport infrastructure and improvements and how other key infrastructure providers will be engaged to ensure the timely delivery of necessary infrastructure.
11. South Norfolk Local Plan: Policy DM 1.2 Requirements for Infrastructure Through Planning Obligations of the South Norfolk Development Management Policies outlines the local policy requirements for the consideration and provision of infrastructure, including transport, and how these should be delivered and funded
12. Community Infrastructure Levy: South Norfolk Council is a Community Infrastructure (CIL) charging authority, with funds collected and pooled for infrastructure delivery by the [Greater Norwich Growth Board \(GNGB\)](#). The GNGB is a partnership consisting of Broadland District Council, Norfolk County Council, Norwich City Council and South Norfolk Council. A shared CIL investment fund, the 'Infrastructure Investment Fund' (IIF) delivers infrastructure projects for community use, education, green infrastructure and transport across the wider area. This includes projects in and around the South Norfolk Area.

Preparation of the VCHAP

13. The [Greater Norwich Local Plan](#) (GNLP) sets out the distribution of growth in the Greater Norwich area. As part of this, 1,200 dwellings were allocated to the village clusters of South Norfolk. The GNLP outlined the areas of the village clusters as being based on primary school catchments. These are considered to be a proxy for social sustainability and therefore were considered appropriate for the distribution of new housing.
14. All sites submitted for inclusion in the VCHAP were subject to an initial site assessment (Library Refs. B.1.1 – B.1.47). This assessment included consideration of distance from local services, including primary schools, doctors' surgeries and other amenities such as village halls or retail/employment facilities. The site assessment also noted the current access to sites via highways and footpaths, as well as access to sustainable transport options. Finally, any known issues with infrastructure already located on sites, such as sewerage pipes or telephone lines, were also highlighted. All of these considerations contributed towards whether sites were taken forward for further consideration for inclusion within the VCHAP.
15. All preferred sites identified through the Site Assessment process were presented and discussed with key infrastructure providers, including Norfolk County Council (NCC) in its role as education provider and highways authority and Anglian Water (AW). Through these ongoing discussions any new or improved infrastructure considered necessary to make development on allocation sites acceptable was identified. Any situations where it would not be possible to provide suitable mitigation for necessary infrastructure were also discussed. These requirements were subsequently incorporated into the site-specific policies where this was appropriate, with current discussions around wastewater infrastructure capacity being reflected in the Council's Statement of Common Ground with Anglian Water (which is included within the Duty to Cooperate Statement) (A.6.1).
16. Potential infrastructure concerns were also raised through the various rounds of consultation throughout the VCHAP preparation process by local residents. These concerns were also

discussed with infrastructure providers and, where appropriate, amendments were made to policies to ensure these issues were addressed.

Infrastructure requirements

17. As noted above, infrastructure requirements identified through discussions with infrastructure providers have been incorporated into the site-specific policies in the VCHAP. The VCHAP has also taken opportunities to provide infrastructure improvements where these have been identified for the benefit of local communities.
18. Most of the sites included for allocation within the VCHAP require a combination of highways and footpath improvements to accommodate the proposed development. These include improvements to provide better access to local services such as schools and public transport. The VCHAP also notes instances where the delivery of new development could provide opportunities to improve local flood risks and urges consideration to be given to maximising these at the design stage of the site's development. Early engagement with technical consultees throughout the design process is considered to be important to achieving these positive outcomes, and this is clearly identified throughout the Plan.
19. Some clear examples of infrastructure delivery being identified through the preparation of the Plan are set out below:
 - A number of site-specific policies require engagement with Anglian Water. These have been included for various reasons including consideration of the capacity of current wastewater recycling centres, with some sites needing to be phased in order for sufficient capacity to be available. Some sites, such as VC DIT1, also have existing infrastructure located on site that will need to be considered when designing and developing the sites;
 - VC ASL1, VC BRE1 and VC LM1 have been identified as potentially being able to deliver parking improvements for local schools. While in some cases this provision will need to be determined at the planning application stage, the consideration of this has been incorporated into each of the site-specific policies to ensure that it remains an option for the relevant stakeholders at that time;
 - VC GIL1REV and VC WOO1 both include site-specific policies that support the local education provision by safeguarding land within the sites for future educational use; and
 - VC BAR2: this site was submitted for consideration during the initial Regulation 19 Publication of the VCHAP in 2023. The submission site includes the existing village hall and playing fields for Barford. As part of assessing this site, it was identified that the current village hall would benefit from upgrading. Therefore, a requirement for a new, equivalent or improved village hall has been included in the site-specific policy alongside improvement to the existing playing field. Development on this site will also need to ensure the continued safe use of these facilities throughout the construction of the development.

Chapter 5: Affordable housing and housing mix

Introduction

1. This chapter of the topic paper covers the delivery of a suitable housing mix, including affordable housing, through the VCHAP allocations. This takes on board the context set by the policies of the GNLP (Library Ref. B.12.1), which set some of the key parameters, including the percentage of affordable units, a requirement for self-build plots, and the need for a mix of dwelling sizes. These requirements will help counter the tendency towards larger, detached houses on rural infills and conversions (often a criticism of new development in rural South Norfolk) and help address the balance in the VCHAP Sustainability Appraisal (Library Ref. A.3.1) which partly offsets the negatives of greater housing dispersal in transport terms, with the social benefits of housing across a wider range of settlements/clusters.

National Planning Policy Framework (NPPF)

2. Provision of housing which meets the needs of communities, and particularly the provision of affordable housing, is a key theme throughout the Framework. The Framework is also clear that development needs to be deliverable, and therefore viable, and that the requirements on developers are clearly set out.
3. Paragraph 63 of the NPPF requires Local Plans to establish the housing needs of different elements of the community, and this is done through the GNLP and its evidence base (see the following section). Paragraph 65 goes on to state that affordable housing should not be sought on sites which fall below the thresholds for 'major' development, and this is also reflected in GNLP Policy 5. Consequently, all of the new VCHAP allocations, which are being made to deliver the GNLP requirement for 1,200 new homes, are for at least 12 dwellings (as set out in the GNLP Growth Strategy - paragraph 166 (g)) and on sites of at least 0.5 hectares; a small number of the allocations carried forward from the 2015 Local Plan fall below these thresholds.
4. NPPF paragraph 71 supports mixed tenure schemes as a way of '*creating diverse communities and supporting timely build out rates*', but recognises that schemes for purely affordable housing can also be appropriate. Both the NPPF (paragraph 82) and the GNLP (in Settlement policies 7.2, 7.3 and 7.4) make provision for affordable 'exceptions' schemes which provide affordable housing that meets an identified local need on sites which might not otherwise be released for general market housing.
5. The NPPF also sets out (paragraphs 63 and 73) that Local Plans should aim to make provision for those seeking to build their own homes as self- or custom-build properties, which is addressed in the following section on the GNLP.

Greater Norwich Local Plan (GNLP)

6. The evidence base for the GNLP, found in the '[Greater Norwich Local Housing Needs Assessment 2021](#)' has been used to establish an appropriate level of affordable housing on sites for 'major' development, as defined by the NPPF. All new allocation sites in the VCHAP are above these thresholds and therefore will be expected to deliver 33% affordable units of an appropriate size and tenure mix, in accordance with GNLP Policy 5. In exceptional circumstances viability information may be submitted through the Development Management process to seek a

reduction in the level of affordable housing. Similarly, the affordable element is expected to be delivered on-site, except in exceptional circumstances.

7. The 2021 Local Housing Needs Assessment remains the most up to date evidence for the plan making process; however, the GNLP recognises (paragraph 268) that this may be superseded over time and that at the point Development Management decisions are made on VCHAP allocation sites, a different percentage may be appropriate.
8. The tables at the end of Section 8 of the 2021 Local Needs Assessment set out both the mix of affordable housing (i.e. sizes of flats and houses), and also the mix for market housing. Across both the Greater Norwich area and in South Norfolk, the biggest need in terms of market dwellings is for three-bedroom houses. The VCHAP allocations have been broadly assessed at 25 dwellings/hectare, although some sites have been allocated at a lower net density, to reflect localised constraints, such as topography, flood risk, the output of landscape and visual appraisals, and heritage impact assessments etc., however there is no indication that the allocations cannot meet the mix of dwelling sizes set out in the current evidence base.
9. Both the affordable housing percentage and the housing mix may be varied by policies in more recent Neighbourhood Plans, where supported by appropriate evidence.
10. GNLP Policy 5 also sets out a requirement for 5% of dwellings on sites of 40+ homes to be offered as serviced plots for self- and custom-build properties. This only applies to a limited number of the VCHAP allocations, however GNLP Policy 7.5 also provides for small groups (up to 3 dwellings) of self- and custom-build properties on sites adjacent to the built up area of settlements, which would provide opportunities across the VCHAP villages.
11. Consequently, the VCHAP will meet the GNLP requirement of at least 1,200 homes on new allocations in the South Norfolk Village Clusters, whilst taking into account:
 - achieving an appropriate housing mix, particularly in terms of property sizes,
 - the necessary level and mix of tenures and property sizes of affordable units, and
 - on appropriate sites, an element of serviced plots for self- and custom-build properties.

Other types of specialist housing, such as accommodation for older people, could come forward on VCHAP allocation sites, but this is not necessary in order to meet the GNLP requirements.

Village Clusters

12. As previously noted, the VCHAP makes all new allocations necessary to meet the GNLP requirement of at least 1,200 new dwellings on sites that are above the threshold for requiring affordable housing. In line with the GNLP Growth Strategy, the minimum allocation size is 12 dwellings. This means that the '*at least the 33% affordable housing on-site*' requirement in GNLP Policy 5 equates to 4 out of 12 dwellings, as opposed to 4 out of 10 or 11 dwellings if allocations were smaller; thus aiding the viability of future development schemes. The importance of delivering affordable housing, and a housing mix more generally, is set out in the VCHAP Sustainability Appraisal, which balances the social benefits of delivering housing across a range of settlements, against the negative effects in terms of transport.

13. Viability appraisals have been produced to support the VCHAP, most recently updated in June 2024 (Library Ref. B.6.1). These have been updated to reflect additional requirements such as Nutrient Neutrality and GIRAMs payments. Additionally, Delivery Statements (Library Ref. B.10.1) have been secured from site promoters, who have been directed to the requirements of national policy, the GNLP and the site-specific proposals in the VCHAP, to ensure that affordable housing is deliverable as one of the key components of development proposals for the sites.
14. Both the NPPF and the GNLP Policy allow for exceptional circumstances where affordable housing requirements may be lowered. The vast majority of VCHAP allocations are greenfield sites, with only localised constraints and, as such, the affordable housing percentage should be achievable in the majority of cases. Where this may not be possible, the loss of affordable units will be offset by the fact that some sites are proposed for 100% affordable development (notably VC HEM1 and VC TAC1REV).
15. In the initial stages of VCHAP production, consideration was given to an overarching policy in the Plan requiring a mix of dwelling sizes; however, whilst this is retained in the plan Objectives, a further policy was considered to duplicate the requirements of the NPPF and GNLP. As such, house types are principally only mentioned in allocation policies where this is guiding the form of development for design purposes.
16. In terms of self- and custom- build, several of the VCHAP allocations are above the 40-dwelling threshold in GNLP Policy 5, which will require 5% of the units to be offered as service plots for such properties. Additionally, a number of smaller sites were promoted through the VCHAP process by individuals looking to develop self- or custom-build properties for themselves, and a number of these have been incorporated as Settlement Limit changes across the Plan area. Lastly, GNLP Policy 7.5 facilitates small (up to 3 dwelling) developments of self- and custom-build units adjacent to the existing settlements, subject to meeting certain criteria; a Supplementary Planning Document to support implementation of this policy is in preparation by Broadland and South Norfolk Councils.

Conclusion

17. To meet the GNLP requirement for at least 1,200 new dwellings across the South Norfolk Village Clusters, the VCHAP makes 46 new allocations of at least 12 dwellings and 0.5 hectares. This is to ensure that sites in the plan offer a reasonable prospect of achieving:
 - At least 33% on-site affordable housing with an appropriate tenure and size mix;
 - A mix of market dwellings that reflects the latest evidence on local need;
 - On sites of 40+ dwellings, 5% of the units are offered as serviced plots for self- and custom-build.

Within the allocations there will be variances, where currently unforeseen circumstances mean that a site does not achieve policy-compliant affordable housing, whilst others are delivered as 100% affordable dwellings. Similarly, the context and constraints of some allocations will dictate that the dwelling mix may need smaller or larger dwellings to better comply with other Local Plan policies. However, the overall aim of the allocations is to contribute to a housing mix across South Norfolk and Greater Norwich that meets local needs.

Chapter 6: Rural transport

Introduction

1. This chapter of the topic paper covers the approach to transport in the VCHAP.
2. The approach should be read in the context of:
 - the GNLP requirement to deliver 1,200 homes across the South Norfolk Village Clusters; and
 - the section on spatial distribution of sites within this Topic Paper (Chapter 3).

National Planning Policy Framework (NPPF)

3. Section 9 of the NPPF (December 2024) sets out the Government's approach to 'Promoting sustainable transport'. Key amongst the considerations for plan-making are:
 - the impact of development on transport networks;
 - identifying and pursuing opportunities for active travel and public transport; and
 - realising the opportunities of transport infrastructure.

The planning system should manage patterns of development to support the NPPF objectives.

4. Paragraph 110 of the NPPF is explicit that opportunities to maximise sustainable transport '*will vary between urban and rural areas*'. The VCHAP forms part of an overall planning strategy for Greater Norwich, which clearly focuses the majority of development towards Norwich, including its urban fringe, and the larger Main Towns and Key Service Centres across the area (GNLP Pt 1, The Strategy, Library Ref. B.12.1). These areas/settlements have the greatest opportunities to promote public transport and active travel, due to the concentration of services/ facilities/ employment, higher density of population, and established infrastructure for both public transport and active travel. However, 24% of the 2018 Greater Norwich housing stock is in Village Cluster parishes (GNLP, page 53, Table 7), and the GNLP recognises that as well as providing for choice and diversity in the housing market, modest levels of growth in more rural locations can also help sustain local services and prevent existing residents having to travel further for local schools, village hall activities, pubs, recreational opportunities etc. With only 9% of the GNLP housing growth directed to Village Clusters, these areas will continue to grow more slowly than other settlements in the plan area.
5. The Council's site assessment process included accessibility to a range of services and facilities as one of the main factors in the choice of sites (Library Ref. B.1.48). Based on the [Norfolk-wide HELAA methodology](#), the VCHAP site assessments expanded the range of services and facilities used to test the suitability of sites to include village halls, pubs/cafes, and formal recreational opportunities. The distance to services was increased, recognising that in some instances villages will share facilities (hence the cluster approach) and the realities of rural life.
6. As NPPF paragraph 111 requires, the VCHAP has been prepared '*with the active involvement of the local highways authorities ... and neighbouring councils*' to ensure that sustainable travel, including access to larger settlements outside of the plan area, is a key consideration. Norfolk County Council has been engaged from the earliest stages of the VCHAP preparations. This started with a series of meetings to discuss those sites which performed well in the initial site assessment process and early iterations of the Sustainability Appraisal, to look in more detail how they performed both from a highways safety perspective, and in terms of the ability to

walk and cycle to nearby facilities and connect into the public transport network. The Highways Authority has been particularly keen to promote safe walking routes to primary schools wherever possible. The involvement of the Highways Authority has not only helped shape the selection of sites, but has also shaped the policies for the allocations to seek improvements to local walking facilities to increase the sustainability of the potential developments. Further information is contained in the Duty to Co-operate Statement (July 2025, Library Ref. A.6.1)

Greater Norwich Local Plan (GNLP)

7. As noted above, the Greater Norwich Local Plan (GNLP), adopted in 2024, established the role of village clusters in the delivery of the identified housing requirements as part of the overall growth strategy for the Greater Norwich area. GNLP Policy 7.4 requires the allocation of a minimum of 1,200 homes through the South Norfolk Village Clusters Housing Allocations Local Plan; this followed debate at the GNLP Examination as to whether the figure should actually be a maximum, or expressed as a range. Part of the debate was around the transport implications of promoting development at the lowest tier of the Settlement Hierarchy; however, as noted above, these locations account for over 24% of existing dwellings which future sustainable transport solutions will need to address, and planned growth in the village clusters is also lower than higher tier settlements.
8. Paragraph 386 of the GNLP sets out how the Plan aligns with the national policy position regarding the scale and mix of housing developments.
9. GNLP Paragraph 386 notes that the Village Cluster developments will be expected to deliver a range of housing types and tenures. In transport terms this is relevant, because affordable units, even those delivered through the S106 process, will prioritise allocation to those with a local connection. This can allow people to stay closer to family and friends, who provide an important support network. It may also help people stay close to their employment, again cutting the need for commuting out from larger settlements for staff at local schools, pubs, care facilities, agricultural businesses etc.
10. Whilst there is no standalone transport Policy in the GNLP, Policies 2 (Sustainable Communities) and 4 (Strategic Infrastructure) promote the approach to transport across the area. This in part derives from several other strategies, including the [Norfolk Local Transport Plan 4](#) (LTP4, 2021 to 2036) and the [2021 Transport for Norwich \(TfN\) Strategy](#).
11. Notably, GNLP paragraph 241 states *'Policy 4 recognises that Greater Norwich is a mixed urban and rural area in which travel and access issues vary, with the use of the private car being particularly important to the rural economy. It is anticipated that the shift to electric and possibly hydrogen vehicles will assist in reducing emissions in rural areas'*.

Transport Strategies and programmes

12. **Norfolk's Local Transport Plan (Norfolk LTP4)** recognises the challenges of delivering sustainable transport options across the substantial rural parts of the County. The Plan seeks to improve the connectivity between more rural settlements and larger market towns and urban areas (LTP4, Policy 10), which provide the main range of services, facilities and employment opportunities. This could be longer distance foot and cycle ways, enhanced bus services, or by *"recognising the significant role that car travel will continue to play in the future – improving some of the road links and connections"*.

13. Many of the potential walking and cycling improvements are contained in the [Local Cycling and Walking Infrastructure Plans \(LCWIPs\)](#) for the Norwich area (March 2022) and wider Norfolk (February 2024). The LCWIPs will help set the priorities for future funding to help people make more sustainable choices. The opportunities for some Village Cluster settlements will be significantly greater than for others, particularly where they are within a reasonable walking or cycling distance of larger settlements. In some instances, major development in those settlements is also looking to improve the connectivity to the surrounding countryside/villages.
14. LTP4 itself looks to overcome some of the barriers to public transport access in rural areas and much has been achieved, particularly for those villages on routes between larger settlements, under the [Bus Service Improvement Plan \(BSIP\)](#). The BSIP has been implemented since 2022 and has increased frequencies, extended hours of operation, and improved facilities (waiting facilities, real time information etc.), as well as made other changes, such as the introducing the Travel Norfolk website/branding, to help make sustainable travel choices easier and more appealing.
15. LTP4 also highlights that some gaps in the regular public transport network are covered by community transport schemes. Those operating in various village clusters areas include: [South Norfolk Flexibus](#); [BACT community transport](#); [Borderhoppa](#); and [Transport Plus/Travel Norfolk Car Scheme](#). The services offered differ between providers, with some focussing on travel for medical appointments, education, and essential shopping, whilst others also offer leisure opportunities.
16. The [2021 Transport for Norwich \(TfN\) Strategy](#) is focused on the Norwich urban area, but recognises that there is a small rural hinterland where people rely on key services, facilities and employment in Norwich, which needs to be taken into account; this includes some of the South Norfolk Village Cluster settlements. If measures to reduce traffic within the city are to be successful, options need to improve for those living in those more rural locations. The TfN Strategy notes that *'car culture and single occupancy vehicles are particularly difficult behaviours to address and it is made more challenging by the rurality of the areas surrounding Norwich where often there is no alternative but to use a car, at least for part of a journey'*. However, relevant policies and actions in the TfN Strategy include reviewing and developing [Park and Ride](#) (which can also benefit a wider catchment of Village Cluster settlements), working in partnership to improve bus services that meet people's travel needs, but also measures to make better use of the transport network, opportunities for people not to travel (e.g. working from home), and influencing travel behaviour.

Village Clusters

17. The VCHAP itself must balance a number of competing requirements, one of which is sustainable transport connections. The section of this Topic Paper on the distribution of development (chapter 3) looks at that balance and reflects the conclusions of the **Sustainability Appraisal (SA)** (Library Ref. 3.1), which initially considered three broad options, narrowed down to two reasonable alternatives, one of which (Option 2) was a higher degree of accessibility. Whilst in purely Transport terms the outcomes of the SA would favour a pattern of development based on Option 2, for the reasons set out in the SA and this Topic Paper, the differences between Options 1 and 2 were relatively small and finely balanced, with Option 1 offsetting better accessibility with the social benefits of providing a range of properties, including affordable dwellings, and supporting local infrastructure.
18. As noted above, proximity to services and facilities was a key criterion in the **Site Selection** process (Library Ref. B.1.48). Compared to the [Norfolk-wide HELAA](#) distances used for the

GNLP, the walking distance to services was increased to recognise the more dispersed, lower density pattern of development in rural areas; however, the choice of sites still looked to favour those with the best access. Access was not taken purely on a distance basis, as consideration was also given to the quality of those walking facilities, prioritising those locations with dedicated footways, and where that was not available, locations where large verges and good sightlines avoided pedestrian/vehicle conflict.

19. Whilst the scale of development proposed in the VCHAP would not be sufficient to deliver major infrastructure improvements, the proposed **allocation policies** look to make appropriate localised improvements to enhance sustainable transport options. Requirements include: footway extensions/enhancements, improved crossing points, connections to the local footpath network, and the promotion of speed limit reductions.

Conclusion

20. Rural transport and accessibility has been at the heart of developing the VCHAP. From the overall distribution of development and the assessment of two broad options in the Sustainability Appraisal, there is a need to balance an approach driven by the most accessible locations with one which also supports the social sustainability of villages. Several factors have been important in this:
 - Supporting local facilities, particularly local schools which have relied on pupils coming out of larger settlements to sustain numbers;
 - Providing a range of homes, particularly affordable units, in village locations where people have established social networks;
 - Recognising changing patterns of work and leisure, with opportunities to work from home/remote working, informal access to the countryside for recreation, and increased delivery of services digitally and to the home; and
 - A longer-term shift to electric cars.

Strategic transport policies for the area also recognise that solutions need to be relevant across urban and rural populations, reflecting the fact that private cars will be a necessary part of that mix.

21. The VCHAP has sought to meet the GNLP housing requirements whilst achieving a balance between competing factors, but with the multiple facets of transport (user choice, emissions reduction, relative costs, infrastructure provision etc.) a key consideration in the distribution of development and choice of specific allocations.

Chapter 7: Nutrient Neutrality

Introduction

1. In March 2022 South Norfolk Council, alongside all other local planning authorities in Norfolk, received a letter from Natural England. This correspondence concerned [levels of nutrient pollution in the protected habitats](#) of the River Wensum Special Area of Conservation and the Broads Special Area of Conservation and Ramsar site.
2. The Council was advised that new development comprising overnight accommodation that was planned within the catchment of these areas had the potential to cause adverse impacts relating to nutrient pollution. As such, in accordance with the Conservation of Species and Habitats Regulations 2017 and with immediate effect as the Competent Authority, the Council was unable to lawfully grant new planning permission unless it was able to conclude that development would not have an adverse effect on these designated areas. This impact is assessed through a Habitats Regulation Assessment (HRA).
3. This created significant development uncertainty for a period of time whilst the affected Local Planning Authorities collectively considered how to proceed. This uncertainty also then continued whilst the necessary nutrient neutrality mitigation schemes have been developed and implemented.

Planning policy context

4. The Greater Norwich Local Plan was prepared, and examined, within the above context. As such, Policy 3 of the GNLP ‘*Environmental Protection and Enhancement*’ sets out the requirements for new development within the catchments of the River Wensum Special Area of Conservation (SAC) and The Broads SAC and Ramsar (GNLP Pt.1 The Strategy, Lib Ref. B.12.1). Site developers are required to provide appropriate evidence alongside their planning application to demonstrate that mitigation has been secured to achieve nutrient neutrality, and that it will be implemented prior to the occupation of the relevant developments.
5. The requirements of Policy 3 include:

“Within the catchments of the River Wensum Special Area of Conservation (SAC), The Broads SAC and the Broadland Ramsar:

- *Residential development that results in an increase in the level of overnight stays;*
- and*
- *Non-residential development that*
- *by virtue of its scale and type may draw people from outside the catchments of the SACs,*
- *and/or may generate unusual quantities of surface water,*
- *and/or, by virtue of the processes undertaken, may contain unusual pollutants within surface water run-off,*

must provide evidence to enable the local planning authority to conclude through a Habitats Regulations Assessment that the proposal will not adversely affect the integrity of sites in an unfavourable condition.”

6. As the strategic Plan for the South Norfolk village clusters area, developers of allocation sites within the VCHAP must have regard to this policy when preparing schemes for their sites.
8. Nutrient neutrality solutions must be retained in perpetuity (for the lifetime of the development) although short-term measures can subsequently be replaced by long-term approaches as these become more readily available. Mitigation measures can be either on-site or off-site solutions.
9. The requirement for nutrient neutrality only applies whilst the protected sites are in an unfavourable condition, with regular monitoring being undertaken by the national environmental bodies.

Nutrient neutrality mitigation measures

9. As part of the Greater Norwich partnership, the Council has worked alongside other Norfolk local planning authorities, Anglian Water and Natural England (plus other stakeholders) to assist developers in accessing mitigation measures.
10. A Joint Venture company, [Norfolk Environmental Credits](#) (NEC), has been established by five local authorities within Norfolk to secure, and trade, nutrient credits. NEC offer strategic mitigation solutions through a portfolio of schemes. The schemes are aligned to the spatial and temporal pattern of development enabling developers to purchase Nutrient Neutrality credits to offset the nutrient inputs arising from their proposed housing development. NEC issues certificates to developers confirming that the credits have been purchased. Developers must submit these certificates alongside their planning applications, and these must have been received before a planning permission can be granted.
11. Norfolk Environmental Credits began trading in credits in January 2024. The first credits were predominantly made available to smaller housebuilders/ developers operating within the River Yare catchment and who were unable to provide on-site mitigation measures within their sites (although to ensure viability of the scheme a small number of larger developments were also able to purchase credits at that time).
12. By the end of 2024 NEC had launched the next round of credits to developers. These credits provided mitigation across the Wensum, Bure and Yare catchments and made credits available to developers of all sizes with approximately 70% of credits intended to be made available to developers whose sites would result in greater levels of nutrients being produced. At the time of preparing this note (July 2025) NEC have traded nutrient credits to over 150 developers which have unlocked over 1600 homes across the Wensum, Bure and Yare catchments.
13. It is anticipated that additional credit providers will enter the market in due course, providing alternative sources of mitigation for developers seeking to bring forward their sites, and evidence suggests that this is now occurring. In March 2025 the Government introduced the Planning and Infrastructure Bill (PIB) which is currently making its passage through Parliament. Assuming the Bill gains Royal Assent it would introduce a simplified levy-based scheme for developers to offset selected environmental obligations under the Habitat Regulations. The proposed Nature Recovery Fund, administered by Natural England, is likely to initially focus on the offsetting of nutrients and some protected species. Payment into the Nature Recovery Fund

by developers is not expected to be mandatory and will co-exist alongside the existing nutrient credit market, giving developers a choice of mitigation options.

14. As an alternative to the purchase of credits to offset the impact of development, developers can provide on-site mitigation measures. It is expected that this is an option that will be more accessible to the developers of larger sites who have greater land areas within which to design mitigation measures, although current data also indicates that some smaller housebuilders have also been able to provide acceptable mitigation on-site and therefore allowing planning permission to be granted. This solution may therefore also provide an option for some developers of allocation sites included in the VCHAP.
15. Alongside these on- and off-site mitigation options, there is also a statutory requirement for Anglian Water to upgrade Water Recycling Centres serving in excess of 2000 residents by 2030. These improvements to the wider wastewater infrastructure will contribute towards the improved condition of the affected habitats. Where appropriate, developers are able to purchase both short-term credits (for the period pre- infrastructure upgrades) alongside reduced long-term credits that provide appropriate mitigation beyond 2030.

Nutrient neutrality and the VCHAP

16. The Council has reviewed the current position regarding nutrient neutrality within the context of the delivery of sites through the VCHAP. The Council believes that approximately half of the sites included for allocation in the VCHAP are impacted by nutrient neutrality. Developers of these sites will therefore be required to include either on-site or off-site mitigation solutions to address the impacts of their schemes.
17. In accordance with the timeframes of the adopted Greater Norwich Local Plan the village clusters Plan will run until 2038, a considerable period beyond the statutory timeframe within which Anglian Water must upgrade identified infrastructure to address nutrient neutrality concerns.
18. Due to the increasing availability of mitigation measures (including companies trading in off-site credits), as well as the increased availability of information regarding the matter, the Council has concluded that it does not create a barrier to the delivery of sites included in the Plan. Furthermore, as noted above, approximately half of the sites included within the VCHAP are not impacted by nutrient neutrality and therefore are not required to include mitigation measures within their schemes. Consequently, these sites may have fewer constraints to address and therefore might be developed earlier within the Plan period.
19. To support the Plan, the Council has provided all site promoters with Delivery Statements for completion, which are included within the evidence base for the VCHAP (Library Ref. B.10.1). The Delivery Statements provide information about the work undertaken to date in connection with each allocation site by the site promoters and/or developers, including viability considerations such as the impact of nutrient neutrality on the delivery of a site. The Council is therefore reassured that promoters are considering this matter in the feasibility of their sites.

Chapter 8: The Strategic Flood Risk Assessment, NaFRA2 and the Water Cycle Study

Introduction

1. This section of the topic paper outlines how the Strategic Flood Risk Assessment (SFRA) has evolved and informed the site allocation process in the South Norfolk Village Clusters Housing Allocations Plan. It also explains how the exception test has been applied to sites identified in the Level 2 SFRA, and how the updated [National Flood Risk Assessment \(NaFRA2\) mapping](#) issued by the Environment Agency (January and March 2025) has been reviewed. The chapter also provides a short commentary regarding the Water Cycle Study (WCS).
2. With regards to the Strategic Flood Risk Assessment, this chapter should be read alongside the Level 1 SFRA, the Level 2 SFRA, the Level 2 SFRA Addendum and the NaFRA2 Addendum (Library Refs. B.8.1 – B.9.27).
3. This chapter should also be reviewed alongside the South Norfolk Village Clusters Water Cycle Study (WCS) (Library Ref. B.7.1), as well as the earlier [Greater Norwich Local Plan WCS](#), which provided a holistic approach to assessing the cumulative impact of growth proposed via the Greater Norwich Local Plan (GNLP) and provided a framework for the subsequent production of the South Norfolk VCHAP WCS.

The SFRA timeline

4. To inform the allocation of sites in the VCHAP, the Council commissioned a Strategic Flood Risk Assessment in line with the current planning policy guidance at the time that work on the VCHAP commenced. The aims and objectives of the SFRA process are documented within the SFRA documents as part of the VCHAP evidence base.
5. Initially a Level 2 SFRA was produced to inform the allocation of sites for the [2023 Regulation-19 version of the Plan](#) in December 2022. That assessment was prepared as an Addendum to the work originally undertaken to inform the GNLP, and which had included assumptions about the South Norfolk village clusters. The original [GNLP SFRA](#) was produced in 2017.
6. The documented delays in the preparation of the VCHAP which resulted in the Regulation-18 Focused Consultation and Regulation-19 Addendum meant that there was a need to review this VCHAP evidence base document, specifically to take account of updated national planning policy and guidance¹. Discussions that took place between the Council, the Lead Local Flood Authority (LLFA) and the Environment Agency (EA) relating to this review are documented in the Council's Statement of Common Ground with the LLFA (located within the Duty to Cooperate Statement) (Library Ref. A.6.1).
7. Consequently, in late 2023, the Council commissioned a new Level 1 SFRA for the South Norfolk District area, as well as an updated Level 2 SFRA to continue to inform the site selection and

¹ These updates included: July 2021 and December 2023 revisions to the National Planning Policy Framework, updates to the Planning Practice Guidance (PPG) in 2022 and updates to the EA climate change guidance in July 2021 and May 2022.

allocation process. These documents, and the associated appendices, were published as part of the supporting documents during the VCHAP - Regulation 19 Pre-submission Addendum publication period.

8. In May 2025 the Council commissioned a further review of the existing Level 2 SFRA for the VCHAP, in response to the publication of the National Flood Risk Assessment 2 (NaFRA2) data in early 2025. The conclusions of this review have been included as a further addendum to the SFRA which supports the submission document. A summary of the impact of the changes arising from the publication of the NaFRA2 is set out in further detail below.

The role of the SFRA in the site allocation process

9. Initial discussions with the Lead Local Flood Authority (LLFA), acting in their capacity as a technical consultee, combined with the outputs of the evolving SFRA have been critical in informing the sites selected for allocation in the VCHAP.
10. The early formal HELAA consultation response submitted by the LLFA was followed by two informal meetings between Council officers and the LLFA in 2021 to explore in greater detail some of the issues arising on promoted sites. These discussions were of crucial importance in selecting sites for the Plan, as well as drafting subsequent site-specific policies. The Council was very appreciative of the input of the LLFA and a record of these meetings is included in Appendix 1 of the submitted Duty to Cooperate Statement, June 2025 (Library Ref. A.6.1).
11. In accordance with the requirements for sequential tests, development was steered towards those areas with the lowest flood risk (both now and in the future), avoiding flood zones 2 and 3 and surface water flowpaths wherever possible. For some sites, this led to subsequent discussions with site promoters to determine the extent of alternative land available and, where possible, site boundaries were amended to avoid or minimise the inclusion of land at risk of flooding.
12. Sites which were clearly identified as being at substantial flood risk – either as a consequence of pluvial or fluvial flooding – were discounted during the site selection process.
13. The Council undertook further investigations into those sites it had identified as being preferred or reasonable alternative options via the Level 2 SFRA. The output of these assessments is available within the evidence base for the Plan (Library Refs B.9.1 – B.9.27), and the findings have been used to inform site selection, policy wording and the requirements for site-specific Flood Risk Assessments (FRAs) at the detailed planning stage.
14. In some cases, it was not possible to fully avoid areas of flood risk and the Council has therefore applied the exception test in these circumstances, in accordance with planning policy guidance. The exception test comprises two parts: (1) a demonstration that the development will provide wider sustainability benefits that outweigh the flood risk, and (2) ensuring that the development will be safe for its lifetime, taking account of the vulnerability of its users.
15. In terms of (1) above, the Council has carefully considered both the objectives of the Village Clusters Plan and the availability of suitable sites promoted throughout the process. Whilst a significant number of sites were promoted for consideration, following a rigorous site assessment process and the compilation of an extensive technical evidence base, the Council

found that many of the promoted sites were not suitable for allocation for a number of different reasons. Key reasons for omitting sites from the VCHAP included identified flood risks, concerns about highways safety and the overall sustainability and connectivity of a site to the existing settlement. These constraints significantly reduced the site options available to the Council.

16. In addition to the identified constraints, the Council remained cognisant of the original objectives of the VCHAP – the allocation of smaller sites across a wide range of village clusters in order to support the rural communities. This approach (which is considered in detail in the accompanying Sustainability Appraisal (Library Ref. A.3.1)) had an impact on the site selection process, resulting in possible allocation sites being shortlisted across a large number of settlements within the village clusters. Conversely, a consequence of this approach was the avoidance of multiple site allocations within either a single settlement or a single village cluster. Inevitably this reduced the number of site allocation options available for inclusion in the VCHAP.
17. Wherever possible sites that are either at no-risk or limited flood risk have been allocated and where flood risks have been identified, discussions have taken place with site promoters to minimise the risk within a site. The Council has taken a proactive and pragmatic approach to this issue that has included amending site boundaries, preparing positive site-specific policies and identifying key issues within the supporting text of the Plan. In addition, where new development may offer opportunities to improve the current causes and impacts of flooding locally, the Council has also sought to identify these within the Plan.
18. Overall, the Council has carefully balanced the objectives of the Plan and the availability of suitable sites within the area against the need to meet the minimum housing requirement of 1,200 new homes, as set out in the GNLP. In combination with the evidence base prepared throughout this process, these considerations have informed the final sites selected for the VCHAP and the Council considers that the overall sustainability benefits arising from the site allocations outweighs the flood risks on those sites identified as needing an exception test.
19. To satisfy part (2) of the exception test, the developers of those sites that remain impacted by flood risk will be required to undertake a Flood Risk Assessment to support the development of their site. This will be submitted to the Council as part of the planning application documentation and will need to have clearly informed the design and layout of the site, access and egress arrangements, and appropriate mitigation measures, making reference as appropriate to the findings of the Level 2 SFRA as well as any other relevant (or updated) flood risk data. This requirement has been clearly set out within both the supporting text for the allocation and the site-specific policy as appropriate. Based upon the detailed site-specific findings of the Level 2 SFRA, as well as some discussions with site promoters, the Council is satisfied that for those sites identified as being subject to the application of the exception test, both elements of the test can be met using a range of strategies and solutions.
20. In addition to the above, and in accordance with the requirements of paragraph 181 of the National Planning Policy Framework (December 2024), all allocated sites exceeding 1 ha will be required to submit an FRA to support proposals for future development.

National Flood Risk Assessment 2 (NaFRA2)

21. The May 2025 NaFRA2 Addendum was prepared by the Council's consultants in response to the publication of the National Flood Risk Assessment 2, which updated the national flood mapping for England. The surface water mapping was published in January 2025 and the Flood Map for Planning (FmFP) was released in March 2025.
22. The publication of further updates to this data is expected within the next 12-18 months and, as per the advice in the Level 2 NaFRA2 Addendum, developers will be expected to refer to the most up to date evidence when preparing site submissions.
23. Following an internal review of the updated NaFRA2 mapping, the Council determined that an update to the Level 2 SFRA which compared the earlier and revised data for preferred and shortlisted sites would be the most appropriate course of action. As such, the Council commissioned a NaFRA2 Addendum to the Level 2 SFRA and this is included within the supporting evidence base.
24. The Addendum sets out a more detailed analysis of the findings, noting the key differences on impacted sites, as well as the limitations of the revised data. Overall, most sites have seen only minor increases or reductions in surface water flood risk in the updated NaFRA2 mapping, with a minority of sites experiencing larger changes. These sites are clearly identified in the NaFRA2 Addendum and the Council's 'List of Additional Modifications and Potential Main Modifications arising from the Statements of Common Ground (SoCG) and Strategic Flood Risk Assessment (May 2025)' document (Library Ref. A.6.2), which has been submitted as a core document alongside the Plan.
25. As part of this analysis, the Council was made aware of an increase in the flood risk at VC EAR2, as shown in the updated mapping. As set out in the NaFRA2 Addendum, this site (previously considered as an 'amber' risk site) is now considered as a 'red' site as a result of these changes. An additional Level 2 site table has therefore been prepared to support this site allocation. The Council remains of the opinion that the site is suitable for allocation in the VCHAP as it forms a smaller part of a larger agricultural parcel of land and the site boundaries could be modified accordingly, reflecting the original submission of the site promoter.
26. The updated FmFP was also reviewed and this concluded that of the five sites previously assessed as being at risk of fluvial flood risk², the risk had largely been reduced within the new datasets. Of the sites previously identified as being at risk of fluvial flood risk, VC GIL1REV is the only allocation site which has seen an increase (<1%) in the area affected by either flood zone 2 or 3. Overall however there has been a reduction of flood risk arising from all sources of flooding for this site based on the previous mapping.
27. To address the changes in mapping resulting from the release of NaFRA2, the Council has reviewed its submission Plan and noted where previously identified flood risks have been amended. The Council is assured that its previous position (pre- the release of NaFRA2) remains robust and provides for a more precautionary approach to the issue of flood risk on site

² Of these 5 sites, only one site was an allocation site in the Village Clusters Housing Allocations Plan (VC GIL1REV).

allocations and it should be noted that consultation on changes in relation to NaFRA2 have not been undertaken with the Lead Local Flood Authority. The Council is therefore of the opinion that the supporting text and the site-specific policies remain sound in their original form but recognises that the Inspector may consider it appropriate to update the affected areas of the Plan to reflect the current mapping. For this reason, Part 3 of the 'Potential Main Modifications' document, referred to above, proposes potential modifications to reflect these changes should the Inspector determine that these amendments are necessary.

Water Cycle Study: Whitlingham Water Recycling Centre position statement

28. In late 2024 the Council was alerted to potential capacity issues at Whitlingham Water Recycling Centre (WWRC) by Anglian Water. This is a strategic issue and has been subject to extensive discussions between a wide range of stakeholders and local authorities affected by this announcement. At the time of preparing this section of the topic paper (July 2025), the Council has issued a formal [Joint Position Statement](#) with Broadland District Council and Norwich City Council (April 2025) which sets out the Councils' response to this matter. For reference, this Joint Position Statement is included as Appendix 4 to this document.
29. The Council has considered the implications of this matter on the delivery of sites in the VCHAP, including the planned upgrades to WWRC set out within the [Anglian Water business plan for the period 2025-2030](#) (referred to as 'AMP8'), and has concluded that it does not affect the soundness of the Plan, as the effected allocations could still be delivered within the timescales of the VCHAP (to 2038).
30. The Council has also considered the potential need to update the Water Cycle Study (or prepare an Addendum to the submitted document) to provide a commentary on the above issue. However, due to the evolving nature of the discussions, and that because regardless of the proposed solutions the VCHAP allocations should still be deliverable by 2038, the Council determined that this was not an appropriate course of action.
31. Within the VCHAP the Council has planned for sustainable growth until 2038. It has also been reassured in discussions with Anglian Water that the required upgrades to WWRC will take place by 2030 at the latest. Therefore, as noted above, sites included for allocation in the VCHAP and requiring a connection to Whitlingham Water Recycling Centre will still be able to come forward within the lifetime of the Plan. The Council has liaised with Anglian Water via the Statement of Common Ground and has agreed to reinstate the original site-specific policy wording proposed in the Regulation-19 version of the Plan for those sites identified as requiring a connection to WWRC, should this be considered necessary by the Inspector.³ The supporting text for these sites already encourages developers of these sites to engage with Anglian Water at an early stage in the process in order to determine whether capacity exists at the treatment works.

³ Those sites are: VC BAW1REV, VC LM1 and VC ROC1

Chapter 9: Heritage assets and the historic environment

Introduction

1. As part of the supporting evidence base, the Council prepared a series of Heritage Impact Assessments (HIAs, Library Ref. B.4.1 and B.4.2) to explore the sites shortlisted for allocation in the Village Clusters Housing Allocation Plan (VCHAP). These HIAs have also informed the site-specific policies for the final allocation sites, and they therefore form an important part of the background material to the Plan.
2. The introductory text to the HIAs establishes the purpose of these documents. These included:
 - identification of heritage assets in proximity of a proposed allocation site;
 - an initial assessment of the asset and its setting;
 - understanding the impact development may have on the asset and its setting; and
 - identifying potential site-specific policy criterion.
3. This section of the topic paper provides further context for the development of the HIAs. It includes a commentary around the establishment of the assessment criteria as well as an overview of the important role the HIAs have taken in informing site selections and shaping site-specific criteria. It also identifies those matters that remain outstanding at the time of drafting this note.
4. This chapter should be read in the context of the Heritage Impact Assessments (Library Ref. B.4.1 and B.4.2) and the Statement of Common Ground with Historic England, contained in the Duty to Co-operate Statement (Library Ref. A.6.1).

Planning policy and heritage context

National context

5. **The National Planning Policy Framework** (NPPF, December 2024): The Glossary defines heritage assets as being *“a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest”*.
6. In accordance with paragraph 212 of the NPPF, great weight is to be given to the conservation of a heritage asset, noting that the more important the asset the greater the weight to be afforded to its conservation.
7. The identification and assessment of the significance of a heritage asset and the impact of a development proposed on that asset should be assessed, taking into account available evidence and any necessary expertise in order to avoid or minimise conflict between the conservation of the heritage asset and any aspect of the proposal (para 208, NPPF).
8. Harm to, or loss of, the significance of a designated heritage asset (including development in its setting) will require clear and convincing justification (para 213, NPPF). However, Paragraph 215

of the NPPF also notes that if less than substantial harm is identified to the significance of a designated heritage asset this should then be weighed against the public benefits of the proposal.

9. **Historic England Advice Notes:** In addition to the policy requirements set out in the NPPF, Historic England (the expert advisor to the government) has also prepared a suite of guidance notes relating to managing the historic environment. Of particular relevance to the assessment of sites for the VCHAP are: [The Historic Environment and Site Allocations in Local Plans \(Advice Note 3\)](#) and [The Setting of Heritage Assets \(GPA3\)](#).

Local context

10. **Heritage assets:** South Norfolk District is an area that benefits from a significant number of designated heritage assets – approximately 4,000 listed buildings and [52 Conservation Areas](#), as well as identified areas of archaeological importance and a small number of registered parks and gardens.
11. These areas and buildings are distinguished by their architecture, history and landscape. Whilst some of these assets may be more important than others, all have an important role in contributing to the overall character within the District and careful consideration is given to any development proposals that may impact on the importance of these assets.
12. In addition to designated heritage assets, the Council also recognises the existence of a number of non-designated heritage assets, and these are also afforded consideration within the development process in order to avoid harm occurring to these assets (and their settings) too.
13. **Greater Norwich Local Plan:** Policy 3 of the Greater Norwich Local Plan (GNLP Pt.1 The Strategy, Library Ref. B.12.1) sets out the strategic policy for the consideration of the historic environment within development proposals, with the overriding aim being the avoidance of harm to the historic environment (para 187, GNLP).
14. **South Norfolk Local Plan:** [Development Management Policy DM4.10 \(Heritage Assets\)](#) sets the local policy criteria for development proposals, including a requirement to take into consideration the contribution heritage assets make to the significance of an area and its sense of place. Proposals are required to sustain or enhance the significance of heritage assets, as well as make positive contributions to local distinctiveness.
15. All of the above principles have provided the foundations for the assessment of potential site allocations on local heritage assets and their settings.

Preparation of the Heritage Impact Assessments

16. The early site assessment stage included an initial review of the impact of a proposed site on identified heritage assets (summer/autumn 2020). This review was undertaken in conjunction with the Council's Senior Design and Conservation Officer. Norfolk County Council's Historic Environment Service also provided comments as part of a Technical Consultation – these specifically related to the archaeological importance of a site. The information gathered at this stage was incorporated into the site assessment forms that informed the initial site selection

process and was published alongside the Regulation 18 consultation (Site Assessment Forms, Library Ref. B.1.1 to B.1.47).

17. Through the Regulation 18 consultation (June – August 2021) Historic England provided detailed comments on the Council's Preferred and Shortlisted sites. In response to these comments the Council identified several sites that required a more detailed understanding of the impact of the proposed allocation on the significance of the designated heritage assets and their settings. In addition to the heritage assets identified by Historic England the Council also recognised the importance of additional assets using a number of available resources (these included the online Norfolk County Council 'Heritage Explorer' tool, the 'National Heritage List for England' published by Historic England, and the Council's own [Conservation Area Appraisals](#)).
18. The assessment of designated and non-designated heritage assets and their settings was needed to identify and analyse the relevant heritage assets, whilst also remaining proportionate to the level of development proposed on a site. In consultation with Historic England the Council agreed the format of a proforma, as well as an assessment criterion, that it considered met these objectives. The Council subsequently used this form when undertaking all Heritage Impact Assessments (Library Ref. B.4.1 and B.4.2) to assess the impact of proposed development on the historic environment.
19. Details of the agreed classifications for the significance (value) of a heritage asset and its setting, as well as the categorisation for the potential impact of proposed development on the same, is set out in the main introduction to the Heritage Impact Assessments.
20. Throughout the preparation of the HIAs, and the continued development of the Plan, the team liaised with the Council's Senior Conservation and Design Officer, as well as Historic England, both of whom have provided ongoing guidance with the assessments. Historic England have also formally responded during consultation and publication periods, as well as engaging with an informal review of some assessments and attending an in-person meeting (with site visits) during summer 2023. Further details are contained in the Duty to Co-operate Statement (Library Ref. A.6.1)
21. Preparation of the HIAs has been an iterative process. Where additional information has been made available, or updates to a HIA has been identified as being necessary, the relevant assessment has been updated (for example, VC ROC1 and VC BAR2). These updates (including updates to the accompanying HIA maps) are highlighted in the final suite of HIA documents within the evidence base (Library Ref. B.4.1 and B.4.2).
22. Within the background papers the Council has also published HIAs for those sites that have not progressed into the submission version of the Plan. This is because in some instances these have influenced final conclusions regarding the suitability of a site for allocation (for example, VCBAR1REV), and they are therefore considered to be an important part of the evidence base for the site selection process.

[Role of the Heritage Impact Assessment in the site selection process](#)

23. HIAs influenced the final selection of allocation sites for the Plan. As site selections have changed, amendments and/or updates to the HIAs have been made to reflect alterations made to the site proposals (including, for example, amended boundaries or extensions to sites) or where updated advice has been received that is relevant to the identified heritage asset.

24. Two key recurring themes emerged in the heritage assessments. These were: (a) the protection of the setting of agricultural buildings through the retention of their visual links to the land beyond their immediate curtilage; and (b) the preservation of views of assets within the wider landscape setting (for example, church towers). The role of archaeological finds, maintaining views of both designated- and non-designated heritage assets in the immediate context and the preservation of existing listed buildings were also areas that were explored via the heritage impact assessments. Below are some examples demonstrating how the HIAs influenced decision-making:

- VC BAR2: Originally prepared to support the possible addition of the site to the Plan as a possible new allocation at the Regulation-18 focused consultation stage in January 2024, this HIA was prepared to assess the impact of the proposed development on School Farmhouse which is located to the south-east of the site. Initial discussions had suggested residential development could be sited to the south of the site, with the associated playing fields and village hall to the north, furthest away from the designated heritage asset. Representations received during the Regulation-18 FC, including from Historic England, led the Council to review the site. This resulted in a change to the proposed site layout, with the land to the north of the site now considered to be the most appropriate location for residential development. Land to the south has been retained as open space in the final policy requirements. This has not only responded to some of the wider community concerns about future accessibility and connectivity of the playing fields to the village, but critically it has also addressed the comments of Historic England who had suggested that retaining the open space to the south of the site would deliver protection for the setting of the heritage asset. As a result of this amendment a link between the farm buildings and the agricultural land beyond is preserved.
- VC LM1: A grade II listed barn (Elm Farm) lies in a central position within this site and the Council recognised the heritage sensitivities associated with the potential allocation of this site at an early stage. However, allocation of the site has been identified as providing an opportunity for the repair/ renovation of the barn and a means to secure its long-term future. Discussions with the highways team at Norfolk County Council confirmed that access into the full site would only be achievable via School Lane to the north and that it would therefore be necessary to incorporate an access road in front of the listed barn within the site layout. Design solutions for both the overall site layout and the access road were explored with the Council's Senior Heritage and Design Officer to ensure the significance of the heritage asset would not be diminished by the allocation. The HIA prepared to assess the impact of development in this location also explored these matters further. The associated HIA map indicates areas within which regard should be had to retaining the existing open character in front of Elm Farm, as well as extended areas within which further regard should be had to the setting of the listed building, and these are clearly referenced in the final site-specific policy requirements.
- VC TAS1: This site was originally allocated for 20 dwellings in the Council's 2015 Site Specific Allocations and Policies Document and was reviewed for inclusion within the VCHAP. Initial discussions suggested that the site may be able to accommodate an increased number of dwellings and as such it was considered for an allocation of approximately 25 dwellings in the 2023 pre-submission version of the Plan. A

Heritage Impact Assessment was undertaken to explore the impact of development on local identified heritage assets, including Old Hall Farmhouse to the northwest of the site and Tasburgh Enclosure Scheduled Ancient Monument opposite the site. This concluded that development at a slightly higher density could be acceptable in this location and that the impact on Old Hall Farmhouse would be negligible subject to the site layout and design having due regard to the setting of the farmhouse in the northwest corner. Through the publication period, however, Historic England disagreed with these findings and advised that the density proposed should be reduced to reduce the harm to the significance of the listed building resulting from development in its setting. A subsequent joint site visit undertaken by the Council and Historic England reached the same conclusion and in response to the on-site discussions the HIA was updated to reflect this position. An updated policy for 20 dwellings was published alongside an amended HIA in 2024 as part of the Regulation-18 focused consultation and the Regulation-19 Addendum Plan. This amendment to the policy, reached via a thorough assessment process, will protect and enhance the settings of Old Hall Farmhouse, opening up wider public views of the heritage asset once the site is developed.

- SN0552REVC: This site was considered for allocation as part of the Regulation-18 focused consultation in January 2024 and would have extended the existing boundaries of preferred allocation site VC BAR1 in a westerly direction, beyond Back Lane. Development of this expanded allocation site would have resulted in development immediately opposite Sayers Farmhouse, a grade II listed building. The Heritage Impact Assessment prepared for the site identified concerns with this relationship, particularly the impact on views to and from the farmhouse and the resultant loss of the open rural character. Whilst some mitigation measures were identified it was considered that development in this location would have a major impact on the listed building and its setting. Through the consultation, Historic England confirmed this finding and advised that the site should not be allocated due to the adverse impact development would have on this heritage asset. The Council determined that this site should not be taken forward in the final Plan.

Historic England: Statement of Common Ground

25. The Council has welcomed the ongoing engagement of Historic England in the preparation of the Village Clusters Housing Allocation Plan. This engagement has played an important role in ensuring that the Heritage Impact Assessments are robust and effective, and that the final policies will not have adverse impact on the identified heritage assets.
26. Throughout the consultation process, the Council has received a significant number of comments from Historic England. Many of these supported the assessments and approaches undertaken by the Council or, in instances where further work or modification was considered necessary, the Council has been able to address these matters to the satisfaction of Historic England. This is evidenced through the subsequent representations received in response to the Regulation-19 consultations.
27. At the time of drafting this topic paper (June 2025), two overarching issues remain outstanding. These matters relate to (a) the detailed site-specific policy wording proposed for

sites where archaeological remains have been identified as being present; and (b) a request to include site-specific policies for extensions to the existing settlement limits. A small number of site-specific issues also remain. All of these issues have been included in the Council's Statement of Common Ground with Historic England, contained in Appendix 3 of the Duty to Cooperate Statement (Library Ref. A.6.1), a document which reflects the collaborative approach taken to assessing the potential impact of development on the historic environment.

Chapter 10: Landscape, trees and visual impact

Introduction

1. To explore the sites selected for allocation in the VCHAP, the Council has prepared a series of Landscape Visual Appraisals (LVAs) (Library Ref. B.5.1). These documents have supported the drafting of the site-specific policies for these sites, and as such form an important part of the supporting evidence base for the submission Plan.
2. The introductory text to the LVAs establishes the purpose of these documents. This includes:
 - Identifying the Landscape Character Area (LCA) within which the site lies and the key features of the LCA;
 - Identifying the presence of trees and Important Hedgerows on, or immediately adjacent to, the site;
 - A description of both the existing land-uses and landscapes, on and off-site;
 - Identifying the presence of Public Rights of Way (PRoWs) within or adjacent to the site, as well as other public viewpoints from where the allocation site will be visible;
 - The identification of key views identified that may be impacted by development of the site; and
 - A summary of the issues identified, the likely effects of development on the landscape resource and visual amenity and an identification of site-specific mitigation measures considered appropriate to mitigate the impact.
3. This section of the topic paper provides further context for the development of the LVAs. It explains the process taken to establish the assessment criterion, as well as a brief commentary exploring how the preparation of the LVAs has been reflected in the final site-specific policies. It should be read in conjunction with the LVAs.

National Planning Policy Context

4. Chapter 15 of The National Planning Policy Framework (NPPF) recognises the importance of, and seeks to protect, the natural and local environment. This includes *“protecting and enhancing valued landscapes”* and *“recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”*¹. This may be achieved by ensuring that new development is sympathetic to both the surrounding built environment and the landscape setting of proposed development (para 135).
5. Trees also make important contributions to the character and quality of an area and existing trees should be retained wherever possible. In addition to their retention, consideration must be given to ensuring that the right trees are planted in the right places, with particular emphasis placed on recognising the tensions that can exist between the presence of trees and achieving acceptable highways standards (para 136).

Local Planning Policy Context

6. South Norfolk Landscape Character Assessments: The South Norfolk area contains a number of distinct landscape area designations that can all be defined by their unique qualities. These are identified in the [2001 Land Use Consultants 'Landscape Character Assessments'](#) which was updated in 2012 by Chris Blandford Associates.
7. These assessments recorded the key elements of the landscape that should be protected in order for the distinct character areas to maintain their identities. They also provided recommendations for future development to assist in protecting these special elements, and to enhance the landscape characters themselves.
8. Greater Norwich Local Plan: Policy 3 (Environmental Protection and Enhancement) of the Greater Norwich Local Plan sets out criteria regarding the protection and consideration of the wider landscape, including the application of a mitigation hierarchy, and the protection of designated areas such as European Sites.
9. South Norfolk Local Plan: Development Management Policy DM 4.5 (Landscape Character and River Valleys) sets out the local policy criteria for the consideration of the wider landscape, including how proposals should respect, conserve and, where possible, enhance the landscape character. The policy outlines the key elements of the Landscape Assessments which should be taken into account and makes specific reference to the distinctive characteristics of Rural River Valleys and Urban Fringes.

The LVAs and the VCHAP

10. The implications of development on the landscape can be assessed either through a full Landscape Visual Impact Assessment (LVIA) or a simpler Landscape Visual Appraisal (LVA).
11. In recognition of the sensitivity of the landscape resource throughout the village clusters area, as well as the important role the countryside plays in the health, recreation and wellbeing of residents, the Council considered the need to undertake an assessment of the impact of the proposed allocations to be both an important part of the site assessment process, as well as a tool to assist with drafting the allocation policies. It was determined that whilst an assessment should be undertaken for all sites emerging as preferred allocations this also needed to be proportionate and based upon the information available to officers at the time of drafting the reports.
12. Detailed discussions with the Council's technical Landscape Architect and Arboricultural Officer concluded that the most proportionate form of assessment for the VCHAP sites would be a Landscape Visual Appraisal. These provide a more informal and flexible approach to the assessment of the impact of development on both the landscape and visual amenity, taking into account a number of the steps required in the LVIA process.
13. A standard proforma was prepared in conjunction with the technical officer and an appraisal was completed for each preferred allocation site and these form part of the evidence base that supported the selection of the final sites for allocation. LVAs have been prepared for allocations in the VCHAP (excluding the Carried Forward Allocations except VC TAS1). In some instances, LVAs have also been prepared for a small number of sites that were considered at previous stages but are not included in the final Plan.

14. Where appropriate, the conclusions of the LVAs have been used to identify and address key issues relating to the allocation sites. This includes the mitigation measures identified in the appraisals informing site-specific policy wording and, in some instances, the need for a full Landscape Visual Impact Assessment to be undertaken as part of a planning application for the site. The production of detailed LVIAs will build upon these initial appraisals, informing the final site layouts, design and landscaping.
15. The LVAs supporting the preferred sites were previously published during the Regulation 19 Publication, Regulation 18 Alternative Sites and Focused Changes consultation and the Regulation Pre-submission Addendum publication.

Appendix 1: Site density of VCHAP allocation sites

Site reference	Site Address	Site area (Ha)	Number of dwellings	Density	Commentary
VC ALP1	West of Church Meadow, Alington	1.87	25	13.37	The site density reflects the scale and density of the adjoining development, Church Meadow, as well as the need to address flood risk issues identified in the Stage 2 Strategic Flood Risk Assessment.
VC BAP1	Former Concrete Batching Plant, south of Church Road	1.65	25	15.15	The density reflects the rural context of this brownfield site.
VC ASL1	Land off Church Road	2.3	35	15.22	The site density reflects the edge of village location, as well the delivery of a village green along the site frontage and land for a school car parking facility.
VC GRE1	North of High Green, west of Heather Way	0.62	12	19.35	The site density responds to the scale and density of the adjoining development.
VC GRE2	Land north of High Green opposite White House Bungalow	1.16	14	12.07	A carried forward allocation from the 2015 Local Plan. The site density reflects the approved scheme for the site.
VC BAR1	Land at Cock Street and Watton Road	0.76	20	26.32	
VC BAR2	Land at Chapel Street	4.94	40	8.10	An extended site area is allocated to include a sports playing pitch and a replacement village hall.
VC BB1	Corner of Norwich Road and Bell Road	1.4	40	28.57	

VC BAW1REV	Land east of Stocks Hill	1.97	35	17.77	The site density reflects the local sensitivities, as well as the identified site constraints.
VC BRE1	Land east of School Road	2.06	40	19.42	An area of open space is required on the site to maintain the setting of the adjacent listed building, Pine Tree Cottage, as well as possible land to facilitate the creation of an overflow car park for the school.
VC BRO1	East and west of the B1332, Norwich Road	2.47	50	20.24	
VC BUN1	Land to the north of Bunwell Street	1.04	15	14.42	The site density responds to the density of the adjoining development to the west of the site and allows appropriate landscaping of the site to incorporate it into the wider landscape.
VC BUN2	Land opposite Lilac Farm, Bunwell Street	0.85	20	23.53	
VC CAR1	Land west of Rode Lane	0.19	3	15.79	A carried forward allocation from the 2015 Local Plan which benefits from planning permission.
VC DIT1REV	Land at Thwaite's and Tunneys Lane	2.53	45	17.79	The density proposed reflects the context of the surrounding development, whilst also allowing for identified on-site constraints to be addressed.
VC BRM1	Land west of Old Yarmouth Road	0.62	12	19.35	The density reflects the linear form of the site and allows for appropriate landscaping to integrate the site into the surrounding area.

VC EAR1	Land east of School Road	1.3	25	19.23	The density reflects the edge of settlement location of the site, as well as the need to address the visual impact of development in this location via an appropriate site design and layout.
VC EAR2	Land north of the Street	1.4	25	17.86	The landscaping requirements identified for the site are reflected in the site density.
VC GIL1REV	South of Geldeston Road and Daisy Way	2.92	40	13.7	The site area includes 0.5ha of land safeguarded for the expansion of the adjacent primary school. The density also reflects the requirement to consider the sensitive location of the site which is adjacent to the Broads Authority area (to the south).
VC GEL1	North of Kell's Way	0.76	20	26.32	
VC HAL1	Land off Briar Lane	2.48	35	14.11	The site density responds to the constraints identified for the site, including its visual impact and relationship with the adjacent heritage asset and the identified surface water flowpath.
VC HAL2	Land at Yarmouth Road west of Hales Hospital	1.8	23	12.78	A carried forward allocation from the 2015 Local Plan. The site density reflects the approved scheme for the site.
VC HEM1	Land at Millfields	0.35	15	42.86	

VC ELL1	South of Mill Road	1.63	25	15.34	The lower density ensures that the impacts on the wider landscape can be appropriately mitigated through the design and layout of the site. There are some views towards the site from the Broads Authority area.
VC ELL2	Land at Florence Way	0.51	12	23.53	
VC LM1	South of School Lane and east of Burnthouse Lane	3.8	35	9.21	The low density of this site reflects the need to keep the south-east section of the site clear to protect the setting of the listed barn within the site. The density also protects the existing on-site biodiversity features and provides an opportunity for a small area of car parking for the school opposite the site.
VCMUL1	Land east of Bluebell Road and north of The Rosery	1.5	35	23.33	
VC SWA1	Land off Bobbins Way	1	20	20	
VC SWA2REV	Land on Main Road	2.7	40	14.81	The site was previously allocated in the 2015 Local Plan and was considered appropriate for an uplift in numbers via the VCHAP whilst continuing to reflect the edge of settlement location of the site.
VC BRA1	Land at Norwich Road	0.9	20	22.22	
VC NEE1	Land north of High Road and east of Harman's Lane	0.9	15	16.67	The density reflects the linear form of the site and is considered appropriate for the local area.

VC WOR1	North and south of High Road	0.95	12	12.63	The density reflects the presence of trees covered by TPOs as well as the landscaping requirements and the need to address flood risk issues on the site.
VC WOR2	Land at the junction of High Road and Low Road	0.52	5	9.62	A carried forward allocation from the 2015 Local Plan. The Council explored an increased density on this site as part of the allocation process but the associated highways works required for a greater number of dwellings would have resulted in an undeliverable site. The scale of development therefore remains the same as previously allocated.
VC NEW1	Land off Alan Avenue	1.05	25	23.81	
VC NEW2	Land adjacent Alan Avenue	1.3	30	23.08	
VC PSM1	Land north of Norwich Road and west of Poppy's Lane	2.83	50	17.67	The density reflects the requirement for an area of green infrastructure on the site, as well as the identified highways improvement works.
VC ROC1	Land south of New Inn Hill	1.47	25	17.01	The density responds to the heritage and landscape matters identified for this edge of settlement site.
VC SEE1	West of Mill Lane	0.53	12	22.64	
VC SPO1REV	Land west of Bunwell Road	2.31	35	15.15	The site density reflects the identified landscape and flood risk constraints.

VC SPO2	South of Station Road	1.67	25	15	The density reflects the village gateway location of the site and the need to address some flood risk issues.
VC SPO3	Land at School Lane	0.55	7	12.73	A carried forward allocation from the 2015 Local Plan. The site density reflects the approved scheme for the site.
VC SPO4	Land at Chapel Road	0.6	14	23.33	
VC STO1	Land north of Long Lane	1.42	25	17.60	The density reflects the landscape sensitivities identified, as well as the density of the adjacent development at Harrold Place.
VC TAC1REV	Land to the west of Norwich Road	1.08	25	23.15	
VC TAC2	Land adjacent The Fields	0.95	21	22.10	
VC TAS1REV	North of Church Road	1.2	20	16.67	The site includes a requirement for an area of land to be safeguarded for the future expansion of the adjacent primary school, a layout that protects the setting of the nearby listed building (Old Hall Farmhouse) and highway works.
VC THU1	Land north of Blacksmiths Gardens	0.78	12	15.38	The density of the site is currently limited by the number of additional dwellings that can be served by Blacksmiths Gardens.

VC THU2	Land adjacent to Holly Cottage, west of Beccles Road	0.77	15	19.48	The site has irregular boundaries, reflecting the landform, and the site density is reflective of this, as well as the need to respond to the identified constraints.
VC TIV1	Pear Tree Farm, west of The Street	1	20	20	
VC HAD1	Land south of Haddiscoe Manor Farm	3.13	35	11.18	The site density responds to the identified constraints, including the requirement for highways works, the need to complement the setting of listed Church and retaining key views towards it.
VC BUR1	Land north of Staithe Road	0.56	12	21.43	
VC WIC1REV	Land to the south of Wicklewood Primary School	2.97	40	13.47	The site density provides for the landscaping that has been identified as being appropriate for this site.
VC WIC2	Land off Hackford Road	0.89	12	13.48	The density reflects the surrounding context of the site and will allow for an appropriate layout and design to mitigate the impact of development on wider views towards the Church.
VC WIC3	Land at Hackford Road	0.7	6	8.57	A carried forward allocation from the 2015 Local Plan.
VC WIN1	Land west of Hall Road	1	20	20	
VC WIN2	Land off Mill Road	0.98	20	20.41	

VC W001	Land south of Church Road	3.3	50	15.15	The site allocation includes pedestrian connectivity through the site between the village and the primary school, as well as the safeguarding of an area of land to support local pre-school facilities. The site has the benefit of planning permission.
VC ASH1	Land west of New Road	1.09	15	13.76	The site density reflects the edge of village location, as well as the identified constraints.

Appendix 2: List of VCHAP sites under 1 ha

Site Ref	Site Address	Site Area
VC GRE1	North of High Green, west of Heather Way, Great Moulton	0.62ha
VC BAR1	Land at Cock Street and Watton Rd, Barford	0.76ha
VC BUN2	Land opposite Lilac Farm, Bunwell Street, Bunwell	0.85ha
VC CAR1	Land west of Rode Lane, Carleton Rode	0.19ha
VC BRM1	Land west of Old Yarmouth Road, Broome	0.62ha
VC GEL1	North of Kell's Way, Geldeston	0.76ha
VC HEM1	Land at Millfields, Hempnall	0.35ha
VC ELL2	Land at Florence Way, Ellingham	0.51ha
VC BRA1	Land at Norwich Road, Bracon Ash	0.9ha
VC NEE1	Land north of High Road and east of Harman's Lane, Needham	0.9ha
VC WOR1	North and south of High Road, Wortwell	0.95ha
VC WOR2	Land at the junction of High Road and Low Road, Wortwell	0.52ha
VC SEE1	West of Mill Lane, Seething	0.53ha
VC SPO3	Land at School Lane, Spooner Row	0.55ha
VC SPO4	Land at Chapel Road, Spooner Row	0.6ha
VC TAC2	Land adjacent The Fields, Tacolneston	0.95ha
VC THU1	Land north of Blacksmiths Gardens, Thurlton	0.78ha
VC THU2	Land adjacent to Holly Cottage, west of Beccles Road, Thurlton	0.77ha
VC BUR1	Land north of Staithe Road, Burgh St Peter	0.56ha
VC WIC2	Land off Hackford Road, Wicklewood	0.89ha
VC WIC3	Land at Hackford Road, Wicklewood	0.7ha
VC WIN2	Land off Mill Road, Winfarthing	0.98ha

Appendix 3: Parish services and facilities audit form

South Norfolk Village Clusters Housing Allocations document: Parish Information

Parish	
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Please complete the table below with as much information as possible and return your completed form by email to lp@s-norfolk.gov.uk by Friday 3rd April 2020. This information will be used in the assessment of the suitability and sustainability of sites submitted for possible future housing development within the village cluster areas.

Please note that the list below **does not** represent a preferred ranking for facilities and services. Please include any additional services/ facilities not included on this list in the 'Other' box below, providing additional information if you feel that this is of relevance for consideration. Information relating to the location of schools and primary healthcare facilities has previously been collated and is therefore not included in the list below.

Do you have a local convenience store, farm shop, Post Office etc suitable for basic day-to-day essentials/shopping?	
Does your parish benefit from a village hall/ community centre? Are there any community groups active on a regular basis? <i>(please provide details of any regular groups)</i>	
Does your community have a regular public transport links (e.g., bus routes/ train services) that connects to a larger service centre, town or Norwich? <i>(please include a brief summary of these services, including their frequency)</i>	
Is there a public house or café facility within your parish?	
Are there any local employment opportunities not listed elsewhere? <i>(please include a brief description of the employment opportunities in your parish e.g., specialist retail, catering, care homes, hospitality, agriculture, manufacturing)</i>	
Are there any regular preschool facilities within your community? <i>(please include brief details)</i>	
Are there any children's play areas or sports/ recreation facilities within your parish?	
Please use this section to advise us of any other community facilities/ services that you consider to be	

relevant to the preparation of the South Norfolk Village Clusters Housing Allocations document.	
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Appendix 4: Whitlingham Water Recycling Centre Joint Position Statement

South Norfolk Council, Broadland District Council and Norwich City Council, Joint Position Statement April 2025

Anglian Water (AW) has recently advised the Authorities that Whitlingham Water Recycling Centre (WWRC) is at capacity and that no more planning permissions should be issued without the imposition of the following condition:

“Prior to occupation written confirmation from Anglian Water must be submitted confirming the upgrades at Whitlingham Trowse water recycling centre have been completed, and there is sufficient headroom to accommodate the foul flows from the development site”

Officers of Norwich City Council, Broadland District Council and South Norfolk Council have carefully considered the request and have discussed the implications of the situation with AW and with the Environment Agency.

The three affected local planning authorities have agreed to cooperate and will keep under consideration and review the number of applications which have been made and permissions granted cumulatively across the three authorities until WWRC has been adequately upgraded. They rely on AW to work to improve the position as quickly as possible and certainly within the next 5 years in line with its duty in s94 and to keep the authorities informed.

On that basis the Councils will adopt the following approach to planning applications which will be served by WWRC response. This is subject to review if circumstances change.

The Councils will not impose the requested condition, which it considers to be flawed.

In respect of each application received Officers will assess the risk to the environment and amenity from the issue which has been brought to its attention by AW and will weigh that against the benefits of the development in the planning balance.

The Councils will require an EIA for development within Schedule 2 of the The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 where officers are of the opinion that due to the nature or extent of the development, the volume of wastewater arising will result in a significant risk of harm to the environment.

Where they consider that the balance is in favour of development a recommendation for approval (subject to other material considerations) will be made.

Assessment of the risk may result in the imposition of a condition controlling foul drainage volumes from a particular development or in permission being granted for an alternative wastewater treatment method, such as a package treatment plant.

In the case of some applications a condition may be imposed which delays occupation of all or part of a development to until a sewer connection has been made. Such conditions will be imposed where there is evidence to justify the imposition of such a condition and can be expected to be in the form of a Grampian style condition. They will be imposed where the Council is satisfied that that there is a reasonable probability that the condition will be fulfilled within the normal development commencement period.

SNC/BDC/Norwich CC will continue to require appropriate nutrient mitigation.