

## Topic Paper: Policy 7.4 Village Clusters

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### Summary

This topic paper outlines the evolution of Policy 7.4. It describes the reasons for the village clusters approach and the preparation of a separate South Norfolk Village Clusters Housing Allocation Plan. It then goes on to discuss the level of growth to be provided and the consideration of sites within the Broadland clusters to meet that requirement through the site assessment and allocation process. This is set within the context of the adopted Joint Core Strategy and guidance contained with the National Planning Policy Framework.

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## Purpose

1. This topic paper is part of a series of papers and its purpose is to provide further justification and explanation of the policy for Village Clusters for the submission of the Greater Norwich Local Plan and its consideration at examination. It should be read alongside Policies 1 and 7.4 and their supporting text, the Site Assessment Booklets for each settlement and the Statement of Consultation for each stage of plan-making.
2. The topic paper contains information from the various stages of public consultation and has been split into two sections. Firstly, the evolution of the village clusters principal and the level of growth to be provided then the consideration of sites through the site assessment and allocation process. It also includes background and context from the adopted Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) and the National Planning Policy Framework (NPPF).

## Background

3. The background to Village Clusters starts with the JCS, which was adopted in March 2011 with amendments adopted in January 2014. The JCS identifies a settlement hierarchy for Greater Norwich to ensure growth is directed across the area in proportion to the level of local service provision. The Norwich urban area is at the top of the hierarchy going down to smaller rural communities and the countryside at the bottom. The scale of development generally decreases at each level of the hierarchy. Most villages in South Norfolk and Broadland are categorised as either Service Villages or Other Villages in the JCS settlement hierarchy.
4. Policy 15 of the JCS identifies a number of Service Villages which are considered suitable for small-scale housing development subject to form and character considerations, as well as small scale employment or service development appropriate to the scale and needs of the village and its immediate surroundings. Service Villages were defined on the basis of having a good level of services/facilities including a primary school, food shop, journey to work public transport service and a village hall. Allocations of between 10-20 dwellings were made in Service Villages through the Broadland and South Norfolk Site Allocation Plans.
5. Policy 16 of the JCS identifies a number of Other Villages which have defined development boundaries to accommodate infill or small groups of dwellings and small-scale business or services subject to form and character considerations, but no allocations. Settlements categorised as other villages were defined based on having a basic level of services and facilities, generally a primary school and village hall and are not thought to be sustainable locations for significant new development.
6. Villages in the Norwich Policy Area (NPA) (see the JCS and GNLP Policy 1 Topic Paper for information on the NPA) could also be considered for additional development to deliver the identified smaller sites in the NPA allowance (2,000 dwellings in Broadland and 1,800 dwellings in South Norfolk) although this allowance

was distributed in accordance with the settlement hierarchy. However, this did result in some Service Villages in the NPA receiving allocations in excess of 100 dwellings.

7. All remaining villages and hamlets not included under JCS Policies 15 or 16 are classified as smaller rural communities and the countryside under Policy 17. Under this policy only development such as local needs exception affordable housing schemes, farm diversification, small – medium commercial enterprises justifying a rural location and replacement/conversion of existing buildings will be allowed.
8. Policies in the JCS will be superseded once the GNLP is adopted.

## Context

9. The context for the Village Clusters approach can be found in the NPPF (2019), which includes guidance on housing in rural areas in paragraphs 77 – 79. It states that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. It goes on to say 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. The NPPF also states that planning policies and decisions should avoid the development of isolated homes in the countryside unless specific circumstances apply.
10. Para 68 (a) of the NPPF is also important to the context of the village clusters approach. It states that development plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare.
11. A number of villages in Broadland and South Norfolk have adopted Neighbourhood Plans (a list of which can be found at Appendix 4 of the GNLP Strategy document) with more under preparation. These have been taken into account in the site assessment process and should be used in conjunction with the GNLP.

## Evolution of the Village Clusters Approach and the level of growth to be provided

12. The following sections explain the evolution of the Village Clusters approach and the development of Policy 7.4 in the GNLP Part 1 Strategy document:

### Regulation 18 Consultation, Stage A, Growth Options document (Jan- March 2018)

13. The Regulation 18, Stage A, Growth Options document was the first stage of public consultation on the GNLP and included two aspects directly related to the evolution of the village clusters approach and asked questions on each.
14. The first was in relation to the **overall strategy for the distribution of growth**.

15. The Growth Options document presented six strategic options for growth in the Greater Norwich area. Of these, three of the options (Option 4 Dispersal, Option 5 Dispersal plus new settlement and Option 6 Dispersal plus urban growth) gave the opportunity for an element of housing growth in villages. The other options (Option 1 concentration close to Norwich, Option 2 Transport corridors and Option 3 the Norwich – Cambridge Tech corridor) were more focussed. The document made it clear that the chosen strategy may be an amalgam of these options. All options included some growth in villages in the ‘baseline’ scenario.
16. A number of questions were asked about the growth options. Question 9, which alternative or alternatives do you favour? Question 10, do you know of any infrastructure constraints associated with any of the growth options and Question 11, are there any other strategic growth options that should be considered? Of these questions 9 and 11 are of the most relevance to the subject of dispersal of growth to villages in rural areas.
17. Question 9 allowed respondents to favour one or more of the six proposed distribution options for growth, or none. Of the 268 people answering this question option 1 (concentration) was the most popular with 101 responses, followed by transport corridors and the Tech corridor. The options related to dispersal had less support. Groups such as the CPRE, Norfolk Transport Action Group, Norwich Cycling Campaign and Norwich Business Improvement District all favoured concentration. Alternative strategic growth options proposed included intensification of urban Norwich and ‘super-dispersal’ over more villages.
18. The second was **the structure of the settlement hierarchy**.
19. The Growth Options document at Regulation 18 Stage A discussed options for defining the settlement hierarchy in the GNLP and used the hierarchy from the JCS as a starting point. The Growth Options document stated that the top three tiers of the JCS hierarchy e.g. Norwich Urban Area, Main Towns and Key Service Centres have well defined criteria which it is not proposed to change. It then went on to mention the possibility of combining tiers 4-6 e.g. Service Villages, Other Villages and Smaller Rural communities and the Countryside into a single tier of ‘village groups’.
20. The Growth Options document went on to say that village groups would be based on the premise that neighbouring villages share services. The implication of this was that villages and hamlets with few or no services could be considered suitable for growth if services could be readily accessed in neighbouring settlements. This concept is supported by the NPPF at Paragraph 78 which states 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’.

21. The Growth Options document consulted on two reasonable alternatives. SH1 – to have a 6-tiered hierarchy which would broadly be a continuation of the approach in the JCS, with the amount of growth in each tier being based on the scale and range of services or SH2 – have a 4-tiered hierarchy including village groups as tier 4. This would be a new approach with all parishes below tier 3 being amalgamated into village groups. An appendix was provided which showed the existing classification of villages and their level of services and facilities to provide context for respondents.
22. As well as asking respondents for their views on options SH1 and SH2 (questions 24 and 25), the Growth Options document probed further in relation to village groups e.g. what criteria should be used to define groups, what specific villages could form groups and how could growth be allocated between villages within a group?
23. The following responses were received to the Growth Options consultation in relation to questions 24-25:
24. Question 24 – Do you favour option SH1 and are the villages shown in Appendix 3 correctly placed (see [appendix 3b of the Statement of Consultation](#) for a summary of comments). Of those who responded, 67 favoured option SH1 and 17 did not. Answers to question 24 generally favoured keeping the lower settlement hierarchy tiers of Service Villages, Other Villages and Smaller Rural Communities. Detailed comments were received about the placement of particular settlements within the hierarchy.
25. Question 25 – Do you favour the Village Group approach in option SH2? (see [appendix 3b of the Statement of Consultation](#) for a summary of comments). Of those that responded 22 were in favour of the village group approach and 53 were against. It was evident though that at least some responses were based on arguing for or against housing allocations in a particular place. Opposition to the village group approach focussed on the view that inclusion in a group might lead to individual villages having more housing, or the merger of villages with the loss of countryside, character, identity and distinctiveness. It was also argued that placing all settlements in village groups would open up rural Greater Norwich for significant development, increasing car dependency and undermining the purpose of a settlement hierarchy. Those supporting village groups argued that villages already share services, with some commenting that this approach is favoured in the NPPF which states that where there are groups of smaller settlements, development in one village may support services in a village nearby. It was also argued that there is merit in linking settlements at different scales of the hierarchy which share services e.g. Diss. Further detailed comments were received about the criteria which should be used to define groups, which specific villages could form groups and how growth could be allocated between villages within a group.

## Discussion post Regulation 18 Consultation, Stage A Growth Options

26. A high-level report on the results of the Regulation 18A consultation was taken to the Greater Norwich Development Partnership (GNDP) Board on 19<sup>th</sup> June 2018. A more detailed appendix of responses was then reported to the GNDP on 26 September 2018.
27. In relation to **the distribution of growth**, the high-level report stated that there was greater support for the concentration of development around Norwich and in transport corridors than there was for more dispersed growth.
28. In relation to **the settlement hierarchy** the high-level report stated that following the consultation the approach to the settlement hierarchy would need to be considered further. It was reported that there was broad support for retaining the existing approach to the settlement hierarchy tiers, with the concept of village groups having less support.
29. Following the Regulation 18A consultation further discussion was undertaken on growth in villages and the potential role of village groups as this concept was considered by some to be a political priority with a number of perceived benefits for rural areas. An initial discussion paper was taken to GNLP Leaders in September 2018 which recommended that allocations should be made in villages with an accessible primary school, taking account of capacity and/or ability of the school to expand. The use of primary school catchments to identify clusters was suggested. It was suggested that the scale of allocations in villages (generally a minimum of 15 dwellings) would be determined by factors such as the scale of existing commitment, range of services, proximity and accessibility to Norwich and other key centres, location on a strategic transport corridor, the opportunities of individual sites and local constraints.
30. A formal decision on the distribution of growth and the approach to the settlement hierarchy was made by the GNDP Board on 29<sup>th</sup> January 2019 through the consideration of a document called 'Towards a Strategy'.
31. The chosen strategy for **the distribution of growth** was discussed in section 4 of the 'Towards a Strategy' document. It was concluded that based on national policy requirements, sustainability, local evidence and consultation feedback, the proposed strategy should combine three key elements of the Growth Options i.e. urban concentration, dispersed growth to sustainable locations in more rural parts and supporting the Cambridge - Norwich Tech corridor. This approach will achieve multiple benefits such as making the best of brownfield opportunities and focussing the majority of growth on urban extensions around Norwich and in the main towns and key service centres. Appropriate growth in accessible villages will support local services, provide choice for the market and promote delivery of a variety of housing types and tenures. This will provide opportunities for people who have grown up there to remain in villages and allow people to take advantage of increasing home

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working opportunities. For more information on the distribution of growth see the Growth Strategy Topic Paper.

32. With regard to **the settlement hierarchy**, the concept of village clusters was discussed at paragraph 4.19 of the 'Towards a Strategy' document which states that *'Board members have been clear that they favour an approach that places all remaining areas of Greater Norwich within a village cluster based on primary school catchments. To reduce additional car journeys and encourage healthy and active lifestyles, and reduce the risks to soundness, it is advisable to limit new housing allocations to sites within the cluster with good access to a primary school and a 'safe route to school'. The scale of growth in any cluster will reflect school capacity or ability to grow, plus the availability of other accessible services. Taking account of the timescales for delivery and other uncertainties, such as pupil preference, it is reasonable to assume that a minimum scale of allocation (15 to 20 dwellings) can be accommodated in all clusters if appropriate sites are available. The identification of sites with the fewest constraints will also help to determine the amount of growth in specific clusters. Under the proposed strategy the clusters will provide around 7% of growth'*
33. The overall figure given for village clusters in the 'Towards a Strategy' document was approximately 2,000 dwellings with specific locations to be the subject of further analysis.
34. Following the agreement of the 'Towards a Strategy' document in January 2019 further work was undertaken to clarify the village clusters concept, develop policy 7.4 for inclusion in the Regulation 18C draft plan and set up the site assessment process.
35. Firstly, every village in Broadland and South Norfolk was designated within a village cluster based on primary school catchments. The GNLP team then worked with Children's Services to look at the capacity of each primary school and their ability to expand. This, along with the availability of other accessible services led to each cluster being rated either 'red', 'amber' or 'green' with a corresponding housing potential. All clusters, regardless of constraints, were considered to be capable of accommodating at least 12-20 homes, so this was the definition of the red cluster. This figure rose to 20-50 homes in amber clusters (depending on local circumstances) and 50-60 homes in green clusters. This classification was a starting point for site assessments based on information provided by Children's Services and there was flexibility within the ratings depending upon the quality of sites and the circumstances of individual schools. Early work looking at the sites submitted and whether there was a 'safe' route to school' within 2km suggested that based on this approach enough suitable sites had been put forward to provide additional land in villages for approximately 2,000 dwellings as suggested in the 'Towards a Strategy' document. This gave confidence to proceed to the full assessment of sites using the village clusters approach. For further detail of the site assessment process see the section on site allocations below.

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36. The minimum number of dwellings for allocation has been set at 12 in both the Greater Norwich Local Plan and the South Norfolk Village Clusters document (see below). Any sites smaller than this number have not been allocated but could potentially come forward as windfall. The threshold of 12 dwellings reflects that fact that sites smaller than this are less likely to achieve the required element of affordable housing.
37. To ensure that the full capacity of submitted sites in sustainable locations had been considered in villages, prior to publication of the Regulation 18C draft plan the GNLP team expanded the site assessment process to look in more detail at brownfield sites and sites that were on school bus routes. This led to the identification of a preferred brownfield site allocation in Horsford and a site on a school bus route in Honingham (which was later deleted from the plan following the Regulation 18C consultation). Work was also undertaken to look at the impact of extending the 'safe route to school' from 2 to 3 km.

## **Regulation 18 consultation, Stage C, Draft Plan (January – March 2020)**

38. Shortly prior to consultation on the Regulation 18, Stage C Draft Plan the decision was taken at a member level to remove the village clusters sites in South Norfolk from the Sites part of the GNLP, although an overall minimum number of houses to find for the South Norfolk villages was to remain in the strategy document. This change was documented in papers to the GNLP Board on 6 January 2020 which stated that as further work would be required to find suitable sites for housing in smaller villages across South Norfolk to support local schools, shops, pubs and post offices without overwhelming local services and facilities South Norfolk Council therefore intended to prepare a South Norfolk Village Clusters Housing Allocations Plan (VCHAP).
39. Paragraphs 30 and 31 of the Regulation 19 plan set out further reasons for the decision to prepare a separate village clusters plan stating that South Norfolk has twice as many parishes as neighbouring Broadland, more market town catchments (including around Beccles and Bungay in Suffolk), significantly less urban fringe and a substantially larger rural territory. This is also reflected in the existing JCS, which identifies 45 Service Villages and 33 Other Villages in South Norfolk and only 15 and 6 respectively in Broadland. Rural South Norfolk also includes two key strategic employment areas at Hethel and Wymondham, and a number of villages associated with the Norwich - Cambridge Tech Corridor.
40. Consequently, the Regulation 18C Sites plan only contained Broadland village sites. The GNLP Strategy documents sets a minimum number of 1,200 new homes in South Norfolk to ensure the overall housing requirement is met. The South Norfolk VCHAP will need to allocate for this number of homes in accordance with policy 7.4 and other policies in the GNLP Strategy.

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41. The intention is to progress the South Norfolk plan as quickly as possible and since it is separate to the GNLP, it will not delay the GNLP's progress. The South Norfolk VCHAP is currently progressing, and a Regulation 18 draft consultation took place from 7<sup>th</sup> June to 2<sup>nd</sup> August 2021. The draft plan has identified preferred option sites, which together with the two Neighbourhood Plans making allocations in the Village Cluster areas, exceed 1,200 homes. The draft plan also included reasonable alternatives and invited the submission of further potential sites. This shows that the GNLP Policy 1 requirement for a minimum of 1,200 homes in the South Norfolk village clusters is appropriate.
42. Policy 7.4 in the draft plan totals 4,024 homes (about 9% of the total number of houses proposed across the GNLP area), this was made up of existing deliverable commitment (including uplift and delivery 2018/19) of 995 in Broadland and 1,349 in South Norfolk and new allocations of up to 480 in Broadland (based on the outcome of site assessments) and a minimum of 1,200 in South Norfolk as shown in draft plan Policy 1. For further details about the final level of growth (updated to reflect 2019/20 delivery) proposed in village clusters relative to the rest of the plan area see paragraphs 44-46 below under the Regulation 19 section.
43. The Regulation 18, Stage C consultation included two questions directly related to village clusters. *Question 45 – Do you support or object or wish to comment on the overall approach for the village clusters? Please identify particular issues and Question 46 – Do you wish to support or object or wish to comment on the approach for specific clusters?* The proposed approach was considered to provide for a suitable amount of growth in villages, an alternative approach would have been to seek more or less development or a different distribution within the villages, although this is limited without breaching normal planning criteria and the sustainable selection of sites.
44. There were 50 responses to question 45 (8 support, 23 object and 19 comments) and 64 responses to question 46 (5 support, 25 object and 34 comments). There was some support for the village clusters approach but the majority of people who responded objected. The main issues raised were:
- Objection to the use of primary school catchments as the basis for defining village clusters
  - Objection to the quantity of housing in village clusters and the threshold size for allocations
  - Objection to the production of a separate South Norfolk Village Clusters Plan
  - No mention of brownfield development or custom homes
  - Minor changes requested to an employment site at Horsham St Faith
  - Objection to the classification of Horsford as a village cluster
- (See [appendix 8 of the Statement of Consultation](#) for the full summaries/responses).

## Regulation 19 Pre Submission (February – March 2021)

45. The consultation comments made at Regulation 18C were considered and only minor changes were made to policy 7.4 between Regulation 18C and Regulation 19.

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Amendments made were to reflect changes in numbers as a small number of site allocations were tweaked in response to representations and to add a reference to the potential for expanding existing small and medium sized employment sites in rural areas.

46. More significant changes to the policy were not supported. The councils are happy with the overall approach to village clusters, the overall quantity of development to be provided in village clusters, the intention to prepare a South Norfolk Village Clusters plan, the position of settlements within the overall hierarchy and the minimum allocation threshold of 0.5ha. Policy 7.4 is considered to be in accordance with the wider vision and objectives of the GNLP.
47. Following minor tweaks policy 7.4 in the Regulation 19 plan allocates 4,220 homes made up of existing deliverable commitment and new allocations as shown in the table below which is an extract adapted from Policy 1 in the Strategy:

Area	Existing deliverable commitment (including uplift and delivery 2018/19 and 2019/20)	New allocations	Total minimum deliverable housing commitment
Village clusters in the remaining parts of Broadland (see policy 7.4 and the GNLP Sites Plan for specific sites) (see appendix 5 details of the clusters)	1,146	482	N/A
Village clusters in South Norfolk (see policy 7.4 and the South Norfolk Village Clusters Housing Site Allocations document for specific allocations)	1,392	A minimum of 1,200	Total across Broadland and South Norfolk Villages = 4,220

48. This means that approximately 9% of the total housing growth for the GNLP is in village clusters, which is a 9% increase on existing stock. This is considered to be an appropriate level of allocations to promote social sustainability and support rural life and services and in balance with the rest of the settlement hierarchy. 80% of the total housing growth in the plan is focussed on the Norwich Urban Area and towns which is important to address issues such as sustainability and climate change, but it is also important to recognise that some growth is needed in villages to ensure their continued vitality and for equity reasons so that people who grow up in a village, or currently live there but require a different property type, have a reasonable expectation of being able to get a home in that village if they wish to do so.

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49. Within the GNLP, growth in villages has been located where there is good access to services to support their retention and therefore reduce the need to travel for village residents. A key element of site selection was a safe walking route to the local primary school. The plan also provides for several relatively small allocation sites as required by para 68(a) of the NPPF and a range of sizes and tenures of new homes to support small-scale local builders and provide choice for the market. The policy allows for infill development within settlement boundaries and affordable led development adjacent or well related to boundaries. It also lists the allocated employment areas within villages and allows for small scale employment development.
50. Appendix 5 sets out the village clusters in Broadland and the amount of growth planned for each cluster. At Regulation 18C it also included two maps, the first illustrated the potential growth in village clusters based on social capacity and the second gave a more realistic view of potential growth based on social and development capacity, to aid people with making their consultation responses but these have been removed in the Regulation 19 version of the plan.
51. The following main issues were raised at the Regulation 19 publication stage:
- There continued to be a number of objections to the production of a separate South Norfolk Village Clusters Plan particularly concerns about conflicting policies, the potential for greater than the minimum 1,200 homes being provided and the difficulty of assessing the impact of development;
  - Insufficient mention or consideration of self/custom build;
  - Too much growth in village clusters/objection to dispersal;
  - Too little growth in village clusters, some of the increase in numbers between Reg 18C and Reg 19 should have gone to villages;
  - Appraisal of settlement boundaries for Broadland villages should have been undertaken;
  - Policy does not allow for growth and expansion of rural businesses, impact of Covid 19 not adequately assessed, approach to employment overly restrictive
  - Policy fails to prioritise rural brownfield sites;
  - Objection to the classification of Horsford as a village cluster rather than a KSC.
52. The GNLP team consider Policy 7.4 as written to be sound and therefore are not intending to make any changes in response to the above comments prior to submission. Officers have given an initial response to the comments raised (see [appendix 11a of the Statement of Consultation](#) for the full summaries/responses). The view on the main issues raised has not changed, the councils continue to support the overall approach to village clusters and the quantum of development to be provided and the position of settlements within the hierarchy. The councils consider that the plan addresses self/custom build, rural brownfield sites and the needs of rural businesses. In addition the South Norfolk Village Clusters Plan continues to progress, with Regulation 18 consultation commencing in June 2021.

## Sustainability Appraisal of Policy 7.4

53. A Sustainability Appraisal of Policy 7.4 has been undertaken. The full appraisal can be seen in appendix C of the Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan (January 2021). In brief Policy 7.4 scores the following through the SA:
54. One double positive score for Housing. This is the same score for all areas of the settlement hierarchy and reflects the positive impact of housing provision across the Plan area. In relation to villages the SA comments that by locating new residential development across smaller villages there is an opportunity for the Plan to diversify the housing market in numerous locations across the Plan area.
55. Three positive scores for Population and Communities, Deprivation and Education. These criteria received positive scores for all areas of the settlement hierarchy, although the higher levels of the hierarchy score double positives for population & communities and education reflecting the closer proximity and access to a wider range of services and facilities in these places. Educational opportunities through growth in villages is still expected to have a minor positive impact.
56. Two neutral scores for crime and historic environment. These are the same scores for all areas of the settlement hierarchy reflecting the fact that it is difficult to predict how crime levels will be impacted by new development and the fact that development in line with Policy 3 to ensure that heritage assets and the local historic environment are conserved and enhanced would be expected to have a negligible impact across the area.
57. Six negative scores for air quality and noise, Biodiversity, Geodiversity & GI, Landscape, Economy, Transport & Access to services and Water. For Biodiversity, Geodiversity & GI, Landscape and Water the scores are similar across the settlement hierarchy. For air quality and noise the score for policy 7.4 is only a minor negative compared to a double negative for other parts of the hierarchy reflecting the fact air quality is likely to be higher in rural villages away from the larger settlements and urban areas. For Economy and Transport, Access & Services the scores for policy 7.4 were negative in comparison with positive scores higher up the settlement hierarchy reflecting the fact that in rural villages some end users could be located relatively far away from employment opportunities and growth in rural locations would be expected to contribute towards a relatively high reliance on personal car use.
58. Three double negative scores for Climate Change Mitigation & Adaptation, Health and Natural Resources, Waste & Contaminated Land. Double negative scores are predicted for Climate Change Mitigation & Adaptation and Natural Resources, Waste and Contaminated land for all sectors of the hierarchy so it is not anticipated that the dispersal of growth to village would have a greater negative impact than elsewhere in the area. One obvious anomaly when compared to other sectors of the settlement hierarchy is the double negative score for health. This reflects the fact that development in villages would lead to a large proportion of new residents being

outside the target distance to hospitals, GPs and leisure centres although there would be excellent access to a diverse range of habitats and outdoor recreation opportunities.

59. In conclusion, when compared against the sustainability appraisal scores for other parts of the settlement hierarchy, policy 7.4 is considered to be appropriate and when weighed against the potential benefits of small scale growth in villages outlined at paragraphs 45-46 above it is not considered that the dispersal of some growth to villages would have any significant unacceptable impacts.

## Consideration of sites in Villages clusters

60. The following sections explain the consideration of sites for allocation to meet the requirements of Policy 7.4 in the GNLP Part 2 – Sites Plan.

### Call for Sites 2016

61. A 'Call for Sites' was held in the spring and summer of 2016. This enabled those who wished to promote parcels of land for a particular use or development to submit this land for consideration for potential allocation in the GNLP. Possible land uses included housing, employment, leisure and community uses. Initial sites were put forward in a number of Broadland and South Norfolk villages.

### Regulation 18, Stage A – Site Proposals Document

62. Regulation 18 Stage A public consultation took place between 8 January and 22 March 2018. This included consultation on more than 600 sites in total put forward through the 'Call for Sites' process.(see [appendix 4 of the Statement of Consultation](#) for summaries of the consultation comments received). No assessment of sites took place at this stage – the purpose of the consultation was simply to seek views on the sites which had been promoted.
63. In total a further 180 sites were submitted through the consultation with 22 revisions to existing sites proposed. These sites were consulted on at Stage B – see below.

### Regulation 18, Stage B – New, revised and small sites consultation

64. Regulation 18 Stage B public consultation took place between 29 October and 14 December 2018. This was a focussed consultation on new, revised and small sites and in total included 235 sites (181 new sites, 26 revised and 28 small sites). (see [appendix 6 of the Statement of Consultation](#) for summaries of the comments received). As with Stage A no assessment of sites took place at this stage.
65. A total of 58 further sites were submitted during this consultation. These sites were consulted on at Stage C – see below.

## Regulation 18. Stage C – Draft Plan consultation

66. Following the Regulation 18 Stage A and B consultations assessment took place of the sites promoted. The basic principles for site assessment were set out in the 'Towards a Strategy' document referred to earlier and in the case of villages grouped sites within 'village clusters' based upon primary school catchments rated red, amber or green as discussed above. A key requirement was that new housing allocations within village clusters should be on sites with good access to a primary school and a 'safe route to school' to reduce additional car journeys and encourage healthy and active lifestyles.
67. Site assessment booklets were created for each village cluster to document the site assessment process. Full information regarding the site assessment process can be found in the [Site Assessment Booklets – Introduction and Methodology](#). Unsuitable sites were screened out at an early stage to leave a shortlist of sites with potential for allocation that were subject to further assessment. A Sustainability Appraisal was undertaken of all shortlisted sites.
68. The outcome of the site assessment process was to identify sites in Broadland villages as either preferred, reasonable alternatives or unreasonable for the Regulation 18C draft plan consultation. In total 15 preferred sites were identified in villages totalling up to 480 dwellings (reflected in Policy 7.4) and 2 reasonable alternative sites. Full details of the sites can be viewed in the [Broadland Village Cluster Site Assessment Booklets](#) which can be found in the Regulation 19 evidence base.
69. Regulation 18 Stage C public consultation on the draft plan took place between 29 January – 16 March 2020. As discussed above this consultation excluded South Norfolk villages which are the subject of a separate South Norfolk Village Clusters Plan being prepared by South Norfolk Council. The consultation included sites carried forward from existing local plans.
70. Through the Regulation 18C consultation a further 61 new sites were submitted and 38 revisions to existing sites, with 25 of the new sites and 14 of the revised sites being in Broadland village clusters.
71. See [appendix 9f of the Statement of Consultation](#) for a summary of the consultation comments made at Regulation 18C with responses and any suggested changes to the plan. The main village cluster sites commented on through the consultation are listed below. The majority of comments received were objecting to their proposed allocation:
- GNLP0379 – Land north of Post Office Road, Lingwood – Preferred Site – 92 reps (88% objections)
  - GNLP3003 – Mill Road, Reedham – Preferred Site – 58 reps (86% objections)
  - GNLP2019 – Land at Rectory Road and south of the Bure Valley Railway, Coltishall – Preferred Site – 51 reps (88% objections)

- GNLP1001 – Land to east of Station Road, Reedham – Preferred Site – 41 reps (88% objections)
- GNLP2176 – North of Dereham Road, Honingham – Preferred Site – 40 reps (85% objections)

## Regulation 19 – Pre submission

- Following the Regulation 18C consultation two main pieces of work were undertaken in relation to sites in village clusters.
- Firstly, the new and revised sites promoted through the consultation were taken through the same site assessment and SA process as the original sites to look at their potential for allocation. This process was documented through the site assessment booklets for each cluster referred to above. Secondly, consultation comments and any further evidence submitted through the Regulation 18C consultation were taken into account when deciding whether to make any changes to the preferred sites in the Broadland village clusters.
- This resulted in a small number of changes to the allocations in Broadland village clusters for the Regulation 19 version of the plan. Most were minor changes/additions of policy requirements in response to comments made, particularly from Anglian Water and Historic England. More significant changes were:
  - Amendment to the boundary of site GNLP1048 in Blofield Heath to reflect recent planning permissions
  - Amendment to the boundary of site GNLP0608 in Great Witchingham to remove area of open space as requested by site promoter
  - Amendment to the boundary of site GNLP0125R in Horsham St Faith and increase to 50 dwellings as requested by site promoter
  - Amendment to the boundary of carried forward allocation HNF3 in Horsham St Faith to include site GNLP4061 as requested by site promoter
  - Delete site GNLP0379 in Lingwood and replace with two allocations of 30 dwellings on sites GNLP0380 and 4016 in response to high level of objections to site GNLP0379 particularly from local residents
  - Delete site GNLP2176 in Honingham in response to objections to its suitability for allocation

Policy 7.4 figures were tweaked accordingly.
- The Regulation 19 publication stage took place for six weeks from 1 February 2021 to 15 March 2021. The following main issues were raised in relation to village cluster sites:
  - Anglian Water objections regarding assets being located within the boundary of some allocated sites . Request for new supporting text and policy requirement (BLO5, 0297, FOU2, 0264, HNF1, 0188)
  - Foulsham – a lot of local opposition – issues of important historic hedgerow and access raised
  - Horsford – recent flooding being investigated by NCC

- Horsham St Faith – increase in numbers without consultation. Historic England objection – request for HIA
- Lingwood – introduction of site GNLP4016 without consultation
- Marsham – alternative site GNLP3035. Historic England objection – request for HIA
- Lack of allocations in the Great and Little Plumstead cluster
- Reedham – lack of consistency – no safe route to school
- South Walsham – potential change of access point

76. The GNLP team consider the sites chosen for allocation in village clusters to be sound and therefore are not intending to make any changes in response to the above comments prior to submission. Officers have given an initial response to the comments raised (see [appendix 11b of the Statement of Consultation](#) for the full summaries/responses). A number of minor modifications are considered appropriate to provide clarification, updates and corrections of errors mainly in response to representations made at the Regulation 19 stage and these will be collated in a schedule of minor modifications.

## Sustainability Appraisal of sites

77. The sustainability performance of each reasonable alternative site has been considered in the selection of sites. The Sustainability Appraisal includes a scoring and assessment narrative on the sustainability of each reasonable alternative and recommendations for mitigation measures which have been incorporated into policy requirements for allocated sites as appropriate. The Sustainability Appraisal of sites includes pre and post mitigation assessment and demonstrates that the selection of sites for allocation is sound. The [Sustainability Appraisal](#) can be found in the Regulation 19 Evidence Base.

## Conclusions

78. This topic paper explains the evolution of Policy 7.4, in particular the reasons for the village clusters approach and decision to prepare a separate South Norfolk Village Clusters Housing Allocations Plan.
79. The number of homes proposed on newly allocated sites in village clusters is 4,220, representing about 9% of the total housing growth and a 9% increase on existing stock. This is considered to be an appropriate figure when compared against the growth strategy overall which focusses the majority of growth to the Norwich Urban area and towns.
80. An element of residential growth in villages is important to sustain rural vitality and support existing services and facilities in village as well as providing opportunities for local people to get a home in the village where they grew up and meets the requirements of para 78 of the NPPF 'to promote sustainable development in rural areas'.

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81. Site allocations in villages have been located where there is good access to services and facilities, particularly a primary school with a safe walking route to school. Allocations within villages can support small-scale local builders, provide choice for the market and help to fulfil the requirement for small sites under 1 hectare in para 68 (a) of the NPPF.