

Date: 2<sup>nd</sup> August 2021  
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Dear South Norfolk Council,

### **South Norfolk Village Clusters Local Plan**

Thank you for consulting Suffolk County Council (SCC) on the Village Clusters Local Plan. This response makes comments regarding cross boundary issues which may result from the chosen distribution of the Village Clusters Local Plan. Particularly around the market towns around county the boundary, which will serve communities on both sides of the border, such as Bungay and Beccles.

#### Education

The responsibility for providing school places in Norfolk is Norfolk County Council, however there is movement of school pupils across boundaries (in both directions) due to parental choice. There are a number of chosen sites at the stretch of the county boundary between Bungay, Beccles and Worlingham where it is most likely where this would occur, particularly where Suffolk Schools are closest to the proposed sites.

Bungay, Beccles and Worlingham have allocated development in the Waveney Local Plan, along with associated education infrastructure to mitigate impacts. The 1200 dwelling settlement expansion of Beccles and Worlingham (Waveney Local Plan Policy WLP3.1) will contain its own new primary school. Allocations in Bungay set aside land for the expansion of Bungay High School.

Some cross boundary movement of pupils is inevitable, and the Village Clusters Local Plan should ensure that there is sufficient education capacity on the Norfolk side of the boundary to meet the needs of new housing.

#### Flood and Water Management

The Village Cluster Local Plan includes in its supporting documents an up to date water cycle study and a Strategic Flood Risk Assessment for the Greater Norwich Local Plan. However the more recent "Level 2" water cycle study from the Greater Norwich Local Plan evidence base has not been included and it is not clear why<sup>1</sup>. This document should be included in the plan evidence base, or an explanation as to why it is not relevant should be given.

#### Public Rights of Way and Countryside Access

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<sup>1</sup> [https://www.gnlp.org.uk/sites/gnlp/files/2021-02/DWG-JBAU-XX-XX-RP-Z-0002-S3-P02.02-GN\\_L2\\_SFRA\\_Final\\_Report.pdf](https://www.gnlp.org.uk/sites/gnlp/files/2021-02/DWG-JBAU-XX-XX-RP-Z-0002-S3-P02.02-GN_L2_SFRA_Final_Report.pdf)

SCC seeks to improve access to the countryside and the Public Rights of Way (PRoW) network where possible and would support planning policies which do so. Due to the closeness of some of the sites to the Suffolk border it is likely that new residents may wish to access the countryside in Suffolk. As such, where possible policies should support connections of public rights of way between the counties.

Where there are opportunities to improve PRoW connectivity across the Norfolk and Suffolk border, SCC recommends they are taken and are happy to work in partnership with South Norfolk District Council and Norfolk County Council in achieving this.

### Transport

The Waveney, Suffolk Coastal and emerging Babergh and Mid Suffolk Joint Local Plan have been prepared with the support of the Suffolk Transport Model. The model shows that the areas of Suffolk that may be affected by the allocations in the Village Clusters Local Plan (mainly towns in the former Waveney area along the county boundary) are not on especially constrained parts of the Suffolk highway network. It is not expected, given the small size of the sites, that the proposed allocations would have significant impact on the Suffolk highway network.

Market towns along the border, such as Bungay and Beccles, are likely to be destinations for new residents accessing local services. It is welcome that this is recognised in the Sustainability Appraisal (SA). Policies allocating sites in the vicinity of these settlements should require good walking and cycling connections to these settlements.

Other than the SA, there does not appear to be any other transport evidence within the supporting documents. While SCC previously mentioned that it did not envisage significant impacts on the highway network. A high level assessment of the impact caused by the Village Clusters Local Plan should be undertaken.

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I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have. As previously mentioned the county council is willing to discuss anything raised in this response.

Yours sincerely,

Cameron Clow  
Senior Planning and Growth Officer  
Growth, Highways, and Infrastructure