

South Norfolk Village Clusters Housing Allocations Plan

(Regulation 19 Pre-submission Draft)

- 1.1. The following submissions consist of firstly comments on section 16 “Gillingham, Geldeston, and Stockton” of the Regulation 19 Pre-submission Draft of the South Norfolk Village Cluster Allocations Plan with specific comments on Gillingham.
- 1.2. The second set of submissions relates to the non-allocation of an area of land to the north of the street reference (SN0274) and the impact that this has on the soundness of the plan in relation to the residential allocations.

16. Gillingham, Geldeston, and Stockton

Form and Character

Gillingham

16.1.

NO COMMENTS

16.2.

NO COMMENTS

Services and Community Facilities

16.5. The cluster has a range of social and community facilities comprising a primary school, village hall and motel in Gillingham and a village hall and pub in Geldeston. Gillingham has a regular bus service to all local towns. There is a more limited bus service in Geldeston, to Diss, Bungay, Beccles and Yarmouth. There is a petrol station, with a convenience store, and fast-food restaurants to the north at the A146/A143 roundabout, which have a direct pedestrian/cycle link from the village.

COMMENT: It is submitted that the facilities at the A146/A143 should be described in greater detail in relation to planning application 2020/0491 which includes a farm shop and application 2023/0187 (still to be determined) which seeks to provide an electric vehicle charging hub and associated shop, a drive-thru cafe/restaurant/sandwich shop/bakery and two buildings for use within Class E (g) (iii), B2 and B8 including trade counters and ancillary showrooms. The area provides both services to the residents of the village as well as job opportunities. The ongoing expansion of the area can help to support the housing increase.

Settlement Limit

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Gillingham

16.6. The Settlement Limit is in two parts. The first includes the main built form of the settlement. The second part is around the school and adjoining housing, an area which has been extended to include the recent development at Daisy Way, which was allocated in the 2015 Local Plan.

COMMENTS: The boundary of the Settlement Limit (red line) around Daisy Way and Tulip Close does not encompass all of the dwellings which have been approved and built. A strange 'gap' has been created between the boundary of the proposed allocation and the proposed settlement boundary.

VC GIL1

16.8. The site lies to the south of a detached area of existing residential development and Gillingham St Michael's Primary School, south of Geldeston Road/The Street, at the western end of the village. The site is well located for the local services, including a newly created pedestrian and cycle route to services at the A143/A146 junction, and buses on the main Norwich/Beccles route. Main facilities in Beccles are also within a reasonable cycling distance of the site.

COMMENT It is submitted that in addition to the reference to 'services,' there should be a reference to local employment opportunities offered by the facilities.

16.9.

NO COMMENTS

16.10.

NO COMMENTS

16.11. At the Regulation 18 stage of the VCHAP the site boundaries were drawn further to the east and included areas within Flood Risk Zones 2 and 3a and tidal flooding. Following the outputs of the Stage 2 Strategic Flood Risk Assessment (SFRA), the site boundaries were moved further east. However, this also incorporates areas at both surface and fluvial (Zones 2 and 3a) flood risk in the south-western corner and a remaining small area of tidal flooding in the southeast corner, which it is recommended are left undeveloped. Development of the site will require a site-specific Flood Risk Assessment (FRA) and strategy, to inform the layout of the site.

COMMENT The need for a full FRA is noted.

16.12. The site is immediately south of Gillingham St Michael's Primary School and would landlock the school if developed out in its entirety. The VCHAP currently proposes 35 dwellings on this site and a further 20 within the school catchment at Geldeston (VC GEL1), which would add a modest

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number of pupils to the school. As both villages also experienced growth under the 2015 Local Plan and Gillingham has other sites that were shortlisted in the VCHAP Regulation 18, which are still being actively promoted, it would be reasonable to expect that there will continue to be growth in the future. As such, the County Council has requested that 0.5ha of land be safeguarded for the expansion of the Primary School, that would facilitate integration with remainder of the site when brought forward.

COMMENT The land requirement is noted.

16.13. The site is noted as being amber for great crested newt, due to the pond adjacent to the school. The site is also within an SSSI Impact Risk Zone and, as a development of over 10 units, is likely to require consultation with Natural England.

COMMENT The need is noted

16.14. Although the site is 2.36ha, the allocation is for approximately 35 dwellings, reflecting the need to safeguard 0.5ha of land for F1(a) use for the Primary School and the need to address flood risk issues.

Policy VC GIL1: South of Geldeston Road and Daisy Way

2.36 ha of land is allocated for approximately 35 dwellings.

The developer of the site will be required to ensure:

- **Vehicular and pedestrian access via Daisy Way;**
- **Pedestrian links to footpaths Geldeston FP8 and FP9 to the west of the site;**
- **Facilitation of the formal diversion of footpath Gillingham FP12, or the incorporation of the formal route into the layout of the site;**
- **A site-specific Flood Risk Assessment (FRA) and strategy that has regard to the issues identified in the Stage 2 VC Strategic Flood Risk Assessment (SFRA), to inform proposals for the site and preparation of a Flood Warning and Evacuation Plan;**
- **A full Landscape Assessment to inform the scale, form and density of the development, as well as the extent of the protection and enhancement of the existing vegetated boundaries;**
- **0.5ha of land set aside for Use Class F1(a), for future expansion of Gillingham St Michael's Primary School.**

COMMENT The overarching requirements as set out in section 16.4 are noted

1.3. During the call for sites stage of the VCHAP two sites were put forward for Gillingham.

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- 1.4. The land to the south of The Street is a proposed allocation in the plan. The land to the north of The Street has not been included as an allocation.
- 1.5. It is submitted, for the reasons set out below, that the uncertainty surrounding the implementation of the plan as a result of the impact of Nutrient Neutrality undermines the overall aims of achieving a proscribed number of dwellings.
- 1.6. The land to the north (SN0274) was shortlisted as a potential allocation. While the exact extent of the Flood Zone would need to be established in detail it was noted that there were few other planning constraints. It was also noted that the site would help to provide good connections to the service/employment land to the north.
- 1.7. The allocation of the northern site could provide much-needed amenities like a proper playground and a Multi-Use Games Area as shown in the proposed application. An all-weather area that can be used as a coloured playground and can be designed to accommodate a wide range of sports, training and games. A MUGA pitch would be an important community asset for the village.
- 1.8. The need for affordable housing within Gillingham could be increased by the construction of a greater number of units than would normally arise from the Local Plan percentages.
- 1.9. The allocation of the site would enable a continuous flow of housing development to take place rather than the 'feast and famine' which results from the plan-making cycle of the Local Plan process.
- 1.10. The VCHAP both in the main report and the Viability Appraisal document details, as far as possible, the impact of Nutrient Neutrality.
- 1.11. The Viability Appraisal seeks to determine if *"a 'surplus' is generated to enable either a Nutrient Neutrality Tariff to be levied for 'off-site mitigation, that a proposed development has sufficient capacity to cover any increase in 'on-site mitigation costs, or, a combination of both 'on' and 'off-site costs'".* The final details have yet to be modelled and resolved and this introduces a degree of uncertainty in meeting the aims of the plan.
- 1.12. At present, there appears to be no time frame available as to when the issues associated with Nutrient Neutrality and possible 'Tariff' will; be resolved. In

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addition, it is uncertain if the developers of the sites will be able to comply with any tariff requirements.

- 1.13. Residential land allocations in some settlements are located within Nutrient Neutrality Zones. This means that while the VCHAP process can move forward there is a strong possibility that the construction of dwellings will be delayed for a yet unknown time. The table, taken from the VCHAP documentation shows those settlements, including the site allocations which are being 'brought forward' from the previous plan are currently subject to 'Nutrient Neutrality constraints.
- 1.14. The table shows that of the 1122 dwellings shown as allocations 413 (37%) are subject to nutrient Neutrality constraints. Of the 173 dwellings carried forward from 2015 145 (84%) are subject to Nutrient Neutrality constraints
- 1.15. The land to the north of The Street is not subject to Nutrient Neutrality constraints and if allocated could be developed in a short time and make a contribution to the housing provisions of the plan.
- 1.16. It is submitted that the plan is over-optimistic regarding the impact of Nutrient Neutrality on the allocations. As a result, it fails the test of soundness.

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List of Allocations

Parishes highlighted in 'red' are in the Nutrient neutrality zone

Parish	Ref	Location	Allocation Numbers	Net Additional Dwellings
Alpington	VCALP1	Land at Church Meadow	25	25
Bergh Apton	VCBAP1	Former concrete works site, Church Road	25	25
Great Moulton	VCGRE1	Land west of Heather Way, Great Moulton	12	12
Aslacton	VCASL1	Land off Church Road	35	35
Barford	VCBAR1	Land at Cock Street and Watton Road, Barford	19	19
Barnham Broom	VCBB1	Land on the corner of Bell Road and Norwich Road	40	40
Bawburgh	VCBAW1	Land east of Stocks Hill	35	35
Bressingham	VCBRE1	Land east of School Road	40	40
Brooke	VCBRO1	Land at Norwich Road	50	50
Bunwell	VCBUN1	Land to the north of Bunwell Street	15	15
Bunwell	VCBUN2	Land opposite Lilac Farm, Bunwell Street	20	20
Ditchingham	VCDIT1	Thwaite Rd/ Tunneys Lane	35	35
Earsham	VCEAR1	Land east of School Road, Earsham	24	24
Geldeston	VCCEL1	Land off Kells Way	20	20
Gillingham	VCCEL1	Land south of GIL1 site	35	35
Hales & Heckingham	VCHAL1	Land off Briar Lane, West Hales	35	35
Hempnall	VCHEM1	Land at Millfields	15	15
Ellingham	VCELL1	Land south of Mill Road, Ellingham Island	25	25
Ellingham	VCELL2	Florence Way	12	12
Little Melton	VCLM1	Land at School Lane & Burnthouse Lane, Little Melton	35	35
Swardeston	VCSWA1	Land off Bobbins Way	20	20
Mulbarton	VCMUL1	Land south of Rectory Lane	35	35
Needham	VCNEE1	Land north of High Road and Harman's Lane	15	15
Wortwell	VCWOR2	Land at Mill Hill, High Road,	12	12

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Parish	Ref	Location	Allocation Numbers	Net Additional Dwellings
		Wortwell		
Newton Flotman	VCNEW1	South of Alan Avenue	25	25
Pulham St Mary	VCPSM1	Land northwest of Norwich Road and Poppy's Lane	50	50
Rockland St Mary	VCROC1	Land west of Lower Rd, south of New Inn Hill	25	25
Rockland St Mary	VCROC2	Land south of The Street	25	25
Seething	VCSEE1	Land west of Mill Lane	12	12
Spooner Row	VCSP01	Land west of Bunwell Rd	15	15
Spooner Row	VCSP02	Land south of Station Road	25	25
Stoke Holy Cross	VCSTO1	Land north of Long Lane	25	25
Tacolneston	VCTAC1	Land to the west of Norwich Road	25	25
Tasburgh	VCTAS1	Land north of Church Road & west of Tasburgh school	25	5
Thurlton	VCTHU1	Land north of Blacksmiths Gardens, Thurlton	12	12
Thurlton	VCTHU2	Land adjacent to Holly Cottage, west of Beccles Road	10	10
Tivetshall St Mary	VCTIV1	Pear Tree Farm, west of The Street	20	20
Haddiscoe	VCHAD1	Haddiscoe Manor Farm	35	35
Burgh St Peter	VCBUR1	North of Staithe Road	12	12
Wicklewood	VCWIC1	Land to the south of Wicklewood Primary School	30	30
Wicklewood	VCWIC2	Land off Hackford Road	12	12
Winfarthing	VCWIN1	Land to the west of Hall Road	20	20
Winfarthing	VCWIN2	Land off The Street	20	20
Woodton	VCWOO1	Land south of Church Road	50	50
Ashwellthorpe & Fundenhall	VCASH1	Land to the west of New Road	15	15
		Allocation Total	1,122	1,102

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Table 2 Neighbourhood Plan Allocations

Parish	Ref	Location	Allocation Numbers	Net Additional Dwellings
Scole	DDNP11	Land east of Norwich Road, Scole	50	50
Scole	DDNP10	Flowerdew Meadow, Norwich Road, Scole	25	10
Roydon	DDNP8	Land south of Roydon Primary School, Roydon	25	25
Burston	DDNP9	Land west of Gissing Road, Burston	25	25
Dickleburgh	TBC	TBC	25	25
Neighbourhood Plan Total			150	135

2. Table 3 Carried Forward 2015 Allocations

Parish	Ref	Location	Allocation / Permission Numbers	Net Additional Dwellings
Great Moulton	VCGRE2	North of High Green, West of Heather Way	14	0
Carleton Road	VCCAR1	Land west of Rode Lane	3	-2
Hales	VCHAL2	Land at Yarmouth Road, west of Hales Hospital	23	3
Bracon Ash	VCBRA1	Land at Norwich Road, Bracon Ash	20	0
Swardeston	VCSWA2	Main Road	30	0
Wortwell	VCWOR2	Land at the junction of High Road and Low Road	5	0
Newton Flotman	VCNEW2	Land adjacent Alan Avenue	30	0
Spooner Row	VCSP03	Land at School Lane	7	2
Spooner Row	VCSP04	Land at Chapel Road	14	0
Tacolneston	VCTAC2	Land adjacent the Fields	21	1
Wicklewood	VCWIC3	Land at Hackford Road	6	0
Carry Forward Allocations Total			173	4