

Date: 6<sup>th</sup> March 2023  
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Our Ref:



South Norfolk Council  
Thorpe Lodge  
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Dear South Norfolk Council,

### **South Norfolk Village Clusters Local Plan: Regulation 19 Consultation**

Thank you for consulting Suffolk County Council (SCC) on the Village Clusters Local Plan. Suffolk County Council supports South Norfolk Council's efforts to put a plan in place to guide sustainable growth.

Generally, SCC supports the draft Village Clusters Local Plan. However, we consider there are some matters that require further evidence for the Plan to be considered sound in accordance with paragraph 35 of the National Planning Policy Framework (NPPF). This response will set out where SCC considers the Plan not to be sound, explain which of the tests of soundness have not been met and provide details of additional evidence required to make it sound.

The 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 close to the boundary. These towns will serve communities on both sides of the border, such as Bungay, Beccles and Diss.

#### 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 proposed allocations, particularly in communities along the Norfolk/Suffolk border in the vicinity of Bungay, Beccles and Worlingham, where this is most likely to occur. Although, this could occur in other locations along the border as well.

As stated in SCC's response to the Regulation 18 consultation, dated 2<sup>nd</sup> August 2021, Bungay, Beccles and Worlingham have allocated development in the Waveney Local Plan, along with associated infrastructure, including education, to mitigate impacts. The 1,200 dwelling settlement expansion of Beccles and Worlingham (Waveney Local Plan Policy WLP3.1) will contain its own new primary school to meet the educational needs of the development. Allocations in Bungay set aside land for the expansion of Bungay High School.

SCC's previous response stated that the Village Clusters Local Plan should ensure there is sufficient education capacity in Norfolk schools to accommodate all growth proposed within the draft Plan. However, the current submission documents provide no evidence that this is the case. In SCC's view this lack of evidence renders the Plan unsound (in accordance with the tests set out at paragraph 35 of the NPPF). Without this evidence SCC considers the Plan has not been positively prepared. The need for school places arising from the proposed allocations has not be identified and evidence of how this need will be met, either entirely within Norfolk or through agreement with SCC that some pupils arising will be accommodated at Suffolk schools, has not been provided. Similarly, SCC considers this lack of evidence means the Plan in its current form is not appropriately justified.

SCC request that appropriate evidence is provided to demonstrate that pupils arising from the proposed growth can be accommodated at Norfolk schools.

### 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 Norfolk/Suffolk border) 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.

However, in our previous response, dated 2<sup>nd</sup> August 2021, SCC stated that a high-level assessment of the impact caused by the Village Clusters Local Plan should be undertaken. The current Regulation 19 draft does not appear to be accompanied by any strategic assessment of cross border traffic impacts arising from the proposed allocations and we have had no further engagement with South Norfolk Council following our 2021 response.

We are aware that the South Norfolk Village Clusters Local Plan has been developed alongside the Greater Norwich Local Plan. A review of the evidence base for the Greater Norwich Local Plan has shown that no strategic cross border assessment, which addresses the Village Cluster allocations was completed for this Plan.

Nevertheless, following recent conversations with Norfolk County Council, we are not anticipating any significant impacts on traffic in Suffolk as a result of the proposed allocations. Though, we would still welcome discussions regarding the creation and enhancement of sustainable, walking and cycling, transport links between Norfolk villages close to the border and key destinations in Suffolk.

I hope that these comments are helpful. SCC would be happy to engage further on both matters raised. Please contact me via the contact details at the top of this letter, if I or my colleagues can be of any assistance.

Yours sincerely,

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Growth, Highways, and Infrastructure  
Suffolk County Council