

Norfolk County Council Response to:

South Norfolk Alternative Sites & Focused Changes (Regulation 18) for: the Draft Village Clusters Housing Allocations Plan (VCHAP)

January 2024

1. Introduction

- 1.1. The County Council welcomes the opportunity to comment on the additional Village Cluster sites. The Comments below are made on a without prejudice basis and the County Council reserves the right to make further comments on the emerging draft VCHAP. Please note that the County Council's previous comments made to the emerging VCHAP remain valid.

2. Minerals and Waste

2.1. SN0218 REV, Land north of The Street, Earsham

Norfolk Minerals and Waste Core Strategy Policy CS16 'Safeguarding mineral and waste sites and mineral resources' applies as the proposed allocation, SN0218, is located within the consultation area for safeguarded mineral extraction site, Earsham Quarry, which is only 25m from the boundary of SN0218 at the closest point, with the A143 in between. The site assessment should include this information. Therefore, the policy wording for this site should state: 'The site is within the consultation area for a safeguarded mineral extraction site and the development must not prevent or prejudice the use of the existing mineral extraction site unless suitable alternative provision is made, or the applicant demonstrates that the site no longer meets the needs of the aggregate industry.'

2.2. VC DIT1 REV, Land at Thwaite Road and Tunney's Lane, Ditchingham

Proposed allocation VC DIT1 REV is 2.42ha and underlain by safeguarded mineral resource, sand and gravel. We consider that it is appropriate and relevant for the requirements of a strategic policy (in this case Policy CS16 of the Norfolk Minerals and Waste Core Strategy) to be included in a site allocation policy where it sets out how the policy will apply to a specific site at the development management stage. Therefore, the policy wording for this site should state: 'This site is underlain by a safeguarded mineral resource; therefore investigation and assessment of the mineral will be required, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place.'

2.3. VC SWA2, Land on Main Road, Swardeston

Proposed allocation VC SWA2 is 2.7ha and underlain by safeguarded mineral resource, sand and gravel. We consider that it is appropriate and relevant for the requirements of a strategic policy (in this case Policy CS16 of the Norfolk Minerals and Waste Core Strategy) to be included in a site allocation policy where it sets out how the policy will apply to a specific site at the development management stage. Therefore, the policy wording for this site should state: 'This site is underlain by a safeguarded mineral resource; therefore investigation and assessment of the mineral will be required, potentially followed by prior extraction to ensure that

needless sterilisation of viable mineral resource does not take place.'

- 2.4. Should you have any queries with the above comments please contact: Caroline Jeffery (Principal Planner) - caroline.jeffery@norfolk.gov.uk

3. **Historic Environment**

- 3.1 Please see historic environment comments below:

Alpington Amber	Earsham Amber – cropmark of significant prehistoric remains
Barford Amber – both sites	Gillingham Amber - there has already been a planning application for this site
Barnham Broom Amber – site of WW2 compound	Swardeston Amber - there has already been a planning application for this site
Bawburgh Amber	Spooner Row Amber
Broome Amber	Tacolneston Amber - there has already been a planning application for this site
Ditchingham Amber	Wicklewood Amber

- 3.2 Amber means that archaeological mitigation will probably be necessary but is unlikely to prevent development.

- 3.3 Should you have any queries please contact: Steve Hickling, Historic Environment Officer - steve.hickling@norfolk.gov.uk

4. **Education**

- 4.1 Please see attached Excel Spreadsheet with Children's Services' comments.

- 4.2 Should you have any queries with these comments please contact Paul Harker – Place Planning Manager - Paul Harker paul.harker@norfolk.gov.uk

5 **Highways / Transport**

5.1 **Alpington SN0433, Land south of Wheel Road**

The revision to the proposed layout is noted, however the improvements identified in the earlier Highway Authority response are still required e.g. carriageway widening to 5.5m, along with 2.0m wide footway. The proposal to access development via private drives might reduce impact, but an acceptable highway layout would still require extensive removal of the existing frontage hedge.

Subject to the above, the Highway Authority does not object to the proposal.

5.2 **Barford**

SN6000 Land North of Chapel Street, Barford

The Highway Authority does not object to the proposed allocation, subject to provision of acceptable visibility splays at the site access. Highway improvements are also required to include 2.0m wide footway at the site frontage with a safe crossing for pedestrians to access existing footway at the south side of Chapel Street and a 20mph zone.

5.3 **SN0552REVC Land at Watton Road**

The Highway Authority would not object to the proposed allocation, subject to provision of visibility splays, measuring 2.4m x 120m in both directions, 2.0m wide footway to provide a safe route between the site and the village, this may include a requirement for of a safe pedestrian crossing at the B1108, assessment of the village speed limit and implementation of recommendations. Improvement to Back Lane may also be required.

5.4 **Barnham Broom**

SN0055 Land east of Spur Road and south of Norwich Road

No objection subject to vehicular access from Norwich Road only, with suitable visibility splays and pedestrian access at Spur Road. 2.0m wide footway to be provided at Norwich Rd frontage and at north side of Norwich Road with safe crossing to tie in with ex facility to west of site. New 2.0m wide footway to be provided at Spur Road between the site and Norwich Road.

5.5 **Bawburgh**

VC BAW1 REV Land to the east of Stocks Hill

No objection subject to satisfactory access visibility

5.6 **Ditchingham**

VC DIT1 REV Land at Thwaite Road and Tunney's Lane

The Highway Authority does not objection subject to satisfactory access.

5.7 **Broome**

SN4020 Land west of Old Yarmouth Road

No objection subject to footway widening at site frontage along with enhanced speed limit signing to east of site. The enhanced signing could comprise a vehicle activated sign and/or village gateway.

5.8 **Earsham**

SN0218 REV, Land north of The Street

The site should be accessed via The Street only. The access would require suitable visibility splays, along with extension of the 30mph speed limit and relocation of the speed reducing gateway feature.

A 2.0m wide footway would be required at The Street, between the site access and

Milestone Lane to connect with the existing facility, this would need to include a simple pedestrian crossing.

Trees east of the development, at the north side of The Street could present a constraint to delivery of footway if they are 3rd party owned. At the south side of The Street, some hedging is present, along with a ditch. In some instances, carriageway can be utilised for footway delivery, The Street is a bus route and needs to be maintained at 6.5m wide.

The Highway Authority would not object to allocation of the site if the promotor demonstrates that a satisfactory footway as above can be delivered.

5.9 **Gillingham**

VC GIL1 REV, South of Geldeston Road and Daisy Way

It is understood that Daisy Way is a private unadopted road. The Highway Authority policy is for a maximum of 9 dwellings accessed via a private drive. However, subject to the development access being laid out to an adoptable standard, the Highway Authority does not object to the allocation revision.

5.10 **Swardeston**

VC SWA2, Land on Main Road,

The Highway Authority does not object to the revised allocation

5.11 **Spooner Row**

VC SPO1 REV, Land west of Bunwell Road

The Highway Authority does not object to the revised allocation

5.12 **Tacolneston**

VC TAC1 REV, Land to the west of Norwich Road

The Highway Authority does not object to the proposed amendment, increasing the allocation frontage overcomes concerns with the original allocation.

5.13 **Wicklewood**

VC WIC1 REV, Land to the south of Wicklewood Primary School

The Highway Authority does not object to the revised allocation

5.14 Should you have any queries with the above comments please contact Dave Wilson Highway Engineer david.wilson@norfolk.gov.uk; or Richard Doleman Principal Transport Planner richard.doleman@norfolk.gov.uk

6 **Environment**

6.1 All sites should be subject to a full site assessment, appropriate surveys and consultation with any relevant organisations and bodies.

6.2 **SN0433, Land south of Wheel Road, Alpington**

There is a County Wildlife Site to the north of the site, whilst it is not understood if this currently benefits from public access (formal or informal), any increased pressure of nearby development should be considered.

FP11 is immediately north of the site and consideration should be given as to whether a crossing point would be required to facilitate access to the wider countryside from the development. It is expected that the development could increase footfall and recreational pressures on both FP11 and FP9.

The Site is immediately adjacent to the settlement boundary but will infill a current open space between existing isolated dwellings, the scheme should be designed in such a way as to be sensitive to this.

Entire loss of the hedgerow and trees to the frontage of the site along Wheel Road would be unacceptable and consideration will need to be given as to what would constitute an acceptable loss for highways access and visibility splays. Any losses would need to be suitably mitigated, likely with mixed native hedgerows.

6.3 **SN6000, Land north of Chapel Street, Barford**

The Yare Valley County Wildlife Site is situated to the North of the site, and whilst not immediately adjacent, due to the public access to part of the CWS, it could be assumed that residents would seek out this location. The increased recreational pressures on the CWS should be considered, especially if informal access exists through the wider CWS which may be less monitored.

The Site constitutes an infill between two existing settlement boundaries, and therefore must be designed taking this into consideration.

Roadside trees should be retained to preserve the street scene and landscape of the village.

A tree belt runs through the middle of the site which appears to first show on 1988 aerial imagery, this now appears to be quite mature and substantial in nature and efforts should be made to retain this where possible. There is also extensive boundary vegetation including mature trees which should be retained.

6.4 **SN0552REVC, Land at Watton Road, Barford**

The site is adjacent to a designated River Valley Landscape area. Being a large extension into the countryside and the current recessive nature of Barford in the landscape - the design, layout and especially boundary treatments of this site should it come forward for development are going to be very important. The site itself however is largely void of existing landscape features and formed of arable land. In the wider vicinity there are a number of County Wildlife sites, and Ancient Woodland (Colton Wood), public access to these sites and potentially increases in recreational pressures should be considered.

6.5 **SN0055, Land east of Spur Road and south of Norwich Road, Barnham Broom**

Extensive vegetation to the road frontage should be retained as much as possible when considering access. It will also be important that a landscaped boundary is given to the south-east backing onto the remainder of the field. Development should be designed to be self-contained and not give rise to extended proposals to the south- east. Where boundary vegetation exists this should be retained and enhanced.

6.6 **VC BAW1 REV, Land to the east of Stocks Hill, Bawburgh**

The exiting hedgerows on the northern boundaries should be retained where

possible.

- 6.7 **VC DIT1 REV, Land at Thwaite Road and Tunney's Lane, Ditchingham**
There is a Site of Special Scientific Interest to the east of the site, and County Wildlife Sites to the south-east and south-west of the site. It is also situated within a designated River Valley Landscape. Impacts of new developments on these close lying sites, and its situation within the River Valley should be taken into consideration.
- 6.8 **SN4020, Land west of Old Yarmouth Road, Broome**
There is a nearby adjacent pond which may require surveys prior to development. The expansion into the countryside would require careful design to ensure there is no negative impacts on the landscape character of the area. The proposals here would constitute a continued linear development with extensive road frontage which extends considerably away from the village centre.
- 6.9 **SN0218 REV, Land north of The Street, Earsham**
This site constitutes a large extension to the existing settlement which will cause a change in the landscape character and setting of the village. It would be beneficial for this to be a landscape led scheme, with key consideration given to the boundary vegetation. The Norfolk Broads are situated to the north, this is an important context in terms of the landscape and visual impacts of the development, as well as considering wider habitats. A public right of way crosses the western end of the site and runs along the entire south-western and southern boundaries. Access along the Public Right of Way must remain at all times, should access be proposed on to the Public Rights of Way discussion should be had with Norfolk County Council Public Rights of Way and Highways team. There is also a pond to the north of the site which may require further surveys before development.
- 6.10 **VC GIL1 REV, South of Geldeston Road and Daisy Way, Gillingham**
The trees along Forge Grove, Gillingham should be protected. Taking into account the existing Tree Preservation Order.
- 6.11 **VC SWA2, Land on Main Road, Swardeston**
There is a County Wildlife Site to the North-West of the site which has well used public access and informal paths. The site could bring increased pressures to this site. The site is managed by Norwich Fringe, we would advise consultation and discussion with them regarding the potential increased pressures and how the development can work with the Fringe Project.
The site also forms the gateway to the village, so design and boundary treatments will be very important. A landscape led design would be best suited to the development ensuring front frontage properties and designed features to that the development does not back onto the approach into the village. The unmade tracks across The Common at Swardeston should be protected to promote Green Infrastructure.

6.12 **VC SPO1 REV, Land west of Bunwell Road, Spooner Row**

Landscape/Townscape impacts would need to be considered, as the site has the potential to drastically change the landscape context of the village. It could give rise to further infill development resulting in no clear green spaces between residential areas.

Design of the site needs to be sensitively planned to ensure open space is retained, landscape led approach would be best. Retention of existing hedgerow on south-eastern boundary of site, adjacent to Bunwell Road, and retention of existing tree on north-west boundary of site, connecting Bunwell Rd to Queen's Street.

6.13 **VC TAC1 REV, Land to the west of Norwich Road, Tacolneston**

There is an extensive network of PRoW to the south-east of the site, increased pressures on footpath network to be considered. Importantly a crossing point should be considered to allow access to the footpath network. There are hedgerows running along the existing access drive which runs through the middle of the site, worth noting these as they are likely to be lost to facilitate development and we'd require suitable replacements. Development is very much into the countryside, so boundary treatments important to minimise visual and landscape impacts. Mature tree in the south-east corner of the road frontage should be retained and protected.

6.14 **VC WIC1 REV, Land to the south of Wicklewood Primary School.**

The site is in a rural location and any development has the potential to cause Landscape and Visual Impacts. Boundary treatments to south and west particularly to assimilate the development into the countryside should be considered, as should street frontage important as this is the gateway into the village.

6.15 **Further Comments**

All sites will require Landscape Assessment/LVIA to inform the scale, form and density of the development, as well as establishing any protection and enhancement of existing landscape features/boundary vegetation.

Where trees are present on site, or immediately adjacent to sites, appropriate Arboriculture surveys will be needed to ascertain any trees that require protection and to establish working arrangements should there be risk of damage to trees or roots.

Where sites are adjacent to Public Rights of Way the right of way should remain unobstructed at all times and should any closure or diversion be required suitable consultation with the Highways Authority will be required. If a site is looking to create access directly onto a public right of way this should also be in consultation with the Highways Authority. Any proposals of new Public Rights of Way will need to be agreed and suitable constructed and legally registered through creation orders. All sites may require Ecological surveys which should be agreed in discussion with a suitably qualified ecologist.

6.16 Should you have any queries with the above comments please contact the Natural Environment Team neti@norfolk.gov.uk

7 Lead Local Flood Authority Comments

- 7.1 With regard to the LLFA's previous comments provided to South Norfolk District Council (SNDC) on the South Norfolk Level 2 Strategic Flood Risk Assessment (SFRA) (FW2022_1170 dated 16 January 2023, the LLFA have been in further discussions with the LPA. The conclusion of these discussions has resulted in a number of the LLFA's concerns not being addressed by the LPA.
- 7.2 The LLFA notes that based on the last communication from SNDC (dated 08 December 2023), SNDC is planning to continue using the updated the SFRA based upon a River Waveney hydraulic model with short comings prepared by themselves rather than the Environment Agency's own recently updated fluvial River Waveney model.
- 7.3 The LLFA has raised concerns regarding the approaches applied in the SNDC hydraulic modelling with the LPA. The LPA has indicated that they do not intend on addressing the LLFA's concerns at this time due to their Local Plan schedule and the associated resources that it would involve.
- 7.4 A main point of divergence relates to the climate change allowances being applied with the hydraulic modelling being inconsistent with the current guidance requirements.

The LLFA is seeking the application of the Exceptions guidance from the primary guidance for this area of 45% allowance for climate change.

The Exceptions guidance states "In some locations the allowance for the 2050s epoch is higher than that for the 2070s epoch. If so, and development has a lifetime beyond 2061, use the higher of the two allowances".

- 7.5 While this difference of 5% may seem small, the correct application of the national climate change guidance will enable consistency around the management catchment area of the River Waveney while enabling alignment with national guidance.

The Environment Agency's updated guidance explanation note (Updated guidance: peak rainfall allowances have been updated in 'Flood risk assessments: climate change allowances') provided on the page 6 to 7 is considered to be an explanation of the changes to the national guidance rather than guidance. Therefore, the LLFA continues to support the application of the national guidance's exception rule as it takes the precautionary approach and remains consistent across the management catchment. Therefore, the LLFA continues to consider that 45% climate change allowance should be applied to the model.

The LLFA's last written response to SNDC (FW2023_0455 dated **19 June 2023**) is attached for further information.

7.6 **Barford (SN6000)**

The LLFA's Water management team would like to draw the LPA's attention to an opportunity to seek flood risk management enhancement opportunities for the village of Barford on this site. The site is located at the head of a significant surface water flow-paths through the main village where there is a history of flooding. Previously, highways have put in place to mitigate some of the flooding along Chapel Street that flows into the village. The LLFA advises the LPA to include this opportunity within the sites opportunities to contribute towards alleviating flooding to the elsewhere in the community.

7.7 Further guidance on the information required by the LLFA from applicants can be found at <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>

Should you have any queries with the above comments please contact the Lead Local Flood Authority Team – email llfa@norfolk.gov.uk

8 **Local Member (County Councillor) Comments**

8.1 Land North of Chapel Street, Barford (SN6000) – the local County Councillor (Hingham Division – Cllr Margaret Dewsbury) has raised concerns regarding this proposed allocation as she is aware that:

“... there are land drains under the playing field coming across from the council houses to the left of the village hall to the ditch/pond behind School Farm. There are also drains coming diagonally from the top left-hand corner across the field to the bottom corner where flooding has occurred in the field and to the houses backing on to it. There is a pond/pit in the field behind the playing field and to the left of a pathway which has pipes going down to the area containing play equipment, a ditch used to go along beside the property on that end but it was piped and filled in many years ago so that children did not fall into it. There have been times when an outlet has been bunged up and water has started spouting up in the middle of the field because the pressure broke the drainpipe.

My concern is that if this field is developed all the drains will be broken, dug up etc and there will be a lot of surface water coming across the area, plus the extra hardstanding around the proposed homes will create more surface water and we will be back to having flooding at the lowest point in the village, i.e. Eastleigh Gardens and Park Avenue. The water tends to go to the area past the attenuation pond into the field beside it or runs down the road all towards the lowest point.

I do not think the playing field should be developed because I do not think they will be able to mitigate all the water that runs across that area. “

8.2 Should have any queries with the above comments please contact Cllr Dewsbury Margaret Dewsbury - margaret.dewsbury.cllr@norfolk.gov.uk

