
SA of the South Norfolk Village Clusters Plan: Interim SA Report (November 2023)

1 Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging South Norfolk Village Clusters Housing Allocations Plan (the Village Clusters Plan). The Village Clusters Plan, which is being developed alongside the Greater Norwich Local Plan (GNLP), aims to allocate smaller sites across village clusters in South Norfolk (48 village clusters have been identified in total), to accommodate at least 1,200 homes.

The Village Clusters Plan was published under Regulation 19 of the Local Planning Regulations in January 2023, and the formally required SA Report was published alongside, essentially presenting an appraisal of “the plan and reasonable alternatives” (in accordance with the central regulatory requirement of the SA process).¹ Prior to that, the Council consulted on a Draft Plan under Regulation 18 in 2021, alongside an Interim SA Report.

The Regulation 19 version of the Villages Clusters Plan allocated sites with a total capacity of 1,228 homes. However, it was subsequently determined that one of the proposed allocations (site VC ROC2 at Rockland St Mary, which was proposed for 25 homes) is not developable as suitable vehicular access cannot currently be achieved. Furthermore, discussions with technical consultees resulted in the loss five homes from another site at Tasburgh.

The loss of this supply (30 homes in total) results in a total remaining supply slightly below the required 1,200 homes (which is a minimum). As such, the Council is now consulting on ways to boost supply. It is important to be clear that this is a focused consultation, and not another consultation on the Village Clusters Plan as a whole.

In this light, the aim of this Interim SA Report is to simply to present an appraisal of options for boosting supply. This is a relatively informal report and does not aim to be a full update to the formally required SA Report.

This report is structured as follows:

- Section 2 – presents further background in respect of work to date
- Section 3 – introduces available options for boosting supply
- Section 4 – presents an informal appraisal of options
- Section 5 – concludes and discusses next steps

2 Work completed to date

A key focus of the SA Report (January 2023; see Section 5) was considering potential alternative approaches to allocation / supply at each of the village clusters in turn. This work was undertaken from a particular perspective of wishing to define ‘reasonable alternatives’ for the Village Clusters Plan as a whole in the form of: A) the emerging preferred approach; and B) one or more alternative approaches with a greater emphasis on accessibility (in terms accessibility to village-level services and facilities and/or accessibility to a higher order settlement).

The work from the SA Report stage (which, in practice, was completed in 2022) provides a useful and important starting-point for work at the current time, namely work to explore options for boosting supply (over-and-above the remaining supply in the Village Clusters Plan which, as discussed, amounts to just under 1,200 homes).

Specifically, an important starting point is a list of eleven village clusters where – at the time of undertaking the work in 2022 – there was considered to be a reasonable alternative involving boosting supply. These village clusters were identified taking account of a both village and site-specific accessibility considerations.

Specifically, the following eleven village clusters were identified (with headline reason in brackets):

- Barford etc (connectivity to Wymondham and Norwich)

¹ The Environmental Assessment of Plans and Programmes Regulations (2004)

- Bawburgh (proximity to Norwich)
- Bressingham (proximity / reasonable links to Diss combined with a possible site-specific opportunity)
- Brooke etc. (connectivity to Poringland; N.B. tentative)
- Ditchingham etc. (connectivity to Bungay combined with a possible site-specific opportunity)
- Earsham (connectivity to Bungay; N.B. tentative)
- Gillingham etc. (connectivity to Beccles; N.B. particularly a focus at Gillingham itself)
- Hales etc. (connectivity Loddon combined with a possible site-specific opportunity N.B. tentative)
- Little Melton etc. (very good proximity to Norwich and Hethersett)
- Mulbarton etc. (possibly the option of focusing growth solely at Mulbarton, where the primary school is located)
- Spooner Row (given a train station, albeit with a limited service)

This list provides useful context to work at the current time, but it does not serve as a set of strict parameters. Whilst these village clusters were judged in 2022 to be associated with a potential higher growth option (relative to the proposed approach) from an accessibility perspective, there are other perspectives / objectives that must also feed-in. Also, the reality is that concluding on the 'accessibility' merits of growth options is not straightforward, because there are a range of factors to consider (as discussed below, under the 'Accessibility' heading).

3 Introducing options

There are three categories of options for boosting supply. Each is considered in turn below.

New options

An immediate starting point is new options not previously assessed, comprising both entirely new sites submitted to the council at the Regulation 19 stage and existing site options for which the site promoter submitted a significant amendment. **One site is taken forward** (see Section 4) and four sites are rejected, namely:

- SN6002 (Needham; 0.9 ha) - does not relate well to the village, density could be out of character and access may be difficult due to road curvature. The village cluster was not flagged in the SA Report (see list above).
- SN5017 REVA (Bramerton; 0.72 ha) - does not appear to have much relationship with established built form. Access to the site would be challenging. The village cluster was not flagged in the SA Report.
- SN0531 REVA (Rockland St Mary; 0.73 ha) – there is a strategic case for boosting supply at Rockland St Mary, (see above). However, this site is exposed to the open countryside and does not relate well to the village.
- SN5039 REVA (Rockland St Mary; 1.31 ha) – as above, there strategic case for boosting supply at Rockland St Mary. However, the site promoter has not been able to demonstrate that a suitable access can be achieved.

Existing allocations

The next port of call is then existing allocations associated with the potential to modestly boost the site capacity, whether via: A) an extension to the site boundary (i.e. allocating a greater proportion of the land submitted as available); or B) an increasing the assumed development density within the existing site boundary.

This is something that has been encouraged throughout the SA process, essentially with a view to supporting comprehensive schemes that result in maximum opportunity to negotiate with land-owners and secure 'planning gain'. In particular, there has been an emphasis throughout the SA process on making good use of existing field boundaries where possible, rather than allocating parts of fields which can give rise to a risk of further piecemeal development in the future with opportunities missed around planning gain.²

Work undertaken by South Norfolk DC officers led to the identification of **seven sites to take forward**.

² The SA Report (2023) explained: "... the Interim SA Report (2021) included a considerable emphasis on aiming to allocate sites that make use of existing land parcels... and that recommendation has been taken onboard and actioned." Despite improvements having been made since the Regulation 18 stage, the SA Report did still flag several sites where there appeared to be the option of expansion (within the submitted site or otherwise) with a view to comprehensive schemes.

With regards to rejected 'sites' (specifically, existing allocations where the option of boosting supply is not taken forward), a number of sites are of note because: A) there is feasibly the option of an expanded (involving available land); and B) they are located at a village cluster 'flagged' in the SA Report (see above).

These rejected sites are listed below (alongside officers' reasons for rejection, quoted in full):

- VC BRO1 (Brooke; 2.2 ha; 50 homes) – “Although the site east of the B1332 is relatively unconstrained and could be extended further east, this would take the rear boundary beyond existing properties, with a subsequent landscape impact and possible heritage impact... Further land to the west has not been promoted...”
- VC EAR1 (Earsham; 1.3 ha; Up to 25) – “Further land was promoted to the east/south-east, but this would create an awkwardly shaped site that clearly encroaches into the river valley and potentially the setting of The Close and views of All Saints Church to the south (both Listed Buildings).”
- VC LM1 (Little Melton; 3 ha; 35 homes) – “Increasing density of the site could impact the on-Listed Building within the site. Much development has occurred in Little Melton due to a previous lack of 5YHLS and a further significant increase in numbers would be disproportionate to the village size at this time.”
- VC MUL1 (Mulbarton; 1.5 ha; 35 homes) – “NCC Highways have placed a clear limit on the highway capacity of Bluebell Road, which is the only appropriate access to this site.”
- VC SWA1 (Swardeston; 1 ha; 20 homes) – “The allocation focusses on reuse of the previously developed element of the site, extension to the east would be a clear break out from the pattern of development established by the recently constructed development to the south and the carried forward allocation to the north...”
- VC BRA1 (Bacon Ash; 0.9 ha; 20) – “A previously refused planning application has demonstrated that there would be unacceptable impacts from extending the site further south.”
- VC PSM1 (Pulham St Mary; 2.83 ha; 50 homes) – “Increasing numbers to match the site area would push the allocation beyond the 50 dwelling mark, making it the largest site in the plan. Its prominence in the landscape would also increase its visual impact.”
- VC SPO2 (Spooner Row; 1.67 ha; 25 homes) – “Estate development could be extended south into the open field; however this would effectively close the gap to the cluster of dwellings at Top Common and the shape/layout of the site is likely to give an uncharacteristically suburban form of development. The inclusion of VC SPO1 [one of the sites 'taken forward'] takes potential new development in Spooner Row to 60+ dwellings.”
- VC SPO3 (Spooner Row; 0.3 ha; 7 homes) – “Carried forward allocation from the 2015 South Norfolk Local Plan with extant planning permission, further expansion of which is limited by Highways constraints.”
- VC SPO4 (Spooner Row; 0.6 ha; 14 homes) – “Carried forward allocation from the 2015 South Norfolk Local Plan, with extant planning permission. Site mirrors development on the opposite side of Chapel Lane... further extension would encroach into the open countryside. The inclusion of VC SPO1 [one of the sites 'taken forward'] takes potential new development in Spooner Row to 60+ dwellings.”
- VC STO1 (Stoke Holy Cross; 1.42 ha; 25 homes) – “The site is relatively prominent in the landscape, including within longer distance views, however the current extent is read against the recent developments at... Expanding the site is likely to increase its prominence within the landscape and Stoke Holy Cross has also experienced growth through the 2015 South Norfolk Local Plan and due to a previous lack of 5YHLS... a further significant increase in numbers would be disproportionate to the village size at this time.”

Three settlements are of note because the decision to reject one or more sites (as potential locations for boosting supply) at least partly reflects a view that there is a need to avoid over-allocation at any given village. This is undoubtedly an important consideration, given the stated objectives of the Village Clusters Plan (as established in light of the emerging Greater Norwich Local Plan, GNLP). However, it is also reasonable to consider applying a degree of flexibility. The following bullets consider the three village clusters in turn:

- Little Melton – benefits from very good accessibility to Norwich. This serves as a reason to consider the possibility of higher growth; however, there is a need to balance this against the stated objectives of the Village Clusters Plan, which is to disperse growth. Also, the site in question is subject to historic environment constraint.
- Spooner Row – the SA Report explained: “*Spooner Row stands-out on account of rail connectivity, albeit there is a very limited service, and there is not thought to be any potential for an improved service, in the context of the current plan. The village is also close to the A11, but regular bus services do not pass through the village.*” The report also flagged Spooner Row as: “... one example of a village where the potential for higher growth to consolidate the built form, and potentially deliver-on place-making objectives, might be envisaged. However, this is highly uncertain, as there is a need to give weight to protecting the existing character of the settlement...”

Attention focuses on SPO02, which is located very close to the train station. However, in practice, were higher growth options to be brought into play, then there could be arguments for significantly boosting the site capacity, such that the approach to growth at the site in question, and for Spooner Row as a whole, would be of a strategic nature (not the aim of the Village Clusters Plan).

- Pulham St Mary – the SA Report (2023) explained that the site in question: “... is located within walking distance of the primary school (via a footpath / cycleway along the Harleston Road) and, as a larger site, might support some investment in local infrastructure (in this instance, enhanced green space is a focus), to the benefit of the village / villages. Given its location, the effect of development might be to support the joint functioning of the two villages.” In short, the SA Report suggested it could be appropriate to ‘push at the boundaries’ of the Village Clusters Plan objectives by supporting a single site for more than 50 homes, with a view to securing benefits. However, as discussed, higher growth would increase visual impact, potentially to an unacceptable degree.
- Stoke Holy Cross – as discussed above, and also within the SA Report (2023), the recent experience is one of sub-optimal piecemeal growth, which serves to highlight the importance of supporting comprehensive growth moving forward, including potentially with a view to delivering new infrastructure to redress any issues created by piecemeal growth. However, in practice no infrastructure opportunities are known to exist (given the number of homes reasonably in contention for allocation) and the site is subject to a degree of landscape constraint.

Existing shortlisted omission sites

The final part of call is the list of existing shortlisted omission sites. These are omission sites that were given close consideration over the course of plan-making prior to January 2023. Presenting shortlisted omission sites was a key focus of the consultation at the Regulation 18 stage, and the status of a site as shortlisted was a consideration as part of the process of defining reasonable alternatives within both the Interim SA Report and the SA Report.

There are a total of 32 shortlisted omission sites, and the majority are rejected by officers at the current time for clear cut reasons. In most instances sites are rejected due to site specific issues/constraints. However, in a small number of cases reasons for rejection include strategic considerations relating to accessibility. This is most notably the case for SN4048SL at Hapton (previously a preferred site), with officers’ reasons for rejection as follows:

“... services in the village are very limited and the nature of the cluster means that the site is more likely to be reliant on services/facilities in Long Stratton (which already has substantial strategic growth allocated), as such it would not be supporting local, rural services, as envisaged by the Village Clusters document.”

This leaves **five sites taken forward** to Section 4.

Looking across the list of rejected sites, the only point to note is three rejected sites at Little Melton which, as discussed above, is flagged within the SA Report as a settlement that could potentially be suited to higher growth from an accessibility perspective, given very good accessibility to Norwich. There are three shortlisted omission sites that could feasibly be allocated, in addition to the feasible option of boosting supply via an increased density at the one proposed allocation. Of these three sites, attention focuses on SN4025, which was a proposed allocation at the Regulation 18 stage. However, flood risk is a constraint to access, and it is generally the case that there are no identified village-specific opportunities to be realised by supporting modest higher growth (beyond new homes).

Conclusion

In conclusion, a total of 13 sites / site-specific options are taken forward for further detailed consideration in Section 4. This shortlist of sites was selected by officers on the basis of clear reasoning, and it is not the aim of this report to call the shortlist into question. However, presented above is a discussion that essentially aims to flag a small number of rejected sites / site-specific options which potentially have a degree of merit from an accessibility perspective. Rejected sites could feasibly be re-considered subsequent to the current consultation (recognising that there is scope to make changes to plans between the Regulation 18 and 19 stages).

4 Informal appraisal of options

The aim of this section is to present an informal appraisal of the 13 shortlisted options for boosting supply, which are in the form of 13 sites where there is the potential for allocation or the potential 'boost' an existing allocation. The sites are listed below alongside latest understanding of the appropriate site area (i.e. the area of the site judged suitable for allocation) and capacity, albeit for some sites there are outstanding questions in one or both respects:

- New site option
 - SN6000 (Barford; 4.82 ha; approx. 30 homes, plus replacement village hall and other community infrastructure)
- Revisions to existing allocations
 - VC BAW1 REV (Bawburgh; 1.9 ha; up to 35 homes) – expanded site but no increase to supply.
 - VC DIT1 REV (Ditchingham; 2.42 ha; up to 45 homes) – expanded site for 10 extra homes.
 - VC GIL1 REV (Gillingham; 2.93 ha; approx. 40 homes) – expanded site for 5 extra homes.
 - VC SWA2 REV (Swardeston; 2.7 ha; approx. 40 homes) – same site but 10 extra homes.
 - VC SPO1 REV (Spooners Row; 2.34 ha; approx. 35 homes) – expanded site for 20 extra homes.
 - VC TAC1 REV (Tacolneston; 1.0 ha; approx. 25 homes) – expanded site but limited or no increase to supply.
 - VC WIC1 REV (Wicklewood; 2.97 ha; up to 40 homes) – expanded site for 10 extra homes.
- Shortlisted omission sites
 - SN0433 (Alpington; 1 ha; at least 12 homes)
 - SN0552REVC (Barford; 0.73; up to 20 homes)
 - SN0055 (Barnham Broom; 1 ha; approx. 15 homes)
 - SN4020 (Broome; 0.76 ha at least 12 homes)
 - SN0218REV (Earsham; 1.4 ha; up to 25 homes)

Accessibility

Performance of options in terms of accessibility objectives has been a key focus of the SA process, including work to define and appraise reasonable alternatives. This reflects a view that there is a risk of the Village Clusters Plan objectives unduly restricting options for growth aim at aligning with accessibility objectives.

The SA Report suggested the following good practice principles:

- *“Proximity to a higher order settlement – perhaps most notably those villages that are in relatively close proximity to Norwich. Swardeston is one such village, but is notable for the fact that there is not a primary school at the village, with the local school instead located at Mulbarton. Ditchingham and Gillingham are also notable as villages closely linked to Bungay and Beccles respectively.*
- *Villages that are distant from a higher order settlement, but with relatively good ‘sustainable transport’ connectivity – Spooners Row stands-out on account of rail connectivity, albeit there is a very limited service, and there is not thought to be any potential for an improved service, in the context of the current plan. The village is also close to the A11, but regular bus services do not pass through the village.*
- *Villages that share transport corridors such that coordinated growth might feasibly support an enhanced bus service – whilst there may be no realistic potential in practice, possible growth corridors to the west and southwest of Norwich can be identified....*
- *Sites well located in terms of the ability to easily walk to local services and facilities – for example... higher growth at Bressingham [might be suggested].*
- *More comprehensive growth to secure new / upgraded community infrastructure – mindful of numerous instances of piecemeal recent and committed village expansion... which risks delivering sub-optimal outcomes, in terms of securing developer funding for new or enhanced infrastructure, including community infrastructure.*

However, it is difficult to pinpoint opportunities, with the emerging preferred approach already set to realise several opportunities, including in response to consultation and wider stakeholder engagement...”

A further accessibility-related opportunity, not covered by the bullet points above, is the opportunity to direct growth to a village where there is known to be an existing issue in terms of viability of local services or facilities.

Given the central importance of the issue, the villages in question are considered in turn (in the order listed above).

New site option & Shortlisted omission site 1: Barford

SN6000 (4.82ha; 30 homes) represents an excellent example of the potential to direct growth in such a way that secures planning gain. This new site was promoted through the January 2023 Regulation 19 publication for 25 dwellings, a relocated village hall and playing pitch, plus retention of the children’s play area. Subsequent discussions then led to a proposal for a scheme involving 30 homes plus additional community land.

It is also the case that the site is well located within the village in terms of relationship to existing services.

Also, there is the option of allocating shortlisted omission site SN0552REVC (0.73Ha; up to 20 homes). The site does not give rise to any particular accessibility-related issues or opportunities; however, there is a need to question the potential total growth quantum at Barford, which is 70 homes (given an existing allocation for 20 homes).

It is not clear that there are any concerns, noting that Barford is located on a B-road corridor in proximity to Norwich, and the corridor is also shared with Little Melton, which comes into consideration as a potential location for growth. Also, Barnham Broome and Bawburgh are linked to this B-road corridor (which relates to the Yare Valley). As such, there could be a growth-related opportunity around maintaining or enhancing bus services.

Existing allocation option 1: Bawburgh

The proposal here is to expand the scheme but not to increase the site capacity, i.e. the intention is to support a lower density scheme in response to concerns raised at the Regulation 19 stage. As such, there are no significant implications for accessibility objectives.

Existing allocation option 2: Ditchingham

There is the option here to extend the existing allocation and support an additional 10 homes, bringing the total site capacity to up to 45 homes. This is broadly supported, because Ditchingham has good accessibility credentials, and the village primary school is almost adjacent. However, this extension would still leave a small part of the field in question left undeveloped, hence the question arises as to whether the field might be allocated in full.

Indeed, the site in question is itself an extension to a site that is currently under construction, serving to shine a light on the risk of incremental development of a field leading to a risk of ‘planning gain’ opportunities missed. Having said this, it is recognised that part of the field that would be left undeveloped is constrained by surface water flood risk, and that highways capacity is a potential constraint to delivering further homes here.

Existing allocation option 3: Gillingham

This existing allocation is important from an accessibility perspective, as it will support a primary school expansion. The supporting text within the Regulation 19 plan explains:

“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 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...”

The current option under consideration would involve an additional five homes. Whilst it is not clear that this is necessary in order to secure delivery of the site and, in turn, the primary school extension, Gillingham is well located in terms of accessibility to facilities at the nearby services (shop and restaurants) and to the town of Beccles, which has a wide range of shops, services, facilities and employment opportunities.

Existing allocation option 4: Swardeston

The approach to growth in the Mulbarton Village Cluster, which includes Swardeston, has been examined closely through the SA process. This is because there is no primary school at Swardeston, such that there is a case for a sole focus of growth at Mulbarton (where there is also a GP surgery and food shop). However, on the other hand, Swardeston is close to Norwich and on a good bus route. The SA Report explained:

“Swardeston is a village where, in theory, growth to deliver a primary school might be an ambition, but this is not thought to be a realistic possibility in practice, in the context of the Village Clusters Plan.”

With regards to the current option under consideration, the proposal involves delivering an additional 10 homes within the existing SWA 2 allocation, bringing the total site capacity to ~40 homes. This is with a view to alignment with a submitted planning application for 43 homes. This does not give rise to any particular concerns, from an accessibility perspective. However, it is important to note that: there is another adjacent allocation; further adjacent land is under construction; and further adjacent land has delivered in the past ten years. This serves to highlight the importance of securing comprehensive growth wherever possible (recalling the lack of a primary school).

Existing allocation option 5: Spooner Row

The option at the current time involves a significant extension of the Regulation 19 allocation, in order to make better use of field boundaries / land within the field in question. Specifically, the proposal is to support a 35 home scheme, rather than a 15 home scheme. The extended site boundary would leave a small portion of the field in question undeveloped, however, this part of the field is subject to flood risk. Moving forward, there should be ongoing scrutiny of the appropriate growth quantum, with a view to maximising the benefits of development. For example, the site might be suited to delivering a new children’s play area and/or accessible green space.

Existing allocation option 6: Tacolneston

The proposal here is quite modest; specifically, the proposal is to extend the site boundary from 0.6 ha to 1 ha and to change the capacity from ‘up to 25 dwellings’ to ‘approximately 25 dwellings’. The SA Report explained:

“The site is in close proximity to a primary school, but is otherwise in a notably rural location, given links to higher order settlements and also noting that some village facilities are beyond easy walking distance. The village is located on the B1113, but there is a limited bus service (the possibility of coordinated growth along this corridor, in order to support an improved service, might feasibly be considered... noting Mulbarton / Swardeston to the north).”

Existing allocation option 7: Wicklewood

This site comprises a small part of a much larger field, where the proposal at Regulation 19 was to support 30 homes and there is now the option of an extended site to deliver 40 homes. It clearly only the north east corner of the field that is suited to development; however, there should nonetheless be ongoing scrutiny of the appropriate scale of growth with a view to securing benefits beyond new homes, including noting the adjacent primary school. Wicklewood is also notably well-connected to Wymondham, including by bus.

Shortlisted omission site 2: Alpington

This shortlisted omission site comprises a small part of a larger field, but there is a logical extent to development given adjacent built form and the listed building to the south, such that there is little reason to question the proposed capacity of 12 homes. The site is adjacent to the village pub and close to the school and Alpington is in proximity to Poringland and Norwich.

Shortlisted omission site 3: Barnham Broom

There is the option to deliver 15 homes on a 1 ha site. This is an example of a site where a larger site might be considered that makes full use of existing field boundaries; however, it is recognised that design and layout needs to take account of the adjacent non-designated heritage asset. A further consideration, as discussed above, is the possibility of supporting a concentration of growth along the B1108-road corridor to the west of Norwich (which links Barnham Broom and around three other villages of note).

Shortlisted omission site 4: Broome

Broome forms part of a wider cluster with Ditchingham that is relatively well served in terms of services and facilities, and the higher order settlement of Bungay is nearby. However, the site in question is not very well located in terms of walking to village services, with the primary school at Ditchingham ~1.5km distant. The question therefore arises as to whether additional growth at Ditchingham is preferable to supporting this site at Broome. However, it is recognised that accommodating all of the development from this site on the revised Ditchingham allocation would create the largest allocation in the Village Clusters Plan, leading to a tension with the plan objectives.

Shortlisted omission site 5: Earsham

The site was previously an allocation at the Regulation 18 stage and is now shortlisted as an option to deliver 25 homes. This site comprises half of an agricultural field, such that there could be pressure on the remaining half in

the relatively near future. As such, consideration might be given to a comprehensive scheme (e.g. 50 homes) that delivers additional benefits for the village. However, it is recognised that this would run counter to the objectives of the Village Clusters Plan, particularly as there is another preferred site of 25 homes at Earsham.

Allocation for even 25 homes would give rise to a risk of over-allocation at Earsham (as previously discussed in the SA Report). However, the village has both a range of local facilities, and good access (including almost continuous footway and a reasonable bus service) to services and facilities in nearby Bungay. Also, the two proposed allocation sites are well separated from each other, reducing the immediate impacts of development.

Biodiversity

There are limited biodiversity concerns associated with the shortlisted site options. Points to note are:

- Ditchingham (option to extend the existing allocation for an extra 10 homes) and Broome (option to allocate a previously shortlisted site for 12 homes) are closely associated with Broome Heath, which is locally designated as a County Wildlife Site, and potentially sensitive as a highly accessible heathland.
- Gillingham (option to extend the existing allocation for an extra 5 homes) is in quite close proximity to two components of the Broads SAC.
- Alington (option to allocate a previously shortlisted site for 12 homes) – the issue here is that development will likely result in at least the partial loss of the frontage hedgerow.
- Tacolneston (option to extend the site boundary and potentially support modest extra supply) – biodiversity value of the site must be understood in the context of its position in the wider landscape. The Regulation 19 supporting text explains: *“A network of off-site ponds exists in proximity to the site development... should ensure ongoing connectivity between these ecological features. Similarly, appropriate measures will need to be taken to ensure the continued protection of the protected horse chestnut tree on the site frontage...”*
- Spooner Row (option to extend the existing allocation for an extra 20 homes) – land adjacent to the proposed allocation, and within the same field, comprises a fluvial flood zone, but the land in question appears to be under arable production (which is unusual). As such, there could possibly be an opportunity for habitat creation.
- Barford (option to allocate a new site for 30 homes and/or a new site for 20 homes) - there is now the option of supporting total growth of up to 70 homes at Barford, which is notably located on the River Yare. There is no priority habitat present along this stretch of the river (but there is nearby), nor is this stretch of the river accessible by public footpath, which serves to highlight a theoretical opportunity for enhancement.

Climate change adaptation

There are limited flood risk concerns associated with the shortlisted site options. Points to note are:

- Bawburgh (option to expand the scheme but not to increase the site capacity) – there is a significant surface water flowpath to the south of the site, but this is unlikely to prove a significant constraint.
- Ditchingham (option to extend the existing allocation for an extra 10 homes) – surface water flood risk in this area is an issue, also noting that surface water flowpath that directly constrains the site also feeds an off-site flowpath. There are limited concerns associated with the option of supporting an additional 10 homes but supporting further homes beyond this (an option discussed above) could prove challenging in flood risk terms.

Climate change mitigation

It is difficult to meaningfully comment on the performance of the options in terms of built environment decarbonisation. It could be the case that supporting additional homes at some sites boosts development viability such that there is greater potential to achieve net zero carbon development (or otherwise achieve a significant improvement on the requirements set out under Building Regulations), but this is highly uncertain.

With regards to transport emissions, the key issues / opportunities are discussed above, under Accessibility.

South Norfolk declared a climate emergency in 2023, and it is also important to note the following from the (GNLP (2021): *“Norfolk County Council has adopted a target of achieving net zero carbon emissions by 2030 for council owned land and buildings and for travel. In addition, they will **work towards carbon neutrality for the county, also by 2030.**”* [emphasis added]

Communities and economy

There is limited potential to comment on the merits of the alternatives in respect of Communities objectives over-and-above the discussion presented under Accessibility, above. Also see discussion below, under Transport.

Economy

There is inherently very limited potential to draw strong conclusions under this topic heading.

Historic environment

One of the sites listed above is subject to notable constraint, namely BAW1 (Land east of Stocks Hill, Bawburgh), which is associated with a village where there is an extensive conservation area associated with a characteristic river valley setting. The supporting text within the Regulation 19 Village Clusters Plan explains: *“Bawburgh Conservation Area encompasses the central area within the village and extends as far south as the site boundary. Existing vegetation along the road frontage to the north of the site should be retained, as should the existing vegetation along the north boundary, as this contributes positively to the character of the area. The site layout and design, including landscaping and the choice of materials, should reflect the proximity of the site to the Conservation Area. In addition, archaeological finds north of the site mean investigation of the site may be required at the planning application stage...”* However, the proposal at the current time is to support an expanded site but not increase the site capacity. The intention is to enable greater scope to layout development within the site boundary so as to address historic environment and other related concerns.

The other key site to consider is previously shortlisted omission site SN0552REVC at Barford (0.73Ha; up to 20 homes). This is because development would extend the village form beyond Back Lane, which has historically formed the western extent over the village (see [historic mapping](#)), and because there is a Grade II listed building opposite the site that is fairly prominent on the approach to the village from the west.

Housing

The first point to note here is support for adjusting the approach at TAC1 (Land to the west of Norwich Road, Tacolneston) in order to bring the allocation more into line with a submitted planning application. This is because the application is for 29 affordable dwellings, alongside open space, landscaping and associated infrastructure.

Secondly, it is appropriate to comment here on delivery risks associated with the sites in question (albeit that sites not delivering can give rise to wide-ranging implications beyond 'housing' related). In this respect, there are no major concerns, although one site to flag is SN0433 (Land south of Wheel Road, Alington). Specifically, this is an example of a site where further work is needed to confirm that suitable access can be achieved (without undue impacts to existing hedgerows). It would clearly be possible to confirm access arrangements prior to plan finalisation (as opposed to leaving this as an issue to be addressed at the planning application stage), but there is nonetheless a clear argument for ruling out sites where access arrangements are uncertain, given the recent experience at Rockland St Mary, which has led to a delay in progressing the Village Clusters Plan.

It is also noted that this site at Alington is proposed for only 12 homes. In this light, there is a need to question whether any abnormal development costs necessary in order to achieve suitable access could impact development viability to the extent that it becomes challenging to deliver the full policy quota of affordable housing.

Land and soils

The nationally available 'provisional' dataset – which is very low resolution / accuracy, such that it must be applied with caution - shows the great majority of South Norfolk to comprise 'Grade 3' quality land, which in practice might be Grade 3a (BMV) or Grade 3b (non-BMV). However, there are also significant patches of Grade 2 quality land, particularly in the north of the district. Gillingham and Barnham Broom are notable as villages associated with Grade 2 quality; however, it is difficult to conclude significant concerns.

Landscape

A number of the site options in question are subject to a degree of constraint:

- Bawburgh (option to expand the scheme but not to increase the site capacity) – the village is associated with notable landscape (and associated historic environment) constraint due to a close association with the valley of the River Yare. It is one of only a limited number of proposed allocations where there is a requirement for a Landscape Appraisal/Assessment to be undertaken in support of any planning application.

- Tacolneston (option to extend the site boundary and potentially support modest extra supply) – there is a need to consider a green gap between existing areas of built form. The Village Clusters Plan explains:

“A green gap separates Tacolneston into two clusters of development, north and south along the B1113. Whilst VC TAC1 will have an impact on the open, semi-rural, character created by this gap it relates well to the existing built form to the north of the village, particularly the development at Dovedale Road, as well as the existing agricultural buildings to the west and the planning permission for 3 dwellings along the site frontage (2016/2635). With appropriate design and landscaping, and viewed in the context of the existing developments, this site will not have a significant impact on the wider landscape setting.”

- Gillingham (option to extend the existing allocation for an extra 5 homes) is sensitive on account of close association with the Broads Authority Area, and also for other reasons including the presence of nearby conservation areas. The Village Clusters Plan explains:

“The site will require a comprehensive approach to landscaping, reflecting the fact that there is only existing development on the northern boundary. Whilst largely contained in the wider landscape, the more localised impacts development could be significant. A landscaping scheme has been agreed for the existing GIL1 allocation (application ref. 2019/1013) and consideration will need to be given as to how this is carried forward under proposals for this allocation. The western boundary of the site has some established vegetation that will require protection and enhancement as necessary. Careful consideration will need to be given to the southern and eastern boundaries, which are open to the remainder of the wider field and adjoining paddocks. Particularly important will be consideration of views from the Broads Authority area to the south, at Kings Dam and beyond, and from the public rights of way Geldeston FP8 and Gillingham FP12. Consequently, a full Landscape Assessment will be required to accompany any planning application(s) for the site.”

- Wicklewood (option to extend the site for 10 extra homes) - is associated with quite an open, expansive landscape, and the lack of existing field boundaries creates challenges. The Village Clusters Plan explains:

“The site is within a prominent plateau landform and forms a smaller area within a larger agricultural field. As such it is recognised that there are landscape and visual impacts associated with development of this site. However, an assessment of the context of the site has confirmed that with careful landscaping and layout this site offers an opportunity to create a key gateway entrance to the village, as well as reinstate previously lost hedgerow landscape features. To achieve these objectives there will be a particular emphasis on the soft landscaping, on-site tree planting and the layout and design of the site. This landscape focus is reinforced by the organic boundaries of the site. An area of open space in the north east corner of the site will form a visual focal point around the existing village sign, reinforcing the gateway location and retaining an open aspect...”

- Broome (option to allocate a previously shortlisted site for 12 homes) – would extend the current linear / frontage only built form further into the open countryside, and the LVA in the Supporting Documents notes the need for careful design and landscaping to create a gateway to Broome (which could also help manage traffic speeds entering the village). There is an existing substantial dwelling on the opposite side of Yarmouth Road, which already creates a more enclosed feel to the east.
- Barford (option to allocate a previously shortlisted site for 20 homes) – as discussed above, under Historic Environment, the site would break into open countryside. It would also use only a small part of a much larger field, therefore there are some limited concerns regarding future development ‘creep’. There are clear views of the field in question on the approach to the village from the west, but views are not extensive.

Finally, at Ditchingham option to extend the existing allocation for an extra 10 homes is potentially supported from a landscape perspective. The village closely associated with the Yare Valley, but the site in question is well contained in landscape terms.

Transport

The site option at Aplington has already been discussed as being associated with access challenges, and the discussion above under Accessibility is clearly also highly relevant from a transport perspective, e.g. with a view to minimising long distance car trips and car trips along rural lanes.

The site at Swardeston is also of note, as there are adjacent sites proposed and under construction, hence there is a clear need for a coordinated approach to securing walking and cycling connectivity. The Village Clusters Plan explains: “*Opportunities to provide pedestrian and vehicular connectivity between the sites should also be explored at the detailed design stage...*”

It is difficult to comment further with any certainty.

Water

A Water Cycle Study (WCS) was prepared in support of the GNLP in 2020, and then an Addendum specific to the Village Clusters Plan was prepared in 2022. A key focus of the 2022 WCS is examining the capacity of Water Recycling Centres (WRCs) and the environmental capacity of the water courses that receive treated water from the WRCs. The study was undertaken mindful that at small, rural WRCs even small changes to the number of homes served can have a significant effect and, in turn, lead to a risk of a breach of capacity, either in terms of the hydraulic capacity of the WRC or the environmental capacity of the receiving watercourse.

The study focuses attention on the following WRCs: Barnham Broom; Ditchingham; Forncett / Forncett End (serves Bunwell as well as Tascolneston / Forncett End); Long Stratton (serves Aslacton, Great Moulton and Tibenham); Whittingham Trowse (serves Little Melton / Bawburgh and Rockland St. Mary); and Woodton. However, it is not possible to conclude any significant concerns. Statutory consultees will provide comment through the consultation.

5 Conclusions and next steps

Conclusions

The key question is how many of these shortlisted options for boosting should ultimately be supported within the next Regulation 19 version of the Village Clusters Plan, and specifically which options should be supported.

Ideally it might be possible to place the options in a sequential order of preference, but taking that step is beyond the scope of this report. It is, however, possible to make the following headline points:

- The **new site option** at Barford (4.82 ha; 30 homes plus replacement village hall, playing pitch and additional community open space) represents a significant opportunity to support delivery of new community infrastructure on the site appears to be subject to limited constraints.
- There is support for a number of the options involving boosting supply from **existing allocations** from an accessibility perspective, and none of the options give rise to significant concerns in other respects. For example, the clusters in the Waveney Valley (Earsham, Gillingham etc. and Ditchingham etc.) have good access to higher order settlements at Bungay and Beccles. An expanded scheme at Wicklewood must be carefully considered from a landscape perspective and the Spooner Row expansion pushes the numbers in the village to the upper end of the range considered appropriate given the objectives of the Village Clusters Plan.
- With regards to options involving allocation of **previously shortlisted omission sites**, there are a number of sites associated with certain issues / constraints, although all are of limited significance. Specifically; the site at Broome performs relatively poorly from immediate accessibility perspective (although the cluster and nearby Bungay provide a good range of services and facilities); the sites at Alington and Barford are subject to a degree of landscape and/or historic environment constraint; and at Earsham there is a need to carefully consider the appropriate extent of the site boundary, with a view to avoiding piecemeal growth leading to opportunities missed in terms of securing benefits to the village.

With regards to the total quantum of additional supply that should ultimately be supported, it is difficult to draw conclusions; however, it is important to say that there is a need for a healthy ‘buffer’ above-and-above the required 1,200 homes figure, as a contingency for unforeseen delivery issues (that might arise either prior or subsequent to plan adoption). Also, there is a need to recall that the 1,200 homes figure is a minimum figure that was established some time ago, and there is generally a need to take a proactive approach to housing growth / meeting needs.

Next steps

The 13 options are published for consultation at the current time alongside this (informal) Interim SA Report. Subsequently the Council will be in a position to make a decision on a preferred approach to boosting supply, and this decision will also be informed by further SA work, including consideration of reasonable alternatives.

A second Regulation 19 version of the Village Clusters Plan will then be published alongside an updated SA Report in due course.