

Date: March 2020  
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Greater Norwich Local Plan Team

Broadland District Council  
Norfolk County Council  
Norwich City Council  
South Norfolk District Council

### **Greater Norwich Local Plan – Regulation 18 Consultation**

Thank you for consulting Suffolk County Council (SCC) on the 'Stage C Regulation 18' consultation comprising the Draft Strategy and Site Allocations. SCC previously responded to 'Stage A Regulation 18' dated 22 March 2018. This response focuses on the questions within the document. The County Council is not able to provide responses to individual sites but considers how the distribution and overall scale of growth in Norfolk could interact with cross boundary infrastructure.

#### **Question 1. Please comment on or highlight any inaccuracies within the introduction.**

SCC would be interested to engage further with the progress of South Norfolk Council's 'village clusters plan' in respect to its relevance to Suffolk's education provision and transport infrastructure.

#### **Question 2. Is the overall purpose of this draft plan clear?**

The introduction is clear, logical and contemporary. The introduction is specific, though also addresses the importance of planning 'flexibly' for a changing world.

The opportunities and challenges presented by an aging population could be better embedded into the objectives relating to communities and economy.

#### **Question 3-18.**

(No Comment)

#### **Question 19. Do you support, object or have any comments relating to the specific requirements of the policy?**

The reference to a 'catchment' approach to water management is recognised and supported. With a catchment strategy, neighbouring counties should be considered too. Watercourses and rivers reflect the properties of a catchment, rather than aligning with administrative county boundaries, posing cross-boundary issues. Changes to the normal hydraulic regime, specifically fluvial and pluvial flooding as a result of growth should be accounted for on a cross-boundary scale. Both the River Waveney and Great Ouse run through Suffolk, thus cross boundary changes to water storage, flow and sedimentation could arise and should be taken into account.

Cross-boundary approach to storage and flood risk are particularly relevant strategic matters. Site specific mitigation may, however, be associated with green field run-off rates.

### **Questions 20-22**

(No Comment)

### **Question 23. Do you support, object or have any comments relating to approach to transport?**

With the proposed construction of roundabouts on the A140 and the level of growth anticipated in the GNLP, there is the opportunity for enabling improved connections and journey times for bus services to Diss Railway Station across the county boundary. Doing so would provide better access to the train station and encourage the use of public transport, which aligns with the need to reduce carbon emissions and promote modal shift.

SCC is able to provide transport data to inform the future traffic modelling work to support the evidence-base of the Greater Norwich Local Plan. There are cross-border linkages that will need to be considered, as will the resultant additional journeys from this part of Norfolk into Suffolk and vice versa. The County Council is available to assist with such evidence during the next stages of the production of the plan, including the site allocations and clusters for South Norfolk. The key strategic road links are likely to be A140, A143, A146 and B1077. Other routes may be impacted by localised impacts, and this will need to be assessed through the modelling to inform the next stages of the plan making process. Improvements to the A140, specifically around Long Stratton, may reduce longer distance travel times between north Suffolk and the Norwich area, increasing people's propensity to commute longer distances, and increasing cross-border traffic flows and stress at key strategic junctions.

Where there is development and final destinations are in Suffolk, consideration of passenger transport infrastructure could be funded for by the Greater Norwich Infrastructure Levy connected to development.

SCC is happy to work cross-border to make sure we get the best value for money and more useful passenger transport routes. The nature of the borderlands means Suffolk residents have tendency to travel to Thetford, Diss and Harleston whilst Norfolk residents would travel to Bungay, Beccles, Eye and Brandon and other similar settlements.

**Question 24-44**

(No Comment)

**Questions 45-46. Do you support or object or wish to comment on the overall/specific approach for the village clusters?**

The delivery of development particularly in South Norfolk of the Greater Norwich Local Plan and in South Norfolk Council's separate village clusters plan is of interest. SCC would appreciate information on how Suffolk's education infrastructure may be affected by increased pupil demand arising from any new development. Relevant existing provision, catchment schools and associated mitigation will need to be considered in respect to upcoming development plans. SCC welcomes communication about the aforementioned, in order to proactively promote synergy for schools cross-boundary.

Regarding Early Years provision, the wards of Fressingfield and Palgrave are the nearest wards to Harleston and Diss. Considering the upcoming growth in the area, forecasts for Fressingfield show an overall potential deficit in places. Upcoming growth is unlikely to be accommodated and alleviated by Suffolk provision due to existing pressure and Full Time Employment provision.

**Questions 47-48.**

(No comment)

I hope that these comments are helpful. Please contact me via the details at the top of this letter if I or any of my colleagues can be of assistance.

Yours faithfully,

Ruby Shepperson  
Planning Officer  
Growth, Highways and Infrastructure Directorate