

# Response to Post-Hearing Evidence

November 3rd 2025 Rebecca Walkley & Len Liggins

## Executive Summary

This response demonstrates that the **December 2024 Strategic Environmental Assessment (SEA)** and the **Parish Council's supporting submissions for the Hearing** do not provide a lawful or transparent basis for allocating **Site 1 (Land west of Norwich Road )** as a preferred site in the Dickleburgh & Rushall Neighbourhood Plan.

The December 2024 SEA process has been procedurally defective:

- It was **commissioned unilaterally** by the Parish Council Chair without recorded authorisation (**Appendices B and C**).
- **We suggest it excluded Reasonable Alternative Sites (RASs)** still owned and available, notably the **Chenery site** owned by Providex Ltd. (**Appendices B, C, D, E**)
- It **redefined selection criteria** and **omitted comparative data** from the earlier 2023 SEA.
- **AECOM's own hearing note and clarification** confirm the second SEA was commissioned **after Regulation 14**, proving the exercise was reactive, not iterative (**Appendix A**).

Meanwhile, **planning permission 2018/0980 has lapsed- for land West of Norwich Road (Appendix G)** adjacent to site 1. Also, **Norfolk County Council Highways** has objected to site 1 as highway access is not viable. **Therefore, Site 1 is not considered deliverable** due to highway and access constraints (**Appendix F**).

Taken together with the **developer's financial interest** in adjacent land, **adviser connections (Rural Solutions)** to the same parties, and the **removal of higher-scoring alternatives**, the plan's evidence base fails to meet the SEA Regulations, the NPPF (31), and the Basic Conditions of the 1990 Act.

# 1 Evolution of the SEA

Two SEAs were produced by AECOM (**AECOM letter “SEA Process”, para. 1–2, confirming preparation of the January 2023 and December 2024 reports. Appendix A)**)

The first SEA at least attempted a full comparison of sites, but its later re-use and selective editing in 2024 produced a less transparent, more restrictive document. AECOM later described the second SEA as a “*natural continuation*” (**AECOM letter, para. 3: “The December 2024 SEA was a natural continuation of the earlier SEA process, using the same topic framework”**), yet it changed the methodology, scope, and dataset.

In practice, this was a new assessment, not an update, which undermines compliance with the SEA Directive requirement to evaluate reasonable alternatives (**AECOM letter, para. 4, acknowledging that the 2024 SEA was commissioned after Regulation 14 feedback and applied a revised site-capacity approach**).

While AECOM is a respected planning and environmental consultancy, the “SEA Process” note provided to the Examiner does not meet the usual standards of transparency and methodological clarity expected under the SEA Directive and IEMA professional practice guidance. It conflates structural continuity with methodological continuity, provides no audit trail for the removal of previously reasonable alternative sites, and acknowledges that the second SEA was commissioned after Regulation 14 consultation and at the request of the Parish Chair alone. These omissions raise legitimate questions about the independence and procedural soundness of the 2024 SEA.

## 2 SEA Evidence and Site 1 Performance

Both SEAs show that **Site 1** performed poorly yet was promoted as the preferred allocation (PC 1.2.3 3a–3c “withdrawal of option 2” **Appendix B**)

In the **Jan 2023 SEA**, Site 1 scored lower than the Chenery site (Site 2) and land east of Ipswich Road (Site 4) for heritage, flood risk, landscape, and biodiversity. AECOM noted uncertainty about effects on Dickleburgh Moor and listed buildings. Reg 14 consultation responses favoured the western sites instead (PC 1.1). In the **Dec 2024 SEA**, the north-west option containing Site 1 was the **lowest-ranked** overall, with negative scores for

nearly every environmental theme — particularly climate change, heritage, and flood risk. Yet the PC retained Site 1 as the preferred site on grounds of availability and a lapsed planning permission (PC 3j).

| Theme                | Site 1 (W of Norwich Rd) | Site 2 (Chenery) | Site 4 (E Ipswich Rd) | Key Finding                    |
|----------------------|--------------------------|------------------|-----------------------|--------------------------------|
| Biodiversity         | –                        | +                | +                     | Sensitive habitats near Moor   |
| Flood risk / Climate | —                        | +                | +                     | Site 1 partly flood zone       |
| Landscape            | –                        | +                | ++                    | Site 1 open countryside        |
| Heritage             | —                        | +                | +                     | Adjacent to Conservation Area  |
| Land use             | –                        | +                | +                     | Higher-grade farmland          |
| Community access     |                          | 0 +              | +                     | Better pedestrian routes east  |
| Transport            |                          | 0 +              | +                     | Highway concerns on Norwich Rd |
| <b>Overall rank</b>  | <b>Lowest</b>            | 2nd              | <b>1st/2nd</b>        | Site 1 least sustainable       |

(++ = strong +, – = negative, — = strong –)

### 3 Changing Site Availability

Despite Site 1’s low ranking, the PC claimed its retention was due to “changes in site availability” (PC 1.2.3 3a–3c **Appendix B**) referring to other sites residents wanted to see developed such as site 2. However, **Providex Ltd**, the landowner of the Chenery site (Site 2) (**Appendices E and K**), never withdrew; only the developer (Tricker and Last) stepped back (PC 4a–4d email from M. Last). No letter of withdrawal from Providex exists.

If their land was removed without consent, this could expose the Plan to **Judicial Review** by Providex for procedural error.

### 4 Lapsed Planning Permission Adjacent to Site 1

The outline permission 2018/0980 for 22 homes off Brandreth Close expired when pre-start conditions were not discharged (PC 3j notes previous approval). The lapse arose from the developer’s failure to act, not Council delay. (**Appendix I**)

We understand that La Ronde Developments are agents for both sites ie for the 22 homes off Brandreth Close for planning application 2018/0980 and Site 1. La Ronde stands to benefit financially if Site 1 is also allocated as the preferred site as both sites could be developed together, saving on infrastructure costs.

A viability illustration shows that a 22-home scheme yields around 13 % profit on GDV (-£1 m), while a 47-home combined scheme (Brandreth + Site 1) approaches 28 % (-£4.5 m). This £3.5–£4 m differential provides a clear incentive for La Ronde to have Site 1 promoted in the SEA. **(Appendix H)**

## 5 Governance and Advisory Influence

The PC has been advised by **Nicole Wright (plans for Hearing October 16th 2025)**, Nicole is now working with Rural Solutions, she was formerly a director of La Ronde Wright (PC 1.2.1 emails listing advisers). Although she no longer holds that post, another director — **Mr David Wright** — remains at La Ronde Wright.

Nicole Wright is either the applicant or landowner representative (declared ownership interest) for La Ronde Wright application for planning permission 2018/0517 **(Appendix J)** this creates the appearance of a **continuing connection** between the advisor and the developer. No conflict-of-interest statement has been published.

## 6 Highways and Site 1

Correspondence from **Norfolk County Council Highways (22 October 2025 Appendix F)** confirms that access to Site 1 from Norwich Road raises safety concerns due to restricted visibility and traffic volume (PC 3h references liaison with Highways). Highways officers stated that any future application would likely be refused unless major junction upgrades were secured. This technical objection undermines the PC's claim that Site 1 is "deliverable and unconstrained."

## 7 Comparable Neighbourhood Plan Cases and Developer influence

Other neighbourhood plans have failed examination or been remitted for re-assessment where a single developer-owned site was promoted despite adverse SEA results.

Governance weaknesses have been identified in a number of neighbourhood plans nationally, where SEA or site-selection processes were found to have been shaped by parties with a commercial interest in the preferred allocation (see Farnham NP 2017, Eaton Bray 2021, Linton 2022, Old Meldrum 2021). These cases illustrate a recurring vulnerability in parish-led plans: limited professional oversight and uneven access to resources can unintentionally allow developer interests to steer evidence or methodology.

The circumstances in Dickleburgh & Rushall show the same characteristics—centralised control of consultant briefs, post-consultation SEA revisions, and preference for land linked to an adjacent consent—raising legitimate concerns about procedural robustness rather than community intent.

We feel that Parish Councils are small organisations and NPs are compiled and written by enthusiastic volunteers giving their time to the community, it seems with minimal support from overstretched local authorities. It's an environment where developers could have pernicious influence as they have a profit agenda and employ professionals who can exert undue influence.

## **8 Email Bundle (1a-1m, 4a-4d, 5h-5k ) Parish Council, AECOM and SNC**

The email bundle (1a–1m, 4a–4d, 5h–5k) (**Appendix C**) corroborates our earlier evidence that the Parish Council chair acted without Steering Group authorisation in both the commissioning of the December 2024 SEA and the removal of the Chenery site from consideration.

The emails demonstrate that the second SEA was initiated personally after Reg 14, with SNC confirming it played no role in that decision. They also show that the Chenery landowner did not withdraw and that access and governance concerns around Site 1 were known years before the Hearing. This correspondence further strengthens our case that Site 1 was advanced on availability and developer interest rather than objective planning evidence.

## 9 Summary and Recommendation to the Examiner

1. The December 2024 SEA is a replacement, not a continuation, and lacks consultation or authorisation (**Appendices C, D, E,**).
2. **Site 1's selection** relies on a lapsed consent and flawed highway deliverability assumptions (**Appendices F, I**).
3. We suggest the **Chenery site** remained available but was wrongly excluded (**Appendices C, D, K**). Providex, the owner may have the right to Judicially Review South Norfolk Council.
4. **AECOM's work** for the December SEA was reactive and unsupervised and flawed (**Appendix A**).

The procedural and evidential record shows the Dickleburgh & Rushall Neighbourhood Plan is **unsound in its present form**.

Taken together, the Parish Council's and AECOM's submissions confirm that the December 2024 SEA was not a continuation but a replacement assessment produced without Steering Group approval or governance. It cannot lawfully underpin the Neighbourhood Plan.

Furthermore, since **Norfolk County Council Highways** has now objected to Site 1's viability and access, the earlier January 2023 SEA (which assumed viability) can no longer be relied upon.

**Site 1's allocation** stems from unverified assumptions of deliverability and developer advantage, not from objective analysis or community preference. Reasonable alternatives, especially the **Chenery site**, were excluded without owner withdrawal, contrary to the SEA Regulations and **NPPF 31**. Comparable NPs confirm that plans showing similar bias have required modification or re-examination.

Accordingly, the Examiner is invited to recommend that **Site 1 be removed or independently reassessed** and that a **fresh, transparent SEA** be commissioned under **South Norfolk Council's** direction to ensure full compliance with the **Basic Conditions** and the **SEA Directive**. A **new, independent SEA** is therefore required under **South Norfolk Council's** supervision.

## Final Statement

This response is submitted on behalf of **Rebecca Walkley and Len Liggins**, residents of Dickleburgh, representing local community concerns about the transparency, governance, and evidential integrity of the Neighbourhood Plan process.

We respectfully ask the Examiner and South Norfolk Council to note these factual clarifications and ensure that the next stage of plan preparation meets the standards of openness and impartiality required by national planning guidance.

## Appendices

| Appendix | Title / Source                                         | Description                                         |
|----------|--------------------------------------------------------|-----------------------------------------------------|
| <b>A</b> | AECOM Letter                                           | Presented for Hearing October 16th 2025             |
| <b>B</b> | Post-Hearing Evidence – PC Key Points                  | Parish Council's response to Examiner               |
| <b>C</b> | Email bundle Parish Council                            | Emails -(1a–1m, 4a–4d, 5h–5k)                       |
| <b>D</b> | Correspondence: Tricker & Last (Sept 2021)             | Emails regarding Chenery site "withdrawal."         |
| <b>E</b> | Land Registry Entry for Chenery Site (NK481443)        | Confirms Providex Ltd as landowner.                 |
| <b>F</b> | Norfolk Highways Letter (22 Oct 2025)                  | Highway safety objection to Site 1.                 |
| <b>G</b> | Post-Hearing Evidence – Status of Permission 2018/0980 | Demonstrates lapse of Brandreth Close consent.      |
| <b>H</b> | Viability Illustration (22 vs 47 Homes)                | Calculation showing profit margins for developer    |
| <b>I</b> | Application for planing 2018/0517                      | Lapsed pp Brandreth Close                           |
| <b>J</b> | Application 2020/0517                                  | Application form showing links to Nicole Wright.    |
| <b>K</b> | Drawing for Chenery Site                               | Shows Tricker and Last as Agent, Providex as owner. |

17 October 2025

Mr A Goodman



**Our Reference**  
Dickleburgh and Rushall  
Neighbourhood Plan SEA

## Response to SEA matters raised at Examination

Dear Andrew,

Please find below our discussed responses to the SEA matters that were raised at Examination (16<sup>th</sup> October 2025). This is intended to be a formal record of these responses for publication on the neighbourhood plan website.

The following questions were posed to AECOM, in relation to the work undertaken to deliver the SEA Environmental Report published in January 2023, and the updated SEA Environmental Report published in December 2024:

1. **Why were sites 3 and 19 not considered in the second SEA Environmental Report?**
2. **Why are the alternatives different in the two reports?**
3. **Why was a second SEA Environmental Report necessary?**

These questions were posed to AECOM considering the following matters to be discussed at hearings held 16<sup>th</sup> October 2025:

- **The site selection process for the proposed housing allocation, and the way in which reasonable alternatives were considered.**
- **The way in which the second Environmental Report (December 2024) was a natural iteration of the first Report (January 2023); and**
- **The extent to which the second Environmental Report properly underpins the site selection process both generally, and in the context of the contents of Table 3.2.**

In the first instance we note the role of the SEA, whilst it considers site options and growth strategies, the SEA does not select sites for allocation. The SEA process supports the evidence base for the plan. In this respect, it is intended to support plan-making and decision-making undertaken by the Qualifying Body (i.e., the NP steering group). A particular requirement of the SEA is to assess the preferred plan approach alongside 'reasonable alternatives'.

Reasonable alternatives were established following consideration of strategic factors (housing need, completions & commitments), and land supply options (site options). This is detailed in Chapter 5 of the first Environmental Report (January 2023) and in Chapter 3 of the second Environmental Report (December 2024).

The second SEA Environmental Report (December 2024) is an iteration of the first SEA Environmental Report (January 2023), in that the process to arrive at reasonable alternatives was repeated in 2024 considering updated evidence and consultation feedback. Two key changes affected the alternatives as they had been established in 2023:

1. Consultation feedback from South Norfolk Council raised concerns in relation to the proposed 'Settlement Gaps' policy which resulted in plan changes (reduced designated areas). This had minor implications for the SEA. Additionally, the response from the Council highlighted a need for the SEA to include the sites that fell within the proposed settlement gaps, which would ultimately mean revisiting and updating the alternatives assessed through the SEA to date.
2. One site that had previously been considered through the SEA (Site 3, which formed part of Option 3) could no longer be confirmed by the Qualifying Body as available over the plan period. Without the confidence that this site could be delivered over the plan period, it was no longer considered a 'reasonable alternative'.

These changes are ultimately what underpinned the decision that a new SEA was necessary. In the second SEA Environmental Report (December 2024) more sites were identified as potential alternatives, which led to the appropriateness of undertaking a 'points of the compass' approach through the assessment, exploring the effects of development in various locations around the settlement. The SEA highlights merits and constraints associated with the sites in these locations, and these findings have fed into plan and decision-making (undertaken by the Qualifying Body).

In establishing alternatives, the SEA identifies sites that are not considered to form reasonable alternative options, particularly sites that do not support the objectives of the plan. Of note, this includes sites that fall within the 'Cordon Sanitaire', with the SEA stating that *"development at these options could be viewed as undermining the work to date with Anglian Water to protect future development and the health and wellbeing of future residents"*. Site 19 has not been confirmed as available over the course of plan-making, and Site 3 fell away post-Regulation 14 consultation as this site also could not be confirmed as available. Additionally, Site N1 was discounted as no reasonable access to the site could be established.

These points ultimately address the questions and matters raised in relation to the SEA and we hope you find this useful. Please do not hesitate to get in contact should any further queries arise.

Yours sincerely,



Cheryl Beattie  
Associate Director



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Examiner Questions

**Part 1: The processes used to select the housing allocation to the west of Norwich Road (Policy DR20), and the reasonable alternatives considered.**

This session will address the following matters:

- 1.1 the site selection process for the proposed housing allocation, and the way in which reasonable alternatives were considered;
- 1.2 the way in which the second Environmental Report (December 2024) was a natural iteration of the first Report (January 2023); and
- 1.3 the extent to which the second Environmental Report properly underpins the site selection process both generally, and in the context of the contents of Table 3.2.

1.1  
the site selection process for the proposed housing allocation, and the way in which reasonable alternatives were considered.

**Selection of sites – gathering community opinion**

1.1 The selection of sites has been guided by public consultation outcomes. We decided that, as we engaged in the development of the NP, we needed to be able to take the community with us. Failure to do so would have inevitably meant that the NP itself would fail. Public meetings were held at the Village Centre (1a and 1b).

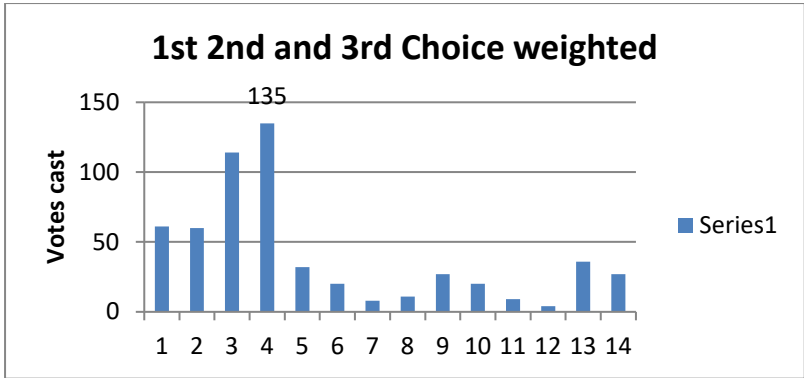
The questionnaire was created and analysed during winter 2018 and spring 2019 (1c). A further 2 open public sessions were organised to gather residents’ views and ensure the NP development was developing in line with public opinion (1d, 1e and 1f).

**1a) Views of those attending meeting 24<sup>th</sup> February 2017.**

The key messages: No development on smaller roads, planned development not piecemeal. Development should not extend the Village. No urban sprawl. Ensuring natural habitats.

**1b) Future development plans for our village**

Villagers responses: 102 individual responses, **May 2017** (residents opinions on the call for sites. If development has to occur, which site would you prefer to see developed).



**1c) NP questionnaire results January 2019 – summary presented to the PC.**

Key outcomes – promote rurality, beautification, ditches, character of the village, biodiversity, development sympathetic to the environment, affordable housing.

**1d) Have Your Say 27<sup>th</sup> April 2019** 10 page document – checking progress.

**1e) Written comments from Have Your Say session 27<sup>th</sup> April 2019.**

Key takeaways: Sightlines, biodiversity corridors (green), wildlife areas, importance of the area around the bottlebank, self-build homes, parking space an bedroom count, housing with the environment in mind.

**1f) Have Your Say 2 18<sup>th</sup> and 20<sup>th</sup> January 2020** 10 page document

Housing in keeping with the village heritage. Rural identity. Rainwater harvesting.

**1g) Written comments from Have Your Say 2 sessions.**

Key takeaways: Rurality, rural environment and rural protection, transport issues around narrow roads and single track roads, Housing development should be to the West of the Village, green corridors and open spaces

within the village. Dark Skies, lorries and traffic, footpaths and safe walking, Current (new) housing estates flooding.

### **Selection of sites**

#### **1.1.2 NP team identifying the site selection process and evidence gathering to support the final decision**

**2** The process to identify a site / sites involved: Gathering further evidence by consultation with advisory bodies, consultation with statutory bodies, site visits, public surveys, traffic surveys, pollution surveys (2a – 2i).

**2a)** We adapted the **Central Norfolk Strategic Housing and Economic Land Availability Assessment: Methodology Final July 2016** as the basis for our HELLA.

**2ai)** Central Norfolk Strategic Housing and Economic Land Availability Assessment: Methodology Final July 2016

**2b)** Reflection upon and scrutiny of documentation from GNLP. Example 5.25. Dickleburgh and Rushall

**2bi)** Extract from GNLP 5.25 Dickleburgh and Rushall

**2c)** 6<sup>th</sup> February 2019 Meeting with Simon Marjoram and John Walchester (SNDC) identifying sites introduction to SNDC advice <http://www.gnlp.org.uk/assets/Uploads/HELAA-addendum-2018-final.pdf> pages 247 - 254 are the Parish of Dickleburgh and Rushall.

**2ci)** Simon Marjoram and John Walchester meeting with AG to discuss changing state of allocations AG minutes

**2cii)** Simon Marjoram and John Walchester meeting with AG to discuss changing state of allocations SM notes

**2ciii)** Note from Richard Squires on the SNBDC sites promoted by SNC for HELA

**2d)** Development of our HELLA – Led by Allan Eaves qualified architect and senior planning officer for London Borough of Harrow (retired).

**2di)** South Norfolk on line HELA responses Allan update

**2dii)** The South Norfolk HELA grid

**2diii)** Judgements in light of Anglia Water recommendation 24.6.19

**2e)** Introduction / Preface to Submission of HELLA Site Assessments.

**2ei)** D and RNP Team intro / preface to submission of HELAA site assessment 28/6/2019

**2f)** site visits

**2g)** Street / Road Character assessments conducted circa Feb 2019 example

**2h)** roadside verge surveys

**2hi)** Master copy

**2i)** Traffic surveys using the movable PC SAMs camera and the speed watch team. Evidence showed the heaviest used roads were Harvey Lane (which is a single track into the Village now a Quiet Lane), and the Street (which links Norwich road, Ipswich Road and Rectory Road).

**2j)** Pollution surveys

**2k)** Example of Bat surveys

**2ki)** Example of Bat survey outcome

### **Meetings to consider the site / sites**

**1.1.3** With the evidence gathered from public opinion, surveys, advice and new evidence emerging all the time the NP team held a series of meetings to identify and confirm the site or sites going forward, to reduce the number of sites and eventually identify 1 or 2 sites to promote in the Neighbourhood Plan (3a – 3g).

#### **Meetings**

**3a)** 3<sup>rd</sup> October 2017 Meeting with Adam Nicholls (SNDC) and members of Starston PC to consider the call for sites outcome and receive procedural advice.

**3b)** 15<sup>th</sup> April 2019 identifying the aims and objectives of the NP Housing Policies

**3c)** 22<sup>nd</sup> June 2019 Site Assessment meeting – Introduction to submission

**3ci)** 4 sites identified as possible for delivering requirements

**3cii)** Dickleburgh NP Density Review

**3ciii)** Agenda Site Assessments

**3d)** 19<sup>th</sup> March 2020 considering the proposals from the Chenery site

**3di)** Chenery proposals The drawing includes a green field (not agreed)

**3e)** 21<sup>st</sup> July 2020 Virtual meeting with La Ronde

**3eii)** draft policies with advice from SN

**3f)** 3<sup>rd</sup> September 2020 Chenery site meeting (agenda)

- 3fi)** minutes
- 3g)** 17<sup>th</sup> September 2020 Reducing the sites. This meeting created a Hierarchy of sites agenda
- 3gi)** Appendix 1c Preferred sites brief
- 3gii)** Screen shot of support documentation
- 3giii)** site scoring
- 3h)** 29<sup>th</sup> October 2020 Confirming the strategy and outcomes for the preferred sites and proposed Design Guide (part of a larger document)
- 3i)** 2<sup>nd</sup> May 2021 identify Site 1 going forward
- 3j)** 17<sup>th</sup> JUNE 2021 meeting Purpose: To review the site allocation in light of the Village Clusters (email from SNDC used as guidance). Confirm the NP will promote 25 homes and allocate 15 homes to site 1 and 10 homes to site 2 (Chenery brown field). To confirm rejection of the extended site.
- 3k)** 12<sup>th</sup> July 2021 Minutes of PC meeting.
- 3l)** 18<sup>th</sup> October 2021 Minutes of PC meeting.
- 3m)** 8<sup>th</sup> and 22<sup>nd</sup> July 2024 part 2 item 34

#### **Emails that supported the site process**

- 1.1.4** The following emails are selected as they are pertinent to the decision making process of reducing the site selection from 2 sites to a single site.
- 4a)** 4<sup>th</sup> August 2021 From AG to the team. Outlining the agreement on numbers and the proposal to Chenery site. The PC requested should Chenery refuse the allocation it should go in full to La Ronde. Verbal confirmation from Tricker and Last that the offer would be rejected.
- 4b)** 20<sup>th</sup> September 2021 AG to Martin Last (Chenery site) – following up initial contact
- 4c)** 22<sup>nd</sup> September 2021 ML to Tony Tricker copied to PC clerk and AG – rejection of the offer and withdrawal by the owners of the process.
- 4d)** 22<sup>nd</sup> September 2021 AG to ML – Thanking Martin Last for the information, confirming the decision will be passed to the team.
- 5e)** 12<sup>th</sup> August 2022 AG to AECOM Cheryl and Emma – confirming the withdrawal of the Chenery site from the process.
- 5f)** Alex Mann No to the LGS
- 5g)** Email trail from 9<sup>th</sup> June 2021 referencing 2 sites and GNLP reg 18
- 5h)** AG to team following zoom meeting with Tricker and Last planning next site meeting
- 5i)** A. Eaves to team re site documentation 7<sup>th</sup> July 2019
- 5j)** A. Eaves questioning the density of the Chenery site 18<sup>th</sup> March 2020 (they have understated the numbers)
- 5K)** 9<sup>th</sup> June 2021. Housing numbers changed 1 more meeting

#### **Part 1.2**

**the way in which the second Environmental Report (December 2024) was a natural iteration of the first Report (January 2023); and**

#### **Applying for funding to produce a Second SEA**

**1.2.1** Following the Regulation 14 process there were questions raised (particularly by South Norfolk District Council) that led our consultant to conclusion that there had been enough changes and policy reviews to justify a new / reviewed SEA. The following emails are simply my (AG) knowledge of the discussion process. There is evidence to suggest that conversations took place between different parties that the NP team were unaware of.

#### **Emails**

- 1a)** 12<sup>th</sup> February 2024 AG to CB at AECOM. Responses from regulation 14.
- 1b)** 25<sup>th</sup> March 2024 CB to AG. Clarification on progress to full submission.
- 1c)** 23<sup>rd</sup> July 2024 AG to CB. Identifying the progress.
- 1d)** 25<sup>th</sup> July 2024 AL (Andrea Long author of the Basic Conditions Statement) to CB questioning if the SEA may need updating in light of the refined objectives.
- 1e)** 25<sup>th</sup> July 2024 CB to AG and AL Agreed there may need to be an update. AG to apply for funding.
- 1f)** 26<sup>th</sup> July 2024 AG to CB funding application for SEA update had begun.

- 1g)** 5<sup>th</sup> August 2024 CB to AG. AECOM organising the application for funding.
- 1h)** 21<sup>st</sup> August 2024 AG to PH (Paul Harris, SNDC) confirming PC sign off of the NP and the application for SEA funding.
- 1i)** July PC meeting signing of the NP?
- 1j)** 30<sup>th</sup> November 2024 AG to CB NP team response to the first draft.
- 1k)** 11<sup>th</sup> December 2024 AG to CB confirming Historic England schedule application no:1487027 for Dickleburgh Moor
- 1l)** 20<sup>th</sup> December 2024 CB to AG Second SEA delivered.
- 1m)** 11<sup>th</sup> September 2025 RS (Richard Squires SNDC) to AG confirming SNDC question over the SEA at reg 14.

## Documents

### 1.2.2

- 2a)** NP team official response to first draft of SEA 2.
- 2b)** AECOM response with confirmation of changes to SEA 2 from NP team response

### The link between the 2 SEA's.

Following the GNLP call for sites exercise, the Dickleburgh and Rushall Parish Council found itself in a position where most of the land around the Village of Dickleburgh (and some land within the Village), came forward as possible / potential development sites. The PC initiated the NP process as a means of retaining an element of control. The SEA was produced after the HRA during the process of determining the site and finalisation of the site/s. Following formal comments made as a response to Regulation 14 it was agreed by AECOM to revisit the SEA. The outcome was that a second SEA was written. It is our understanding that this was always a complementary SEA and not an alternative SEA.

Both SEA's use the same Framework (see below).

| Jan. 2023 Table 3.2 SEA Framework p.8 |                                        | Dec. 2024 Table 1.1 Summary Framework p.3 |                                        |
|---------------------------------------|----------------------------------------|-------------------------------------------|----------------------------------------|
| SEA Topic                             | SEA Objective                          | SEA Topic                                 | SEA Objective                          |
| Biodiversity and geodiversity         | Protect and enhance                    | Biodiversity and geodiversity             | Protect and enhance                    |
| Climate Change                        | Reduce contribution                    | Climate Change                            | Reduce contribution                    |
|                                       | Support Resilience                     |                                           | Support Resilience                     |
| Landscape                             | Protect and Enhance                    | Landscape                                 | Protect and Enhance                    |
| Historic environment                  | Protect and conserve                   | Historic environment                      | Protect and conserve                   |
| Land soil Water                       | Ensure efficient effective use of land | Land soil Water                           | Ensure efficient effective use of land |
|                                       | Protect and enhance water quality      |                                           | Protect and enhance water quality      |
| Community wellbeing                   | Growth aligned with need               | Community wellbeing                       | Growth aligned with need               |
| Transport                             | Promote sustainable transport          | Transport                                 | Promote sustainable transport          |

### 1.2.3 Site selection process

- 3a)** Following the NP team site analysis, the NP team identified 4 possible sites as going through the first round. In relation to SEA 2 that effectively meant that the NP team had selected option 1 and option 2 to go forward for further consideration (SEA 2 page 4, figure 1.1 and p.21, figure 3.5).
- 3b)** The sites were further reduced to a single site in option 1 (site 2 of both SEA's 1 and 2) and a single site in option 2 (site 1 of both SEA's 1 and 2). Significant assistance was provided by SEA 1 p.26, 6.45. At this stage the NP team were prepared to offer the housing solution to the 2 sites (10 on the brown field site in option 2 and 15 on the green field site on option 1 of SEA 2).
- 3c)** The sites were reduced again to a single site after the withdrawal of the option 2 site (SEA 2 and SEA 1).

### 1.2.4 The relationship between the 2 SEA's

**4a)** The 2 SEA's provide, to our mind, an unrivalled analysis of the environment in and around the Village of Dickleburgh. They complement each other providing analysis from the macro level to the micro level. The SEA's also reflect the changing state of availability of sites and the developing policies of the NP.

### **Part 1.3**

**The extent to which the second Environmental Report properly underpins the site selection process both generally, and in the context of the contents of Table 3.2.**

#### **SEA 2 Table 3.2 and SEA 1 summary findings 6.45**

Table 3.2 in SEA 2 is a strategic overview of the 4 groupings of sites identifying strengths and weaknesses of each option (geographic group of sites).

Summary findings 6.45 (page 26) in SEA 1 is a focused look at the 4 sites that came forward from SEA 2 option 1 and 2 (the overview).

Together the table and summary finding provide a comprehensive analysis of the sites to guide the decision making process.

#### **The confusion?**

Some may have been confused by the use of the term "option" in both SEA's. In both SEA's the original options denotes sites. The second SEA, to reduce the number of options, groups sites into geographical areas and identifies each area as an option. Thus enabling the NP team to whittle down the geographical areas and therefore the number of sites. In SEA 1 the 4 options denote 4 single sites and provides in depth (micro) analysis of each site. In both SEA's the site numbers are the same.

#### **Each site is an option and the options correlate across the SEA's**

In both SEA 1 and 2, sites are regarded as options and identified as such (SEA 1 figure 5.4, and SEA 2 figure 1.1). Both SEA's present a rationale to reduce the number of options and reassign options (SEA 1 15.11 – 5.16, and SEA 2 1.4.3, page 3).

### Redacted emails

Numbering as relates to the presentation at the examination meeting October 2025

#### 4a) From AG to NP Team

**From:** The Goodmans

**Sent:** 04 August 2021 18:22

**To:**

**Subject:** Neighbourhood plan update

Dear all

Following the last meeting of the NP team it was agreed that:

The NP team would go for the minimum number of houses to be built - 25.

(This does not include the 22 already allocated by South Norfolk that have prior planning approval.)

The allocation was

15 to La Ronde on site 1

10 to Tricker and Last on the Chenery site.

The proviso was that should Tricker and Last say 10 was unviable - the offer would be rescinded and the offer made to the owners of the site on the Ipswich Road opposite the listed buildings and beside the Old police station.

The NP team decision went before the Parish Council for their support. The Parish Council thanked the NP team for all their hard and diligent work and requested that we reconsider the option should the Chenery site be unviable. If T and Last reject the offer, the PC would like the offer to be made to La Ronde to build all 25 houses.

I spoke to Tricker and Last and made them the offer explaining this was a "sounding out" conversation and a formal offer would only be made if they confirmed they would accept it and build to the specifications of the NP and the site specific concerns expressed by the NP team. Tricker and Last are talking to the land owners to see if they will accept the offer. I await their reply.

Ann and I spoke to La Ronde. La Ronde have agreed they will build on a carbon neutral basis. In that they will assess the carbon emissions of the whole build and compensate to that number not just the building of the homes. They have accepted the offer of the 15 homes but do have capacity to deliver the whole 25. They are also looking at the Quiet Lanes initiative to see if they can incorporate the ideas and styling into their development plan.

Should T and Last refuse the offer, my personal view is that we should go back to La Ronde and offer them the additional 10 houses. This would show the PC that we are listening to their concerns and thinking strategically about the look and feel of the village of Dickleburgh and Parish as a whole.

One of the reasons we chose the Ipswich Road site was that this was the preferred site of residents when the Hopkins homes development was proposed. However the survey had all 4 sites (2 on Ipswich Road, Chenery and La Ronde) as almost the same so we would still be meeting the wishes of the residents.

I would be happy to organise a meeting in the Village Centre should we wish to have one, alternatively we could utilise email; Unfortunately the PC does not have zoom anymore.

Finally La Ronde have offered free training at the Village Centre on planning and delivering the La Ronde site in a way that we would wish it incorporating our Design Code and the latest NPPF requirements.

Any thoughts?

Andrew.

#### 4b) From AG to ML

**The Goodmans**

Mon, 20 Sept 2021, 10:56

to

Dear

I contacted your offices in order to discover the results of the meeting between Tricker and Last and the owners of the Chenery site re the opportunity to build on the site. I need to know what the thoughts of the owners are in order to progress the plans. If you are unable to inform us I am happy to speak directly to the owners if you can furnish us with their details, if that helps. Either way we do need to know the intentions.

Kindest regards

Andrew Goodman

#### 4c) From Tricker and Last to AG

**Martin Last**

Wed, 22 Sept 2021, 08:17

to

Hi Andrew

Whilst my client is pleased to note your intention to include both of his sites in your NP. Unfortunately he does not feel that a proposal to limit the land to 10 dwellings maximises the potential

Kind Regards

**Last & Tricker Partnership**

*Note: The offer to include the green field site as part of the development site was never made. The NP team had already rejected enlarging the site*

**4d) From AG to Tricker and Last  
The Goodmans**

22 Sept 2021, 09:11

to

Hi Martin

Thank you for getting back to me, I will pass the information on to the rest of the NP team.

Kindest regards

Andrew

**5i) A. Eaves to team re site documentation 7<sup>th</sup> July 2019**

Conversation opened. 6 messages. All messages read.

Fwd: Site Assessments

Inbox

From: **IS**

10 Jul

2019,

13:07

**To: AE**

Hi Allan, can you give us more details regarding site 10 as I was under the impression that this site was not going to be considered due to the large amount of complaints received by the site manager on DIC 1.

Seems very very suspect that this site was added in June this year, is this because the land is/was owned by councillor XXXXXXXX brothers, sisters & cousins?

Or is it because, if the land is owned by Hopkins homes, that councillor XXXXXXXX family will not get their payments for the land if Hopkins homes are unable to develop this land.

Since the near completion of the DIC1, Harvey Lanes:-

A) footfall has increased substantially with parents with young children, teenagers, young adults and the more elderly.

B) there has also been an very substantial increase in vehicles, from the east of Harvey Lane, of all sorts speeding towards the very narrow part of the lane (were the PEDESTRIAN MARGIN LINE will be) before the village centre/children's play area/school, playing field and access to local shop and bars.

C) The speeding has dramatically increased since the small road widening was put in place to the east of Limmer Avenue by JMS

Can you also explain why, on the plan that site 10 is marked in DARK RED?

Please get back to us with some urgency.

Regards

IS

Begin forwarded message:

**From:** AE

**Date:** 7 July 2019 at 10:48:55 BST

**To:** NP Team

**Subject:** Site Assessments

Hi All Neighbourhood Team,

I have completed my review/revisions of all the assessment documents based on feed back from our 22nd June meeting and also made comments or amendments based on the assessments completed by GNLP in their document.

As before I have to send the updated HELAA assessments by 3 further e mails due to their MB size

Regards

**A**

**4 attachments**

Submission Site Assess Doc.doc

PREFACE TO SUBMISSION OF HELLA ASSESSMENTS.doc  
DICKLEBURGH SITE ANALYSIS AREAS .xls  
GNLP SITE MAPSDickleburgh with Late 2018 Sites.pdf

Reom:AE

10 Jul  
2019,  
13:27

to IS AG

Hi I,

I note your concern and agree all your comments on site 10 but am not aware of any involvement of by councillors or their relatives. It was the GNLP team that now re included part only of site 10 in their assessments. However it is not included in our recommended sites nor is it in the current GNLP favoured sites in fact they rate it in their "Unreasonable Sites". The only reason why it is marked in red, I think, is because it was a new revised version of the site.

If you would like further information about the GNLP assessments we received prior to our meeting on 22nd June I will forward to you. However our assessments should take preference.

Regards

AE

**4 attachments**

Submission Site Assess Doc.doc

PREFACE TO SUBMISSION OF HELLA ASSESSMENTS.doc

DICKLEBURGH SITE ANALYSIS AREAS .xls

GNLP SITE MAPSDickleburgh with Late 2018 Sites.pdf

**The Goodmans**

10 Jul  
2019,  
14:51

to AE IS

Further to Allan's remarks. Highways have indicated (privately) that they will object to further development of Harvey Road.

A

**IS**

10 Jul  
2019,  
17:57

to AG

Hi Andrew, thanks for that information, I just didn't want that Hopkins Homes Chris Smith getting another one over on us, so he could smile at us again.

Regards

I

Sent from my iPad

**AE**

19 Jul  
2019,  
11:27

toAG

Hi Andrew

Should we talk 're next steps?

Allan

**The Goodmans**

19 Jul  
2019,  
16:34

to A

Hi A yes definitely. Next week at your discretion. Hope B is recovering well.

Kindest regards as always

Andrew

**5e) From AG to AECOM  
The Goodmans**

12 Aug 2022, 10:37

to

Dear

I am forwarding this as evidence to support the NP decision to go for option 1 site 1 (brown field site). I am still writing the prose. The developer is playing a bit of a game here. The NP team did/have not agreed to extend the boundary to include what is identities on fig 5.4 as N (I believe) he is none the less making it clear they do not want to develop the land - through difficulties in meeting the design brief of the NP. The earlier attachment shows their thoughts should they get the extension and not have to meet the design brief.

Kindest regards

Andrew

**5f) From A. Mann to AG**

**From:**

**Sent:** 01 October 2024 16:59

**To:** [cllr.andrewgoodman@dickleburghandrushallpc.org.uk](mailto:cllr.andrewgoodman@dickleburghandrushallpc.org.uk)

**Cc:** [clerk@dickleburghandrushallpc.org.uk](mailto:clerk@dickleburghandrushallpc.org.uk)

**Subject:** Local green space in Dickleburgh

Dear Mr Goodman,

Thank you for your letter addressed to my father and myself which was received back in August. I apologise for the slow response, but we did have to seek a third-party opinion in order to get some clarity on your proposal, in which you suggest the field between Manor Farm and the bungalows off the Ipswich Road in Dickleburgh is used as a local green space in the future Neighbourhood Plan.

I spoke with Ann Baker on the telephone last week and explained to her that the Thelveton Farms Partners do not wish to see this field allocated as a local green space in the Neighbourhood Plan at this stage. Should this situation change then we will of course let you know.

Yours sincerely

Alex Mann

**5h) From AG to NP Team**

**The Goodmans**

Fri, 4 Sept 2020, 08:53

to

Dear all

Thank you for attending the meeting which I thought was quite inciteful. The plan, now we have spoken to Martin is to hold our next meeting on Zoom to revisit the site preferences and whittle them down to accommodate around 40 ish houses rather than the 80+ previously muted through the GNLP.

As we discovered yesterday there are problems with next Thursday so I will cancel that meeting. The meeting therefore to consider sites and consider whether we support aspects of the Last proposal will take place on Thursday week in the evening. It would be helpful if as many members of the wider group were present so if you are able to spread the word it would be helpful.

Allan and I will send the agenda in the next few days and hopefully after a successful meeting we will be able to confirm to owners of all 4 sites which ones are going forward as preferred sites in the NP.

Kindest regards as always

Andrew

**5j) From AE to AG questioning the stated density of the Chenery site.**

18 Mar  
2020,  
11:14

to

Hi Andrew,

thank you for plans submitted by Last Tricker. My comments are as follows :-

Firstly I would refer to overall NP requirements, and my recent preferred site specific briefs and the following :-

1. The most significant requirement in the site specific brief for this site is the requirement that the view of the Grade 1 Church Tower is not impeded by any development. An existing site line approaching the village from the south of site on left of Ipswich Road gives a view of the Church Tower from before the Grade II White House. In order to maintain this view any development of the site needs to either be set back from road to west of site line or height restricted to maintain view.

The developer needs to demonstrate by way of elevations, sections, axonometric or photographic projections that this site line is maintained.

2. The density indicated on the plan is shown as 20.6 dph but by my calculations it is 24 dph and above our recommended standards.

3. I have looked at back gardens lengths and on some of the bungalows these are as little as 5M and 10M. On the 2 storey houses some of the back gardens are as little as 10M-15M and on back to back of gardens o/a 25M not meeting our requirement for habital room overlooking min distance of 30M. Also on front to front of 2 houses on the new road as close as 12M.

4. The car parking provision required for the 25 houses with the o/a bedroom provision is 66 based on our design guide. I counted 49 off road and 6 in laybys of road, total 55 ie short by 11 spaces.

5. The above points require amendments to meet the requirements of the Neighbourhood Plan and will involve a reduction in density to achieve them

regards

Allan

### **5g / k) From AG to Team housing allocation final meeting**

#### **D and R NP housing allocation final meeting**

10 messages

**The Goodmans**

9 June 2021 at 11:47

To:

Dear all

I propose that we have 1 more zoom meeting to agree the final document going to South Norfolk.

Why?

As you may know the numbers required from this parish have been changing over the time we have been developing the plan. Today the number as identified by the latest reg 18 consultation is a minimum of 25 homes. This means if we do not reconsider then we will exceed this number by around 150% which I am confident no one wants.

The final draft section 8 (redacted) identifies 2 sites. We must

1 confirm we are happy with the allocation - which I think we have already done but lets make absolutely sure

2 confirm the sites. there is some possible confusion here as when we last met a third site on the Ipswich road was offered as a possibility if site 1 and 2 failed to deliver the required housing. The fact is they absolutely will, so we can confirm the final 2 sites, whatever they are.. I know there is some concern that we get the sites right.

Can we have a zoom meeting maybe next thursday 19th July at 7.30 pm The mtting will effectively be each person stating their preference and then a vote. The PC nolonger have zoom so it will be through the free service which means we must end after 40 minutes. I promise it will be brief - but vital

Kindest regards to all

Find below a section from the reg 18 outlining the thoughts on the reg 18 documentation

#### **Dickleburgh Neighbourhood Plan**

The Dickleburgh Neighbourhood Plan is being prepared by the Dickleburgh Neighbourhood Plan Steering Group. The Dickleburgh Neighbourhood Plan will include site allocations for residential development, based upon housing requirements for different areas as set out in the Greater Norwich Local Plan (GNLP). The indicative housing requirements for Dickleburgh is a minimum of 25 homes.

To ensure transparency, the chapter includes the list of the sites in Dickleburgh that have been promoted to the Council for consideration. The assessment and allocation of these sites will be undertaken through the Neighbourhood Plan, relevant details of the site(s) promoted to the Council have been shared with the Neighbourhood Plan steering Group.

The ongoing devolution of responsibility for making allocations to Dickleburgh will be contingent on adequate progress being made with the Neighbourhood Plan.

Details of the Dickleburgh Neighbourhood Plan can be found here: <https://dickleburgh-rushallpc.norfolkparishes.gov.uk/neighbourhood-plan/>

## **Form and character**

### ***Dickleburgh and Rushall***

The main concentration of development within the parish is based along the former A140. There are also smaller rural communities at Rushall and Langmere. Individual dwellings and farmsteads are dispersed throughout the remainder of the parish.

The historical centre of the village has developed along The Street and is characterised by buildings close to the road. More recent development has extended the built-up area both north and south along the former A140 with further developments eastwards along Rectory Road and Harvey Lane. Immediately to the north of the main part of the village is an area of development at Dickleburgh Moor, a small detached ribbon of development along the west side of Norwich Road. A number of estate developments have taken place in between Rectory Road and Harvey Lane. The A140 by-passes the village to the west providing links to Norwich to the north and Ipswich to the south, as well as Diss via the A1066.

### ***Services and Community Facilities***

The settlement has a range of social, recreational and community facilities including preschool, a primary school, village hall, pub and shop. The village has the benefit of mains sewerage. There is also a limited bus service. There are also several employment uses covering various sectors.

### ***Settlement Limit and Constraints***

The Settlement Limit has been drawn to include the main built form of the settlement, but specifically excludes the grounds of All Saints Church and the Rectory, the allotment gardens on Chapel Road and the recreation ground on Harvey Lane because of their contribution to the form and character of the village. In addition, no boundary has been drawn around the detached ribbon development at Dickleburgh Moor as further residential development would be detrimental to the rural character of the area. The Settlement Limit extends around the main settlement which includes the allocated land north of Harvey Lane made within the 2016 Site Allocations Plan. No alterations are proposed to the existing Settlement Limit.

**Allan Eavis**

9 June 2021 at 17:30

To:

Andrew can you confirm you do mean " maybe next thursday 19th July at 7.30 pm"

Allan

**The Goodmans**

9 June 2021 at 21:29

To: Allan Eavis

Hi Allan

At the moment yes. I hope no one replies suggesting a different day and time. If I do not get any negative replies by Saturday I will confirm by email the date and time (thursday) and give people a zoom password.

Fingers crossed

Andrew

**Jackie Patching**

10 June 2021 at 08:17

To: The Goodmans

Hi Andrew, this is fine but I think the date should read Thursday 17th June. Let me know if I am wrong.

Kind regards,

Jackie

Sent from my iPad

---

**The Goodmans**

10 June 2021 at 10:20

To: Jackie Patching

Oops

Cheers Jackie - Thursday 17th it is  
Andrew

---

**Allan Eavis**  
To: The Goodmans

11 June 2021 at 10:17

Andrew,  
you said next Thursday 19th July ??? Next Thursday is 17th June , but if you did mean July then there is no  
thur 19th??

---

**The Goodmans**  
To: Allan Eavis

11 June 2021 at 12:58

Hi Allan  
Yes it will be Thursday 19th. Sorry about the confusion. So far no one has said they can not attend the  
zoom meeting  
Regards  
Andrew  
PS I have been contacted by La Ronde again. They would like to meet the team the following week.  
Perhaps in person.  
Anyway we can talk that one through on the 19th.  
Take care

---

**Matthew Hill**  
To: The Goodmans  
Cc:

14 June 2021 at 13:49

Afternoon Andrew,  
I am just catching up on emails regarding the NP.  
You mention a Zoom Meeting next Thursday 19th July at 7.30pm. We assume that you mean this Thursday,  
17th June? Can you please confirm?  
Thanks a lot  
Matt  
Sent from my iPhone

---

**kcbarker2011@hotmail.co.uk**  
To: The Goodmans

15 June 2021 at 08:54

Hi Andrew  
Thanks for this, just to confirm do you mean this Thursday? 17th? I have another meeting this week 7 to 8.  
Karen

---

**The Goodmans**  
To: Karen Barker

Hi Karen  
Yes this thursday 7pm it will NOT be a long meeting - promise  
Andrew

**From AE to KB and AG**  
**Allan Eavis**

to  
Dear Karen.  
Further to the Neighbourhood Team meeting on 30th May, I recall you offered your services to assist me in the  
Development Team. Sorry I have not got back to you sooner.

I have been engaged in completing the HELAA site Assessments for All the sites offered up under Call for Sites in preparation for presentation at the Meeting planned for 22nd June. The HELAA forms consist of 3 pages each and I have also prepared an Index of Contents, Preface and Notes (please see attached). I have not copied the HELAA documents as they exceed the capacity of my e mail MB for attachments being a total of 140 MB. The main reason for this is that the forms were not writable so I had to use (dragged) pdf copies which can then be completed but with a sort of click and Markup Toolbar. Ideally at the meeting I would like to have given all Team members a print out of all documents to agree/disagree/comment so we can complete a consensus for submission. However this would involve a Mass of paper and my poor printer would probably give up ghost ! So still not sure how to achieve this. But I would very much appreciate your views and have copied documents to a Memory stick which I could either drop round to you or you could call to collect.

Kind Regards

Attachments

Preface of HELLA document

Submission site assess doc

### **Emails related to Part 1.2**

**1a) 12<sup>th</sup> February 2024 AG to CB at AECOM. Responses from regulation 14.**

Fwd: Your Neighbourhood Planning Application

Dickleburgh and Rushall NP policies

Re: RE: Dickleburgh and Rushall NP

To:

26/07/24 18:02

3

Hi Cheryl

I thought we were putting in an expression of interest but it may have been a full application form. We applied as Dickleburgh and Rushall Parish Council

User name

password

You will note I made a mistake in the user name it is not the full address of this email. It is missing the 1 after goodman

Please do talk to Locality as we may have messed things up in the application

[Thank you for completing your application form - Locality Neighbourhood Planning](#)

Thank you for your support Cheryl

Kindest regards

Andrew

----- Original Message -----

From: CB

To: AL AG

Cc: RL

Sent: Thursday, July 25th 2024, 10:24

Subject: RE: Dickleburgh and Rushall NP

Hi Andrea/ Andrew,

Nice to hear from you both, Andrew – sorry for the slight delay, very busy week and about to head on leave. Yes, I agree that we need an SEA and HRA update for submission, please could I request that you enter a EoI (Expression of Interest) through the Locality website so that we can get a project code to deliver the updates. If you just submit the EoI I'll speak to Locality and let them know its on its way and I'll fast track the application myself. We can turn around the reports pretty quickly once we've a budget to work from.

Hope this is ok, please don't hesitate to get in touch if any further queries, I'm away for a long-weekend but returning Tuesday next week.

Many thanks

Cheryl.

**From:** AL

**Sent:** Thursday, July 25, 2024 10:16 AM

**To:** CB

**Cc:** RL

**Subject:** Re: Dickleburgh and Rushall NPhad previous

Dear Cheryl,

I hope you are well. Myself and my colleague Rachel Leggett are supporting the Dickleburgh Np Team with their NP submission. My commission is to prepare the Basic Conditions Statement. Neither myself or Rachel have had previous involvement in the plan and therefore some of the background to it is a little sketchy.

I have copies of the SEA and HRA reports produced by AECOM - these we presume were undertaken on the Pre-Submission version of the Plan. Following the Pre-Submission consultation, the plan has been amended by the Group working with my colleague Rachel. Whilst the amendments are significant in terms of number, they are largely around clarity and conformity and in terms of policy direction there is probably little substantive change.

One of the questions I have asked the group is to check with yourselves as to whether the SEA (and HRA) will need updating to reflect these amendments e.g. for example the wording of the objectives have changed in a few places and policy titles may have changed.

It is our understanding that the Group are currently pulling the document together to incorporate the changes and hopefully they should be sending this on to you for a view on whether the updates are required. I will then be able to complete the Basic Conditions.

Hopefully this provides a bit of context for you

Best wishes

Andrea

**From:** The Goodmans

**Sent:** 23 July 2024 17:08

**To:** Beattie, Cheryl; Us Goodman; Andrea Long

**Subject:** Re: Dickleburgh and Rushall NP

Hi Cheryl

This computer died 6 months ago, along with access to this email - it has taken that long to get it back up and running. Today is the first day. So, apologies for leaving you in the lurch without an answer.

You will see I have copied another email address for myself can we use them both please over the next few weeks if we need to share thoughts. just in case.

I have copied Andrea Long into this. Andrea and her business partner Rachel are consultants working with us to get the NP over the line. Andrea has written the basic conditions report but has some questions that probably are best answered by you. But in answer to your question - yes the NP policies have changed we have merged some and dropped others. I will send you a word document from the laptop with the other email address on it that will have the latest and I hope final policies. When you see it the blue is intended to go in the red is intended to come out.

Regarding a submission date - essentially as quick as we can

Kindest regards

Andrew

On Mon, 25 Mar 2024 at 15:41, Beattie, Cheryl wrote:

Hi Andrew,

My sincere apologies, I'm not sure if I responded to you on this – have updates been made to the NP now, and is there a submission date you are working towards?

Many thanks

Cheryl.

**From:** The Goodmans

**Sent:** Monday, February 12, 2024 10:30 AM

**To:**

**Subject:** Dickleburgh and Rushall NP

hi Cheryl

Sorry I did not use the opportunity to telephone you. Things have been extremely busy here. As you will be aware Ann the Parish Clerk has been collating the NP Reg 14 responses along with Alan Patching. I assume you have had all the responses from the different organisations and public regarding the SEA but just in case - I have been given this and I thought it best to pass it on to you, just in case.

Happy to talk over any issues if needed.

We have had our Reg 14 response meeting and I am in the process of writing it up. Do you need a copy of that document when it is finished?

Kindest regards

Andrew

**1e, d)** 25<sup>th</sup> July 2024 CB to AG and AL Agreed there may need to be an update. AG to apply for funding and email trail. (Including **1a)** 12<sup>th</sup> February 2024 AG to CB at AECOM. Responses from regulation 14.) (Including **1b)** 25<sup>th</sup> March 2024 CB to AG. Clarification on progress to full submission.)

**1c)** 23<sup>rd</sup> July 2024 AG to CB. Identifying the progress.

Dickleburgh and Rushall NP policies

To: CB SEA; AL

23/07/24 17:35

1

3

Dickleburgh and Rushall NP policies as of 23rd July 2024.docx

5.1 MB

1 Attachment

Hi Cheryl

Attached is are the policies as of now

Kindest regards

Andrew

RE: Dickleburgh and Rushall NP

To: AL AG

25/07/24 10:24

3

Hi Andrea/ Andrew,

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Many thanks

Cheryl.

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**To:** CB

**Cc:**

**Subject:** Re: Dickleburgh and Rushall NP

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Best wishes

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**To:**

**Subject:** Re: Dickleburgh and Rushall NP

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**To:** Beattie, Cheryl

**Subject:** Dickleburgh and Rushall NP

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Sorry I did not use the opportunity to telephone you. Things have been extremely busy here. As you will be aware Ann the Parish Clerk has been collating the NP Reg 14 responses along with Alan Patching. I assume you have had all the responses from the different organisations and public regarding the SEA but just in case - I have been given this and I thought it best to pass it on to you, just in case.

Happy to talk over any issues if needed.

We have had our Reg 14 response meeting and I am in the process of writing it up. Do you need a copy of that document when it is finished?

Kindest regards

Andrew

**1f)** 26<sup>th</sup> July 2024 AG to CB funding application for SEA update had begun.

**Re: RE: Dickleburgh and Rushall NP**

**To:**

26/07/24 18:02

3

Hi Cheryl

I thought we were putting in an expression of interest but it may have been a full application form. We applied as Dickleburgh and Rushall Parish Council

User name

password

You will note I made a mistake in the user name it is not the full address of this email. It is missing the 1 after goodman

Please do talk to Locality as we may have messed things up in the application

Thank you for completing your application form - Locality Neighbourhood Planning

Thank you for your support Cheryl

Kindest regards

Andrew

**1g)** 5<sup>th</sup> August 2024 CB to AG. AECOM organising the application for funding.

RE: App-15321

To:

05/08/24 11:14

1

Hi Andrew,

I've asked Locality to send the application straight to me when it comes through, and it will be me delivering the update. I'll let you know as it progresses.

Many thanks

Cheryl.

**1h,i)** 21<sup>st</sup> August 2024 AG to PH (SNDC) confirming PC sign off of the NP and the application for SEA funding.

Dickleburgh and Rushall NP

To:

21/08/24 10:12

6

Dear Paul

An update. We have completed reg 14. We have reviewed all policies including the housing allocation. The PC are happy with the policy and have signed it off. You will be receiving a letter from the parish clerk informing you of this over the next few weeks. The NP is now in the hands of a consultant recommended by your team, Rachel Leggett and associates. Rachel is preparing the NP for full and final hand over to South Norfolk. We are happy for you and your team to talk directly to Rachel.

Upon advice from RL and associates we have spoken to Locality and the Aecom team that wrote our SEA to ascertain whether an updated SEA is needed. The advice was that we may need a new / updated SEA. That process has been in motion for the last few weeks, Cheryl, the team leader is aware that we need the document to fall into the same production timescale as the NP.

We are, as is Rachel, keen to ensure we meet any SNBDC imposed deadlines.

Kindest regards

Andrew

**1j)** 30<sup>th</sup> November 2024 AG to CB RL NP team response to the first draft

Dickleburgh and Rushall NP team response to the SEA first draft - PDF version

To:

30/11/24 11:24

Dickleburgh and Rushall Neighbourhood Plan Meeting AECOM amendments\_\_ AG V12.pdf

1.5 MB

1 Attachment

Dear Cheryl

Please find attached the only D and R response to the 1st draft. Any previous unauthorised documents should be ignored.

I am pleased to inform you that the team is back on track. You will notice in the document there are references to the updated NP particularly around Local Gap B. The changes here are crucial.

Hi Rachel,

Thank you for your help and support in getting us back on track.

Kindest regards to you both

Andre

**1k)** AG to CB

Dickleburgh and Rushall SEA

To: Beattie, Cheryl Aecom SEA; Leggett, Rachelle;

11/12/24 10:44

2

Dear Cheryl,

I have found the evidence regarding the Historic England scheduling of aspects of Dickleburgh Moor see web address below.

The schedule application is no:1487027

<https://services.historicengland.org.uk/webfiles/GetFiles.aspx?av=035DF9E4-265B-42F4-ACE4-7AED63AD54BA&cn=71C98C09-AB94-40FD-B910-3DD334DFA9C3>

Kindest regards

Andrew

**1l) Email CB to AG, RL delivery of the SEA**

RE: RE: RE: Dickleburgh and Rushall NP team response to the SEA first draft - PDF version

To:

20/12/24 09:50

DRNP SEA Environmental Report\_submission version\_19 Dec 2024.pdf

1.8 MB

Dickleburgh and Rushall Neighbourhood Plan Meeting AECOM amendments\_\_ AG V12+CB.docx

24.8 MB

2 Attachments Download all as ZIP

Hi Andrew/ Rachel,

Thank you so much for bearing with me this week, it's been a difficult (hectic) run up to Christmas. Please find attached the finalised SEA addressing the comments received. I have also attached responses in the comments document so you can more readily track the updates. The Environmental Report is now with Locality for final sign off before the project is closed.

I wish you both the best of luck with submission, and hope that you have a wonderful Christmas break and a happy new year!

Should anything arise during examination with regards to the SEA, please do get in touch with either me (I'm hopefully here into February assuming baby doesn't come early) or alternatively email Nick

Many thanks

Cheryl.

**1m) 11<sup>th</sup> September 2025 Email from R. Squires to A Goodman reply to email 11<sup>th</sup> September 2025**

RE: Dickleburgh and Rushall NP

To:

11/09/25 16:18

5

Hi Andrew,

Thanks for your email. I've checked through my email archive and I do not recall being involved in the consideration / decision to undertake a review to the SEA. As Rachel says, I think that decision was based on her advice following Reg. 14, based on the age of the original SEA, some of the Reg. 14 representations, and the amendments to the plan.

Looking back at South Norfolk Council's Reg. 14 representations, the decision to review the document may or may not have been influenced by the following comment from ourselves:

*'At this point in time the Council does not intend to comment on the individual assessments of site. The Council is however very concerned that the assessment of sites has been significantly influenced by the application of various emerging policy constraints included in the Neighbourhood Plan, most notably the proposed strategic gaps. The Council has commented separately on the justification for the strategic gaps. However, on the basis of the SEA, the Council is very concerned that the appraisal has not properly considered reasonable alternatives e.g. all other things being equal, it would appear that potential sites 8 and 10 could be developed without meaningfully eroding the separation between the settlements of Dickleburgh and Rushall. This may have unduly constrained the consideration of sites, leading to questions about whether the plan is underpinned by relevant and up-to-date evidence that justifies the policies within it in accordance with the NPPF and which contributes to the achievement of sustainable development as required by the basic conditions.'*

*The Council would recommend that the evidence base of the plan is reviewed to ensure that the approach to the assessment of potential allocations has been fairly and objectively undertaken and that opportunities for sustainable development have not been unjustifiably discounted.'*

I have found the following statement within an update email that you sent me on 21/08/2024, if that helps:

*'Upon advice from RL and associates we have spoken to Locality and the Aecom team that wrote our SEA to ascertain whether an updated SEA is needed. The advice was that we may need a new / updated SEA. That process has been in motion for the last few weeks, Cheryl, the team leader is aware that we need the document to fall into the same production timescale as the NP.'*

Having not been involved in the SEA or site assessment process, I can't offer my own explanation for the lower number of sites in the more recent SEA. However, paragraphs 3.2.7-3.2.13 in the Dec 2024 SEA seem to discuss this issue. 3.2.7 states '*Site number 3 has more recently been withdrawn by the developer*'.

I hope this helps.

Kind regards,

Richard

**From:** AG

**Sent:** 11 September 2025 09:40

**To:**

**Cc:**

**Subject:** Dickleburgh and Rushall NP

Hi Richard

We are beginning to put together responses for the inspection. There is an area where you may have information that helps clarify the situation.

I hope you will remember that there was some concern raised post regulation 14 that there may need to be a review of the SEA. My recollection is that - we reviewed and changed the NP to address the issues raised by the Reg 16 responses. We also asked you if the SEA needed review. You, I think, were not sure and suggested we ask Aecom. I contacted Cheryl Beattie at Aecom who suggested that it might and that she would get guidance. I do not know if there was any communication between the Local Authority and Aecom but certainly the outcome was that it was agreed there should be a review / modification / re write / addition.

The consequence was that Ann and I successfully applied for additional funding and Aecom produced a new SEA authored by Cheryl. Looking at the 2 SEA's together, my view is they provide an extremely thorough analysis of the environment of the Parish and the consequences of development.

A concern that was raised by regulation 18 objectors is that there are less sites on SEA 2 than SEA 1. I am guessing the answer is that some sites have been withdrawn by the landowner/s but that is my speculation. Can you shed any light on this?

Thank you

Andrew

## Appendix D

Emails and references below from Parish Council documents

3j) 17th JUNE 2021 meeting Purpose: To review the site allocation in light of the Village Clusters (email from SNDC used as guidance). Confirm the NP will promote 25 homes and allocate 15 homes to site 1 and 10 homes to site 2 (Chenery brown field). To confirm rejection of the extended site.

4a) 4th August 2021 From AG to the team. Outlining the agreement on numbers and the proposal to Chenery site. The PC requested should Chenery refuse the allocation it should go in full to La Ronde. **Verbal confirmation from Tricker and Last that the offer would be rejected.**

**4c) 22nd September 2021 ML to Tony Tricker copied to PC clerk and AG – rejection of the offer and withdrawal by the owners of the process.**

4d) 22nd September 2021 AG to ML – Thanking Martin Last for the information, confirming the decision will be passed to the team.

5e) 12th August 2022 AG to AECOM Cheryl and Emma – confirming the withdrawal of the Chenery site from the process.

1.2.1 Following the Regulation 14 process there were questions raised (particularly by South Norfolk District

Council) that led our consultant to conclusion that there had been enough changes and policy reviews to

justify a new / reviewed SEA. The following emails are simply my (AG) knowledge of the discussion process.

There is evidence to suggest that conversations took place between different parties that the NP team were unaware of.

1a) 12th February 2024 AG to CB at AECOM. Responses from regulation 14.

1b) 25th March 2024 CB to AG. Clarification on progress to full submission.

1c) 23rd July 2024 AG to CB. Identifying the progress.

1d) 25th July 2024 AL (Andrea Long author of the Basic Conditions Statement) to CB questioning if the SEA may need updating in light of the refined objectives.

1e) 25th July 2024 CB to AG and AL Agreed there may need to be an update. AG to apply for funding.

1f) 26th July 2024 AG to CB funding application for SEA update had begun.

4

1g) 5th August 2024 CB to AG. AECOM organising the application for funding.

1h) 21st August 2024 AG to PH (Paul Harris, SNDC) confirming PC sign off of the NP and the application for SEA

funding.

1i) July PC meeting signing of the NP?

Title register for:

Land On The West Side Of, Ipswich Road, Dickleburgh, Diss, IP21 4NJ  
(Freehold)

Title number: NK481443

Accessed on 24 October 2025 at 03:24:18

This information can change if we receive an application. This service can not tell you if HM Land Registry are dealing with an application.



**This is not an official copy. It does not take into account if there’s a pending application with HM Land Registry. If you need to prove property ownership, for example, for a court case, you’ll need to order an official copy of the register.**

Register summary

|                   |                                                               |
|-------------------|---------------------------------------------------------------|
| Title number      | NK481443                                                      |
| Registered owners | Providex Property Limited<br>47 Butt Road, Colchester CO3 3BZ |
| Last sold for     | £190,000 on 02 May 2018                                       |

A: Property Register

This register describes the land and estates comprised in this title.

| Entry number | Entry date                                                                   |
|--------------|------------------------------------------------------------------------------|
| 1            | NORFOLK : SOUTH NORFOLK<br><br>The Freehold land shown edged with red on the |

|   |            |                                                                                                                                                                                                                                                                                                                                                                                        |
|---|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   |            | plan of the above title filed at the Registry and being Land on the west side of Ipswich Road, Dickleburgh, Diss (IP21 4NJ).                                                                                                                                                                                                                                                           |
| 2 | 2016-09-12 | The land tinted yellow on the title plan has the benefit of any legal easements reserved by a Transfer of other land dated 9 September 2016 made between (1) Pauline Glenda Garnham and Julia Marie McGriffin and (2) Providex Property Limited but is subject to any rights that are granted by the said deed and affect the registered land.<br><br>NOTE: Copy filed under NK461573. |
| 3 | 2018-07-06 | The land has the benefit of any legal easements reserved by the Transfer of other land dated 2 May 2018 referred to in the Charges Register but is subject to any rights that are granted by the said deed and affect the registered land.                                                                                                                                             |
| 4 | 2018-07-06 | The land has the benefit of any legal easements granted by the Transfer dated 2 May 2018 referred to in the Charges Register but is subject to any rights that are reserved by the said deed and affect the registered land.                                                                                                                                                           |
| 5 | 2018-07-06 | The Transfer dated 2 May 2018 referred to above contains as to light or air and a provision relating to the creation and/or passing of easements.                                                                                                                                                                                                                                      |

## B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

**Class of Title:** Title absolute

**Entry number      Entry date**

|   |            |                                                                                                                                                                                                                                                                                                                                                                                                           |
|---|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | 2018-07-06 | PROPRIETOR: PROVIDEX PROPERTY LIMITED (Co. Regn. No. 09931139) of 47 Butt Road, Colchester CO3 3BZ.                                                                                                                                                                                                                                                                                                       |
| 2 | 2018-07-06 | The price stated to have been paid on 2 May 2018 was £190,000.                                                                                                                                                                                                                                                                                                                                            |
| 3 | 2018-07-06 | RESTRICTION: No disposition of the registered estate (other than a charge) by the proprietor of the registered estate , or by the proprietor of any registered charge, not being a charge registered before the entry of this restriction, is to be registered without a written consent signed by Pauline Glenda Garnham of Glenville, Ipswich Road, Dickleburgh, Norfolk IP21 4NJ or their conveyancer. |

## C: Charges Register

This register contains any charges and other matters that affect the land.

**Class of Title:** Title absolute

| Entry number | Entry date |                                                                                                                                                                                                                                                                 |
|--------------|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1            | 2005-10-28 | The deeds and documents of title having been lost the land tinted blue on the title plan is subject to such restrictive covenants and easements as may have been imposed thereon before 28 October 2005 and are still subsisting and capable of being enforced. |
| 2            | 2018-07-06 | A Transfer of other land dated 2 May 2018 made between (1) Pauline Glenda Garnham and Julia Marie McGraffin and (2) Providex Property Limited contains restrictive covenants by the Transferor.                                                                 |

NOTE: Copy filed under NK481442.

---

|   |            |                                                                                                                                                                                           |
|---|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3 | 2018-07-06 | A Transfer of the land in this title dated 2 May 2018 made between (1) Pauline Glenda Garnham and Julia Marie McGraffin and (2) Providex Property Limited contains restrictive covenants. |
|---|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

NOTE: Copy filed.

**Email from Stuart Blake (Norfolk County Council Highways) to Richard Squires (South Norfolk Council) – 22/10/2025**

**RE: Dickleburgh & Rushall Neighbourhood Plan - examination hearing / Highways issues**

Hi Richard,

Thank you for your email. I hope you're keeping well.

The core issue with this allocation is that it does not adjoin the public highway. Establishing a connection would require third-party land, which lies outside the red line boundary of the proposed allocation.

The suggested route to the highway relies on a constructed development that has not yet been adopted as highway, as well as a further site with outline consent but with no further detail available. As such, there is no certainty that this link will be delivered. For us to support the allocation, a direct connection to the highway is essential, and therefore an adopted link between the site and the existing highway boundary must be available in order to allocate the site.

In addition, the newly constructed estate road appears to be approximately 4.8 metres wide, with a single 1.8 metre footway. To support the proposed scale of development (62 dwellings), we would typically expect an estate road of 5.5 metres in width with footways on both sides.

Unfortunately, based on the above concerns, we must continue to object to this allocation.

I'm happy to discuss this in further detail if necessary.

Kind regards

Stuart

**Stuart Blake, Engineer - Major and Estate Development**

### Note for the attention of Andrew Ashcroft, Dickleburgh Neighbourhood Plan Examiner

### Prepared by South Norfolk Council and the Agent for Site DR20 (Rural Solutions Limited)

At the hearing session held on 16<sup>th</sup> October 2025 the planning history of the site West of Norwich Road was discussed. Specifically, whether the outline permission 2018/0980 had lapsed for 7 affordable homes, 7 custom-build homes and 8 accessible dwellings for older people.

South Norfolk Council and the landowner's agent agree that the outline consent has indeed lapsed. Although a s.73 variation extended the outline's timeframe, condition 1 stated that all remaining applications for reserved matters must be made before 23 August 2021.

An extract from planning application 2020/0517 is below:

#### DECISION NOTICE

Town and Country Planning Act 1990

**Reference :** 2020/0517  
**Application Type :** Removal/Variation of Condition (S73)  
**Applicant :** Mr D Daniels  
**Location :** Land West Of Norwich Road Dickleburgh Norfolk  
**Proposal :** Variation of condition 2 of 2018/0980 - to amend phasing of development  
**Date of Decision :** 10 June 2020

Permission **has been granted** for the carrying out of development referred to above without compliance with condition(s) imposed on the planning permission referred to above but in accordance with the application form and plans submitted subject to compliance with the following conditions:

1. Application for the approval of the reserved matters for at least one phase of the development must be made before 23 August 2020 with all remaining applications for reserved matters before 23 August 2021. The development hereby permitted should be begun before the expiration of TWO YEARS from the date of approval of the last of the reserved matters to be approved.

#### Reason for the condition

A time limit is required to be imposed by Section 92 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

An application for permission in principle for 9 homes on a portion of the same site is under consideration by South Norfolk Council ref. 2025/3340.

# Appendix H – Comparative Viability

## Illustration: 22 vs 47 Homes

### Purpose

This appendix illustrates the economic difference between a small-scale (22 dwellings) and a medium-scale (47 dwellings) housing scheme on the same site.

The example uses typical rural market values and costs to show how scaling up the number of dwellings significantly increases developer profit margins — and therefore the financial incentive for the landowner/developer to seek a larger allocation.

### Assumptions (illustrative but realistic)

| Item                             | Basis                | Comment                                                                                                                                                                     |
|----------------------------------|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Average open market sale price   | £350,000 per home    | Based on comparable South Norfolk values (2024–25).                                                                                                                         |
| Build cost                       | £150,000 per home    | Includes plot externals, prelims, site management.                                                                                                                          |
| Fixed infrastructure / abnormals | £1,200,000           | Roads, drainage, attenuation, access; fixed regardless of unit count.                                                                                                       |
| Section 106 / CIL                | £10,000 per home     | Allowance per dwelling.                                                                                                                                                     |
| Professional fees                | 10% of build + infra | Architects, engineers, planning, surveys.                                                                                                                                   |
| Contingency                      | 5% of build + infra  | Industry standard for medium risk.                                                                                                                                          |
| Sales & marketing                | 3% of GDV            | Standard developer allowance.                                                                                                                                               |
| Finance                          | 6% of total cost     | Typical blended cost of capital.                                                                                                                                            |
| Land cost                        | £700,000 (see note)  | <b>If land already owned</b> , this cost may be sunk. It is shown here for completeness, as the developer still seeks an equivalent land value return to achieve viability. |

### Viability Comparison Table

| Metric                           | 22 Homes          | 47 Homes           |
|----------------------------------|-------------------|--------------------|
| Gross Development Value (GDV)    | £7,700,000        | £16,450,000        |
| Build cost (@ £150k)             | £3,300,000        | £7,050,000         |
| Fixed infrastructure / abnormals | £1,200,000        | £1,200,000         |
| Professional fees (10%)          | £450,000          | £825,000           |
| Contingency (5%)                 | £225,000          | £412,500           |
| S106 / CIL (@ £10k)              | £220,000          | £470,000           |
| Sales & marketing (3%)           | £231,000          | £493,500           |
| Finance (≈6%)                    | £379,560          | £753,060           |
| Land (allowance)                 | £700,000          | £700,000           |
| Total Development Cost           | <b>£6,706,560</b> | <b>£11,904,060</b> |
| Developer Profit (£)             | <b>£993,440</b>   | <b>£4,545,940</b>  |
| Profit on GDV (%)                | ≈13%              | ≈28%               |
| Profit on Cost (%)               | ≈15%              | ≈38%               |

## Interpretation

- **At 22 homes**, the scheme delivers a profit of **around £1.0 million**, equivalent to **≈13% of GDV**.  
This is below the industry-accepted benchmark of **20% on GDV** typically required for private-led development viability.
- **At 47 homes**, profit increases to approximately **£4.55 million**, or **≈28% on GDV**.  
The larger scale dilutes fixed infrastructure costs and improves overall efficiency.
- The **incremental 25 dwellings** more than **quadruple developer profit** for less than a doubling of total cost.

## Land Ownership and Value Considerations

While La Ronde is understood to **own or control** the land, the **land value** or “**hope value**” still forms part of the financial return expected by the owner.

Even if no immediate purchase is required, developers and landowners assess viability on the basis of a “**notional land value**”—what the site could achieve if sold or developed—so the land cost line remains a relevant benchmark.

Removing that allowance (treating land as fully sunk) would increase profit margins further, potentially pushing the **47-home scheme above 30%** return on GDV.

### Summary Table (with and without land cost)

| Scheme   | Profit (with land cost) | Profit (no land cost) | Margin on GDV |
|----------|-------------------------|-----------------------|---------------|
| 22 Homes | £993,000                | £1,693,000            | ≈13–22%       |
| 47 Homes | £4,546,000              | £5,246,000            | ≈28–32%       |

### Conclusion

The comparison demonstrates that:

- The **economic incentive** for a developer/landowner to pursue a **larger scheme (≈47 units)** over a smaller one (≈22 units) is very strong.
- The larger layout transforms a **marginally viable** project into a **highly profitable** one, roughly **tripling or quadrupling net returns**.
- When combined with an adjacent lapsed planning site under the same ownership, the total yield and site value would increase substantially.

This financial differential explains why a party connected to the land would have a vested interest in ensuring **Site 1** (and the adjacent lapsed permission area) is selected in the SEA process.

### Estimated Developer Profit:

- **22 homes: ~£1.0m** (≈13% GDV)
- **47 homes: ~£4.5m** (≈28% GDV)
- **Difference: ≈£3.5–£4.0 million increase** in profit

### Appendix H Summary:

*This viability illustration supports the view that promoting Site 1 as the preferred allocation confers a material financial advantage to the developer/landowner compared with smaller or alternative sites, and therefore must be treated as a potential conflict of interest in the plan-making process.*



## Appendix I

### Note for the attention of Andrew Ashcroft, Dickleburgh Neighbourhood Plan Examiner

### Prepared by South Norfolk Council and the Agent for Site DR20 (Rural Solutions Limited)

At the hearing session held on 16<sup>th</sup> October 2025 the planning history of the site West of Norwich Road was discussed. Specifically, whether the outline permission 2018/0980 had lapsed for 7 affordable homes, 7 custom-build homes and 8 accessible dwellings for older people.

South Norfolk Council and the landowner's agent agree that the outline consent has indeed lapsed. Although a s.73 variation extended the outline's timeframe, condition 1 stated that all remaining applications for reserved matters must be made before 23 August 2021.

An extract from planning application 2020/0517 is below:

#### DECISION NOTICE

Town and Country Planning Act 1990

**Reference :** 2020/0517  
**Application Type :** Removal/Variation of Condition (S73)  
**Applicant :** Mr D Daniels  
**Location :** Land West Of Norwich Road Dickleburgh Norfolk  
**Proposal :** Variation of condition 2 of 2018/0980 - to amend phasing of development  
**Date of Decision :** 10 June 2020

Permission **has been granted** for the carrying out of development referred to above without compliance with condition(s) imposed on the planning permission referred to above but in accordance with the application form and plans submitted subject to compliance with the following conditions:

1. Application for the approval of the reserved matters for at least one phase of the development must be made before 23 August 2020 with all remaining applications for reserved matters before 23 August 2021. The development hereby permitted should be begun before the expiration of TWO YEARS from the date of approval of the last of the reserved matters to be approved.

#### Reason for the condition

A time limit is required to be imposed by Section 92 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

An application for permission in principle for 9 homes on a portion of the same site is under consideration by South Norfolk Council ref. 2025/3340.

## Planning Services

South Norfolk House, Cygnet Court,  
Long Stratton, Norwich NR15 2XE

[www.south-norfolk.gov.uk](http://www.south-norfolk.gov.uk)

Email: [planning@s-norfolk.gov.uk](mailto:planning@s-norfolk.gov.uk)

Tel: 01508 533845

Fax: 01508 533625



## Application for removal or variation of a condition following grant of planning permission. Town and Country Planning Act 1990. Planning (Listed Buildings and Conservation Areas) Act 1990

### Publication of applications on planning authority websites.

Please note that the information provided on this application form and in supporting documents may be published on the Authority's website. If you require any further clarification, please contact the Authority's planning department.

### 1. Site Address

|                |                                                                   |
|----------------|-------------------------------------------------------------------|
| Number         | <input type="text"/>                                              |
| Suffix         | <input type="text"/>                                              |
| Property name  | <input type="text"/>                                              |
| Address line 1 | <input type="text" value="Land West of The Street/Norwich Road"/> |
| Address line 2 | <input type="text" value="Dickleburgh"/>                          |
| Address line 3 | <input type="text"/>                                              |
| Town/city      | <input type="text" value="Norfolk"/>                              |
| Postcode       | <input type="text"/>                                              |

Description of site location must be completed if postcode is not known:

|              |                                     |
|--------------|-------------------------------------|
| Easting (x)  | <input type="text" value="616769"/> |
| Northing (y) | <input type="text" value="282664"/> |

Description

### 2. Applicant Details

|                |                                                                                       |
|----------------|---------------------------------------------------------------------------------------|
| Title          | <input type="text" value="Mr"/>                                                       |
| First name     | <input type="text" value="D"/>                                                        |
| Surname        | <input type="text" value="Daniels"/>                                                  |
| Company name   | <input type="text" value="Heartland PACT Ltd and Flagship Housing Developments Ltd"/> |
| Address line 1 | <input type="text" value="c/o agent"/>                                                |
| Address line 2 | <input type="text"/>                                                                  |
| Address line 3 | <input type="text"/>                                                                  |
| Town/city      | <input type="text"/>                                                                  |

2. Applicant Details

|                  |  |
|------------------|--|
| Country          |  |
| Postcode         |  |
| Primary number   |  |
| Secondary number |  |
| Fax number       |  |
| Email address    |  |

Are you an agent acting on behalf of the applicant? ☒ Yes ☐ No

3. Agent Details

|                  |                     |
|------------------|---------------------|
| Title            |                     |
| First name       | La Ronde            |
| Surname          | Wright              |
| Company name     | La Ronde Wright Ltd |
| Address line 1   | 74 Bracondale       |
| Address line 2   |                     |
| Address line 3   |                     |
| Town/city        | Norwich             |
| Country          |                     |
| Postcode         | NR1 2BE             |
| Primary number   |                     |
| Secondary number |                     |
| Fax number       |                     |
| Email            |                     |

4. Description of the Proposal

Please provide a description of the approved development as shown on the decision letter

Demolition of an existing dwelling and the erection of a mixed use development comprising of 7 affordable homes, 7 custom-build homes and 8 accessible dwellings for older people. A small scale community facility. A unit for commercial/community use. Public open space and enhanced areas of woodland.

Reference number

2018/0980

|                                                            |            |
|------------------------------------------------------------|------------|
| Date of decision (date must be pre-application submission) | 23/08/2019 |
|------------------------------------------------------------|------------|

Please state the condition number(s) to which this application relates

Condition number(s)

2

#### 4. Description of the Proposal

Has the development already started?

☐ Yes ☒ No

#### 5. Condition(s) - Removal/Variation

Please state why you wish the condition(s) to be removed or changed

The indicative phasing plan as listed on the Decision Notice has been updated.

If you wish the existing condition to be changed, please state how you wish the condition to be varied

No development whatsoever shall take place on each plot / phase (as set out in the indicative delivery phasing plan (15229-1728 Revision A)) until the plans and descriptions giving details of the reserved matters referred to above shall have been submitted to and approved in writing by the local planning authority for that particular plot / phase. These plans and descriptions shall relate to: appearance, scale, landscaping and layout of any building to be erected together with the precise details of the type and colour of the materials to be used in their construction.

#### 6. Site Visit

Can the site be seen from a public road, public footpath, bridleway or other public land?

☒ Yes ☐ No

If the planning authority needs to make an appointment to carry out a site visit, whom should they contact?

- ☒ The agent  
☐ The applicant  
☐ Other person

#### 7. Pre-application Advice

Has assistance or prior advice been sought from the local authority about this application?

☒ Yes ☐ No

If Yes, please complete the following information about the advice you were given (this will help the authority to deal with this application more efficiently):

Officer name:

Title   
First name   
Surname   
Reference

Date (Must be pre-application submission)

Details of the pre-application advice received

#### 8. Ownership Certificates and Agricultural Land Declaration

**CERTIFICATE OF OWNERSHIP - CERTIFICATE A - Town and Country Planning (Development Management Procedure) (England) Order 2015 Certificate under Article 14**

I certify/The applicant certifies that on the day 21 days before the date of this application nobody except myself/the applicant was the owner\* of any part of the land or building to which the application relates, and that none of the land to which the application relates is, or is part of, an agricultural holding\*\*

\* 'owner' is a person with a freehold interest or leasehold interest with at least 7 years left to run. \*\* 'agricultural holding' has the meaning given by reference to the definition of 'agricultural tenant' in section 65(8) of the Act.

**NOTE:** You should sign Certificate B, C or D, as appropriate, if you are the sole owner of the land or building to which the application relates but the land is, or is part of, an agricultural holding.

Person role

- ☐ The applicant  
☒ The agent

8. Ownership Certificates and Agricultural Land Declaration

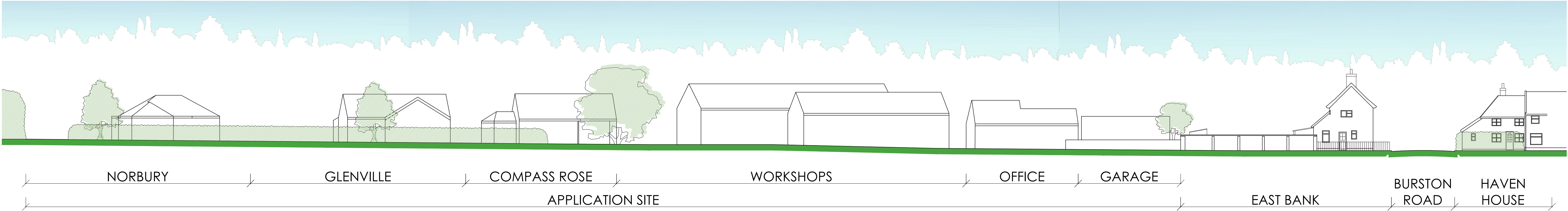
|                                  |            |
|----------------------------------|------------|
| Title                            | Ms         |
| First name                       | Nicole     |
| Surname                          | Wright     |
| Declaration date<br>(DD/MM/YYYY) | 11/03/2020 |

☒ Declaration made

9. Declaration

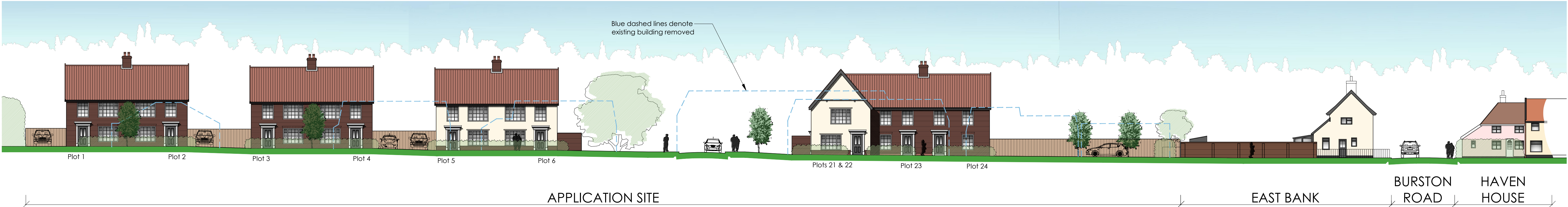
I/we hereby apply for planning permission/consent as described in this form and the accompanying plans/drawings and additional information. I/we confirm that, to the best of my/our knowledge, any facts stated are true and accurate and any opinions given are the genuine opinions of the person(s) giving them. ☒

|                                  |            |
|----------------------------------|------------|
| Date (cannot be pre-application) | 11/03/2020 |
|----------------------------------|------------|



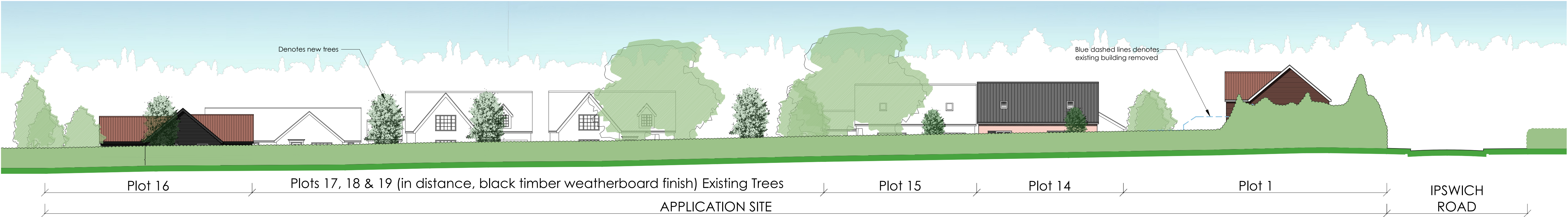
Existing Street Elevation Looking West from Ipswich Road

scale 1:200  
0 1 2 3 4 5 6 7 8 9 10m



Proposed Street Elevation Looking West from Ipswich Road

scale 1:200  
0 1 2 3 4 5 6 7 8 9 10m



Proposed Elevation Looking North

scale 1:200  
0 1 2 3 4 5 6 7 8 9 10m

INDICATIVE MATERIALS

ROOF MATERIALS



Red pantiles  
Sandtoft: Natural Red

Black pantiles  
Sandtoft: Antique Slate

Natural Slates

WALL MATERIALS



Red brickwork  
Cream mortar

Pastel Render colours:  
Green, Cream, & Pink

Black painted brickwork plinth

Black timber weatherboard

Rev B Apr 22 Amended to latest layout  
Rev A Feb 22 Added elevation looking North

**LAST & TRICKER**  
PARTNERSHIP  
3 Lower Brook Mews,  
Lower Brook Street  
Ipswich, Suffolk, IP4 1RA  
01473 252961 / 01473 233129  
www.lastandtricker.co.uk  
info@lastandtricker.co.uk

Client: **Providex Ltd.**  
Project: **Residential Development at  
Land to West of Ipswich Road,  
Dickleburgh,  
Diss,  
IP21 4NJ**

Drawing: **Existing & Proposed Street Elevations**

Date: Jan '22 Scale: 1:200 at A1 Drawn: BR  
Job No: 5516 Drwg No: 34 Revision: B