

Greater Norwich Local Plan

Regulation 18 Draft Plan Consultation

Response Form

Thank you for responding to the Regulation 18 Draft Plan Consultation on the emerging Greater Norwich Local Plan.

The current consultation runs from. **29th January to 16th March 2020.**

It covers the **Strategy and Site Allocations**. We need to get views on these documents to help us draw up the version of the plan which will be submitted to the Planning Inspectorate.

When commenting on a policy or site, please include the site reference(s) in your comments.

If you have any questions relating to the consultation please contact the Greater Norwich Local Plan team on 01603 306603 or email gnlp@norfolk.gov.uk

It is easier to respond online at www.gnlp.org.uk . If you cannot do this, please use this form to respond to the consultation on new, revised and small sites.

Consultation documents are available from www.gnlp.org.uk. There are also supporting documents which provide information on our policies and sites which may help you to make your comments.

Hard copies of the documents are available at consultation "Deposit Points" at:

- County Hall, Martineau Lane, Norwich (main reception);
- City Hall, St Peters Street, Norwich (2nd floor reception);
- Broadland District Council, Thorpe Road, Thorpe St Andrew (main reception);
- South Norfolk Council, Cygnet Court, Long Stratton (main reception).

Submitting your Response Form

Responses should be submitted by email to gnlp@norfolk.gov.uk or completed hard copy forms should be sent to:

*Greater Norwich Local Plan Team
PO Box 3466
Norwich
NR7 7NX*

**All submissions should be made no later than 5pm on
Monday 16th March 2020.**

1a. Contact Details	
Title	Mrs
First Name	Heidi
Last Name	Frary
Job Title (where relevant)	Clerk
Organisation (where relevant)	Barford & Wramplingham Parish Council
Address	
Post Code	
Telephone Number	
Email Address	Barfordpc@gmail.com

1b. I am...	
Owner of the site <input type="checkbox"/>	Parish/Town Council X YES
Developer <input type="checkbox"/>	Community Group <input type="checkbox"/>
Land Agent <input type="checkbox"/>	Local Resident <input type="checkbox"/>
Planning Consultant <input type="checkbox"/>	Registered Social Landlord <input type="checkbox"/>
Other (please specify):	

1c. Client/Landowner Details (if different from question 1a)	
Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
Address	
Post Code	
Telephone Number	
Email Address	

Please make your comments below. You can comment on more than one policy or site on this form. Please clearly state the reference number of the policy or site your comments refer to.

Policy or site reference	Comments

Barford and Wramplingham Parish Council

Response to the Regulation 18 Draft Plan Consultation

Deadline 16th March 2020.

Section 1 Introduction

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

- This consultation exercise seems to be repeating much of what was done not more than a year or two ago. Yet sites considered for development around Barford and Wramplingham are being considered again. This makes a mockery of previous consultations.
- Fourteen potential sites were previously consulted on in early 2018. The Regulation 18 Site Proposals document concluded: "the sites proposed offer the potential for significant growth, with the necessary inclusion of supporting services and infrastructure provided alongside housing within GNLPO006, GNLPO032, GNLPO320, most of GNLPO515, GNLPO525. However, without provision of infrastructure such as relief roads and high school provision, Wymondham is likely to be able to accommodate fewer dwellings potentially on the smaller sites such as GNLPO092/ part of GNLPO525, GNLPO032 and GNLPO355."
- The complexity of the whole process, the information that needs to be assimilated, and the expertise required to make a useful response means that many members of the public are likely to be put off trying to comment. In this respect, the Consultation Documentation and response procedures are of low quality.
- Of direct concern to Barford and Wramplingham Parish Council is the policy by South Norfolk District Council to draw up its own Village Clusters Housing Site Allocations document. There are four very significant sites around Barford and Wramplingham as follows:
 - GNLPO416: land off Barnham Broom Road
 - GNLPO1013: Church Lane
 - GNLPO552: Land off Watton Road
 - GNLPO014: Turnpike Field
- Furthermore, recent correspondence with District Councillor Richard Elliot indicates that consultation concerning these is not going to happen until September/October 2020.
- This means that the allocation of these clusters is
 - NOT being considered within the scope of the whole GNLPO Regulation 18 Draft Plan
 - NOT being considered within the consultation exercise
- In addition, the new Northern Bypass (NDR) and the foreseen extension to link it to the A47 in the West of Norwich, was, as we understand it, intended to facilitate development of housing close to Norwich in the north. This should therefore reduce the need for fragmentary and environmentally damaging rural development elsewhere. However, the GNLPO seems to be ignoring this, and continuing to promote building on green-belt land in Broadland and South Norfolk where the Village Cluster sites are NOT OPEN FOR CONSIDERATION.

- Our further concerns about the South Norfolk lack of transparency in this exercise are heightened by our understanding that:
 - the Village Cluster approach will permit housing developments of significant size to be built outside the local Development Boundaries.
 - **there is apparently no maximum allocation, just a minimum allocation above and beyond the existing commitment.**
- Barford and Wrampingham Parish Council consider that the lack of inclusion of all the Village Cluster proposed sites in the South Norfolk ward:
 - Excludes the Parish Council from making a meaningful contribution relating to the land in and around the villages at this important time.
 - Is not consistent with a true and fair consultation approach.
 - Demonstrates that the consultation exercise is incomplete.
- Barford and Wrampingham Parish Council also wish to endorse the comprehensive response by CPRE to this consultation exercise.

Section 2 – Greater Norwich Spatial Profile

Question 3: Please comment on or highlight any inaccuracies within the special profile

- The use by Government of the outdated 2014 National Household Projections is leading to unnecessary land allocation for housebuilding, as highlighted by the CPRE response.
- Quoting from the CPRE response, “If the most recent ONS statistics had been used, current commitments are sufficient to cover housing needs to 2038”.
- The use of outdated statistical data by Government is very poor practice.

Section 3 – The vision and objectives for Greater Norwich

Question 6: Do you support or object to the vision and objectives for Greater Norwich?

- Barford and Wrampingham PC consider that:
 - the environmental sustainability vision (Para 135 subset Environment) which includes reducing impact of travel through concentrating activities close to centres of population (Para 125) and reducing the necessity for transport, and
 - Para 120 which highlights the need for good access to services and facilities...

are inconsistent with developing village cluster sites in relatively remote locations and where local services are sparse as is the case with Barford and Wrampingham. Wrampingham has no services. Barford has a small primary school and an intermittent, subsidized bus route.
- The increasing pressure on water availability in the Eastern Counties is inconsistent with building more and more houses (particularly in numbers greater than needed).
- The claim that new quality development will be located to minimise the loss of green-field land (Para 132) **directly contradicts** the policy of allocating and developing Village Cluster Sites, particularly around **Honingham and Colton** as well as around **Barford and Wrampingham** at GNLPO552 & GNL1013 & GNLPO416, as well as the proposed locations of many other proposed sites such as GNLPO006, GNLPO545R, GNL21255, GNLPO285, GNL2150 **North of Wymondham.**

- In addition, these **Wymondham** sites and the proposed village cluster sites at GNLPO415R-A-G, GNLPO415R-A, GNLPO415R-B, GNLPO415R-C, GNLPO415R-D, GNLPO415R-E, GNLPO415R-F and GNLPO415R-G around **Honingham and Colton**, and on those around **Wrampingham and Barford** GNLPO552 & GNLPO1013 & GNLPO416, will increase the water drainage pressure on the local rivers Tiffey and Tud, **and increase the likelihood of flooding in Barford and Wrampingham.**
- The plethora of sites could result in a very large and completely disproportionate number of houses around our villages.
- Barford and Wrampingham PC consider that brownfield sites already allocated should be used first (as has happened in Barford), and that there should be a phased approach to new housing so that existing allocations and any brownfield sites are developed before permitting or allocating additional sites to be built on.
- The delivery statement on economic development is remarkably weak, lacking any focus or vision. Maybe house building is seen to be the (circular) economic driver for the local economy rather than stimulation of Industries!

Question 8: is there anything that you feel needs further explanation, clarification or reference?

- Why do the architects of the GNLPO vision believe the continued building of clay-brick-built houses is compatible with environmental sustainability given the high carbon footprint of such technology?

Section 4: The delivery of growth and addressing climate change

Question 9: Do you support, object, or have any comments relating to the approach to housing set out in the Delivery Statement?

- Barford and Wrampingham Parish Council consider that the opaque policy on village cluster sites is inconsistent with the Climate Change statement in Table 5: “reduce the need to travel, particularly by private car;”.
- Note There is no bus service for Wrampingham, and there are only intermittent services through Barford, serving the bus stops shown near the Village Hall. One is only weekly. All are subsidised and vulnerable to cost cutting by NCC. The hourly day-time service along the B1108 is also a subsidised route. There are no bus services in the evening, nor connecting the two villages to their designated GP surgery in Hethersett.
- It is difficult to understand how the drive to build more houses rectifies the current situation, let alone providing services for new houses

Question 12: Do you support, object, or have any comments relating to the Climate Change Statement?

- The claim that the GNLPO plan aims to address climate change (Para 140-141 and policy statement) directly contradicts the policy of allocating and developing Village Cluster Sites

(and the building on many other areas) in relation to transport requirements, loss of green field sites etc.

Section 5 – The strategy

Policy 1 The Sustainable Growth Strategy

Question 13: Do you agree with the proposed settlement hierarchy and the proposed distribution of housing within the hierarchy?

- **Barford and Wrampingham Parish Council do not agree with the proposed hierarchy and distribution of housing:** the village cluster site allocations and development are inconsistent with the more centralised location of industrial development e.g. on the Norwich Research Park and in Norwich. Furthermore, continued expansion of villages and therefore the village cluster approach just puts more and more strain on the limited local amenities and services if and where they exist. The village cluster policy seems to be an environmentally deleterious, but local authority-backed policy to the benefit of landowners, developers and house builders.

Question 14: Do you support, object, or wish to comment on the approach for housing numbers and delivery?

- As said above, and as highlighted by the CPRE response, the use by Government of the outdated 2014 National Household Projections is leading to unnecessary land allocation for housebuilding.
- Barford and Wrampingham Parish Council wish to see land already allocated for house building used up before any new allocated land is used, with a focus on brownfield sites first – we are pleased to see this has recently happened in Barford.
- Barford and Wrampingham Parish Council do not understand why more land is set to be allocated when the 2016 projections of housing need to 2038 will be met by the area of sites currently allocated as stipulated in the CPRE response.

Policy 2 – Sustainable Communities

Question 18: do you support, object, or have any comments relating to the preferred approach to sustainable communities including the requirement for a sustainable statement?

- **Barford and Wrampingham Parish Council object to the policy of Village Clusters** on the basis that it contradicts the key environmental criteria for sustainability regarding the excessive and unnecessary use of green belt, the unsustainability of adding to villages thereby stretching the use of their already stretched and often minimal services.
- Barford and Wrampingham Parish Council would like to point out that key village cluster site in the Tiffey and Tud valleys around Barford and Wrampingham at GNLPO552 is in the flood plain which regularly floods and is therefore highly unsuitable for house building. This has been highlighted previously but seems to be ignored. It gives the impression that the Authorities are unaware of the increase in rainfall that now occurs as a result of global warming. **The area is also an important green infrastructure corridor as highlighted in Figure 8.**
- **Complementing points made in response to Question 6**, the large area of possible developments north of Wymondham (GNLP0525R and thereabouts) and the proposed

village cluster sites at GNLPO415R-A-G. GNLPO415R-A, GNLPO415R-B, GNLPO415R-C, GNLPO415R-D, GNLPO415R-E, GNLPO415R-F and GNLPO415R-G around **Honingham and Colton**, and on those around **Wrampingham and Barford** GNLPO552 & GNLPO1013 & GNLPO416, will result in a massive additional run-off into the local rivers Tiffey and Tud, **and increase the likelihood of flooding in Barford and Wrampingham**. Barford in particular suffers considerably from high water levels, and additional housing north of Wymondham and around Honingham will exacerbate this. Development in these areas will also ruin the landscape value of the areas.

- Please be fully aware that proposed sites on northern & southern water catchment areas of River Tiffey and River Tud, the confluence of which forms the extreme western tip of our Parish Boundaries, will increase drainage into the rivers so that flooding/increased water flow upstream of the confluence will affect both villages.

Policy 7.4 – The Village Clusters

Question 45: Do you support or object or wish to comment on the overall approach for the village clusters. Please identify particular issues.

- Please see many of the points made above which are not being repeated here other than to re-iterate the following:
- **Barford and Wrampingham Parish Council STRONGLY OBJECT to**
 - the lack of consideration of the village cluster locations in South Norfolk district in this GNLPO consultation process with special reference to those areas around Barford and Wrampingham.
 - The fact that many of the proposed village cluster locations are on green belt and outside the current development areas, and in our case often in flood plain and GI corridor areas.
 - The lack of transparency in the consideration of these village clusters.
 - The way village clusters seem to be a route to getting around normal planning conditions. We fully agree with the comment made in the CPRE response: ““Village Clusters” appear to be an artificial concept, invented to justify the dispersal of housing into the countryside.”

Disclaimer

Data Protection and Freedom of Information

The Data Controller of this information under the General Data Protection Regulation (GDPR)2018/Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk Council. The purposes of collecting this data are:

- to assist in the preparation of the Greater Norwich Local Plan
- to contact you, if necessary, regarding the answers given in your form

The response forms received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be made available for public viewing. By submitting this form you are consenting to your comments being stored by Norfolk County Council, and the details being published for consultation purposes.

Once comments have been checked and verified they will be available online (with respondents' names) for others to see. Any representations which are deemed to contain offensive comments will be removed from the consultation site. Whilst we will include names on our website, we will remove personal contact details such as addresses, telephone numbers, emails and signatures before publishing.

If you wish to comment but feel that you have a strong reason for your identity to be withheld from publication, you can contact your District Councillor who will put forward your comments as appropriate. Please note that where you submit your views in writing to your local District Councillor, this is described as "lobbying" and the local member will be obliged to pass these on. The local District Councillor will be required to provide your details to the GNLP where they will be stored for their records.

Please note, however, that if you subsequently wish to comment as part of the formal Regulation 19 stage of the Greater Norwich Local Plan (due to take place in 2020) comments must be attributable for the public examination by the Planning Inspectorate.

See our Privacy notice here <http://www.greaternorwichlocalplan.org.uk/> for information on how we manage your personal information.

Declaration

I agree that the details within this form can be held by Norfolk County Council and that those details can be made available for public viewing and shared with Broadland District Council, Norwich City Council and South Norfolk Council for the purposes specified in the disclaimer above.

Name	Date 11 March 2020
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Greater Norwich –Regulation 18 Draft Local Plan Response Form

FOR OFFICIAL USE ONLY	
Response Number:	
Date Received:	

Your completed form should be returned to the Greater Norwich Local Plan team **no later than 5pm on Monday 16 March 2020.**

If you have any further questions about the ways to comment, or if you need consultation documentation in large print, audio, Braille, an alternative format or a different language, you can email us at gnlp@norfolk.gov.uk or phone us on 01603 306603.