

Response to South Norfolk Village Clusters Housing Allocations Plan (Reg. 18 Draft)

Site: SN0432REVA, East of Norwich Road

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General Comments

There is plenty of evidence to suggest that the current local development plan is already providing more than 4,000 additional homes over that predicted, see response to this plan by CPRE. Therefore, there is no evidence to build 30% more houses again in this fundamentally flawed plan. These houses are not required now or even in 2038.

The sites identified in Brooke lead me to believe that given previous planning applications that have been rejected by the council on the same sites, that the identified sites have been promoted by landowners and developers, without responsible oversight by the council as an easy option. A minimal level of scrutiny would have established that the sites are too small for the number of houses proposed, and that the resulting planning application may be for fewer larger houses that would not satisfy the random allocation of 50 houses on two sides of the Norwich Road.

Given the current global warming crisis the building of any house that is not carbon neutral and does not require energy to heat and cool it is totally irresponsible. The built environment contributes around 40% of the UK's total carbon footprint. New houses should have renewable energy powered heat pumps, solar panels as standard and should not consume any power generated off site. This should be at the forefront of a council that has responsibility for extensive low-lying areas of the country, a coastline that is crumbling rapidly due to rises in sea levels and an increase in the intensity of storms due to higher temperatures driven by a doubling of carbon dioxide in the atmosphere in the last 150 years.

In addition, the contribution of the additional transport emissions, especially carbon dioxide emissions of petrol and diesel cars of 50 cars going to and from Norwich every weekday equates to 1.5 tonnes of CO₂ per week that can be avoided. Each new house built in South Norfolk should have an EV charge point installed as standard, reducing the CO₂ emissions to 2.7 kg per week, a reduction of 99.82% in CO₂ if all cars were electric.

I am suspicious of the timing of this plan, some 3 weeks after the local elections, and wonder if the timing was delayed until a successful conservative election campaign? Local politics should not be influencing local development. Secondly, I cannot understand the reason, or logic, for any of these developments in any village, except to generate additional council tax revenue for the Council. Without any evidence I also question the specific location of the two proposed sites in Brooke and would like a full disclosure of any and all discussions relating to the selection of these sites. I am not aware of any previous discussion of a Village Clusters Plan in open forum, and wonder where in the council these plans were developed.

QUESTION 33: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

The extent of the settlement area must be addressed. Currently there is little control over development distance from the road in an east west direction, only a limit to the North. The two proposed sites for up to 25 houses are a consequence of the inadequate definition of this area.

QUESTION 34: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response and please specify which site(s) you are referring to. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

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<p>Preferred for up to 25 dwellings on a site of 1 hectare.</p> <p>Reasoned justification: The site is well located and relatively unconstrained, however it is quite open in the landscape and development in depth to achieve a reasonable density/volume of dwellings would require careful design. There is a need to consider the highways requirements in relation to potential development on the west of Norwich Road in combination with this site.</p>

And comments also relate to

Site: SN0432REVB, West of Norwich Road
<p>Preferred for up to 25 dwellings on a site of 1.2 hectares.</p> <p>Reasoned justification: The site is well located and relatively unconstrained. The site fills a gap between the existing settlement and the grounds of Brooke Lodge; however, it is open to wider countryside to the rear (west) and development in depth to achieve a reasonable density/volume of dwellings would require careful design. There is a need to consider the highways</p>

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requirements in relation to potential development on the east of Norwich Road in combination with this site.

Response: The proposed area of 10,000 m² to 12,000 m² and up to 25 houses allows for only 400 to 480 m² per plot, without an area allocated for access roads. This implies that the nature and style of the houses would be completely out of character with any of the houses in Norwich Road. If the stated aim of the Village Clusters Plan is to create an opportunity to live in a village, then the houses that are built should be as closely matched to the character of the village as possible. The most recent development to the North of the village consists of a sympathetic design.

Lighting. The village currently has no streetlights, and this should be extended to any development, although it is unlikely that in such a packed development lights would not be installed, especially approaching a new roundabout. This would change the dark skies nature of the village close to existing dwellings.

Broadband speeds are already limited, and bandwidth would be severely impacted by the addition of another 50 dwellings.

The **access** road would be outside the current 30 mph zone, which is already completely ignored by traffic coming in and out of the village, but access onto the main road from either west or east may have to be from a roundabout, increasing the costs to the highways department.

Surface water flooding is common on both sites east and west of the road in winter, and careful consideration of porous surfaces to infiltrate water to ground should be encouraged to avoid flooding of the main road.

Nature conservation issues

There are several ancient oak trees on, or very close, to the boundaries of the proposed site SN0432REVB. Oak trees, according to research conducted by the Centre for Ecology and Hydrology (<https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/british-trees/oak-tree-wildlife/>) state that 2,300 species are supported by oak trees, 326 species depend on oak for survival and that 229 species are rarely found on trees other than oak. The loss of any of these trees due to root zone damage caused by construction, foundations etc., would result in significant loss of biodiversity and loss of carbon capture capacity, probably leaving the council open to valid criticism of damage to natural capital assets.

The site is regularly used by Buzzards, various owl species, hares, over 30 species of garden bird surveyed in June 2021, including green and greater spotted woodpeckers, swifts, swallows and house martins.

Both sides of the road are used by farm vehicles for access, and it is not clear how access to the fields to the rear of both sites would be maintained without further restricting the size available for development, and the subsequent reduction of plot size.

Summary of Objections

1. There is no need to build any new houses anywhere in South Norfolk outside the current LDP as there is already an excess of housing stock in this plan to cater for the increases in the region of 4000 extra houses. This development is not necessary in terms of housing requirements.
2. The proposed development to the North of Brooke is out of proportion to the rest of the village and represents a possible 20% increase in population and a 10% increase in housing stock to the village. A proposed development of no more than 6 houses on the east and west proposed sites may be acceptable, representing a potential 3% increase in population and a 2% increase in housing stock to match the predicted population increase over the same time period.
3. Consideration of the carbon dioxide emissions of the construction and population has not been adequately addressed in any overall council housing strategy that requires reduction, not increases in emissions.
4. Access issues have been referred to but more details are required.
5. The timing of the plan is suspicious, the history of planning permission refusals on these sites are suspicious and there is no evidence that this site has been considered in any detail, leading to the conclusion that this is already a done deal in the absence of evidence to the contrary. This may have to lead to a full disclosure request via an FOI regarding the selection process for all proposed sites.
6. There is a significant risk of surface flooding, and a considerable risk to biodiversity from any development on this site.