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Dear Sir/Madam ,

Re South Norfolk Village Clusters Housing Allocations Plan (Reg. 18 Draft) Consultation Response from Hempnall Parish Council

We have telephoned the local plan team on 01508-533805 and they have informed us that respondents to the South Norfolk Village Clusters Consultation can submit their responses via email and mail and that it is not essential to use the online portal.

Please see below the formal consultation response of Hempnall Parish Council to the South Norfolk Village Clusters Housing Allocations Plan (Reg. 18 Draft). We have submitted answers to all questions that we consider to be of relevance to the Parish Council.

QUESTION 1: Do you agree with the Objectives for the Village Clusters Plan? If you think the Objectives should be changed, please explain how and why.

A) Hempnall Parish Council considers that the Village Clusters approach to allocating new housing is misguided and damaging because it involves dispersing an unnecessary level of development into villages with very negative consequences for the climate and landscape and pursuing such a policy would result in a significant loss of countryside and green spaces

Hempnall Parish Council does not support the objectives for the Village Clusters Plan because allocating new sites in villages as part of a dispersal policy is unsound as it conflicts with the objective of the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050. Concentrating development in and around Norwich is the best way to reduce greenhouse gas emissions as such development can more easily be based on the usage of public transport. There is increasing potential for more

residential space to be provided in Norwich as a result of trends towards home working and internet shopping which are leading to a reduction in the need for office and retail space in the city centre.

Vehicle use is often the main contributor to operational emissions resulting from new housing * *. Therefore development that is dispersed will create a greater level of greenhouse gas emissions than development that is concentrated in or close to Norwich. Eventually private cars will all be electric or hydrogen powered but for the “shelf life” of the GNLP (to 2038) the transition will not have been completed and for the first 12 years (and probably more) of the plan the majority of vehicles will remain as petrol or diesel powered.

The table on page 80 of the GNLP papers from June 23rd, 2017 clearly showed that the best spatial option for new housing in order to minimise negative environmental consequences was Option 1: Urban Concentration close to Norwich. This option was the one which was best for: minimising, air, light and noise pollution; improving well-being; reducing CO2 emissions; mitigating the effects of climate change; protecting and enhancing bio-diversity and green infrastructure; promoting the efficient use of land; respecting the variety of landscape types in the area; reducing the need to travel and promoting the use of sustainable transport modes; minimising the use of the best agricultural land and maintaining and enhancing water quality and its efficient use. In terms of all these and other factors taken together the least desirable option was Option 4: Dispersal of Development of which the plans for village clusters are an integral part.

Unfortunately the obvious conclusion that should have followed on from the publication of this table, i.e. for the GNLP to be based on Option 1, was not pursued. Instead the distribution pattern for new housing envisaged in the draft plan, while it includes a degree of urban concentration, still promotes dispersal of development through proposals to make new allocations in Village Clusters and via policy 7.5. These allocations are in addition to the rural housing sites already included in current commitments carried over from the JCS and are additional to estimates for windfall developments in villages.

If the GNLP proposals for the location of new housing are not changed and the village cluster allocations are retained a sizeable chunk of development will end up being dispersed and the plan will not have:

- Taken a proactive approach to mitigating climate change impacts (as required by NPPF paragraph 149) because the plan would be facilitating a distribution pattern of development that produces greater greenhouse gas emissions than would be the case if a better option (Option 1) had been chosen
- Complied with NPPF paragraph 148 which seeks to “*shape places in ways that contribute to radical reductions in greenhouse gas emissions*” because it clearly does not shape the development of places in a way that enables there to be a radical reduction in greenhouse gas emissions – far from it in fact. The shape of development in locational terms, because it includes a sizeable element of dispersal, would lead to an increase in greenhouse gas emissions. Concentrating development in and near Norwich is a much sounder spatial option if the requirements of paragraph 148 are to be met.

- Made the best attempt to comply with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050. Obviously by choosing to disperse a large amount of new housing greenhouse gas emissions will rise more rapidly than if development was all concentrated near Norwich - pursuing dispersal makes it less likely that emissions will reach net zero by 2050.
- Complied with paragraph 150 of the NPPF which states that "*new development should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation and design.*" Clearly dispersing a sizeable quantity of development is not locating housing in the right place to help reduce greenhouse gas emissions.
- Followed National Planning Practice Guidance (PPG) (2019) which states that: "*effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases*" and "*Planning can also help increase resilience to climate change impact through the location, mix and design of development.*" In addition, the PPG provides examples of mitigating climate change by reducing greenhouse gas emissions and adapting to climate change through "*Reducing the need to travel and providing for sustainable transport*". Dispersing development is not locating new housing in the best place to reduce climate change impacts nor is it reducing the need to travel or making it easy to provide sustainable public transport.

* * Source: Climate Change section of the Environmental Statement for Chalgrove Airfield in Oxfordshire – in this 3000 home development "*total GHG emissions from operational phase (over 60 year design life) contribute 80% to the overall emissions of the Proposed Development.*" Estimated operational emissions are summarised in Table 15-13 of the ES. Of these operational emissions four fifths (1,021,260 tonnes of CO₂) will result from vehicle use.

For all the reasons given above Hempnall Parish Council considers that the objectives of the South Norfolk Village Clusters Plan are unsound because policies which plan to disperse housing in to villages (the Village cluster policy and policy 7.5) will producing damaging consequences. It is clear from the table on page 80 of the GNDP papers from June 23rd, 2017 that dispersing development has far greater negative impacts on the environment and landscape than concentrating development in and close to Norwich.

This is because Dispersal:

- **Increases air, light and noise pollution**
- **Increases CO₂ emissions**
- **Causes more Greenfield sites to be built on**
- **Robs us of valuable agricultural land**
- **Threatens habitats and bio-diversity**
- **Suburbanises the countryside**

Therefore plans to introduce a Village Clusters approach should be removed from the GNLP.

B) Furthermore Hempnall Parish Council considers that the Village Clusters approach to allocating new housing is unnecessary because the Total Housing Potential suggested for the GNLP is too high (49,492) and if it were reduced to the level required to address local housing need, as assessed by the standard method i.e. 40,541 dwellings, then allocations to village clusters would not be needed and proposals to allocate land for a minimum of 1200 houses in village clusters in South Norfolk could be withdrawn from the GNLP.

In making a choice to proceed with the lower housing figure of 40,541 dwellings and not allocating additional housing in to villages via a village clusters policy the GNLP would be demonstrating that:

- The plan has taken a proactive approach to mitigating climate change impacts (as required by NPPF paragraph 149) because it will have chosen the least damaging option in terms of greenhouse gas emissions (the huge CO2 emissions that would have resulted from building nearly 50,000 houses would be made less severe or serious) while still complying with NPPF paragraph 60. Of course the construction and operation of 40,541 houses will still generate enormous greenhouse gas emissions but the total will at least be around 20% less than if 49,492 were built.
- The plan has attempted to comply with NPPF paragraph 148, as best possible given the requirements of NPPF paragraph 60, by endeavouring to “*shape places in ways that contribute to radical reductions in greenhouse gas emissions*”. While choosing to build 40,541 extra houses is not going to lead to a radical reduction in greenhouse gas emissions making this choice radically lowers emission levels below those which would occur if 49,492 houses were built.
- The plan has attempted to comply, as best possible given the requirements of NPPF paragraph 60, with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to ‘net zero’ by 2050.

If the choice is made for the GNLP to proceed with the higher housing potential figure of 49,492 including a minimum of 1200 additional houses in village clusters in South Norfolk the plan will not have demonstrated that it has:

- Pursued a proactive approach to mitigate climate change impacts because it will have chosen an option that makes something bad (i.e. climate change) more severe and serious than it otherwise would have been if the lower local housing need figure was chosen. The plan would not be compliant with NPPF paragraph 149.
- Attempted to comply with NPPF paragraph 148 because it will have chosen not to take advantage of the opportunity to achieve the radically lower

emission levels that would result from the adoption of the lower local housing need figure

- Complied, as best possible given the requirements of NPPF paragraph 60, with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050 because in not choosing the lower local housing need figure it will have facilitated the generation of considerably higher level of greenhouse gas emissions.

Relevant NPPF paragraphs and Climate Change Act targets relating to concerns over the magnitude of the Total Housing Potential

The NPPF requires that: *“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures”* – **paragraph 149**

The Oxford English dictionary defines mitigating as: *“having the effect of making something bad less severe, serious, or painful.”* Therefore the NPPF says that local plans should take a proactive approach in making something bad (i.e. climate change) less severe, serious or painful.

NPPF paragraph 148 states that the planning system: *“should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions”*

Climate Change Act 2008 has set a legally binding target for the UK to reduce its Greenhouse Gas emissions from 1990 levels by at least 80% by 2050.

The Climate Change Act 2008 (2050 Target Amendment) Order 2019

The UK has recently legislated to end its contribution to global warming by 2050, with a target that will require the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050, compared with the previous target of at least 80% reduction from 1990 levels.

Given that the carbon foot print resulting from the pre-construction and construction work necessary to build each new house is in the region of 100 tonnes of CO₂ * then fulfilling the Total Housing Potential of 49,492 houses could generate 4,949,200 tonnes of CO₂ and this is just the amount of CO₂ resulting from building the houses. If the operational greenhouse gas emissions over the lifecycle of the properties is factored in the emissions total leaps to astronomical levels as the building phase is only responsible for about a quarter of total lifecycle emissions. Of course building methods could improve during the plan period, thus reducing both construction and operational emissions, but with the government constantly “kicking the can” down the road on introducing stricter building regulations this may well take many years to be realised and even with better standards total emissions resulting from the building and operation of 49,492 additional houses will still be very high.

There is a choice that can be made between retaining the policy draft figure of 49,492 or setting a lower total housing number in accordance with NPPF paragraph 60 which says that: *“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard*

method in national planning guidance – unless exceptional circumstances justify an alternative approach”

Hempnall Parish Council contends that adherence to climate change policy should require local authorities to choose the minimum number of houses needed in order to comply with the local housing need assessment resulting from the appliance of the standard method in national planning guidance and to not set a housing target or housing potential at a higher level.

**(source: Climate Change section of the Environmental Statement for Chalgrove Airfield in Oxfordshire - this is 3000 home development. If you look to page 15, it says: “The total GHG emissions from pre-construction and construction are estimated to be in the order of 313,370 tCO₂e” i.e. around 100 tonnes per house)*

Conclusions

- Hempnall Parish Council considers that the Village Cluster proposals are unnecessary because they form part of an un-sound (and quite possibly not legally compliant), unnecessarily high Total Housing Potential number which is not compatible with NPPF paragraphs 148 and 149 and does not comply with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to ‘net zero’ by 2050
- The Village Cluster proposals are also un-sound because they form part of a policy to disperse a significant amount of development. A widespread dispersal of development in to villages also conflicts with the requirements of NPPF paragraphs 148, 149 and 150 and the objective of the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to ‘net zero’ by 2050. Nor does it follow the guidance provided by National Planning Practice Guidance (PPG) (2019)
- Setting the housing number so high and dispersing some development in the way the GNLP suggests including via village clusters will result in a number of very negative consequences in regard to the landscape and the environment and loss of green space and countryside.
- There are already a huge number of sites available for new housing in villages as part of the current commitments (as yet not “built out”) within the Joint Core Strategy. Existing commitments totalled 31,452 in April 2020. Many of these are in villages and Hempnall Parish Council considers that these commitments together with an estimated 4,450 new windfall houses by 2038 provide a more than adequate number of sites for new housing in villages. Adding the village cluster numbers on top of these current allocations and likely windfalls is unnecessary.

Please also see our concerns (in our response to question 66) regarding the classification of some village cluster sites as SL sites which would lead to a situation where any housing approved for these sites would not count towards housing targets and therefore would be additional development on top of the Total Housing Potential causing even more green spaces to be lost.

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C) A Sounder Way Forward

1) Set the Total Housing Potential at the minimum local housing need figure of 40,541. This satisfies the Government's Standard Methodology requirement.

2) Realise that by setting the housing target at 40,541 this number of new houses could be met by a combination of: 31,452 existing commitments; 5240 completions (2018 – 20); with the balance of 3,849 houses supplied by windfall developments and Brownfield sites in Norwich. In this scenario no new allocations for housing involving Greenfield sites need be made and therefore it would not be necessary to include any village cluster sites in the plan or utilise sites that might come forward as a result of policy 7.5. The negative aspects of dispersal would be avoided.

3) Accept that there is no need to introduce additional sites on the grounds that developers require more choice. The 31,452 existing commitments already provide an adequate supply of development land for many years to come and give developers all the flexibility they need in regard to site choices. Developers only build to market demand and if there is a surplus of sites they will simply "cherry pick" attractive rural sites and leave more sustainable sites land banked.

4) Learn from past mistakes. Clearly the JCS included a housing target that was far too large – hence 31,452 un-built commitments remain with only 5 years left on the plan. This time the GNLP should set a realistic target – the housing need figure of 40,541 is probably already too large. Village cluster allocations are not needed

5) Concentrate development in and around Norwich. This is the best way to reduce greenhouse gas emissions. Setting a lower total housing potential makes this locational approach feasible and eradicates the need for a village clusters approach.

6) Future proof the plan - Post Covid and Post Brexit things will be very different. Trends towards home working and internet shopping are leading to a reduction in the need for office and retail space in the city centre. In order to revitalise the city centre incorporate in to the GNLP the ever increasing potential for converting redundant office and retail space in to residential use. This is a **sound approach** NPPF paragraph 148 encourages: "*the reuse of existing resources, including the conversion of existing buildings*". This kind of conversion could provide a large number of new dwellings in a sustainable location and take pressure off development in the countryside and negate the need for housing allocations via a village clusters approach.

7) Realise that the 5,000 houses included in the Total Housing Potential to provide an opportunity for extra capacity should the 2018 ONS household projection figures become reality could be treated as phased development i.e. even if sites for these houses are allocated they need only be brought forward for development if required. In this phased approach Brownfield sites should be prioritised. This way the GNLP will have soundly demonstrated that it is aware that the ONS 2018 projections may require this additional provision but also that it acknowledges the fact that this provision will only need to be brought on stream if the projections prove to be accurate.

8) Listen to parish councils who know what their residents want. For example in Hempnall the Parish Council considers the amount of new housing currently projected for the village, resulting from the JCS site south of Bungay Road, the affordable housing scheme that the parish council seeks to implement in conjunction with Saffron Housing at Millfields and from likely windfalls – totalling approximately 45 to 50 houses - is the right amount for the village (a 10% increase over current housing numbers). Therefore we do not want any of the sites put forward by landowners for inclusion in the GNLP to be allocated in the plan. We would also like our policy that all development be restricted to inside the current development boundary to be honoured except in regard to the provision of a rural exception site for affordable housing. The addition of extra housing, via the introduction of the Village Cluster approach, is not wanted or needed in Hempnall nor, we suspect will it be welcomed in many other villages in South Norfolk and Broadland.

9) Provide affordable housing in villages via Rural Exception Sites. The Parish Council in conjunction with Saffron has plans to build affordable housing near Millfields. The site is owned by South Norfolk Council and they have asked for its inclusion in the GNLP as an allocated site. If their request is granted it will prevent its classification as an exception site and our affordable housing scheme will be lost. We ask that SNC complies with NPPF 77 which says: *“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs”*. Rural exception sites enable local affordable housing requirements to be fully met. Reliance on market schemes fails to achieve this objective. For example the 23 house JCS development south of Bungay Road was originally intended to include 7 affordable houses. Through the use of viability studies the developer has managed to reduce this in stages to just three (7 then 5 now 3).

10) Lobby central government to insist on carbon zero building standards at the earliest opportunity. As things stand currently the GNLP, for much of its 20 year plan period, will not operate in an environment where the highest standards are required.

The value of the countryside and green spaces to the well being of all has been revealed throughout the Covid-19 pandemic. The Village Cluster approach would lead to an unnecessary loss of these green areas The Countryside deserves stronger protection in the GNLP than is currently on offer.

Clearly the land take to build 49,492 houses (Total Housing Potential including village cluster allocations) is considerably greater than that required to construct 40,541 (Housing need figure). Choosing the lower figure and dropping the Village Cluster proposals would save many Greenfields from the threat of development and in so doing makes it easier to protect the countryside, habitats, landscape, flora and fauna and the climate.

QUESTION 2: Do you agree that the Village Clusters Plan should include a policy on 'Standard requirements'? If so, do you agree that the criteria suggested are appropriate, or should they be amended and/or should additional criteria be added?

Hempnall Parish Council does not support the Village Clusters approach – see our detailed response to Question 1.

QUESTION 3: Do you agree that the Village Clusters Plan should include a policy on 'Design'? If so, do you agree that the criteria suggested are appropriate, or should they be amended and/or should additional criteria be added?

Hempnall Parish Council does not support the Village Clusters approach – see our detailed response to Question 1.

QUESTION 4: Do you agree that the Village Clusters Plan should include a policy on 'Housing Mix'? If so, do you agree that the criteria suggested are appropriate, or should they be amended and/or should additional criteria be added?

Hempnall Parish Council does not support the Village Clusters approach – see our detailed response to Question 1.

Questions 5. to 63.

No comments as these questions are not general questions nor do they relate to Hempnall.

NB There appears to be no question 64

QUESTION 65: 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 notes in relation to proposed Village Cluster 18 (Hempnall, Topcroft Street, Morningthorpe, Fritton, Shelton and Hardwick) state that: “*No alterations are proposed to the existing settlement limits within this cluster*” however if the 2 sites identified in Hempnall as preferred sites in the South Norfolk Village Clusters Housing Allocations Preferred Sites Plan were approved for housing the settlement limit (known as the Development Boundary in the JCS) of Hempnall would be enlarged to accommodate the territory occupied by these sites and so the note is misleading.

It is Hempnall Parish Council policy to oppose new development outside the current settlement limit (Development Boundary) and to oppose any changes to that boundary. This is one of the reasons why we consider that site SN1015 should not be approved for inclusion in the GNLP as a South Norfolk Village Cluster allocation. In regard to site SN02220SL the Parish Council is negotiating with Saffron Housing for this site to be used for social housing. If this usage is agreed the site could be developed as a Rural Exception Site built on land adjacent to an existing settlement boundary. However if SN02220SL is progressed as a site for market housing Hempnall Parish Council would oppose this because it contravenes our policy on the settlement limit (Development Boundary).

At this point we consider it important to re-state our overall policy supportive of “organic” housing growth in the village but rejecting the unnecessary imposition of additional housing via the village cluster proposals:

“Hempnall Parish Council considers the amount of new housing currently projected for the village, resulting from the JCS site south of Bungay Road, the affordable housing scheme that the parish council seeks to implement in conjunction with Saffron Housing at Millfields and from likely windfalls – totalling approximately 45 to 50 houses - is the right amount for the village (a 10% increase over current housing numbers). Therefore we do not want any of the sites put forward by landowners for inclusion in the GNLP to be allocated in the plan. We would also like our policy that all development be restricted to inside the current development boundary to be honoured except in regard to the provision of a rural exception site for affordable housing. The addition of extra housing, via the introduction of the Village Cluster approach, is not wanted or needed in Hempnall”.

QUESTION 66: 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?

Site: SN0220SL, Land at Millfields Preferred for up to 15 dwellings on a site of 0.48 hectares

Hempnall Parish Council supports the provision of affordable social housing in villages via Rural Exception Sites. The Parish Council in conjunction with Saffron has plans to build affordable housing on this site adjacent to Millfields. We are therefore surprised to see it being promoted as a preferred site in the South Norfolk Village Clusters Housing Allocations Preferred Sites Plan. The site is owned by South Norfolk Council and the council is presumably aware of the plans Saffron have drawn up and the negotiations that have been taking place.

If this site is approved for market housing this would prevent its classification as an Exception Site and our affordable housing scheme will be lost. We ask that SNC complies with NPPF 77 which says: *“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs”*. Rural exception sites enable local affordable housing requirements to be fully met.

This site was originally earmarked by SNC as Millfields Phase 2 – i.e. as an extension to the current Millfields “old folks” bungalow development. This fact seems to have been overlooked in the current process. However if the site cannot be treated as a rural exception site for social housing the parish council would prefer that it be used to provide additional bungalows for elderly residents for which there is a far greater need than the need for more market housing.

There appears to be a degree of confusion over the intentions in regard to this site and we suggest an on site meeting between SNC, Saffron, Hempnall Parish Council and an officer from the Place Shaping team to resolve matters. We look forward to your response.

In terms of the kind of dwelling (old folks' bungalows or social rented property) that is built we agree with the note that in order to not disrupt the setting of the mill the height of properties should be limited to 1.5 storeys.

The use of the suffix SL to describe this site raises concerns:

- It is our understanding that sites labelled SL are small sites (either under 0.5 hectares in size or fewer than 12 dwellings) and that the houses involved (if the site were to be approved for development) would not count towards the 1200 allocation for village cluster sites in South Norfolk - i.e. they would be additional development above this target. This means that the village cluster approach will involve more Greenfield development than appears at first sight. This is not explained in the consultation and therefore many respondents commenting on SL sites that are identified as preferred sites will not be aware of their potential impact on total housing numbers in South Norfolk and more generally within the GNLP area.
- Also it seems that SL sites will not be given allocated status – even if they are approved for development - but would be treated the same way as windfall sites. Does this mean that the numbers of houses involved have been counted in the GNLP estimate of 4,450 houses resulting from Windfall development by 2038 or are they additional to this number?
- Furthermore question 66) asks: *“Do you support or object to the allocation of the preferred site?”* If this SL site will not count as an allocated site the question is in itself misleading and incorrect.

The SL classification should not be allowed to lead to a situation where even more houses are permitted on Greenfield sites. All new houses should be counted as contributing to targets wherever they are built during the plan period.

QUESTION 67: 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?

**Site: SN1015, Land adjacent to the primary school, The Street
Preferred for 20 dwellings on a site of 1.6 hectares**

Hempnall Parish Council objects to the inclusion of this site as a preferred site in the South Norfolk Village Clusters Housing Allocations Preferred Sites Plan. This is because we object to the Village Cluster concept (as explained in our answer to question 1) and because we consider that the current level of development we expect to take place in our village is the right amount - allowing organic growth but avoiding the need to “cement on” additional housing estates which breach the current settlement limit - our reasoning on this is repeated below (in italics):

“Hempnall Parish Council considers the amount of new housing currently projected for the village, resulting from the JCS site south of Bungay Road, the affordable housing scheme that the parish council seeks to implement in conjunction with Saffron Housing at Millfields and from likely windfalls – totalling approximately 45 to 50 houses - is the right amount for the village (a 10% increase over current housing numbers). Therefore we do not want any of the sites put forward by landowners for inclusion in the GNLP to be allocated in the plan. We would also like our policy that all development be restricted to inside the current development boundary to be honoured except in regard to the provision of a rural exception site for affordable housing. The addition of extra housing, via the introduction of the Village Cluster approach, is not wanted or needed in Hempnall”.

The Parish Council is also concerned that housing development at this location, which is adjacent to the school grounds, could restrict future expansion of Hempnall Primary School, should additional school places be needed.

QUESTION 68: Do you think that any of the shortlisted or rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response and please specify which site(s) you are referring to.

Hempnall Parish Council approves the rejection of all the other sites promoted for development i.e. SN0147, SN0178SL, SN0580, SN1016, SN1017, SN1018, SN2029SL, SN2046, SN2081, SN2146SL, SN4012, SN4083.

In relation to the sites in this list that are located in Hempnall we thank the Place Shaping Team for taking on board the concerns we have expressed in previous consultations and for rejecting these sites for development

QUESTIONS 70 to 173. (NB there doesn't appear to be a question 69)

No comments as these questions are not general questions nor do they relate to Hempnall.

QUESTION 174: Do you agree with the proposed Monitoring Framework? Please add additional comments to explain your response and please specify which site(s) you are referring to.

No Comment

HEMPNALL PARISH COUNCIL - ADDITIONAL CONCERNS

- The parish council was surprised and alarmed that sites appeared in the consultation that were not previously known to the council. This appears to happen because the Call for Sites is an ongoing process and sites are not

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publicised until assessment has taken place. We consider it important that a parish council is informed as soon as a site that lies within its territory is promoted for inclusion.

- We are also concerned that a reliance on a percentage formula to supply affordable housing as part of a bigger “market based” development is not working as it should. For example the 23 house scheme on the JCS development south of Bungay Road (HEM 1) was originally intended to include 7 affordable houses. Through the use of viability studies the developer has managed to reduce this in stages to just three (7 then 5 now 3). Steps need to be taken to ensure that commitments on affordable housing made when planning permission is granted are adhered to. We consider that a much better method of providing affordable housing in villages is via the use of Rural Exception Sites.
- Hempnall Parish Council supports the phasing of housing i.e. whereby existing sites allocated for development in current plans (e.g. the JCS) have to be built out before new allocations added in to emerging plans (e.g. the GNLP) can be developed. This is a particular issue in South Norfolk, Broadland and Norwich as there was an existing commitment of 31,452 dwellings in April 2020. This existing commitment is enough to allow 2,000 houses per year to be built for at least 15 years before it is used up – it would cover all house building to at least 2036 – i.e. nearly up to the projected end of the GNLP (2038). There really is no need for any new sites to be allocated in the GNLP and certainly no need to proceed with village cluster allocations. Insisting on the delivery of current commitments would also tackle the Land Banking issue and protect many green spaces and much countryside from development because without phasing new Greenfield sites allocated in the GNLP would be “cherry picked” for development ahead of existing JCS sites.
- We consider that all new housing built within the duration of the plan should count towards the Total Housing Potential in the GNLP including: all windfalls; housing on rural exception sites; dwellings on village cluster sites if permitted and all housing built on other smaller sites identified with an SL suffix in the South Norfolk Village Clusters Housing Allocations Preferred Sites Plan. If these houses are not included then the total number of new houses built could exceed the 49,492 figure identified as the Total Housing Potential and this elevation of the numbers would put additional pressure on the countryside and involve the loss of even more green space.

Summary of the Hempnall Parish Council Position in regard to the South Norfolk Village Clusters Housing Allocations Plan (Reg. 18 Draft)

Hempnall Parish Council does not support the objectives for the Village Clusters Plan because:

A) We consider that the Village Clusters approach to allocating new housing is misguided and damaging because it involves dispersing an unnecessary level of

development into villages with very negative consequences for the climate and landscape and pursuing such a policy would result in a significant loss of countryside and green spaces

It is clear from the table on page 80 of the GNLP papers from June 23rd, 2017 that dispersing development has far greater negative impacts on the environment and landscape than concentrating development in and close to Norwich.

This is because Dispersal:

- Increases air, light and noise pollution
- Increases CO2 emissions
- Causes more Greenfield sites to be built on
- Robs us of valuable agricultural land
- Threatens habitats and bio-diversity
- Suburbanises the countryside
- Makes the provision of public transport as an alternative to the private car more difficult

B) We consider that the Village Clusters approach to allocating new housing is unnecessary because the Total Housing Potential suggested for the GNLP is too high (49,492) and if it were reduced to the level required to address local housing need, as assessed by the standard method i.e. 40,541 dwellings, then allocations to village clusters would not be needed and proposals to allocate land for a minimum of 1200 houses in village clusters in South Norfolk could be withdrawn from the GNLP.

The value of the countryside and green spaces to the well being of all has been revealed throughout the Covid-19 pandemic. The Village Cluster approach would lead to an unnecessary loss of these green areas The Countryside deserves stronger protection in the GNLP than is currently on offer.

Clearly the land take to build 49,492 houses (Total Housing Potential including village cluster allocations) is considerably greater than that required to construct 40,541 (Housing need figure). Choosing the lower figure and dropping the Village Cluster proposals would save many Greenfields from the threat of development and in so doing makes it easier to protect the countryside, habitats, landscape, flora and fauna and the climate.

Therefore plans to introduce a Village Clusters approach should be removed from the GNLP.

For our detailed comments on sites proposed for Hempnall see our responses to questions 65) to 68) inc.

Our concerns regarding sites classified as SL in the consultation are repeated below:

The use of the suffix SL to describe sites raises concerns because:

- It is our understanding that sites labelled SL are small sites (either under 0.5 hectares in size or fewer than 12 dwellings) and that the houses involved (if

the site were to be approved for development) would not count towards the 1200 allocation for village cluster sites in South Norfolk - i.e. they would be additional development above this target. This means that the village cluster approach will involve more Greenfield development than appears at first sight. This is not explained in the consultation and therefore many respondents commenting on SL sites that are identified as preferred sites will not be aware of their potential impact on total housing numbers in South Norfolk and more generally within the GNLP area.

- Also it seems that SL sites will not be given allocated status – even if they are approved for development - but would be treated the same way as windfall sites. Does this mean that the numbers of houses involved have been counted in the GNLP estimate of 4,450 houses resulting from Windfall development by 2038 or are they additional to this number?
- Furthermore question 66) asks: *“Do you support or object to the allocation of the preferred site?”* If this SL site will not count as an allocated site the question is in itself misleading and incorrect.

The SL classification should not be allowed to lead to a situation where even more houses are permitted on Greenfield sites. All new houses should be counted as contributing to targets wherever they are built during the plan period.

Ian Nelson
Clerk to Hempnall Parish Council

