

South Norfolk Village Clusters Housing Allocations Plan - Regulation 18 Consultation

Norfolk County Council Response

14 July 2021

1. Introduction

- 1.1. The County Council (CC) welcomes the opportunity to comment on the above consultation relating to the draft version of the South Norfolk Village Clusters Housing Allocations Plan (VCHAP). The officer-level comments below are made on a without prejudice basis and the County Council reserves the right to make further additional comments on any subsequent stages of the Local Plan and/or any application/s on any of the above sites.
- 1.2. The remainder of this note sets out more detailed comments in relation to the County Council's statutory roles and responsibilities:

Comments

2. Over-arching Strategic and Infrastructure Comments

- 2.1. Response to Question 1 - The County Council welcomes / supports the underlying objectives to the Plan as set out in SNVC Objectives 1, 2, and 3. In particular the County Council supports Objective 2 in respect of protecting village communities and supporting rural services and facilities.
- 2.2. Response to Question 2 - Policy SNVC 1 (Standard Requirements) – Support the need for a Standard Policy covering over-arching requirements to ensure specific infrastructure constraints are addressed. The policy and/or supporting text would need to indicate clearly:
 - (a) those infrastructure types and services which potentially may need enhancing to support the proposed housing growth (e.g. local schools; library service etc); and
 - (b) indicate the appropriate funding / delivery mechanisms, for example, use of community infrastructure funds; planning obligations; or planning condition.
- 2.3. Response to Question 3 – Policy SNVC 2 (Design) – Support the need for a policy on design; and welcome the proposed broad criteria. However, it is felt that the criteria should be expanded to include reference to healthy living – i.e. ensuring opportunities for cycling and walking and life-long-housing in line with Agreement 20; and Section 7 (Health) of the Norfolk Strategic Planning Framework (2021).

(Please see further detailed comments provided by the Lead local Flood Authority – below in respect of Policies SNVC 1 and 2).
- 2.4. Response to Question 4 (Housing mix) – Support the need for a policy on housing mix (Policy SNVC3).
- 2.5. If you have any queries regarding this response please contact Stephen Faulkner (Principal Planner – Strategic Planning Team) by email at

stephen.faulkner@norfolk.gov.uk or phone on 01603 222752.

3. **Transport – Assessment of Sites**

3.1. The following detailed site comments are made:

3.2. **Alpington**

SN0412REV - Whilst it is recognised that the site is brownfield, it is not at a sustainable location and offers limited access to local facilities. The proposed allocation for 25 dwellings is a concern and it is felt that allocation should be limited in scale to accord with previous traffic generation. Local highway improvements would be required to provide safe and suitable access.

3.3. **Aslacton**

SN0459 - Carriageway widening and frontage footway should be required. The footway should extend eastwards to link with the bus stops at Muir Lane.

3.4. **Barford**

SN0552 - Identified as a reasonable alternative. The site is shown in the map booklet, split in two with sections north and south of the B1108. It is not clear that a safe and acceptable pedestrian route could be provided between the sites and local facilities. In the absence of evidence to the contrary, it is possible the Highway Authority would object to applications at these sites.

3.5. **Little Melton**

SN1046REV – It is understood that this site is not being proposed for housing but would instead lie with the settlement boundary of the village. While the site as proposed would lie with the settlement boundary it is not considered appropriate for housing for the following reasons:

Access appears to be proposed via the site of Glenhaven at Great Melton Road, it is not clear that an access with acceptable visibility can be achieved. Great Melton Road is not considered to be of a suitable standard to accommodate development traffic and sufficient highway does not appear to be available to widen the carriageway and improve footway to local amenities. It is probable that the Highway Authority would object to an application at this site.

SN4052 - The highway requirements are noted but the ability to meet them should be demonstrated prior to allocation.

3.6. **Wortwell**

SN2036 - It would need to be demonstrated that adequate visibility can be achieved at Low Road / High Road junction. Concern over scale of development and its ability to support suitable highway improvement to secure safe access.

3.7. **Newton Flotman**

SN4024 - The estate road serving NEW1 is not suitable to also be the sole means of

access to SN4024. A second point of access is needed and will require 3rd party land.

3.8. **Rockland St Mary**

SN2064REV - It is believed that 3rd party land is needed for the visibility splay to the west of the proposed site access. Particularly as the highway requirements relate to the ability to provide a safe access, the ability for them to be met should be demonstrated prior to allocation.

3.9. **Seething**

SN0405 - An off-carriageway pedestrian route between the site and pedestrian access at the school would be required for the site to be acceptable. Discussions regarding the required highway mitigations should be concluded and the necessary land / agreements secured prior to allocation of the site.

SN2148 - Frontage footway along with carriageway widening would be required.

3.10. **Ashwelthorpe**

SN024240017SL - Visibility left from New Road to Wymondham Road is limited. It should be confirmed prior to allocation that this can be satisfactorily resolved.

3.11. **Wrenningham**

SN2183 - The highway access to the site would be via Wymondham Road which is of a limited width and without footway, it does not appear feasible to improve the road to a standard that would be appropriate to support development of the site. It is not clear that acceptable visibility splays can be provided at the site access. It is also considered that the Wymondham Road junction with Ashwellthorpe Road and Mill Lane is not of a suitable standard to support development traffic. Visibility is constrained from Wymondham Road to the right and there are no facilities for a safe pedestrian route across the junction to the school. It is likely that the Highway Authority would object to an application at this location and as such would request it is not allocated.

3.12. In summary – there are significant highway concerns with the site proposed above at Wrenningham (SN2183), which if it remains in the Local Plan at the pre-submission (reg 19) stage would result in the County Council as Highway Authority raising a Soundness Objection as the Plan would not be:

- (a) Justified – as the site has not taken into account evidence from the Highway Authority;
- (b) Effective – would not be deliverable over the plan period due to the highway issues raised; and
- (c) Consistent with national policy in terms of highway safety; and any development proposal could not be consistent with paragraphs 108 and 109 of the National Planning Policy Framework.

In addition if housing were to come forward at Little Melton (site reference SN1046) this would very likely raise / attract a highway objection for the reason set out above..

- 3.13. The remaining proposed allocation sites above would need to be accompanied with suitable/effective mitigation; and their supporting policies would therefore require appropriate criteria-based policies addressing the highway issues/concerns above .
- 3.14. If you have any queries regarding this response please contact David Wilson (Engineer Major Development) by email at david.wilson@norfolk.gov.uk telephone 01603 223272.

4. **Minerals and Waste**

- 4.1. The Mineral Planning Authority is pleased to note the inclusion within the site assessments of its previous comments on the potential allocation sites regarding mineral resource safeguarding. Currently, the reasoned justification for the sites does not include reference to mineral resource safeguarding. We would like to reiterate from our previous comments that the need for mineral resource safeguarding to be addressed needs to be included within the requirements of the respective site's allocation policy.
- 4.2. SN0218-Land West of Earsham: our previous response highlighted that this site was within 250m of both an active mineral extraction site, and a proposed mineral extraction allocation in the Minerals and Waste Local Plan Review. These areas were also the subject of a planning application for mineral extraction. On 9 November 2020, application FUL/2019/0062 was approved for mineral extraction on three areas off Hall Road & Pheasants Walk, to the north of the A146. It is expected that the permission will be implemented in Autumn 2021. The site assessment and reasoned justification should be amended to include reference to the permitted mineral extraction areas to the north.
- 4.3. The Site assessments for SN0414 and SN0392, both at Haddiscoe do not contain reference to the proposed mineral extraction site MIN 25 at Haddiscoe, which was mentioned in our previous response. The site assessments should be revised to contain this information.
- 4.4. The Site assessment for SN0532, at Caistor St. Edmund does not contain reference to the active mineral extraction site within 250m which was mentioned in our previous response. The site assessment should be revised to contain this information.
- 4.5. If you have any queries regarding this response please contact Richard Drake (Senior Planner, Minerals and Waste Policy) by email at richard.drake@norfolk.gov.uk or telephone 01603 222349.

5. **Lead Local Flood Authority**

- 5.1. At present, there is no mention of flood risk within the SNVC Objectives. While in the SNVC Core Policies, there is only a passing mention of the need for a flood risk assessment as a standard requirement. We understand the VCHAP is to be a self-

standing document that is separate from GNLP and yet the proposed policies given within VCHAP are proposing to use policies from both in the GNLP, the South Norfolk Development Management Policies and the Neighbourhood Plans.

- 5.2. The Policy SNVC1 - Standard Requirements confirms the need to acknowledge the existing and typical requirements for developments, however at present the current policy is limited in its provision and even indicates that specific requirements are potentially optional. With this in mind, we question whether appropriate consideration to supporting policies (such as Flood Risk and Water Management policies) have been given due consideration and representation by the proposed VCHAP.
- 5.3. The Greater Norwich Strategic Flood Risk Assessment Level 2 has not considered the effects of the VCHAP sites within the assessment or its Cumulative Impact Assessment relating to flood risk. As the VCHAP considers the allocation of approximately 1200 homes, an appropriate level of consideration to the strategic flood risk would be reasonable to be considered both within the plan and its supporting evidence base. At present this consideration has not been observed.
- 5.4. Given the recent flooding events in South Norfolk during August 2020 and Christmas 2020, better consideration of flood risk and its management should be included in the housing allocation process and the supporting documentation (such as the Level 2 GNSFRA) should be adjusted to reflect the proposed VCHAP.
- 5.5. The LLFA would request that the VCHAP policies requires that any future development (or re-development) proposals show there is no increased risk of flooding from an existing flood source and mitigation measures are implemented to address surface water arising within the development site.
- 5.6. Any new development or significant alteration to an existing building should be accompanied by an appropriate assessment of flood risk which gives adequate and proportionate consideration to all sources of flooding and proposed surface water drainage.
- 5.7. In Policy SNVC2 – Design, we request that the any development application made will be required to demonstrate that it would need to be consistent with the Norfolk LLFA Developer Guidance, the Local Flood Risk Management Strategy and national policies on the management of flood risk.

Detailed Site Comments by LLFA – (see attached Spreadsheet)

- 5.8. In addition to the review of the draft VCHAP Regulation 18 policies, we have also reviewed a number of 'preferred' and 'shortlisted' sites provided by the South Norfolk Village Clusters team. The following criteria have been used in our review:
- 5.9.
 - **Flood Risk and Flood Depths**

- These have been reviewed for the 3.33%, 1.0% and 0.1% AEP events for surface water flooding.
 - Flooding has been reported as minor, moderate and major.
 - Where it has been deemed necessary, site specific comments have been provided as 'additional comments'.
 - Assessment of on-site flood risk is proportionate to the site size and the flood risk significance.
- **Reports of Internal and External Flooding**
 - Reviewed with the LLFAs current flood records (which date back to 2011).
 - On-site and flood records within 500m of the site boundary have been reported.
- **Watercourses**
 - These have been reviewed and identified when on-site or within 100m proximity to the site boundary.
 - If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as off-site.
 - Watercourses have been defined (ordinary watercourse, main river etc)
 - We have not defined the ownership of the watercourses in this assessment.
 - We have not reviewed 'offline watercourses', blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network.
 - We have not defined whether the features are obstructed by housing or roads etc.
- **Surface Water Sewer Systems**
 - Reviewed against Anglian Water sewer mapping.
 - Both on-site and off-site surface water sewers with 100m of the site boundary have been reported.
 - We have not defined whether the features are obstructed by housing or roads etc.
- **Additional Information**
 - Source Protection Zones (If applicable)
 - Predominant Site Superficial Geology
 - Internal Drainage Boards (If applicable)
- **We have then reported:**
 1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site
 2. Level of constraint
 3. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed

appropriate.

- 5.10. Where appropriate, we have provided additional site specific comments.

To try and make the system as relatable to the system initially requested by SNDC, we have produced a traffic light system based on the recommendations column:

- Red - Recommend a review of the site and potential removal from the local plan.
- Amber - Significant information required at the planning stage.
- Green - Standard information required at the planning stage.

- 5.11. Of the 86 sites submitted for review, we have been able to review 83. We were unable to review 3 of the of the sites as a cross-reference with the provided GIS information was not possible. We have highlighted these rows as pink in our review table and provided an explanation as additional comments where applicable.

We note that some sites included in the GIS information were not included in the list for review by the SNVC team. We advise that if any further sites require a review, the LLFA must be formally reconsulted.

- 5.12. Should you have any further queries, please contact the Lead Local Flood Authority by email at llfa@norfolk.gov.uk.

6. **Environment**

- 6.1. Sites that are likely to have a significant impact on the Landscape would benefit by being accompanied by a LVIA, or LVA suitably proportional to the scale of development. An element of this should take into consideration any potential impacts on views from Public Rights of Way, Norfolk Trails or publicly accessible County Wildlife Sites where the primary purpose is for recreational leisure use, and views across the landscape form part of the enjoyment of using these routes and/or areas. Any soft/hard landscape plans should also take into account the wider landscape, creating bigger, better and more joined up habitats, and look to create screening where deemed necessary or to reflect and integrate with the surroundings by carefully chosen design and species. Species should be native or of known value to pollinators.
- 6.2. Norfolk County Council are part of the [County Wildlife Site partnership](#). Where sites are within the vicinity of County Wildlife Sites (CWS) and increased recreational pressure may be seen, Norfolk County Council may look to seek Planning Obligations and/or use of Community Infrastructure Levy (CIL) funds in order to mitigate against these pressures, including any soft landscaping design/species selection to reflect the composition of the CWS. Where adjacent to a CWS, a suitable buffer should be incorporated within the design. There may also be other pressures which will be assessed at the time of application which may lead to Green Infrastructure requests through Planning Obligations.

- 6.3. Norfolk County Council jointly manages, with Norfolk Wildlife Trust, a growing network of Roadside Nature Reserves (RNRs). Where proposals about an RNR careful consideration would need to be given to the location of site access points and the application must demonstrate that the RNRs will not be adversely impacted by the proposal. If the site is adjacent to an existing or candidate RNR opportunities to enhance the RNR should be incorporated into the scheme design or contributions discussed by means of Planning Obligations // CIL.

- 6.4. Should you have any queries with the above comments please contact Emily Smith (Green Infrastructure and Landscape Officer) on 01603 224492