

## Response from Barford and Wramplingham Parish Council

### DISCLAIMER

The Barford and Wramplingham Parish Council have used their best endeavours to prepare a consultation response that is factually accurate. No liability is accepted for any errors or omissions in this consultation response nor for any damages arising in contract, tort or otherwise from the use of any material contained in this response nor from any action or decision taken as a result the publication of it.

The material and information contained in this response represent the BWPC's views; they do not constitute legal or other professional advice.

### Concerning Paragraph 1.10: Barford Flood Alleviation Zone

#### OBJECT

#### Do you consider the plan to be legally compliant? NO

Barford and Wramplingham Parish Council (BWPC) consider that the lack of action concerning likely flood risk downstream in Barford resulting from the development (described under Duty to Cooperate below) is in contravention to NPPF Clause 165: *Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its **lifetime without increasing flood risk elsewhere**.*

And also of relevance to clauses 166 and 167.

See also other VCHAP sections.

#### Do you consider the plan to be sound? NO

See other sections.

#### Does it comply with the duty to co-operate? NO

The Barford Flood Alleviation Scheme is unlikely to cope with the 25-30% increase in dwellings proposed under the VCHAP scheme including the 20+ houses proposed in VCBAR1. Barford and Wramplingham Parish Council is not aware of any assessment for this issue by Anglian Water (AW) or any other body (see also arguments at the end of the VCBAR1 section and within responses to VCBAR2). Whilst AW are not a prescribed body for the purpose of the duty to cooperate under s.33A PCPA and Reg 4 of the 2012 regulations, **they have been included** under the list of **Local Plan – Specific Consultation Bodies** in the South Norfolk Statement of Community Involvement, May 2017 (Updated 2022), which is specifically referred to in the VCHAP Representation Form Guidance Notes (August 2024). Flooding is and sewage pollution

in Barford has become a nightmare issue for many residents. We consider that a lack of consultation with AW would make the VCHAP proposal non-compliant as defined by the VCHAP Duty to Cooperate Statement, and probably unsound as well.

Furthermore, the Barford Flood Alleviation Scheme is dependent on downstream maintenance of a network of **privately owned surface water ditches that lead to the River Tiffey**. These are largely not accessible to machinery and have to be hand dug/cleared by their increasingly elderly owners. Not all new owners understand their legal responsibilities to do so. For these reasons the network may well be operating at well below capacity even with the existing number of houses, road layout etc. We are not aware that VCHAP or key stakeholders have considered this issue which may be a defining bottleneck.

On a related note, Barford is one of approximately 20 villages in Norfolk who's sewage flooding issues are still being investigated by Anglia Water's Complex Investigation and Resolution Team. Flooding and sewage pollution is a major problem in many Norfolk villages including Barford and Wrampingham.

## SUMMARY

The Barford Flood Alleviation Scheme is unlikely to cope with the 25-30% increase in dwellings proposed under the VCHAP scheme. Barford and Wrampingham Parish Council is not aware of any assessment for this issue by Anglian Water or any other body. This would make the VCHAP proposal unsound as defined by the VCHAP Duty to Cooperate Statement. The Barford Flood Alleviation Scheme is dependent on downstream maintenance of a network of **privately owned surface water ditches that lead to the River Tiffey**. These are largely not accessible to machinery and have to be hand cleared by their increasingly elderly owners.

## What changes do you think need to be made to the plan?

Please comply with NPPF Clause 165

Please comply with the duty to cooperate: It is essential that Anglian Water are consulted, and a full response obtained. See later sections of our response also.

## If you wish to participate in the hearing session(s), please outline why you consider this to be necessary?

Somebody from the Parish Council can bring local knowledge to bear.