

Response from Barford and Wramplingham Parish Council

DISCLAIMER

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Concerning Paragraph 1.22: site description

OBJECT

Do you consider the plan to be legally compliant? NO

1) Flood risk

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.***

Probably relevance to clauses 166 and 167 also.

See also other VCHAP sections.

2) SNC is required to provide a Sustainability Appraisal.

The Sustainability Appraisal is not accurate and probably misleading:

- Higher growth given good links to Wyjmondham and Norwich. Links to Wymondham are on narrow, unclassified roads, already beset with potholes. This reflects a lack of local knowledge by AECOM Ltd.
- Full of repetitions, as if that is enough to justify such excessive development.
- What is meant in clause 6.3.59 by “possible in-combination biodiversity benefits at Barford?” Building on such a scale on agricultural fields will reduce biodiversity.
- Clause 9.2.3 states: “BAR2 (Village hall, Barford, 40 homes) is the other key site that is delivering new community infrastructure, namely a replacement village hall and an improved playing pitch.” The text is “bigging up” the replacement VH as a “new village hub.” HOWEVER: the playing pitch will not be improved. It will be diminished by and

estimated 20-40% in area by a roadway to access the housing development. This will prevent, for example, cricket matches from being held ever again. Furthermore, the new VH, which is stated to be “as least as good as,” takes no account of the probably 25% increase in village size, or in the required internal furnishing/appointment of the VH facilities. Thus, the statement is misleading, and therefore not compliant.

3) **Site assessment document**

The document is confusing and not fit for purpose.

Page 7: Assertion of flood risk as green is incorrect and misleading. We do not agree there is low risk of surface water flooding in Barford, which will be exacerbated by runoff from a new development. The village has been beset with flooding problems for decades and had to have a flood alleviation zone built – the capacity of which has not been considered for this big development.

4) **Car-dependency (lack of soundness also)**

The site is located a long distance from many services such as shops and surgeries, secondary schools, and larger centres of employment. This precludes the use of cycling to access these services, and makes the new development car and therefore carbon dependent, which is contrary to the following:

(i) **NPPF Clause 89:**

Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and **exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport)**. The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

(ii) **Joint Core Strategy for Broadland, Norwich and South Norfolk:**

2.8 We have to plan places and design and renovate buildings so they are more energy efficient and less carbon dependent, where walking and cycling is an option for many more journeys....

(iii) **Walking, wheeling and cycling strategy for Norfolk, 2004:**

“To create a healthier and greener Norfolk by enabling people to walk, wheel and cycle more often...”

Do you consider the plan to be sound? NO

See arguments for non-compliance with duty to cooperate, and legal compliance.

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

1) Sewage treatment and flood risk:

Flooding and sewage pollution in Barford has become a nightmare issue for many residents.

According to the VCHAP Water Cycle Study for Barford by the consultancy firm AECOM Ltd., circa 74 extra houses will be built in Barford as a result of the GNLP and proposed VCHAP policies. This will reduce the available headroom of the Barford Water Recycling Centre to only 7%. BWPC are of the view that the AECOM study is almost certainly a desktop study and unlikely to have involved any site visits by one of their Engineers to discuss problems occurring locally. The study is limited to treatment of foul water only and based on Dry Weather Flow. In order for this study to have any relevance or practical use, other than for the Planners to justify their VCHAPS proposals, consideration MUST be given to storm water flows,

BWPC has, for decades, reported to Anglian Water that regardless of the Dry Weather Flow (DWF) capacity of the waste water (sewerage) systems, during (regular) heavy rain, the system as it stands cannot cope, and sewage is released into the environment. Until about a year ago, it came up in gardens, sometimes in houses. BWPC understands that non return valves have been fitted in some parts of the network, but during heavy rain, sewage now comes up in the road. BWPC wishes the Planning Inspector to recognise that an increase in Barford housing by about 25-30% will increase the frequency by which the system is overwhelmed, and increase the sewage release unless suitable and substantial mitigating engineering solutions are included to ensure no additional flow enters the existing system during times of high rainfall.

BWPC considers that increasing the sewage load to within only a few percent of the maximum is neither sensible nor sound. BWPC considers that the 7% headroom figure is meaningless when considering the full picture of real surface flows during wet weather.

BWPC also wishes the Planning Inspector to be aware that Anglia Water (AW) have informed the Parish Council that:

"We are not currently in a position to share a response to this consultation and unlikely to finalise our response prior to the consultation closing date owing to current workloads and intervening consultation priorities. As you may already know, the Council has produced a Water Cycle Study and a Level 2 Strategic Flood Risk Assessment to inform their plan which are also published on their website. A Statement of Consultation has also been produced and summarises previous comments made in relation to previous stages of the Plan. Our response to the Regulation 18 Focussed Consultation regarding the two sites proposed in Barford referenced below - indicated that there is current capacity at the Barford Chapel Street water recycling centre to accommodate the proposed growth, but this may be impacted by cumulative growth from other commitments. We suggested that a policy requirement should be included for both allocations to require early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network." [quoted from email to BWPC Clerk]

BWPC are concerned that AW appear happy to promote extra housing, which suggests they accept that continued sewage pollution is acceptable. BWPC is not satisfied that the assessment by Anglian Water in respect of there being “adequate capacity” is reasonable or rational having regard to the information given above.

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).

BWPC does not accept that AW are not intending to make a response by the deadline. BWPC considers that this shortfall means the plan is not compliant with the duty to cooperate, and neither is it legally compliant (see earlier comments also).

2) Surface Water Drainage:

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. Some owners do not understand their legal responsibilities to do so. Therefore the network may be operating at well below capacity even with the existing number of houses, road layout etc. 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.

3) Lack of enforceable safeguards

BWPC is concerned that, as seems to be the case in many other developments, the lack of enforceable safeguards will enable developers and designers to make their money and walk away from ensuing problems leaving villagers affected to pick up the pieces. Recently, we have witnessed a terrible consequence in the UK of such poor management by Planners and the construction industry.

SUMMARY

The development will likely cause flooding (surface and foul water) downstream thereby contravening NPPF Clause 165; the plan fails the duty to cooperate by failure to engage with Anglian Water; the Sustainability Appraisal is inaccurate and probably misleading; the Site Assessment Document consideration of flood risk is misleading; the development will increase car dependency and is in contravention of NPPF Clause 89, the JCS and the Cycling Strategy for Norfolk; it will also reduce the current playing field considerably and is thus unsound.

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

Please comply with regulations specified above and ensure local knowledge is sought.

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.