

Comments

Main Modifications to the Local Plan (18/02/19 to 01/04/19)

Comment by	Mr & Mrs Lupton (1208235)
Comment ID	184
Response Date	01/04/19 09:51
Consultation Point	Policy ENV 09 Flood Risk & Surface Water Drainage (View)
Status	Processed
Submission Type	Letter
Version	0.2

**Do you consider the proposed modification is:
(please mark the appropriate box)**

**If you consider the proposed Main Modification
to be UNSOUND, please identify which test of
soundness your representation relates to?**

**Please give us details as to why you think the Local Plan with proposed modifications is NOT legally
compliant or sound?**

Evidence of flood risk from surface water and ground water such as BDCs Strategic Flood Risk Assessment does not cover small rural settlements yet these are the ones least likely to have good, managed drainage systems. They are more likely to have a system of ditches and ponds which are forever being compromised by filling in, culverting or not being maintained. They are also likely to be surrounded by fields which can provide vast amounts of runoff. Thus they are likely to be vulnerable to flooding. These rural settlements are only expected to have minor developments and it seems that "all developments" does not apply to minor developments in flood zone 1 where there is a risk from other sources of flooding. In the absence of NCC LLFA and BDC SFRA for these lower grade settlements identifying where there are existing flood risks where is the protection from new development increasing flood risk to existing properties downstream?

It is important to note that some sustainable drainage solutions (SuDS) which rely on underground storage and slow release of water are not suitable for areas where the ground water levels may be close to the surface at some times of the year, for example in a valley bottom close to a drainage channel. Currently reports base their assessment of the depth of the water table from a rough contour map of levels. This is not accurate enough as our past experience has shown that the water table is claimed to be 10m below ground level in our village while bore hole assessments and personal experience show that ground water is frequently just below the surface and sometimes above it.

Solutions using ponds at surface level may be required to ensure the stored water is above the water table at all times. These solutions take up space so it is imperative that they are considered from the first in any planning application.

Ground water levels can vary widely over the course of the year. Levels measured in dry periods can not be relied on at wetter times of the year.

How would you like to be notified?

Comment by	Mr & Mrs Lupton (1208235)
Comment ID	183
Response Date	01/04/19 09:50
Consultation Point	Policy ENV 02 Biodiversity protection and enhancement (View)
Status	Processed
Submission Type	Letter
Version	0.2

**Do you consider the proposed modification is:
(please mark the appropriate box)**

**If you consider the proposed Main Modification
to be UNSOUND, please identify which test of
soundness your representation relates to?**

**Please give us details as to why you think the Local Plan with proposed modifications is NOT legally
compliant or sound?**

How is this policy going to be implemented in the smaller rural settlements where the cumulative effect of small developments could have a significant affect but each individual development would be too small to be required to produce the necessary reports. There has been, and is promising to be further, development in the village of Mileham where surface water flooding has become an issue following a 10% increase in dwellings in 30 months. The flood water surges along the roads until it flows directly into the chalk River Nar at a SSSI polluting the river with silt, salt, oil, break dust, washer fluid etc..

Norfolk CC as LLFA have not produced a Surface Water Management Plan for Breckland yet. Also the studies by the District council such as the Strategic Flood Risk Assessment do not consider the smaller settlements below LSC level. The requirements for minor developments in Flood zone 1 to consider flood risk from surface water or ground water are only needed if there are historical records or identified areas of ground water flood risk. From our research historical records are incomplete and there are no 'identified' critical drainage areas in the district despite BGS maps showing a significant number of areas where ground water flooding is probable.

How would you like to be notified?

Comment by	Mr & Mrs Lupton (1208235)
Comment ID	182
Response Date	01/04/19 09:46
Consultation Point	Policy HOU 07 - Affordable Housing (View)
Status	Processed
Submission Type	Letter
Version	0.2

To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1

HOU 07

**Do you consider the proposed modification is:
(please mark the appropriate box)**

If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?

Please give us details as to why you think the Local Plan with proposed modifications is NOT legally compliant or sound?

We have not found clear evidence on the Districts website of specifically what type of affordable housing is required in any location. While acknowledging a need for affordable homes for people 'native' to a settlement there should be some sort of consideration for the suitability of a location in rural settlement of affordable housing for families of school age children if there is no school or for disabled or elderly people if there is no doctor's surgery.

How would you like to be notified?

Comment by	Mr & Mrs Lupton (1208235)
Comment ID	181
Response Date	01/04/19 09:44
Consultation Point	Policy HOU 05 - Small Villages and Hamlets Outside of Settlement Boundaries (View)
Status	Processed
Submission Type	Letter
Version	0.3

**Do you consider the proposed modification is:
(please mark the appropriate box)**

If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?

Please give us details as to why you think the Local Plan with proposed modifications is NOT legally compliant or sound?

While there is a restriction on development in HOU03 and HOU04 so the number of dwellings does not exceed the identified need and rural villages are deemed not appropriate for large scale market housing there is no such restriction in HOU05. Development will happen in these 'unrestricted' villages unless some definitive guidance is included in the Plan.

The basis for calculating percentage of development is also quite confusing.

We are concerned that the support of the Parish Council is not required for developments in these areas. While this may be justified to prevent parish councils from rejecting all applications unreasonably, the parish councils have local knowledge that the District Council may not be aware of and it is important that the views of the parish council on the development, its suitability, environmental issues such as wildlife in the area, traffic issues and flooding risks should be taken into account in reaching a decision.

Perhaps *'it has the parish council's support in terms of its suitability, environmental issues such as wildlife in the area, traffic issues and flooding risk'* would be appropriate.

Although only small developments are envisaged in these areas the cumulative effect of several small developments can be significant and should be considered in any planning decision as each small development may increase the load on limited local services, on traffic, and on drainage. This could cause problems with service providers (Anglian Water, telecoms etc) not being in a position to plan their future service provision resulting in settlement services capacity being exceeded. Some limit on total numbers or rate of increase could minimise any adverse effect on the existing village from new development.

Conversely the type of developments envisaged for rural settlements seem to be minor and therefore they and the relevant service authorities are not required to assess their impact on existing services.

Current experience in one such village which will be losing its settlement boundary has seen two developments providing 24 dwellings (a 10% increase) in the period 2016 to 2019. There is a natural surface water drainage system and there has been a marked increase of flooding incidents (inside existing dwellings and on lorry route) in the last couple of years.

How would you like to be notified?

Comment by	Mr & Mrs Lupton (1208235)
Comment ID	180
Response Date	01/04/19 09:41
Consultation Point	Policy HOU 01- Development Requirements (Minimum) (View)
Status	Processed
Submission Type	Letter
Version	0.6

To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1

HOU 01

Do you consider the proposed modification is:
(please mark the appropriate box)

If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?

Please give us details as to why you think the Local Plan with proposed modifications is NOT legally compliant or sound?

It appears that there is not an actual allocation for further development in villages outside settlement boundaries, only assuming a small amount of growth there from windfall sites. However there should be some upper limit for growth in these settlements to prevent unsustainable developments and loss of green open spaces. One such village has had a 10% increase in size between 2016 and 2019 with two separate developments and there is pressure for more development in other parts of the village.

How would you like to be notified?