PORINGLAND NEIGHBOURHOOD PLAN
South Norfolk Council Regulation 16 Response

South Norfolk Council welcomes the opportunity to make representations on the Submission version of the Poringland Neighbourhood Plan.

South Norfolk Council has been supportive of Poringland Parish Council’s decision to prepare a Neighbourhood Plan and has assisted the Parish Council in its preparation.

South Norfolk Council supports the overall aims and objectives of Poringland Neighbourhood Plan and welcomes the refinements to the plan that have been made during previous consultation processes. The Council has a small number of remaining comments on the Submission version of the plan, which it considers can be suitably addressed through the examination process, in order for the plan to achieve sustainable development.

Policy 2: Housing - scale

Policy 2 supports schemes comprising 20 or fewer dwellings. Officers have previously raised concerns that the 20-dwelling threshold has not been sufficiently justified by evidence and that this policy could result in the delivery of numerous smaller sites without the necessary associated infrastructure to mitigate the cumulative impact. The proposed policy wording has been amended following discussion about these concerns and now includes criteria for supporting schemes larger than 20 dwellings. However, it is still considered that the policy could be tightened to avoid unintended consequences.

**Representation 1:** The Council considers that Policy 2 would benefit from revisions to ensure that larger sites are not artificially sub-divided to avoid delivering the necessary supporting infrastructure, and also clarification as to whether or not the support for small sites and infill plots is only for those which fall inside current and future Development Boundaries, other than where they are justified by exceptions policies at the local and national level.

Policy 3: Housing - mix

The principle of Policy 3 is considered acceptable; however, the Council has concerns that a clear justification of the requirement for 20% of all dwellings to be either suitable for- or easily adaptable for- older or less mobile residents has not been provided. It is also unclear how a dwelling would be considered as being “easily adaptable” and therefore how this particular objective could be achieved when assessing planning applications.

**Representation 2:** The Council considers that the Plan would benefit from referencing supporting information, such as local demographic statistics,
which justifies the inclusion of the 20% requirement in Policy 3. The Plan would also benefit from more detail on what ‘easily adaptable’ is considered to mean, such as examples of particular measures or reference to specific standards.

Supporting text to Policy 5: Affordable housing

With regard to Policy 5 and its supporting text, the Council support the fact that the affordable housing cascade has been amended to reflect the approved South Norfolk Council cascade; however, an additional priority relating to military personnel has been inserted since the Regulation 14 consultation and consequent changes to the supporting text are considered necessary.

**Representation 3:** The Council considers that the wording in the supporting text on page 22 requires amending to reflect housing legislation - ‘However, South Norfolk Council will need to determine priorities between applicants to favour Service Personnel and their families, so that applicants in housing need who have served in the Armed Forces are given greater priority over those who have not than those without a local connection that have not served’.

Environment, sustainability and rural character

These policies are considered to be positive and aim to make the Neighbourhood Plan a locally distinctive document, that adds to the policies in the existing Local Plan. In particular, Policy 13 has been significantly updated following discussions between Council Officers and the Neighbourhood Plan Group. However, the following concerns remain, and further changes are required to both the supporting text and the policy text in order to clarify the information and improve the effectiveness of the policies:

Policy 7: Trees and hedgerows

**Representation 4:** The Council considers that Policy 7 should be amended to clearly include reference to the retention of significant trees, hedgerows and landscape features, ideally within the public realm wherever possible, to ensure appropriate future management, as follows: ‘Proposals shall include high quality landscaping design that as a minimum retains existing significant trees, hedgerows and landscape features, ideally within the public realm.’

Policy 9: Long views on Policy Map 2 and Policy Map 4

**Representation 5:** The Council recommends Policy Map 2 (page 55) and Policy Map 4 (page 57) are updated to illustrate the important views being referred to in Policy 9 (and shown in the photographs at page 58) and to illustrate the Chet Valley Linear Reserve and the parkland around Porch Farm.
which are referenced within the supporting text for Policy 9. It is also recommended that the broad locations from which longer distance views towards Norwich and the Tas Valley, referenced in Policy 9, should be illustrated on Map 2.

Policy 13: Flood risk

**Representation 6:** The Council considers that changes are required to both Policy 13 itself and the supporting text, in order to clarify the information and improve the effectiveness of the policy.


‘The problem is caused by natural springs and streams, and the predominant boulder-clay geology overlain by 8-12m of sand and gravel. Many of the problems stem from the predominant boulder clay geology overlain in some areas by sands and gravels. Where the sands and gravels interface with the boulder clay close to the surface, this can give rise to transient springs and natural flow routes.’

Policy 13: All major development proposals, or all development proposals coming forward within the areas of high, medium and low risk from surface water flooding, as identified by the Environment Agency, must have due regard to The Millard Report Poringland Integrated Urban Drainage Strategy and satisfy the following criteria:

a) The application includes a Flood Risk Assessment (FRA) and Surface Water Drainage Strategy that gives adequate and appropriate consideration to all sources of flooding and surface water drainage to ensure there is no increased risk of flooding either on the development site or to existing property as a result of the development. Developers will be expected to ensure that downstream water flooding is avoided. Developers must demonstrate that there will be no increase in flood risk elsewhere.

b) Sustainable Drainage Systems will need to be considered for all planning applications, following the SuDS hierarchy, but in particular note:

   i. Development that manages surface water through infiltration methods may be supported but only if it can be clearly demonstrated to be effective by appropriate percolation and soil investigation tests showing that this will not result in the increase of flood risk on-site or off-site. There should be no direct discharge to groundwater and schemes should provide a saturated zone of 1.2 metres. Where percolation test results support the use of infiltration drainage, developers should give careful consideration to the
outcomes of the Poringland Integrated Urban Drainage Study to ensure that flood risk is not increased elsewhere.

ii. Where infiltration is not effective or practicable, as will be the case in much of Poringland, developers should seek solutions that use storage zones or connections to a water course. Such drainage solutions should intercept and store long term surface water run-off up with manage surface water within the site by means of attenuation and controlled discharge including an appropriate allowance for climate change. Again, it will be necessary to demonstrate that the solution will not increase flood risk elsewhere and should be based on sufficient treatment steps.

Any drainage strategy is likely to should avoid the piping of existing drainage channels, but where it is demonstrated unless this is shown to be necessary it should be supported by Land Drainage Consent from the Lead Local Flood Authority. …’

Policy 22: Economic development

The ‘economy and community services/facilities and infrastructure’ policies are supported, subject to the following amendment to Policy 22:

**Representation 7**: The Council considers that the final sentence of Policy 22 is not justified and that it could promote less sustainable patterns of development, contrary to other aims of the Plan, and that any concerns regarding conflict between uses is adequately dealt with by other Neighbourhood Plan and Local Plan policies, as such the following should be deleted - Such economic development that is located separate from residential areas will be considered favourably.

Labelling of photographs, maps and figures

It is also recommended that the labelling of all photographs, maps and figures is reviewed and updated where appropriate for clarity and consistency purposes. In some instances, it is not clear where illustrations in the plan are highlighting good examples and, if they are, what specifically is being illustrated, or where they are highlighting potential issues/concerns.

**Representation 8**: The Council considers that the Plan would benefit from a comprehensive assessment of the labelling of illustrations, to maximise the benefit of having them in the Plan, e.g. those on page 37 supporting Policy 14.

South Norfolk Council
12 September 2019