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14 March 2021

## **RESPONSE TO THE GNLP REGULATION 19 CONSULTATION**

Please acknowledgement of receipt.

**Dear Greater Norwich Local Plan Team,**

Hempnall Parish Council considers that the Housing Growth Needs as set out in paragraphs 176 to 187 of the Draft GNLP Regulation 19 Publication (under Policy 1 – The Sustainable Growth Strategy in Section 5 of the document ‘The Strategy’) are unsound (and possibly not legally compliant) both in regard to the magnitude of the Total Housing Potential and in respect of the spatial distribution of development.

In particular we consider that both the total number of houses (Total Housing Potential) and the distribution of development conflict with Climate Change objectives and potentially contradict objectives set in regard to environmental protection and enhancement including protection of the landscape.

### **Relevant NPPF paragraphs and Climate Change Act targets relating to concerns over the magnitude of the Total Housing Potential**

The NPPF requires that: *“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures”* – **paragraph 149**

The Oxford English dictionary defines mitigating as: *“having the effect of making something bad less severe, serious, or painful.”* Therefore the NPPF says that local plans should take a proactive approach in making something bad (i.e. climate change) less severe, serious or painful.

**NPPF paragraph 148** states that the planning system: *“should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions”*

**Climate Change Act 2008** has set a legally binding target for the UK to reduce its Greenhouse Gas emissions from 1990 levels by at least 80% by 2050.

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### **The Climate Change Act 2008 (2050 Target Amendment) Order 2019**

The UK has recently legislated to end its contribution to global warming by 2050, with a target that will require the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050, compared with the previous target of at least 80% reduction from 1990 levels.

Given that the carbon foot print resulting from the pre-construction and construction work necessary to build each new house is in the region of 100 tonnes of CO<sub>2</sub> \* then fulfilling the Total Housing Potential of 49,492 houses could generate 4,949,200 tonnes of CO<sub>2</sub> and this is just the amount of CO<sub>2</sub> resulting from building the houses. If the operational greenhouse gas emissions over the lifecycle of the properties is factored in the emissions total leaps to astronomical levels as the building phase is only responsible for about a quarter of total lifecycle emissions. Of course building methods could improve during the plan period, thus reducing both construction and operational emissions, but with the government constantly "kicking the can" down the road on introducing stricter building regulations this may well take many years to be realised and even with better standards total emissions resulting from the building and operation of 49,492 additional houses will still be very high.

There is a choice that can be made between retaining the policy draft figure of 49,492 or setting a lower total housing number in accordance with NPPF paragraph 60 which says that: *"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach"*

Hempnall Parish Council contends that adherence to climate change policy should require local authorities to choose the minimum number of houses needed in order to comply with the local housing need assessment resulting from the appliance of the standard method in national planning guidance and to not set a housing target or housing potential at a higher level.

**Therefore Hempnall Parish Council considers that the GNLP should reduce the Total Housing Potential to the level required to address local housing need as assessed by the standard method i.e. 40,541 dwellings as it is unsound to proceed with a Total Housing Potential for 49,492 extra houses by 2038 because the higher figure is not compatible with Government Climate Change Objectives.**

In making a choice to proceed with the lower housing figure the GNLP would be demonstrating that:

- The plan has taken a proactive approach to mitigating climate change impacts (as required by NPPF paragraph 149) because it will have chosen the least damaging option in terms of greenhouse gas emissions (the huge CO<sub>2</sub> emissions that would have resulted from building nearly 50,000 houses would be made less severe or serious) while still complying with NPPF paragraph 60. Of course the construction and operation of 40,541 houses will still generate enormous greenhouse gas emissions but the total will at least be around 20% less than if 49,492 were built.
- The plan has attempted to comply with NPPF paragraph 148, as best possible given the requirements of NPPF paragraph 60, by endeavouring to *"shape places in ways that contribute to radical reductions in greenhouse gas emissions"*. While choosing to build 40,541 extra houses is not going to lead to a radical reduction in greenhouse gas emissions making this choice radically lowers emission levels below those which would occur if 49,492 houses were built.
- The plan has attempted to comply, as best possible given the requirements of NPPF paragraph 60, with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050.

If the choice is made for the GNLP to proceed with the higher housing potential figure of 49,492 the plan will not have demonstrated that it has:

- Pursued a proactive approach to mitigate climate change impacts because it will have chosen an option that makes something bad (i.e. climate change) more severe and serious than it otherwise would have been if the lower local housing need figure was chosen. The plan would not be compliant with NPPF paragraph 149.
- Attempted to comply with NPPF paragraph 148 because it will have chosen not to take advantage of the opportunity to achieve the radically lower emission levels that would result from the adoption of the lower local housing need figure
- Complied, as best possible given the requirements of NPPF paragraph 60, with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050 because in not choosing the lower local housing need figure it will have facilitated the generation of considerably higher level of greenhouse gas emissions.

\*(source: Climate Change section of the Environmental Statement for Chalgrove Airfield in Oxfordshire - this is 3000 home development. If you look to page 15, it says: "The total GHG emissions from pre-construction and construction are estimated to be in the order of 313,370 tCO<sub>2</sub>e" i.e. around 100 tonnes per house)

**Furthermore Hempnall Parish Council considers that the GNLP should reduce the Total Housing Potential to the level required to address local housing need in order to provide a greater level of environmental and landscape protection**

Clearly the land take to build 49,492 houses is considerably greater than that required to construct 40,541. Choosing the lower figure saves many Greenfields from the threat of development and in so doing makes it easier to protect countryside, habitats, landscape, flora and fauna.

**Hempnall Parish Council's concerns over the distribution of Housing**

Allocating new sites in villages as part of a dispersal policy is unsound as it conflicts with the objective of the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050. Concentrating development in and around Norwich is the best way to reduce greenhouse gas emissions as such development can more easily be based on the usage of public transport. There is increasing potential for more residential space to be provided in Norwich as a result of trends towards home working and internet shopping which are leading to a reduction in the need for office and retail space in the city centre.

Vehicle use is often the main contributor to operational emissions resulting from new housing \*  
\*. Therefore development that is dispersed will create a greater level of greenhouse gas emissions than development that is concentrated in or close to Norwich. Eventually private cars will all be electric or hydrogen powered but for the "shelf life" of the GNLP (to 2038) the transition will not have been completed and for the first 12 years (and probably more) of the plan the majority of vehicles will remain as petrol or diesel powered.

The table on page 80 of the GNDP papers from June 23<sup>rd</sup>, 2017 clearly showed that the best spatial option for new housing in order to minimise negative environmental consequences was Option 1: Urban Concentration close to Norwich. This option was the one which was best for: minimising, air, light and noise pollution; improving well-being; reducing CO<sub>2</sub> emissions; mitigating the effects of climate change; protecting and enhancing bio-diversity and green infrastructure; promoting the efficient use of land; respecting the variety of landscape types in the area; reducing the need to travel and promoting the use of sustainable transport modes; minimising the use of the best agricultural land and maintaining and enhancing water quality and its efficient use. In terms of all these and other factors taken together the least desirable option was Option 4: Dispersal of Development.

Unfortunately the obvious conclusion that should have followed on from the publication of this table, i.e. for the GNLP to be based on Option 1, was not pursued. Instead the distribution pattern for new housing envisaged in the draft plan, while it includes a degree of urban concentration, still promotes dispersal of development through proposals to make new allocations in Village Clusters and via policy 7.5. These allocations are in addition to the rural housing sites already included in current commitments carried over from the JCS and are additional to estimates for windfall developments in villages.

If the GNLP proposals for the location of new housing are not changed a sizeable chunk of development will end up being dispersed and the plan will not have:

- Taken a proactive approach to mitigating climate change impacts (as required by NPPF paragraph 149) because the plan would be facilitating a distribution pattern of development that produces greater greenhouse gas emissions than would be the case if a better option (Option 1) had been chosen
- Complied with NPPF paragraph 148 which seeks to “*shape places in ways that contribute to radical reductions in greenhouse gas emissions*” because it clearly does not shape the development of places in a way that enables there to be a radical reduction in greenhouse gas emissions – far from it in fact. The shape of development in locational terms, because it includes a sizeable element of dispersal, would lead to an increase in greenhouse gas emissions. Concentrating development in and near Norwich is a much sounder spatial option if the requirements of paragraph 148 are to be met.
- Made the best attempt to comply with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to ‘net zero’ by 2050. Obviously by choosing to disperse a large amount of new housing greenhouse gas emissions will rise more rapidly than if development was all concentrated near Norwich - pursuing dispersal makes it less likely that emissions will reach net zero by 2050.
- Complied with paragraph 150 of the NPPF which states that “*new development should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation and design.*” Clearly dispersing a sizeable quantity of development is not locating housing in the right place to help reduce greenhouse gas emissions.
- Followed National Planning Practice Guidance (PPG) (2019) which states that: “*effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases*” and “*Planning can also help increase resilience to climate change impact through the location, mix and design of development.*” In addition, the PPG provides examples of mitigating climate change by reducing greenhouse gas emissions and adapting to climate change through “*Reducing the need to travel and providing for sustainable transport*”. Dispersing development is not locating new housing in the best place to reduce climate change impacts nor is it reducing the need to travel or making it easy to provide sustainable public transport.

\* \* Source: Climate Change section of the Environmental Statement for Chalgrove Airfield in Oxfordshire – in this 3000 home development “*total GHG emissions from operational phase (over 60 year design life) contribute 80% to the overall emissions of the Proposed Development.*” Estimated operational emissions are summarised in Table 15-13 of the ES. Of these operational emissions four fifths (1,021,260 tonnes of CO<sub>2</sub>) will result from vehicle use.

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**Furthermore Hempnall Parish Council considers that the GNLP should remove plans to disperse housing in to village clusters and via policy 7.5 because this dispersal of development has a greater negative impact on the environment and landscape than that which would result from concentrating development in or near Norwich**

It is clear from the table on page 80 of the GNLP papers from June 23<sup>rd</sup>, 2017 that dispersing development has far greater negative impacts on the environment and landscape than concentrating development in and close to Norwich.

Dispersal:

- Increases air, light and noise pollution
- Increases CO2 emissions
- Causes more Greenfield sites to be built on
- Robs us of valuable agricultural land
- Threatens habitats and bio-diversity
- Suburbanises the countryside

### **Conclusions**

- Hempnall Parish Council considers that the GNLP in its present form is un-sound (and quite possibly not legally compliant) because it has set the total housing potential number unnecessarily high - this is not compatible with NPPF paragraphs 148 and 149 nor does it comply with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050
- Furthermore we consider the GNLP to be un-sound because it chooses to disperse a significant amount of development, a policy which also does not "chime" with the requirements of NPPF paragraphs 148, 149 and 150 and the objective of the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050. Nor does it follow the guidance provided by National Planning Practice Guidance (PPG) (2019)
- Setting the housing number so high and dispersing some development in the way the GNLP suggests also has a number of very negative consequences in regard to the landscape and the environment.

### **A Sound Way Forward**

1) Set the Total Housing Potential at the minimum local housing need figure of 40,541. This satisfies the Government's Standard Methodology requirement.

2) Realise that by setting the housing target at 40,541 this number of new houses could be met by a combination of: 31,452 existing commitments; 5240 completions (2018 – 20); with the balance of 3,849 houses supplied by windfall developments and Brownfield sites in Norwich. In this scenario no new allocations for housing involving Greenfield sites need be made and therefore it would not be necessary to include any village cluster sites in the plan or utilise sites that might come forward as a result of policy 7.5. The negative aspects of dispersal would be avoided.

3) Accept that there is no need to introduce additional sites on the grounds that developers require more choice. The 31,452 existing commitments already provide an adequate supply of development land for many years to come and give developers all the flexibility they need in

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regard to site choices. Developers only build to market demand and if there is a surplus of sites they will simply “cherry pick” attractive rural sites and leave more sustainable sites land banked.

4) Learn from past mistakes. Clearly the JCS included a housing target that was far too large – hence 31,452 un-built commitments remain with only 5 years left on the plan. This time the GNLP should set a realistic target – 40,541 is probably already too large.

5) Concentrate development in and around Norwich. This is the best way to reduce greenhouse gas emissions. Setting a lower total housing potential makes this locational approach feasible.

6) Future proof the plan - Post Covid and Post Brexit things will be very different. Trends towards home working and internet shopping are leading to a reduction in the need for office and retail space in the city centre. In order to revitalise the city centre incorporate in to the GNLP the ever increasing potential for converting redundant office and retail space in to residential use. This is a **sound approach** NPPF paragraph 148 encourages: *“the reuse of existing resources, including the conversion of existing buildings”*. This kind of conversion could provide a large number of new dwellings in a sustainable location and take pressure of development in the countryside. The GNLP is possibly un-sound because it has not fully explored the potential for this kind of conversion.

7) Realise that the 5,000 houses included in the Total Housing Potential to provide an opportunity for extra capacity should the 2018 ONS household projection figures become reality could be treated as phased development i.e. even if sites for these houses are allocated they need only be brought forward for development if required. In this phased approach Brownfield sites should be prioritised. This way the GNLP will have soundly demonstrated that it is aware that the ONS 2018 projections may require this additional provision but also that it acknowledges the fact that this provision will only need to be brought on stream if the projections prove to be accurate.

8) Listen to parish councils who know what their residents want. For example in Hempnall the Parish Council considers the amount of new housing currently projected for the village, resulting from the JCS site south of Bungay Road, the affordable housing scheme that the parish council seeks to implement in conjunction with Saffron Housing at Millfields and from likely windfalls – totalling approximately 45 to 50 houses - is the right amount for the village (a 10% increase over current housing numbers). Therefore we do not want any of the sites put forward by landowners for inclusion in the GNLP to be allocated in the plan. We would also like our policy that all development be restricted to inside the current development boundary to be honoured except in regard to the provision of a rural exception site for affordable housing.

9) Provide affordable housing in villages via Rural Exception Sites. The Parish Council in conjunction with Saffron has plans to build affordable housing near Millfields. The site is owned by South Norfolk Council and they have asked for its inclusion in the GNLP as an allocated site. If their request is granted it will prevent its classification as an exception site and our affordable housing scheme will be lost. We ask that SNC complies with NPPF 77 which says: *“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs”*. Rural exception sites enable local affordable housing requirements to be fully met. Reliance on market schemes fails to achieve this objective. For example the 23 house JCS development south of Bungay Road was originally intended to include 7 affordable houses. Through the use of viability studies the developer has managed to reduce this in stages to just one (7 then 5 then 3 now 1).

10) Lobby central government to insist on carbon zero building standards at the earliest opportunity. As things stand currently the GNLP, for much of its 20 year plan period, will not operate in an environment where the highest standards are required.

**The value of the countryside and green spaces to the well being of all has been revealed throughout the Covid-19 pandemic. The Countryside deserves stronger protection in the GNLP than is currently on offer.**

Yours faithfully,

Ian Nelson  
*Clerk to Hempnall Parish Council*