

Planning Committee Agenda

Members of the Planning Committee:

Cllr J M Ward (Chairman)
Cllr K Vincent (Vice-Chairman)
Cllr A D Adams
Cllr S C Beadle
Cllr N J Brennan
Cllr J F Fisher

Cllr R R Foulger
Cllr C Karimi-Ghovanlou
Cllr K Leggett
Cllr S M Prutton
Cllr S Riley

Date & Time:

Wednesday 7 September 2022
9:30am

Place:

Council Chamber, Thorpe Lodge, 1 Yarmouth Road, Thorpe St Andrew, Norwich

Contact:

Dawn Matthews tel (01603) 430404
Email: committee.bdc@southnorfolkandbroadland.gov.uk
Website: www.southnorfolkandbroadland.gov.uk

PUBLIC ATTENDANCE:

This meeting will be live streamed for public viewing via the following link: [Broadland YouTube Channel](#)

You may register to speak by emailing us at
committee.bdc@southnorfolkandbroadland.gov.uk no later than 5pm on Friday 2
September 2022

Large print version can be made available

If you have any special requirements in order to attend this meeting, please let us know in advance.

AGENDA

1. **To receive declarations of interest from members;**
(guidance and flow chart attached – page 3)
2. **To report apologies for absence and to identify substitute members;**
3. **To confirm the minutes of the meeting held on 10 August 2022;**
(minutes attached – page 5)
4. **Matters arising from the minutes;**
5. **Applications for planning permission to be considered by the Committee in the order shown on the attached schedule**
(schedule attached – page 8)
6. **Planning Appeals (for information);**
(table attached – page 170)

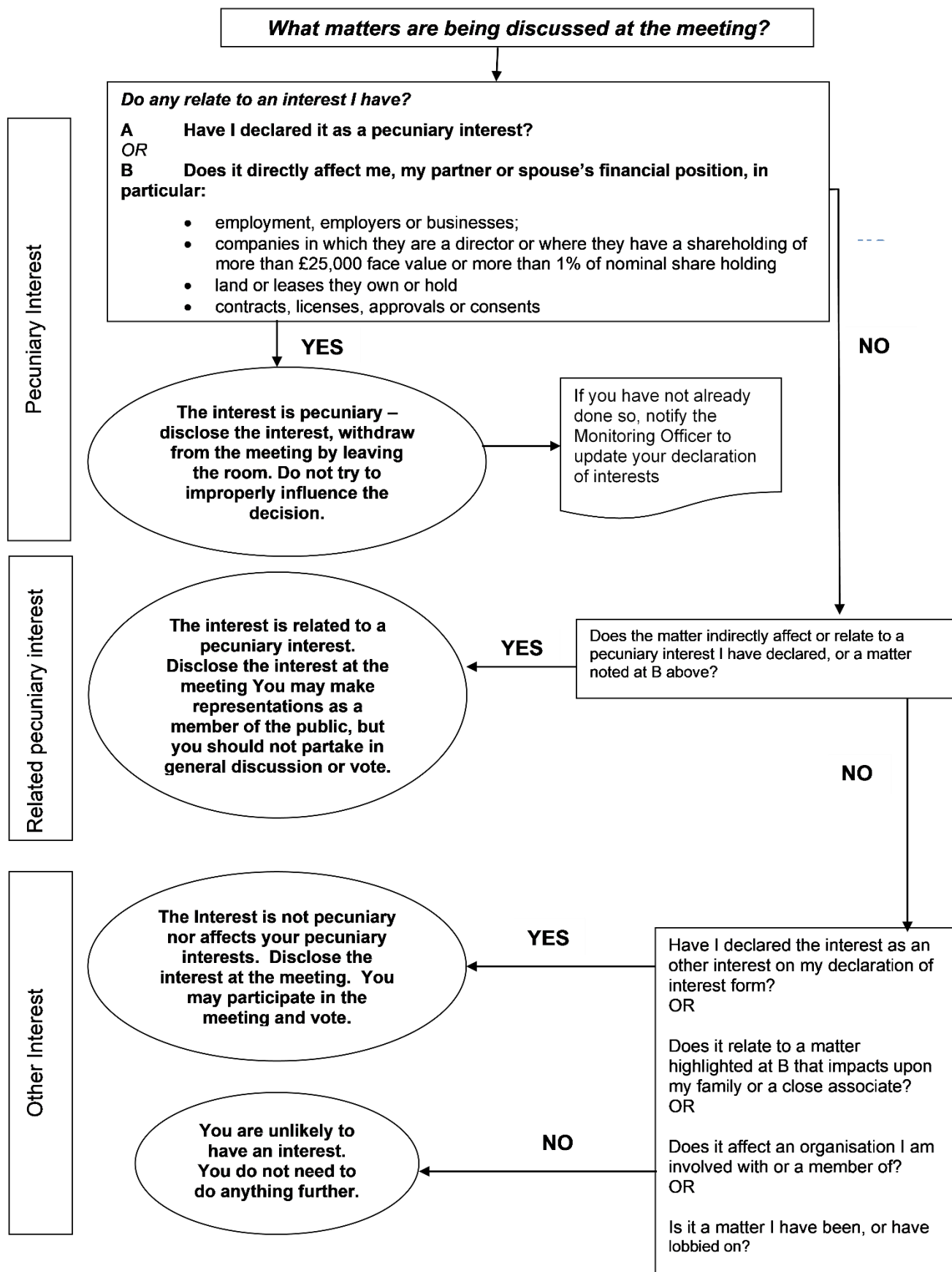
DECLARATIONS OF INTEREST AT MEETINGS

When declaring an interest at a meeting Members are asked to indicate whether their interest in the matter is pecuniary, or if the matter relates to, or affects a pecuniary interest they have, or if it is another type of interest. Members are required to identify the nature of the interest and the agenda item to which it relates. In the case of other interests, the member may speak and vote. If it is a pecuniary interest, the member must withdraw from the meeting when it is discussed. If it affects or relates to a pecuniary interest the member has, they have the right to make representations to the meeting as a member of the public but must then withdraw from the meeting. Members are also requested when appropriate to make any declarations under the Code of Practice on Planning and Judicial matters.

Have you declared the interest in the register of interests as a pecuniary interest? If Yes, you will need to withdraw from the room when it is discussed.
<p>Does the interest directly:</p> <ol style="list-style-type: none">1. affect yours, or your spouse / partner's financial position?2. relate to the determining of any approval, consent, licence, permission or registration in relation to you or your spouse / partner?3. Relate to a contract you, or your spouse / partner have with the Council4. Affect land you or your spouse / partner own5. Affect a company that you or your partner own, or have a shareholding in <p>If the answer is "yes" to any of the above, it is likely to be pecuniary.</p> <p>Please refer to the guidance given on declaring pecuniary interests in the register of interest forms. If you have a pecuniary interest, you will need to inform the meeting and then withdraw from the room when it is discussed. If it has not been previously declared, you will also need to notify the Monitoring Officer within 28 days.</p>
<p>Does the interest indirectly affect or relate any pecuniary interest you have already declared, or an interest you have identified at 1-5 above?</p> <p>If yes, you need to inform the meeting. When it is discussed, you will have the right to make representations to the meeting as a member of the public, but you should not partake in general discussion or vote.</p>
<p>Is the interest not related to any of the above? If so, it is likely to be an other interest. You will need to declare the interest, but may participate in discussion and voting on the item.</p>
<p>Have you made any statements or undertaken any actions that would indicate that you have a closed mind on a matter under discussion? If so, you may be predetermined on the issue; you will need to inform the meeting, and when it is discussed, you will have the right to make representations to the meeting as a member of the public, but must then withdraw from the meeting.</p>

**FOR GUIDANCE REFER TO THE FLOWCHART OVERLEAF.
PLEASE REFER ANY QUERIES TO THE MONITORING OFFICER IN THE FIRST
INSTANCE**

DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF



PLANNING COMMITTEE

Minutes of a meeting of the Planning Committee of Broadland District Council, on 10 August 2022 at 9:30am at the Council Offices.

Committee Members Present: Councillors: J Ward (Chairman), A Adams, S Beadle, N Brennan, J Fisher, R Foulger, L Hemsall (for K Vincent), C Karimi-Ghovanlou, K Leggett and S Prutton

Other Members Present : Cllr K Lawrence (for application no 20220272)

Officers in Attendance: The Assistant Director of Planning (HM), the Principal Planning Officer (PK), the Senior Planning Officer (JF), and the Democratic Services Officer (DM)

13 DECLARATIONS OF INTEREST

Application	Parish	Councillor	Declaration
20220775	Taverham	Cllr Adams Cllr Karimi-Ghovanlou	Contacted by an interested party – referred them to another district councillor

14 APOLOGIES FOR ABSENCE

Apologies for absence were received from Cllrs S Riley and K Vincent.

15 MINUTES

The minutes of the meeting held on 13 July 2022 were confirmed as a correct record and signed by the Chairman.

16 MATTERS ARISING

A member raised a concern that the applications relating to Reephams which had been deferred at the July meeting had now also been deferred from the August meeting.

17 PLANNING APPLICATIONS

The Committee considered the reports circulated with the agenda, which were presented by the officers.

Members were advised that, in relation to application no 20220272 at Buxton, there would be a need for the detailed surface water drainage scheme to be submitted in advance of final determination of the application.

The following speakers addressed the meeting on the application listed below.

Application	Parish	Speakers
20220272	Buxton	Cllr K Lawrence – local member

The Committee made the decisions indicated in the attached appendix, conditions of approval or reasons for refusal of planning permission as determined by the Committee being in summary form only and subject to the final determination of the Director of Place.

18 PLANNING APPEALS

The Committee noted the appeals lodged and decisions received.

(The meeting concluded at 10.30am)

Chairman

NOTE: Conditions of approval or reasons for refusal of planning permission as determined by the Committee are in summary form only and subject to the Director of Place's final determination.

1. **Appl. No** : **20220272**
Parish : **BUXTON WITH LAMAS**
 Applicant's Name : Mr V Kiddell
 Site Address : Sunnymeade, Crown Road, Buxton, NR10 5EH
 Proposal : Erection of Detached Bungalow
 Decision : An amendment having been lost (2-8) members then voted (8-2) to Authorise the Assistant Director of Planning to Approve, subject to conditions, addressing the requirements of nutrient neutrality and receipt of a satisfactory surface water drainage scheme.

Authorised to Approve subject to conditions, addressing the requirements of nutrient neutrality and receipt of a satisfactory surface water drainage scheme

1. 3 year time limit
2. Development shall be carried out in accordance with the submitted plans and documents
3. Tree protection
4. Landscaping
5. External materials and boundary treatments
6. Bin storage and collection
7. Surface water drainage
8. On-site parking and manoeuvring
9. Removal of Householder PD rights relating to conversion of double garage

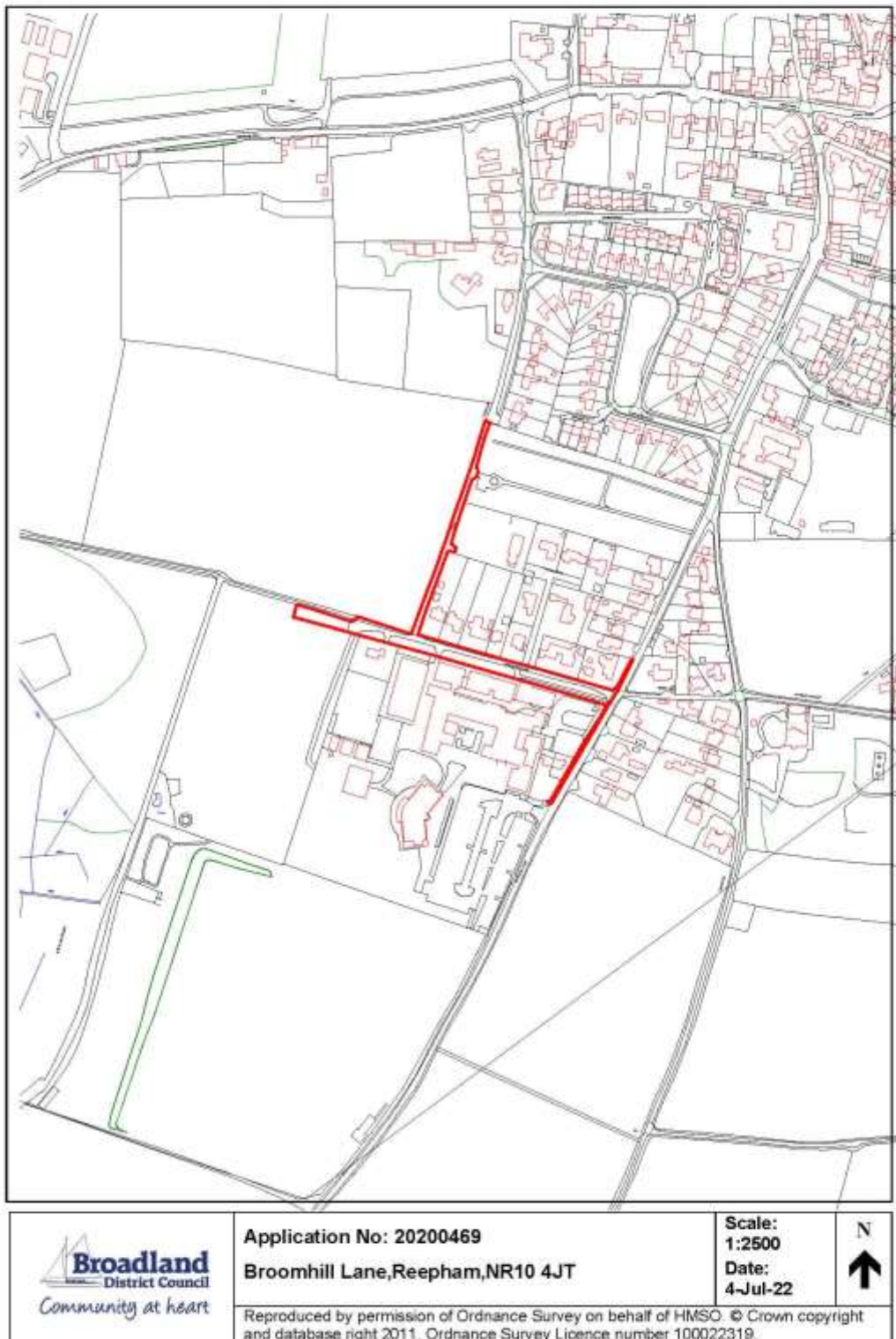
2. **Appl. No** : **20220775**
Parish : **TAVERHAM**
 Applicant's Name : Mr and Mrs Chen
 Site Address : Eastgate, Taverham Park Avenue, Taverham
 Proposal : Variation of condition 6 of planning permission 20181142 - Landscaping scheme.
 Decision : Members voted (8-2) for Approval subject to conditions

Approved with conditions

1. In accordance with plans
2. Limit height of hedge
3. Landscaping
4. No PD for classes A,B,C,D,E or G
5. No PD for fences, walls classes A or C

	Application No	Location	Officer Recommendation	Page
1	20200469	Broomhill Lane, Reepham, NR10 4JT	APPROVE subject to conditions	10
2	20200847	Land west of Broomhill Lane, Reepham	To authorise the Assistant Director of Planning to APPROVE subject to nutrient neutrality related matters being resolved	32
3	20201183	Reepham High School And College, Whitwell Road, Reepham, NR10 4JT	APPROVE subject to conditions	116
4	20220034	Dinosaur Park, Morton Lane, Weston Longville, NR9 5JW	To authorise the Assistant Director of Planning to APPROVE subject to ecology matters being resolved	132
5	20220732	Land Adjoining Burgh Rd, Spratts Green, Aylsham, NR11 6TX	APPROVE subject to conditions	160

Application 1



- 1. Application No: 20200469**
Parish: REEPHAM

Applicant's Name: Norfolk County Council
Site Address: Broomhill Lane, Reepham, NR10 4JT
Proposal: Widening of carriageway with traffic calming, revised junction configuration with Whitwell Road, shared use cycleway/footway and surfacing footpath to Park Lane

Reason for reporting to committee

The Local Member has requested that the application be determined by the Planning Committee for appropriate planning reasons as set out below in section 4.

This application is on the agenda having been deferred prior to the previous meeting. The deferral was due to officers being made aware on the day before the meeting that an error may have occurred in relation to the notification process for the meeting, when it was apparent from investigations that this was indeed the case, with the agreement of the Chairman of the Planning Committee, it was agreed to defer the application so that the Council's stated procedure could be followed in advance of the next meeting.

Recommendation summary:

Approve subject to conditions

1 Proposal and site context

- 1.1 The application site is irregular in shape and includes sections of Broomhill Lane, Park Lane and Whitwell Road. The site is located within the Parish of Reepham. The proposal is to widen the Broomhill Lane carriageway to 5.7m, provide a 3m wide shared use footpath/cyclepath to its southern side and a 1.8m wide (minimum) footpath to its northern side. Also proposed is a reconfiguration of the junction with Whitwell Road and the surfacing of Park Lane.
- 1.2 The application is submitted in association with planning application 20200847 which seeks permission for 141 dwellings, a cemetery extension and associated infrastructure and 20201183 which seeks permission for a new sports hall within the curtilage of Reepham high school.
- 1.3 The surfaced part of Broomhill Lane is currently narrow with a wide grass verge to its southern side and only a short extent of footpath at its eastern end providing access into the adjacent high school. At its western end, Broomhill Lane narrows into an unsurfaced track before widening, heading north and

providing access to the B1145. Park Lane is currently an unsurfaced track providing access between Park Lane at the northern end and Broomhill Lane at the southern end.

2 Relevant planning history

- 2.1 20200469 Widening of carriageway with traffic calming, revised junction configuration with Whitwell Road, shared use cycleway/footway and surfacing footpath to Park Lane. Undetermined
- 2.2 20201183 Provision of a New Sports Hall with associated Changing Facilities, Studio, Sports Classrooms and Parking. Undetermined

3 Planning Policies

- 3.1 National Planning Policy Framework (NPPF)
 - NPPF 02 : Achieving sustainable development
 - NPPF 04 : Decision-making
 - NPPF 05 : Delivering a sufficient supply of homes
 - NPPF 06 : Building a strong, competitive economy
 - NPPF 08 : Promoting healthy and safe communities
 - NPPF 09 : Promoting sustainable transport
 - NPPF 11 : Making effective use of land
 - NPPF 12 : Achieving well-designed places
 - NPPF 14 : Meeting the challenge of climate change, flooding and coastal change
 - NPPF 15 : Conserving and enhancing the natural environment
 - NPPF 16 : Conserving and enhancing the historic environment
 - NPPF 17 : Facilitating the sustainable use of minerals
- 3.2 Joint Core Strategy (JCS)
 - Policy 1 : Addressing climate change and protecting environmental assets
 - Policy 2 : Promoting good design
 - Policy 4 : Housing delivery
 - Policy 5 : The Economy
 - Policy 6 : Access and Transportation
 - Policy 7 : Supporting Communities
 - Policy 8 : Culture, leisure and entertainment
 - Policy 14 : Key Service Centres
 - Policy 20 : Implementation
- 3.3 Development Management Development Plan Document (DM DPD) 2015
 - Policy GC1: Presumption in favour of sustainable development
 - Policy GC2: Location of new development
 - Policy GC4: Design
 - Policy EN2: Landscape

Policy TS3: Highway safety
Policy CSU5: Surface water drainage

- 3.4 Site Allocations Development Plan Document 2016
Policy REP1 – Land off Broomhill Lane, Reepham

4 Consultations

4.1 Reepham Town Council:

Whilst the Town Council have no objections to the improvement of Broomhill Lane from Whitwell Road to the boundary with the proposed development, they would like to raise the following concerns / objections;

Objections have been made to the construction of a shared cycle/footpath on the south side of Broomhill Lane on the grounds that it creates an unacceptable safety hazard caused by cyclists to pedestrians entering and leaving the school also to the creation of the cycle route along the present Byway on the grounds that it does not form part of a safe cycle route. On entering Park Lane from Broomhill Lane a cyclist using the cycle path would have the options of turning in to Sun Barn Road, which effectively takes them back to School Road/Whitwell Road, or continuing to the Dereham Road junction which is already considered by many to be dangerous due to poor sight lines for anybody trying to cross Dereham Road from Park Lane.

There is concern that the creation of the vision splay will lead to the closure of the original main entrance to the school (as detailed in the Access Statement) so that service vehicles will use a new entrance to be created in Broomhill Lane. This means that service vehicles will turn into Broomhill Lane and cross the newly created foot/cycle path to enter the school.

There are objections to the proposal to impose a 20mph speed limit and build speed bumps on Broomhill Lane on the grounds that there is no evidence that there is currently, or has been, an unacceptable risk to pedestrians or cyclists on the existing or proposed highway.

There are objections to the proposal to downgrade the “footpath” from Park Lane to the junction with Broomhill Lane from a Byway Open to All Traffic. This is an ancient highway and, in the absence of a good reason for downgrading, should be retained as part of our local historic heritage.

Part of the proposal for the housing development includes for an extension to the existing cemetery adjacent to the Byway. The Town Council need to protect the right of vehicular access across the Byway from the existing cemetery to the proposed new cemetery or by some other mutually agreed access.

Concern has been expressed about the increase in traffic in close proximity to both the High School and Primary School and an increase in traffic accessing both Nowhere Lane and Whitwell Common, both of which are unsuitable for such an increase.

It is envisaged that cyclists will be using the Byway from Park Lane so barriers should be erected across the exit from the Byway to prevent cyclists entering Broomhill Lane at more than a walking pace.

It is envisaged that cyclists will be using the Byway to leave Broomhill Lane so steps should be taken to prevent them from using the footpath between Ewing Close and School Road adjacent to the old people's bungalows at Sun Barn Walk. The residents of Sun Barn Walk must be regarded as vulnerable on the grounds of age and infirmity and the passage of large numbers of cyclists past their homes would be unacceptable, particularly as the footpath is their primary access to the town centre facilities.

There is concern that the proposed pedestrian crossings will be downgraded / removed following planning permission and the Town Council would not wish these to be removed.

Comments on amended plans:

Reepham Town Council acknowledge the amended plans and note that the revision by Highways to the proposal regarding the unmade road between Park Lane and Broomhill Lane seems to address the Town Council's concerns regarding access to the proposed cemetery by the provision of a removable bollard at Park Lane and the surfacing of the unmade road to a standard suitable for vehicular traffic.

It is however noted that there has still been no provision for barriers preventing cyclist, and others, from exiting the unmade road onto Broomhill Lane at no more than walking pace, as per the Council's original objection.

Other concerns raised by the Town Council in their initial submission remain unaddressed and therefore the objections remain.

Comments on amended plans:

Reepham Town Council wish to express its concern that previous comments made by the council have not been taken into account and to repeat its view that the road widening scheme, housing development and school sports hall are so interlinked that each one should not be considered in isolation.

Further comments received:

Reepham Town Council would like to make the Planning Committee aware that it continues to have very serious concerns about the following aspects of the proposed development at Broomhill Lane, Reepham.

The proximity of the site access, next to the High School and close to the Primary School, has led the Council to be deeply concerned about the safety of children and other pedestrians going to and from the school.

It is the view of the Town Council that the information contained w

Within the documents submitted by the developer in respect of the traffic situation misrepresent the true situation in Reepham, particularly with regard to the congestion at Townsend Corner and in School Road. The Town Council therefore continues to feel that a detailed traffic survey should be carried out at Townsend Corner and School Road. If the development was to go ahead the Town Council feels strongly that it should be made a condition that the developer prepares a traffic management plan, which prevents construction traffic accessing the site between 8.00am and 9.00am and between 3.00pm and 4.15pm and that construction traffic does not pass through the Market Place at any time.

The Town Council also continues to be deeply concerned about the ability of the Doctors' Surgery, which is already under pressure, to cope with the increased demand.

Although Anglian Water, in its response to the consultation, has asserted that the water recycling plant in Reepham has sufficient capacity, the Town Council has also received unconfirmed reports that Reepham Sewage Treatment works has discharged untreated sewage into the nearby stream on a number of occasions. It asks that such information should be obtained from Anglian Water before a decision on the development is made.

4.2 Cllr Stuart Beadle:

I would like to call in the planning application 20200469 so the decision on the application is made by the Planning Committee. I have had requests to that effect from residents but would like to specifically draw the attention of the committee to additionally some aspects of the proposal:-

Request that the proposed junction with the main road is revisited particularly with respect to safety, including large numbers of walking students who enter and leave the School and College very near the current junction, including making the footway wider by realigning the road slightly into the curtilage of the bungalow opposite.

Request that the speed limiting raised traffic tables be revisited with a view to replacing them with nip points that include the facility for pedestrians to cross, but also incorporate large semi mature trees to reduce the urbanisation of the street scene. This may also be facilitated with the Schools co-operation of moving the current the second pedestrian access to the School to near the second raised table.

The text indicates that a route for encouraging pedestrians would be along Park Lane and onto Dereham Road and then into the Town. This increased flow of foot traffic would have to cross the main B road to gain access to the only footpath. There should be provision for some pedestrian crossing of some type at this point as a consequence of these access proposals.

4.3 BDC Conservation and Tree Officer:

The highway widening scheme requires the removal of a number of significant trees on Broomhill Road and is in close proximity to a number of garden trees in private properties. A site specific AIA and TPP for the purposes of the highways scheme implementation should be submitted now to assess the impacts of this preliminary work. I would still expect to see how the trees lost from the Broomhill Road area will be mitigated for, specifically at Broomhill Road and not in the wider scheme. There is still adequate verge space here as well as space at the school to undertake tree planting. In addition a full AIA and TPP will be needed when the full scheme comes forward.

Comments on amended plans:

The planting set out in PR2208 is a positive move to enhance the road widening scheme and I support the adjustment to improve the tree protection zone for the retained trees. I would recommend conditioning landscaping details (species, size etc) and compliance with the submitted AIA and AMS.

Comments on amended plans:

The scheme shows the road extending to the north to straighten out the current informal highway boundary, having looked at the plans closely I can't see how the privately owned weeping willow tree (in yellow) below will be retained or if it is retained, protected. It's so close to the road edge. Will there be excavations and kerb edging put in along this edge?

There are some purple circles indicating tree root protection zones indicated on the planting plan, but no details on how the trees will be protected, will there be fences? I can't see there is the room to be honest so will there be localised measures or arb supervision?

I also have concerns about the residential and school hedge(s) and how the work around them will be managed. It looks like the widening cut will affect their roots. Normally we would have an AMS (arb method statement) detailing of how the highways team will be working in the root protection areas. Is there opportunity to raise levels along the school hedge to give an effective no-dig path or will there need to be excavations along the length?

Comments on amended plans:

Grateful for the information provided by the applicant. It would be useful to know when the scheme starts so if there are any localised issues that crop up we can be on standby to advise. I know the residents are particularly concerned about retaining their hedges and trees.

4.4 Highway Authority:

It is the view of the Highway Authority that this application should not be considered separately from application reference 20200847 (proposed residential development at land west of Broomhill Lane, Reepham).

Notwithstanding the above: Drawing number PR2208-HP-003 references visibility spays of 2.4m x 55m in each direction from Broomhill Lane to Whitwell Road, the splays are not shown on the drawing and they should be.

The splay to the north requires land that is understood to be in ownership of Lovell and the south, land associated with the Reepham High School and College. It is not clear whether land required for both visibility splays is available for dedication which would be essential to ensure they are available in perpetuity.

Confirmation is requested that the proposal will not alter access arrangements at the school.

The unmade section of Park Lane that is proposed to be have a surface improvement to facilitate cycling and walking between Broomhill Lane and the residential area to the north is an unclassified road. The road needs to remain available for all vehicles, but the improvement should not make it attractive for use other than walking and cycling.

Public concern has been expressed that improvements at Park Lane might increase the potential for cyclists to use Sun Barn Walk. It is noted that barriers and no cycling signs are present at either end, but consideration should be given to complimenting those with appropriate measures at its junction with Ewing Close.

Given the above, the Highway Authority is not of the view that the applicant has demonstrated that the proposal would be acceptable and requests a holding objection until such time that satisfactory responses to the above concerns have been received.

Comments on amended plans:

The road is proposed to be 5.5m wide with ramps across its full width. It is considered that noise & vibration arising from vehicles passing over the ramps may cause nuisance at adjacent properties and a 5.7m carriageway with speed cushions would be preferred. A traffic regulation order will be required to prohibit the use of Park Lane by motor vehicles to the south of the cemetery access. The availability of land for the visibility splay at Whitwell Road, south of Broomhill Lane remains a concern. There appears to have been some progress as you will see from the attached. I am however advised that regardless of the revised lease, a process may need to be completed with the Department of Education before the land can be released to be dedicated as highway. My understanding is that if the case needs to be referred to Secretary of State for approval, that can take a year. Whilst I believe Lovell are actively progressing with NPLaw, release of the visibility land, I feel it will be some time before we can be assured of its provision.

Comments on amended plans:

I have been looking at the latest iteration of drawing PR2208-HP-003 (no revision number) and am pleased to see that the carriageway is now shown at 5.7m wide with speed cushions, clearly any scheme at Broomhill Lane would be subject to detailed design/ approval and a S278 agreement before it could be implemented but there are a number of matters that I would request are resolved prior to considering grant of consent:

My understanding is that the land at the school frontage that is required for the visibility splay from Broom Hill Road has not yet been secured. It is essential that the agreed visibility splays of 55m x 2.4m are made available as highway, prior to commencement of any scheme at Broomhill Road.

The highway design drawing should show in full, the visibility splays from Broomhill Lane to Whitwell Road.

The footway at the west side of Whitwell Road, north of Broomhill Lane should extend to the rear of the visibility splay.

The road layout at the western end of the proposal requires revision in a number of respects. It is questioned whether the layout has been assessed in respect of vehicle swept paths, we would require assurance that the junction was suitable for vehicle types that could be expected to service a

development. The approach from the south is skewed but should be perpendicular. It is however expected that the layout will be revised to provide an acceptable interface with the proposed residential development layout should that progress.

In some instances, the speed cushions appear to conflict with existing and proposed accesses, along with manholes. Some adjustment will be required.

The drawing highlights proposed locations for DDA compliant bus stops either side of Whitwell Road, north of Broomhill Lane. Whilst the feasibility of providing a compliant stop at the east side of the road is questioned, it is understood that the only scheduled buses using this part of Whitwell Road service the High School and would not stop at the proposed location. The proposed bus stops should be removed from the drawing.

The highway surface water from Broomhill Road is shown as discharging to a system of Aquacells, installed on the existing line of Broomhill Lane and within the root protection zone of mature trees. This is not considered appropriate and alternative provision is required.

A blue feature is shown crossing the west end of Broomhill Lane, it is not clear what this is intended to represent.

The layout/position of the turning head appears to differ slightly between the spine road and development layout drawings. The Rossi Long drawing shows the estate road (heading south) slightly further west. The proposed turning head doesn't seem to tie in with the underlying estate road layout.

Comments on amended plans:

Refuse vehicle track runs, should be done with Broadland's largest vehicle. I believe Rossi Long have done this with the site plans.

Soakaways would not be accepted in the footway. The best approach for you to take would be to limit the amount of detail you show on the plan and take the highway water back to the development site.

The scheme will need to go through the usual detail design/approval process before inclusion in a S278 agreement and that would include surface water discharge.

Forward visibility provision should be shown at the spine road bend due to the proximity to the side road. The width of the spine road should be shown on the plan. As you know, we have agreed 5.7m for the straight section, the width should reduce through the bend to the north, to 5.5m to tie with the estate road. The side road to the south should be 5.5m.

We would accept a footway width reduction to 1.8m at the north side of Broomhill Lane.

Comments on amended plans:

As you will know, the visibility splay at Whitwell Road, south of Broomhill Lane still does not appear to have been secured and is a fundamental concern. With regard to drawing ref PR2208-HP-003E, I would offer the following comments:

The junction to the south west estate road is on a bend and the forward visibility splay for southbound vehicles approaching the bend must be shown. This safety critical area must be provided as highway so it is available in perpetuity.

Whilst it is anticipated that the property at the northwest corner of the Broomhill Lane/Whitwell Road junction will be redeveloped, my understanding is that we need to consider the dwelling in its existing format. That being the case, the proposed speed cushions shown at chainage 20 appear to conflict with an access (as denoted by a magenta hatch) and either need to be relocated, or the access reconfigured.

The refuse vehicle used for the swept path analysis does not accord with the specification provided in the BDC guidance document on waste collection. The track runs should be redone in accordance with the guidance for a 32 tonne vehicle with the dimensions 12.5m length x 3.0m width.

Notwithstanding the above, the tracking (movements out of the side road heading east along the access road) shows overhang of the northern footway into the estate, a movement which requires the wheels to run very close to the south-eastern radius of the junction. It is reasonable to assume in reality this could result in over-running of the footways. This should be addressed, particularly considering the vehicle used for the analysis was under specification.

Final Highway Authority Comments (8th June 2022):

Further to my response of 28 May 2020 and subsequent correspondence with the applicant and the Planning Authority, I should wish to comment as follows:

Indicative designs of the proposed layout have been provided and are acceptable subject to detailed design.

The proposals at Broomhill Lane include improvements to the visibility splays to the north and south at Whitwell Road. It is understood that the land required to be dedicated as highway for the south splay is yet to be secured.

As visibility splay improvements are an essential element of the proposal, these should be secured, dedicated as highway and delivered prior to any other work associated with the proposal.

Park Lane is an unclassified Road, albeit presenting as an unsurfaced footpath. A Traffic Regulation Order (TRO) will be required to ensure the revised layout with shared use footway/cycleway is not used by motor vehicles, this will however need to retain access to the rear of the cemetery.

The Highway Authority would not object to the proposal subject to the following conditions:

SHC 17: Prior to the commencement of the development hereby permitted visibility splays shall be provided in full accordance with the details indicated on drawing number PRA029-GA-003. The splays shall thereafter be maintained at all times free from any obstruction exceeding 0.225 metres above the level of the adjacent highway carriageway.

SHC 23: Development shall not commence until a scheme detailing provision for on-site parking for construction workers for the duration of the construction period has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented throughout the construction period.

SHC 24A: Prior to the commencement of any works a Construction Traffic Management Plan which shall incorporate adequate provision for addressing any abnormal wear and tear to the highway together with wheel cleaning facilities shall be submitted to and approved in writing by the Local Planning Authority.

SHC 24B: For the duration of the construction period all traffic associated with (the construction of) the development will comply with the Construction Traffic Management Plan and use only the 'Construction Traffic Access Route' and no other local roads unless approved in writing with the Local Planning Authority.

SHC 33A: Notwithstanding the details indicated on the submitted drawings no works shall commence on site unless otherwise agreed in writing until detailed drawings for the off-site highway improvement works as indicated on drawing number PRA029-GA-003 have been submitted to and approved in writing by the Local Planning Authority.

SHC 33B: Prior to the first occupation/use of the development hereby permitted the off-site highway improvement works (including Public Rights of Way works) referred to in Part A of this condition shall be completed to the written satisfaction of the Local Planning Authority.

SHC 34(1): No works shall commence on the site until the Traffic Regulation Order for prohibition of motor vehicles at Park Lane, south of the cemetery has been secured/promoted by the Local Highway Authority.

SHC 34(2): No works shall commence on the site until the Traffic Regulation Order for a 20mph zone at Broomhill Lane has been secured/promoted by the Local Highway Authority.

4.5 Lead Local Flood Authority

Officers have screened this application and it falls below our current threshold for providing detailed comment. This is because the proposal is for less than 100 dwellings or 2 ha in size and is not within a surface water flow path as defined by Environment Agency mapping. You should satisfy yourself that the applicant has demonstrated compliance with the NPPF paragraphs 155 - 165 by ensuring that the proposal would not increase flood risk elsewhere and will incorporate sustainable drainage systems. The applicant should also demonstrate how the proposal accords with national standards and relevant guidance. If the proposal does not accord with these the applicant should state their reasoning and the implications of not doing so

4.6 Natural England:

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes. Natural England's generic advice on other natural environment issues is set out at Annex A.

4.7 CPRE:

CPRE Norfolk objects to this application for the following reasons:

- The application is contrary to the Local Development Plan and the Site Allocations DPD (2016.) This is because, although the proposal includes the land within site allocation REP1 (land off Broomhall Lane, Reepham) it does not follow the requirements of that allocation. This is because:
 - a) The application seeks to increase the number of houses from the approximate range of 100-120 houses in total to 141, an increase of between 17.5% and 41%.

- b) The application does not include a Sports Hall which is listed as being part of allocation REP1. Instead, it suggests (in the Design and Access Statement) that a Sports Hall will be built on another part of Reepham High School's playing fields.
- We are concerned by the high number of inaccuracies, mistakes and out-of-date and draft information submitted.
- We contend that the application is contrary to NPPF 127c which requires planning policies and decisions to ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change'. This proposal would see an artificial extension to the settlement of Reepham, with a suburban-style design and layout, out of keeping with the setting.
- We are concerned that the Planning Statement makes no mention under 'Ecology' of the existence of and potential impacts of the development upon, Booton Common SSSI and Whitwell Common SSSI.
- We have grave concerns about various aspects of the impacts the increased traffic associated with the development would have on road safety, the local road network and congestion.
 - a) The Transport Assessment considers this 600-650m 'as being within easy walking and cycling distance for most people.' Unfortunately, this will not be the case for a significant minority of residents, particularly some elderly and anyone with mobility issues.
 - b) The application's Design and Access Statement makes the claim that 'the nearest bus stop from the site is located on School Road approximately 0.2miles (4-minute walk) from the site entrance and this provides frequent services into Norwich, Holt, and Fakenham.' This is not the case.
 - c) A major concern with the Transport Assessment is in the way that TRICS data has been used to forecast the number of car movements to and from the proposed development. This is largely because of the extremely unusual if not unique situation of Reepham. It is a historic town and yet is set within a network of 'B' and minor roads, without any railway station or other frequent public transport to all necessary destinations.
 - d) The forecast trip generation figures are therefore called into question, as they are based on samples which are not on the whole from similar locations and situations as Reepham. It is impossible to accept that a new development of 141 dwellings in Reepham would only generate an additional 67 combined arrivals and departures in the morning peak hour (08:00-09:00) and 69 in the evening peak (17:00-18:00), given the necessity for private vehicle use to get to and from most places of employment.
 - e) Reepham is set within a network of 'B' and minor roads, making it unsuitable for major development which would bring with it a significant

increase in the number of car journeys, particularly for those travelling to and from work.

- f) The TA's Conclusions make the claim that 'the proposed residential development is located within an existing residential area which is accessible by all means of travel' (7.2.1.) This clearly is not the case as the nearest bus stop (according to 7.1.11) is 800m walking distance from the site, while the nearest railway station (Norwich) is 14.7 miles away.
 - g) Access from Broomhill Lane onto Whitwell Road is unsafe, given the wall and narrow footway giving limited visibility to the north, towards the town centre
- we strongly feel that the proposed housing would be contrary to NPPF 103 as the development would not 'be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes'
 - The development and its reliance on private vehicles will do the opposite to what is called for in NPPF 148, where 'the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change.
 - Throughout the application documentation statements are made suggesting that the proposed development is part of the settlement of Reepham, or is within the existing residential area. This is not the case. The development would be a 'bolted' on estate within land which is clearly countryside.
 - Reepham Primary School is currently full.
 - The failure to include a Sports Hall in the application is a major concern, in part as this makes it contrary to the Local Plan.
 - The current adopted Local Plan, the Joint Core Strategy, has a policy of developments of over 16 dwellings providing at least 33% of houses as 'affordable', rather than the just less than 20% offered as part of this application.
 - We are also concerned about how public consultation has been used for this application.

Comments on amended transport statement:

This amended transport statement, like its predecessor, fails to understand the nature of traffic on Whitwell Road/School Road, or fails to provide an accurate assessment of this.

- The revised transport assessment acknowledges that traffic peaks at both school drop-off and pick-up times (5.6.2), yet fails to produce survey evidence to illustrate the severity of this issue.
- The claim is made that as the proposed development is close to the primary school and high school that 'residents will be able to walk and cycle to/from school' (5.6.3.) While this is true, the transport assessment's analysis

summary makes no explicit mention of the other residents of the proposed development and how their travel patterns will contribute to traffic problems at school drop-off and pick up times. It is likely that many adult residents will be travelling by private cars to work at school drop-off times, as well as immediately before those times, adding to the clearly documented problems which already exist on Whitwell Road/School Road.

- Maintains the misconception that many residents will travel to work on foot, by cycle or by public transport.
- We still strongly feel that the proposed housing would be contrary to NPPF 103 as the development would not 'be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes'.
- We contend that this proposal is relevant to NPPF 109. The increase in traffic from the development, combined with the proximity of the High School and Primary School, the poor visibility at the junction of Broomhill Lane and Whitwell Road, the parking along Whitwell Road/School Road, and reliance on private cars for transport, makes this proposal unsafe in terms of highway safety, and would lead to severe impacts on the local road network, particularly at school drop off/pick up times.

Other Representations

4.8 Resident comments

- Premature ahead of housing application
- Impact of Covid 19 on consultation/public engagement opportunities
- No need for cycle path between Broomhill and Park Lane and would conflict with pedestrian use
- Scheme would enable an unwanted/unacceptable housing development (eg insufficient infrastructure, state of highway network, impact of traffic, impact on character of area, lack of public transport, lack of jobs, visual impact etc
- Inaccuracies in the application documents for example Park Lane is a maintained unsurfaced road and not a footpath, spelling mistakes, reference to school access being re-located onto Broomhill Lane.
- Submitted information dates to 2013 and pre-dates site allocations document
- Insufficient information provided to accurately assess application
- Loss of parking on grass verge for school
- Increased disturbance during construction
- Widening of the road will make it more dangerous/unsafe
- Impact on wildlife
- Application should not be considered separately from housing application.
- Local highway network not suitable to cater for development

- Transport Assessments and Travel Plans should be submitted with the application
- Impacts on ecology
- Overlooking
- Overshadowing
- Out of character
- Impacts on heritage interests
- Location of Zebra crossing dangerous
- Impact on air quality
- Impact on public utilities
- Scheme will encroach onto private property
- Public money should not be spent on scheme
- Amendments do not improve scheme
- Carbon producing use of materials
- Impact on drainage
- Why are bus stops on Whitwell Road as there is no bus service on this route? The bus stops are not DDA compliant. The bus stops are not safe.
- Impacts on trees, ancient banks and hedgerows
- Insufficient tree planting
- More sympathetic design should be adopted to reflect local character and does not reflect manual for streets.
- Road should be 4.8m wide maximum with 2m wide footpath and 2m wide cyclepaths.
- Speed bumps create carbon emissions
- More sympathetic materials should be used.
- Yellow lines should be shown on plans
- Cemetery access is required from Park Lane and engineering and access control details should be shown.
- Documents should not be accepted with draft watermarks
- Scheme should be designed for maximum of 120 dwellings
- What lighting is proposed
- Does not constitute sustainable development so contrary to GC1
- Outside settlement limit so contrary to GC2
- Not good design so contrary to GC4
- Insufficient reports have been submitted to consider application – drainage, land and air quality, hydrological information, public utilities.
- Insufficient information about parking and access for cemetery
- Speed cushions do not slow car down
- Highway boundary should be plotted on the ground
- Increased road noise for existing residents
- Position of pedestrian crossings adjacent to residential access is unsafe
- Insufficient visibility at junction with Whitwell Road.
- 3m wide cycle path is not sufficiently evidenced

- 2 associated applications should be refused given the issues raised so this should be too as therefore unnecessary.
- Submitted transport assessment for 20200847 is incorrect and inaccurate and should not be relied upon to determine acceptability of the applications.

5 Assessment

Key Considerations

5.1 Planning law (section 38(6) of the Planning and Compulsory Purchase Act 2004) requires that applications must be determined in accordance with the development plan unless material considerations indicate otherwise. Relevant development plan policies are detailed above. Material considerations include policies in the National Planning Framework (NPPF), and the online Planning Practice Guidance (PPG).

5.2 The key considerations for the determination of this application are:

- Principle of development
- Highway safety
- Design and character
- Other issues – drainage, land ownership

Principle

5.3 The site of the highway works is within the settlement limit of Reepham where the principle of development is acceptable under policy GC2 of the Development Management DPD 2015 (DM DPD).

5.4 Furthermore, policy REP1 of the Site Allocations DPD 2016 (SA DPD) is relevant as it allocates the site at the western end of Broomhill Lane for residential led development subject to, inter alia, vehicular access from a realigned and improved Broomhill Lane incorporating appropriate traffic management measures and footway provision. It is these matters that the application seeks to address to facilitate the development of REP1. This further supports the principle of development.

5.5 The merits or otherwise of application 20200847 which seeks to secure permission for the residential led development covered by REP1 are discussed separately in the officers report for that application (item 2 of this agenda). However it is considered that the principle of a scheme which realigns and widens Broomhill Lane to enable the delivery of a residential led development on REP1 is acceptable in principle.

- 5.6 In addition, the highway authority has confirmed that the extent of highway works required is no greater than what would be required if the residential scheme came forward for 100-120 dwellings and a sports hall (quantum of development indicated to be delivered by REP1).
- 5.7 Concern has also been expressed by residents that the highway works application has been de-coupled from the residential application. The purpose of this was to provide opportunity for the highway works application to secure consent and move to a detailed design stage (securing the necessary agreements under s38 and s278 of the Highways Act) should there be delays in the residential application being determined.
- 5.8 Whilst there is no “technical” reason why the decoupling cannot be progressed, the highway authority shared the view that these applications should not be considered separately and it has therefore been resolved by officers to determine the applications concurrently to ensure that they reflect one another’s requirements.
- 5.9 Objections were raised by residents that the application was not accompanied by a Transport Assessment and Travel Plan however these would not be required for a highway works application such as it would not, in itself, increase traffic on the highway. It should be noted however that a Transport Assessment accompanies the associated residential application 20200847 and the acceptability of that is considered in the report for that application.
- 5.10 Concern from residents has also been expressed about the age and accuracy of the supporting statement which accompanied this application and an update statement was submitted. Notwithstanding these concerns the highway authority have raised no objections to the proposed plans which are the documents being submitted for approval (rather than supporting documentation).

Highway Safety

- 5.11 Policy TS3 of the DM DPD does not permit development where it would result in any significant adverse impact upon the satisfactory functioning or safety of the highway network.
- 5.12 The proposals include improvements to the visibility splays to the north and south at Whitwell Road where it is understood that the land required to be dedicated as highway for the south splay is yet to be secured. The Highway Authority has presented the view that the visibility splay improvements are essential to enable the junction to safely accommodate any traffic associated with the development. It is therefore required that the visibility improvements are provided prior to commencement of any other work associated with the proposal.

- 5.13 The proposal includes the surfacing of Park Lane where a Traffic Regulation Order (TRO) will be required to ensure the shared use footway/cycleway is not used by motor vehicles, this will however need to retain access to the rear of the cemetery. The promotion of a TRO can be secured via planning condition.
- 5.14 The scheme has been designed to ensure that the associated residential development results in an acceptable impact on the immediate highway network. The Highway Authority has raised no objections to the proposed development and comments made in respect of layout have been addressed through the submission of amended plans
- 5.15 Therefore, subject to the above being secured the requirements of Policy TS3 of the DM PDP will be met.

Design and Character

- 5.16 Policy 2 of the JCS seeks to promote good design and respect local distinctiveness including the landscape setting of settlements, the landscape character and historic environment, townscape and the provision of landscaping. Policy GC4 of the DM DPD expects development to achieve a high standard of design and avoid significant detrimental impacts and pay adequate regard to the environment, character and appearance of the area, reinforce local distinctiveness and make efficient use of land and resources.
- 5.17 Broomhill Lane currently has a suburban and semi-rural feel with the rurality increasing as it heads west away from the settlement. The narrow informal road with uneven edges and wide grass verge is part of this character and adds to the sense of place. The proposed scheme would alter this character through the introduction of a more formalised highway arrangement and greater amounts of hard surfacing. The scheme would also necessitate the removal of trees at the western end of Broomhill Lane. Whilst acknowledging that there is a degree of change in the character of Broomhill Lane, it is not considered that this represents any significant harmful impacts. It is also apparent that the development would not impact a conservation area or designated heritage assets and would not impact on the wider countryside. Furthermore, the works are deemed necessary by the highway authority to deliver an allocation in the adopted development plan and do not go beyond the scope of those needed or envisaged to be required to meet the requirements of the allocation. This weighs in favour of the application and given the importance of delivering housing within the NPPF and the limited harm to the character of the area I consider that the impact on the character of the area is acceptable.

- 5.18 Details have been provided of how trees to be retained can be protected in consultation with the Council's Conservation and Tree Officer and the locations for new tree planting have been identified on the plans with more specific detail able to be secured by condition. This will help to mitigate the proposed tree loss.
- 5.19 Overall I am satisfied that whilst the scheme will impact upon the existing character and appearance of the site and immediate surrounds, this change is outweighed by the need to provide a suitably designed scheme in highway terms to deliver an allocation in the adopted development plan.

Other Issues – including drainage, land ownership, ecology, finance

Drainage:

- 5.20 Policy CSU5 of the DM DPD requires schemes to ensure that the risk of flooding is not increased on site or elsewhere. The application proposes to pipe surface water into underground aquacells to infiltrate into the ground. The LLFA have made no comments on the application and the highway authority has confirmed that the detailed drainage design will be secured through their own s278 and s38 agreements

Land ownership:

- 5.21 Concern has been raised by residents that the proposed development would impact on land ownership. The location of the highway boundary has been indicated on the submitted drawings and show no work to take place outside of this boundary with the exception of an area of footway and visibility spaces at the junction with Whitwell Road which is controlled by Reepham High School. Discussions are ongoing regarding the dedication of this land as highway and will be secured through the s106 for the residential development.

Ecology:

- 5.22 Whilst Natural England have advised they have no objection to the application, this pre-dated the recent advice received by Broadland District Council in respect of Nutrient Neutrality. The Council has recently been made aware by Natural England that development with the potential to have nutrient impacts on Habitats sites should now be considered when making decisions in relation to planning. Any impacts need to be identified and mitigation proposed and secured for the Council to conclude no likely significant effects under the Habitats Regulations. The Council needs time to consider the impacts of this requirement on the decision making process and therefore the officer recommendation reflects this need.

Finance:

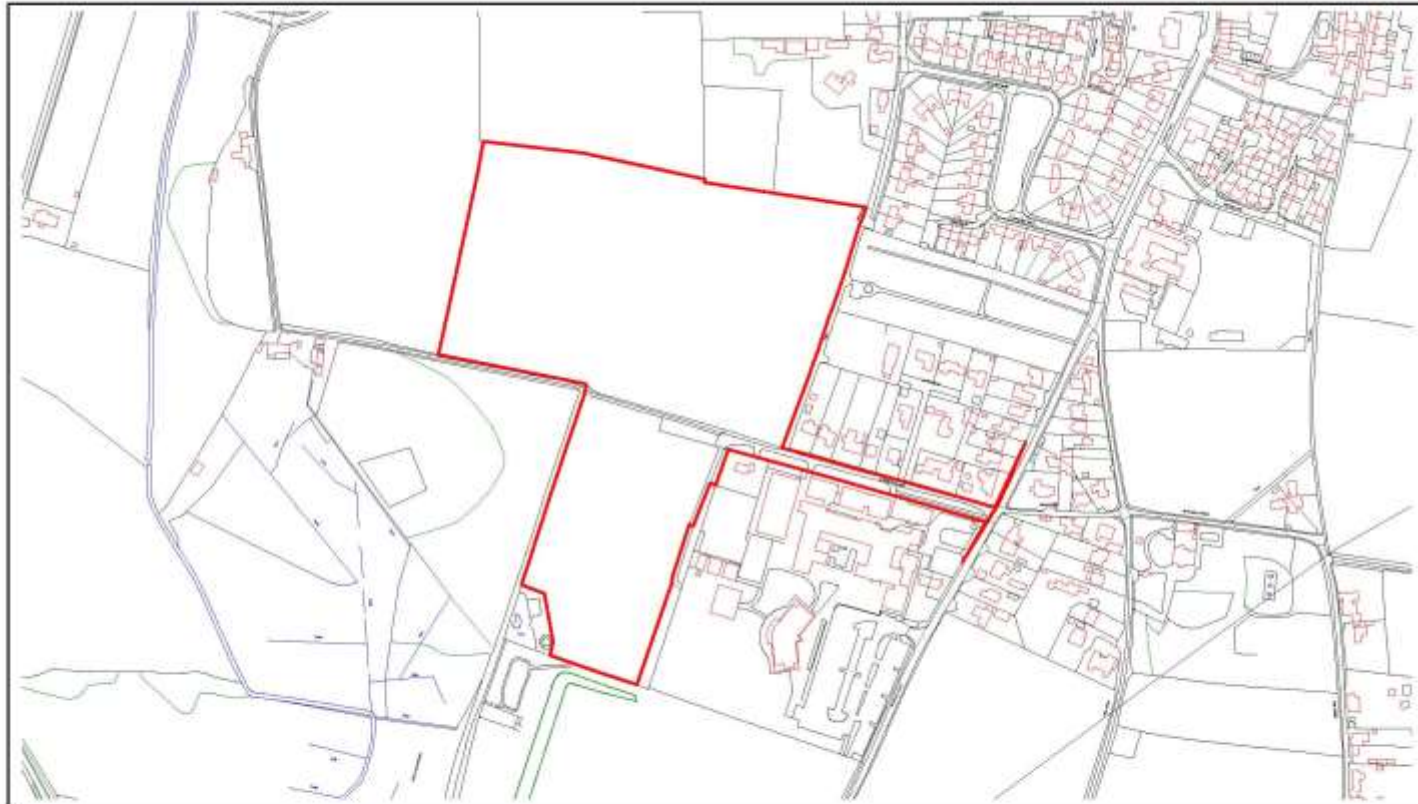
- 5.23 Under Section 143 of the Localism Act the Council is required to consider the impact on local finances. This can be a material consideration but in the instance of this application the other material planning considerations detailed above are of greater significance.
- 5.24 The development is not considered to fall within Schedule 2 of the EIA regulations such that this application needs to be screened, nevertheless, it should be noted that this proposed development has been given regard to in the screening of 20200847 along with 20201183 given the “in combination” effects caused by the three applications being interlinked.
- 5.25 This application is not liable for Community Infrastructure Levy (CIL).


Conclusion

- 5.25 In summary, the scheme is considered to comply with the applicable development management policies such that subject to the suggested conditions and Traffic Regulation Order (TRP) the application is recommended for approval.

Recommendation:	Approve subject to conditions
	Conditions: <ol style="list-style-type: none">1. 3 year commencement2. Plans and documents3. Highways conditions SHC17, SHC23, SHC 24A,. SHC 24B, SHC33A, SHC33B, SHC34(1) and SHC 34(2)4. Landscaping scheme

Contact Officer, Chris Raine
Telephone Number 01508 533841
E-mail Christopher.raine@southnorfolkandbroadland.gov.uk



 Broadland District Council Community at heart	Application No: 20200847 Land West of Broomhill Lane, Reepham	Scale: 1:2500 Date: 4-Jul-22	N ↑
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2. Application No: 20200847
Parish: REEPHAM

Applicant's Name: Lovell, Lakeside 500, Broadland Business Park, Old Chapel Way, Norwich, NR7 0WG

Site Address: Land west of Broomhill Lane, Reepham

Proposal: Proposed residential development for 141 dwellings with associated open space, highway and landscaping works. Extension to existing Reepham cemetery

Reason for reporting to committee

The application is contrary to policies of the development plan and the officer's recommendation is for Approval

This application is on the agenda having been deferred prior to the previous meeting. The deferral was due to officers being made aware on the day before the meeting that an error may have occurred in relation to the notification process for the meeting, when it was apparent from investigations that this was indeed the case, with the agreement of the Chairman of the Planning Committee, it was agreed to defer the application so that the Council's stated procedure could be followed in advance of the next meeting.

Recommendation summary:

Authorise the Assistant Director of Planning to approve subject to conditions and a section 106 Agreement, subject to satisfactorily addressing the requirements under the Habitats Regulations regarding nutrient neutrality and subject to the application being referred to the Secretary of State in respect of the Sport England objection.

1 Proposal and site context

1.1 The application seeks full planning permission for a residential development of 141 dwellings, a 0.3ha extension to Reepham cemetery, the provision of public open space, landscaping and associated infrastructure works including a pumping station and sub-station.

1.2 The application has been submitted alongside application 20200469 which seeks full planning permission for the widening of Broomhill Lane with traffic calming, revised junction configuration with Whitwell Road, shared use cycleway/footway and the surfacing of Park Lane and 20201183 which seeks outline permission for the provision of a new sports hall with associated changing facilities, studio, sports classrooms and parking. The interrelationship between these three applications is discussed further below.

- 1.3 The application site is approximately 7.7 ha in area and is located to the south-west of Reepham which is designated as a Key Service Centre under policy 14 of the Joint Core Strategy for Broadland, Norwich and South Norfolk 2011/2014 (JCS).
- 1.4 The site is made up of three distinct areas. The northern field is approximately 5.24 ha and was last in agricultural use. The field slopes approximately from the north boundary to the south-west. To the north and west are further agricultural fields. To the east is Park Lane, an unsurfaced maintained section of highway connecting Park Lane to the north and Broomhill Lane to the south. Further to the east is Reepham Cemetery with gated access onto Park Lane and the curtilage of residential dwellings, the closest property being Middlemarch, Broomhill Lane which is a two storey dwelling of modern construction with windows facing out over the site.
- 1.5 The second area of the site is Broomhill Lane which adjoins Whitwell Road at its eastern end and continues west with a metalled section to the north with residential accesses along its length and a wide grass verge and footpath to the south with pedestrian and service access into Reepham High School and residential access into a single dwelling. As it heads west, Broomhill Lane becomes unsurfaced and lined with trees and hedges before once again becoming surfaced and then returning north to the B1145.
- 1.6 The third area of the site measures approximately 2.13 ha and is located to the south of Broomhill Lane and west of Reepham High School. The land was last used as playing fields associated with the school and provided a rugby pitch and run-off area. To the south-west of this part of the site is an observatory which I understand to be managed by Reepham High School. To the west of this part of the site is Back Lane an unsurfaced maintained section of highway which connects with Broomhill Lane at its northern end and Marriot's Way at its southern end. An area of County Wildlife Site is located to the south west of this part of the site. To the south are school playing fields and school allotments.
- 1.7 The application proposes 141 dwellings of which 28% would be for affordable housing (which equates to 40 dwellings). The application proposes a mix of single and two storey dwellings ranging from 1 to 4 bedrooms.

2 Relevant planning history

- 2.1 20080277 - New 6th Form Block and Science, Art and Music Extensions, Extend Existing Coach/Car Park. Reepham High school. Approved.
- 2.2 20080413 - Change of Use of Land from Agricultural to School Playing Field. Reepham High School. Approved

2.3 20200469 - Widening of carriageway with traffic calming, revised junction configuration with Whitwell Road, shared use cycleway/footway and surfacing footpath to Park Lane. Undetermined

2.4 20201183 - Provision of a New Sports Hall with associated Changing Facilities, Studio, Sports Classrooms and Parking. Undetermined

3 Planning Policies

3.1 National Planning Policy Framework (NPPF)

NPPF 02 : Achieving sustainable development

NPPF 04 : Decision-making

NPPF 05 : Delivering a sufficient supply of homes

NPPF 06 : Building a strong, competitive economy

NPPF 08 : Promoting healthy and safe communities

NPPF 09 : Promoting sustainable transport

NPPF 11 : Making effective use of land

NPPF 12 : Achieving well-designed places

NPPF 14 : Meeting the challenge of climate change, flooding and coastal change

NPPF 15 : Conserving and enhancing the natural environment

NPPF 16 : Conserving and enhancing the historic environment

NPPF 17 : Facilitating the sustainable use of minerals

3.2 Joint Core Strategy (JCS)

Policy 1 : Addressing climate change and protecting environmental assets

Policy 2 : Promoting good design

Policy 3: Energy and water

Policy 4 : Housing delivery

Policy 5 : The Economy

Policy 6 : Access and Transportation

Policy 7 : Supporting Communities

Policy 8 : Culture, leisure and entertainment

Policy 14 : Key Service Centres

Policy 20 : Implementation

3.3 Development Management Development Plan Document (DM DPD) 2015

Policy GC1: Presumption in favour of sustainable development

Policy GC2: Location of new development

Policy GC4: Design

Policy EN1: Biodiversity and habitats

Policy EN2: Landscape

Policy EN3: Green infrastructure

Policy EN4: Pollution

Policy RL1: Provision of formal recreational space

Policy TS2: Travel plans and transport assessments
Policy TS3: Highway safety
Policy TS4: Parking guidelines
Policy CSU1: Additional community facilities
Policy CSU2: Loss of community facilities or local services
Policy CSU3: Provision of community facilities or local services within large scale residential development
Policy CSU4: Provision of waste collection and recycling facilities within major development
Policy CSU5: Surface water drainage

3.4 Site Allocations Development Plan Document 2016
Policy REP1 – Land off Broomhill Lane, Reepham

3.5 Supplementary Planning Documents (SPD)
Recreational Provision in Residential Development SPD
Landscape Character Assessment
Parking Standards SPD
Affordable Housing SPD

4 Consultations (summarised)

4.1 Reepham Town Council:

Whilst the Town Council, as then constituted, accepted the Broomhill Lane site as suitable for development there have been significant changes both in the make-up of the Town and of the scale of the development. The original proposal was for 120 dwellings together with provision of a sports hall behind the High School with access from Broomhill Lane. This has now been amended to the current proposal for 141 dwellings and the construction of the sports hall on the playing field adjacent to the Sixth Form College on Whitwell Road. While the reasons for selecting the Broomhill Lane site remain the same, the changes presented by this application make some aspects of it less acceptable. The Town Council therefore wish to object to the application and make the following comments.

Concerned about increased density and compliance with REP1, impacts on infrastructure including the sewerage system and traffic on Broomhill Lane, School Road and Whitwell Road.

Concerns that the scheme is not viable and the level of affordable housing proposed.

Concerned at loss of school land reducing its playing field and prevent the school being able to increase its population in the future.

Incorrect to state that no rights of way will be extinguished or diverted. Broomhill Lane and Back Lane are part of the historical heritage of the town and they should not be extinguished or diverted.

Object to provision of chimneys which suggest that solid fuel will be used causing CO2 emissions.

Ground surveys have not been carried out for the proposed cemetery land.

Further comments:

Further to the comments previously made, Reepham Town Council would like to record its continued objection to this application, highlighting in particular its objection to the proposed increase in density on the site and non-compliance with Broadland District Council DPD Site allocations document (2016) REP 1 which states that: 'The site will accommodate approximately 100-120 homes' and that the sports hall will be built on the site. The Town Council wish to object to the proposal for 141 dwellings and is disappointed that, if approved, the sports hall will be built on the school's remaining playing field land rather than being located in line with the policy stated in REP1.

Concern also remains about the reduced number of 'affordable' or 'social housing' and the Town Council would still wish to see an increase in the level of social housing to 30%.

The Town Council do not feel that their concerns about the significant increase in the volume of traffic on Broomhill Lane, School Road and Whitwell Road has been addressed. The Council is also concerned about the close proximity of the exit from Broomhill Lane to the High School. The Council is concerned that increased traffic from the development will lead to an increased risk for pedestrians, including children, accessing both the Primary and High School sites.

A significant number of residents have expressed their concern, that due to Government restrictions, there has not been a proper public consultation. Given the large scale of the planning application, the objections raised by both the Town Council and by residents, the Town Council continues to request that this application be considered by Broadland District Council Full Planning Committee

The Town Council remain in support of adopting the land for the extension to the cemetery.

Reepham Town Council would like to record that following the consideration of the submitted amendments - Additional Air Quality Assessment and Amended Transport Assessment received 21/04/21, their previous objections

and concerns still stand.

Comments on amended viability assessment:

Reepham Town Council would like to record that following the consideration of the submitted amendments - Updated Viability Assessment received 20 May 2021, their previous objections and concerns still stand. In addition, the council would like to express their concern that as the Viability Assessment suggests the site is not viable, there is a risk that once development has started, the site could then be left unfinished due to the lack of funds available. The Council would like reassurance that this will not happen.

Further comments:

It was agreed that the Town Council's previous concerns remain. In addition, the Council are disappointed to note that the second drainage basin appears to further reduce the recreational space, and would like clarification. They welcome the additional affordable houses, and note that they have been provided due to the potential increase in property value, but the developer could have reduced the number of properties in the overall development instead.

Further comments:

The Town Council considers the report (Transport Assessment) by Rossi Long to contain many inaccuracies such that it does not represent the reality of the traffic situation in Reepham and the likely impact of the development on traffic in the town. For example:

- The report asserts that the High School is served by 4 buses, whereas the true figure is around 13-15.
- That there is a 'good frequency' of buses when, in reality there are four per day to Norwich and one bus per week to each of two other destinations. The journey to Norwich, although only about 25 minutes by car takes 70 minutes by bus. This suggests that residents are unlikely to leave their car at home and travel by bus. Hence traffic in School Road, Whitwell Road and Nowhere Lane, at the junction of which with the A1067, where there is poor visibility, there was recently a very serious multi-vehicle accident.

The Town Council also noticed that in a recent email to you, Dave Wilson Engineer Major and Estate Development wrote comments which reflects some of its concerns.

The Town Council wishes to reiterate its deep concerns about the impact of the Broomhill Lane development on traffic congestion and the safety of school children in Reepham and formally requests that the developers be required to do a full and proper suite of studies, along the lines suggested by Dave

Wilson, together with first hand observations of traffic at Townsend Corner, School Road and Nowhere Lane at school start and finish times to substantiate their claims.

Further comments received:

Reepham Town Council would like to make the Planning Committee aware that it continues to have very serious concerns about the following aspects of the proposed development at Broomhill Lane, Reepham.

The proximity of the site access, next to the High School and close to the Primary School, has led the Council to be deeply concerned about the safety of children and other pedestrians going to and from the school. It is the view of the Town Council that the information contained w

Within the documents submitted by the developer in respect of the traffic situation misrepresent the true situation in Reepham, particularly with regard to the congestion at Townsend Corner and in School Road. The Town Council therefore continues to feel that a detailed traffic survey should be carried out at Townsend Corner and School Road. If the development was to go ahead the Town Council feels strongly that it should be made a condition that the developer prepares a traffic management plan, which prevents construction traffic accessing the site between 8.00am and 9.00am and between 3.00pm and 4.15pm and that construction traffic does not pass through the Market Place at any time.

The Town Council also continues to be deeply concerned about the ability of the Doctors' Surgery, which is already under pressure, to cope with the increased demand.

Although Anglian Water, in its response to the consultation, has asserted that the water recycling plant in Reepham has sufficient capacity, the Town Council has also received unconfirmed reports that Reepham Sewage Treatment works has discharged untreated sewage into the nearby stream on a number of occasions. It asks that such information should be obtained from Anglian Water before a decision on the development is made.

4.2 Anglian Water

No assets affected. Reepham (Norfolk) Water Recycling Centre will have available capacity for the foul drainage. The sewerage system at present has available capacity for these flows via a pumped conveyance to the public foul sewer. We will ask that the pump rate is confirmed at Section 106 stage. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection. Informatives requested.

From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management

4.3 BDC Conservation and Tree Officer:

The tree removals (T13 – 16 Stems within G3 and G4) to facilitate the development presents a loss in a variety of ways to ecosystem services. There is however opportunity to gain broader species diversity across the site and make long term improvements to the tree population, including addressing the ash trees expressing signs of ash dieback and those trees on site with other defects, T11 and stems in G1.

The current unmaintained track that heads east from Broomhill lane passes close to existing trees. With increased usage of the path, thought should be given to the route and how, if any surface treatment is needed, will be designed with tree roots in mind.

The tree protection measures set out in the report should be adopted and followed in full, please could you condition L09. Trees and hedges not detailed to be removed in the Arboricultural report should be retained, please could you condition L16. Tree planting for the scheme should be set out in more detailed landscape plans, the scheme should aim to achieve at least 20 % canopy cover across the site after 10 years and include species that benefit wildlife, in particular native mammals, birds and pollinating insects. The tree planting should be set out to delineate routes and benefit public spaces. There is opportunity to include tree planting along the pedestrian link to the cemetery by providing trees at the frontages of plots 71 – 78 and 70 - 65 in particular.

Comments on amended plans:

G5 beech hedge High School – currently 15m in height - the relationship between plots 6 – 16 needs clarifying, the hedge will need ongoing maintenance. The proposed dwellings situated close to the western face of the hedge located in the school will remain in the schools responsibility to keep it cut, how much space will be needed for a flail mounted tractor, if this is what they use? A protective fence should be erected along this boundary to prevent damage to the hedge during the construction works, this hasn't been specified in the Tree Protection Plan.

G1, I am concerned there is inadequate information of the varied nature of the trees in this group, the oak and cherry need to be identified because they are unlikely to be included in the long-term replacement strategy for the poor-quality ash trees. Do we have details of this strategy? Could this strategy be

submitted or described? Adequate space is needed to give access to this area to carry out removals or other tree work. The proximity of plot 37 and less so plot 33 & 34 could be problematic long term, evening shade cast, inappropriate requests for management or removal could become an issue.

The Broomhill Road approach – previous discussions with highways have explored the option to retain trees T16, 15 and 13. There appears to be adequate space, could this be confirmed? Do these trees need to be removed or is there opportunity to retain them?

G3 (ash and oak) and G4 (cypress group), it's not clear on the survey because all these trees have been grouped together, which trees are being retained. Footpath 4 on the landscape plan shows a route directly through these trees. We would need a more detailed construction plan, a no dig path would be appropriate along with more information on the quality of the trees and an arb method statement for this work specifically.

Is there opportunity to create a vista through from the entrance road off Broomhill? Is the existing beech hedge being retained and if not, is there any scope for hedgerow replacement planting on the scheme? The drainage or attenuation ponds to the far east of the site, the contours appear to conflict with the protection fence around T7, though outside the calculated RPA of these retained trees, a slight amend to the shape of the pond would minimise the risk to trees or if not, excavation in this area should be carried out under arb supervision.

There appears to be no protection measures to prevent damage to the hedgerows around the site – these should be retained and protected wherever possible, details of the fences or boundary treatments for the dwelling like domestic fences, should be specified and method statements supplied.

Trees T1 – T5 along the northern boundary are significant, mature oak trees. It's good to see tree 1 has limited pressures associated with the proposals, however plots 78 – 71, although to the south of these trees are all in close proximity. The gardens will be dominated by their canopies. If there is opportunity to pull these dwelling further south to allow these trees more space there will be less pressure for these trees to have ongoing management or even removal, this could be achieved by reducing the gardens of plots 65-70 or reducing the roadside front gardens.

The tree planting plans show just 4 different species of new tree being used; a broader range of tree species would help improve the biodiversity value of the planting scheme. Please avoid planting the street trees directly in front of properties, if they are positioned between dwellings there is less risk of future removal.

I think in this scheme a TPO may be appropriate to provide ongoing protection of the retained trees, it is likely we will look to do this before first occupancy.

Comments on amended plans:

G5 beech hedge – confirmed adequate space has been retained to manage the hedge and tree protection is now provided in this area.

G1 – a more detailed survey has taken place. The survey captures some trees within G1 as category C – 12 trees category U - 6 trees. However, the removal schedule describes the entire G1 being removed “all are Category U trees and are in declining condition”. Unfortunately I still need clarification. Are all G1 trees being removed or not? I have contacted Stephen Milligan directly and am waiting to hear back from him.

Broomhill Approach – thanks for clarifying.

G3 – Tree protection and removal has now been clarified, footpath will be no-dig.

Drainage / attenuation pond outline has been amended to avoid the RPA of T7, 8, 9, 10 thank you.

T1-5, or plots 71-78 no change to layout, is there a reason? I would prefer to see more space given to the trees at the northern boundary T2, 3, 4, & 5).

Suggested conditions:

Condition Tree Protection measures L09 and specifically T50 root pruning and Footpath construction shown within root areas G3 and southern tip of G1 should be a no dig specification.

Hedgerows L16 – please could you condition the retention of the boundary hedgerow and indicated retained trees in line with the revised AIA.

Planting plan – the landscape plan needs updating, I am suggested a revised scheme is required to reflect the removals in G1 and to diversify the planting stock, please could you condition implementation of planting plan.

The revised AIA details the removals on site;

Removal of T39- T48, G4, G5 and two stems within G3 and G7 to accommodate the new access road.

Removals on arboricultural grounds: T14, T18, T23, T24, T26, T28, T29 and G1 (T11 – T28) all are Category U trees and are in declining condition.

Adequate replacement planting should also be provided along this western edge also to reflect the level of tree removal in this area. The landscape plan needs updating in line with the revised AIA.

Comments follow clarification with tree consultant:

The tree numbering has changed from the previous report. Based on this revised numbering there are no objections to the removal of G1.

4.4 BDC Contracts Officer:

Tracking plans/swept path analysis for a suitably sized refuse vehicle need to be submitted as per the planning guidance notes. Confirmation needs to be provided of which areas of the development are private drive which refuse vehicles will not access and a bin collection point will need to be provided. Developer should confirm whether they or residents will pay for new bins.

4.5 Environment Agency:

Groundwater and Contaminated Land The application does not contain a risk assessment for the cemetery extension. All new cemeteries and cemetery extensions require a groundwater risk assessment, to determine the suitability of the new/extended area for burials.

It is normally the responsibility of the applicant to undertake the required risk assessment, but during the coronavirus pandemic the Environment Agency has been authorised to:

- carry out groundwater risk assessments for local authorities and other cemetery operators proposing to develop new or expanded cemeteries
- provide advice and recommendations to protect the water environment, and particularly groundwater, using the results of these risk assessments

At this time groundwater risk assessments will be entirely desk based, and will not require any site visits from our operational staff. To complete the groundwater risk assessment on your behalf, the Environment Agency may ask you for site specific information in line with the procedures set out in our guidance Cemeteries and burials: groundwater risk assessments.

The Environment Agency uses a risk-based approach when carrying out groundwater risk assessments. The risk for each site will depend on a number of factors, including:

- vulnerability and sensitivity of the underlying groundwater
- depth to the water table

- proximity of groundwater abstractions, particularly those used for drinking water or food production purposes
- proximity to watercourses and wetland habitats
- aquifer type and local hydrogeological conditions
- number and density of burials
- burial techniques employed

We will be happy to undertake an initial Tier 1 assessment on behalf of the applicant. Please could you kindly request that the applicant provides us with a map of the cemetery extension area, any anecdotal information from the local grave diggers as to the shallow subsurface soil types i.e. sandy, clay rich etc and the presence of water. We also require the estimated number of burials per year.

Comments following Tier 1 assessment:

We have no concerns regarding the proposal and consider it low risk. This assessment has been undertaken without any site visit and is based on a desk study only. As such we have not been able to confirm and rule out the proximity of ditches and any field drains as such we would like to reiterate that we do not allow burials within 10m of field drains and ditches.

4.6 BDC Environment Management Officer:

Neither a land assessment nor air quality assessment have been submitted. It is standard practise for an assessment of land quality to be submitted with an application of this size and I would also expect an air quality assessment as well.

Comments on amended plans:

The report that has been submitted is titled supplementary and in the introduction refers to a previous report that has been produced for the site. This has not been submitted and I would like to see this before I consider the submitted report as the one report provides the background information to the supplementary report. Can you ask for this to be submitted please?

Comments on Additional Site Investigation Report:

I have read through the reports submitted for the site and feel that, based on this information there is a need to add a condition to require a site investigation in particular for the areas referred to in the reports.

Comments on Air Quality Assessment:

The report is satisfactory and covers the points previously raised. The report recommends some mitigation measures in relation to the construction phase which should be followed and incorporated into a Construction Management Plan. A condition should be imposed to reflect this.

4.7 Highway Authority

Thank you for consulting the Highway Authority in respect of the above planning application. I have reviewed the submitted documents and would comment as follows:

It is the view of the Highway Authority that this application should not be considered separately from application reference 20200469 (proposed highway improvements at Broomhill Lane, Reepham).

The Highway Authority is aware of a third planning application (reference 20200795) by Lovell, at the corner of Broomhill Lane and Whitwell Road which also needs to be considered.

It is noted that Policy REP1 allocates approximately 100 to 120 dwellings at this location. At 141 dwellings, this application exceeds the upper threshold of the allocation.

Improvements are required at Broomhill Road to facilitate access to the proposed development. Those improvements should ensure that visibility splays are provided from Broomhill Lane to Whitwell Road. The visibility splays will need to be approved by the Highway Authority and must be dedicated as highway.

Section 3.2.5 of the TA states that 2.4m x 55m visibility splays from Broomhill Lane are possible both to the north and south at Whitwell Road. It is acknowledged that Lovell have purchased the property at the north corner of the junction and therefore control the required visibility land. It not clear that the splay to the south can be dedicated as highway and therefore can be achieved. The land required for both visibility splays must be dedicated as highway to ensure that it will be provided in perpetuity.

The application is supported by a Transport Assessment (TA). The TA includes an assessment of development generated vehicular movements, using TRICS. It is acknowledged that the usage of TRICS is an industry standard methodology. However the highway authority considers that the estimated vehicular trips appear low. This concern is compounded considering the characteristics of the location. The data set for assessment included suburban and edge of town locations. Reepham is a market town but

its transport characteristics are more akin to a large rural village, opportunities to travel by public transport are limited and there typically is a reliance on the private car. In this instance, TRICS does not appear to provide an appropriate selection of sites to provide a robust estimate of vehicular trips. Trip rates should be derived from a local traffic survey, location of which should be agreed with the Highway Authority.

Beyond estimating development trips, the TA contains no assessment of impact on the surrounding highway network. Further information is required on the impact of the development traffic on the local highway network.

Traffic flow data from an unclassified automatic traffic count survey has been provided for the period 24/01/19 – 30/01/19. The location of the survey is not defined and needs to be identified to ensure the data validity. It is noted that the same data is presented 17 times.

The provided traffic data shows clear traffic peaks associated with school journey times.

Reepham High School and College, located at Whitwell Road is serviced by multiple school buses, their impact on the network will be concentrated when leaving the site. This impact needs to be understood in the context of traffic from the proposed development.

The distribution of development trips does not appear to have been assessed. Further information is required based on census data, demonstrating how development traffic might distribute through the local highway network.

Traffic flows should be represented on flow diagrams, showing base traffic, base with background growth to 2026 (the end of the local plan period) and finally with the addition of estimated development traffic.

It is understood that at school peak periods, interaction between vehicle types can result in traffic queues forming at the School Road approach to the School Road junction with the B1145 Towns End/Station Road and Market Place, this is a concern not only in terms of network resilience but also in respect of the adjacent fire station. Visibility at the junction may be a constraint. A capacity assessment of the junction should be provided and that will need to be informed by a classified turning count including queue observations.

In addition to the above, consideration should be given to off-site highway works to mitigate the impact of the development. Mitigation might include, but not be limited to, a combination of:

- Part time 20mph speed limits in vicinity of the schools

- Improvement to the pedestrian crossing at Reepham Primary School.
- Improvements to public transport
- Localised road widening.

Broomhill Lane continues in a straight line beyond the extent of its formal construction, bisecting the site and then forms a boundary with the site as it continues west. Back Lane forms a junction with Broomhill Lane and heads southwards, bounding the west side of the southern section of the site. Those existing routes are dedicated highway and must not be affected by the development. Given the above, the Highway Authority is not of the view that the applicant has demonstrated that the impact of the development on the highway network will be acceptable and therefore requests a holding objection until such time that satisfactory responses to the above concerns have been received. I have not provided comment regarding the proposed development layout but will be pleased to do so following satisfactory resolution of the off-site highway concerns.

Comments on amended plans:

1. The unmetalled section of Broomhill Lane that runs through the open space isn't shown. The layout should clearly identify the position of the Broomhill Lane through the site. The section of Broomhill Lane which will run through the open space will require a TRO to prohibit access by motor vehicles.
2. Is there to be pedestrian access from the western end of the open space (adjacent the infiltration basin) to Broomhill Lane?
3. The section of Broomhill Lane to be improved to serve the site has not been drawn to the correct dimensions. The carriageway scales at 4.8m wide, whereas the improvements are to provide a width of 5.5m (albeit as above the carriageway may need to be increased in width beyond 5.5m). The upgrading of Broomhill Lane also shows radii of 10m at the junction of Broomhill Lane with the estate road, whereas drawing 0302-P11 has been drawn with 8m radii.
4. Visibility splays must be shown at all junctions. Where necessary widen the footways to cover the width of splays. The estate roads will be subject to a 20mph zone and consequently visibility of 2.4m x 33m is required.
5. The layout of the estate roads should provide a loop road of at least 5.5m in width. The layout currently only provides for a 4.8m wide loop road.
6. The horizontal alignment of the estate roads should contain vehicle speeds in line with the 20mph zone. However, many of the proposed roads are generally long and straight and will do little to contain speeds. To address this:
 - a) Alter the priority at the junction of the estate road with Broomhill Lane such the priority continues from Broomhill Lane around plot 54 and the road heading south passed plot 1 becomes the side road.

- b) Alter the priority of the estate road so that it continues around plot 47, and the road serving plots 7-26 becomes the side road.
 - c) Adjacent plot 135 alter the priority of the estate road so that it continues around this dwelling (and the road heading west passed plot 128 becomes the side road). Alternatively retain the junction as proposed such that it forms a turning head and extend the type 6 road from plot 120 up to it.
 - d) Consider options to slow vehicle speeds on the section of road between plots 32 to 128 e.g. provide a pinch point with raised table positioned across the open space / unmetalled section of Broomhill Lane.
 - e) The section of road between plots 83 & 95 is unlikely to contain vehicle speeds. Consider options to redesign/amend the layout to contain vehicle speeds. E.g. amend the priority of the type 3 road so it continues around the north-eastern corner of the open space and lengthen the type 3 to around plot 106. A size 3 turning head would be required at the transition in road types. By changing the road priority adjacent the open space extend the type 6 road serving plots 66-78 up to the realigned type 3 road.
7. In light with the above the road serving plots 7-26 can be reduced to a type 6 road. Rather than provide a cul-de-sac, extend the road from plot 22 to the main estate road to provide a type 6 loop road.
 8. A pedestrian link is proposed adjacent plot 21 to Back Lane. If the road serving plots 20-24 were to remain private the general public would have no right to access this pedestrian link. Whether this road remains a cul-de-sac or becomes a loop road we would be willing to adopt up to plot 22 on the basis it provides a pedestrian link to the existing highway.
 9. There appears to be a pedestrian link to Back Lane adjacent plot 37. However, this just replicates the unmetalled section of Broomhill Lane that runs through the open space. Remove the new link adjacent plot 37 and upgrade the 25m long length of Broomhill Lane that connects to Back Lane.
 10. There appears to be a pedestrian link at the end of the private drive adjacent plot 16. However, this does not appear to connect with anything and would be reliant on access over private land to reach it. In the absence of evidence to suggest otherwise this should be removed.
 11. Is there a pedestrian link between the western side of the loop main loop road and the private drive serving plots 131, 140 & 141? As this is a private drive the general public would have no right to access along it to use the footway link. Also a link here just replicates the adjacent unmetalled section of Broomhill Lane. Remove the link to the private drive and upgrade the existing section of Broomhill Lane as necessary.
 12. The pedestrian links from the estate roads to Back Lane and Park Lane (e.g. adjacent plot 21 and through the cemetery extension) should take the form of 3m wide footway/cycleways.
 13. The transition in road types is incorrect – see adjacent plots 79, 82 & 120. Where a type 6 road has a margin the footway from the type 3 road should be extended at least 2m beyond the transition. See attached.

14. The transition in type 3 and type 6 roads will comprise a ramp and cannot therefore conflict with private accesses. See plots 79 & 81. 1
15. Where a 1m margin is to be proposed on a type 6 road similar to that adjacent plot 70, the carriageway should retain a width of 4.8m. If the developer wished to provide a 1m margin on two sides (e.g. to run services in) then the overall width should be increased to 6.8m over that section.
16. It is reasonable to assume the play area may result in some demand for parking, and this will lead to vehicles parking on-street. Provide a layby for at least 2 cars adjacent the play area.
17. The roads serving plots 55-61 and 121-125 are designed as type 6 roads but each serves less than 10 dwellings. For the avoidance of doubt these would remain private.
18. A size 5 turning head is required adjacent plot 123.
19. We would not normally accept no dig techniques in carriageway construction. It is noted the carriageway adjacent plots 1 & 38 conflicts with the RPA of existing trees.
20. It is suggested a tree is to be retained which conflicts with the access to plots 52 & 53. Amend the layout so the accesses are clear of the tree.
21. Plots 38, 47 & 51 are wheelchair accessible bungalows but only standard sized parking spaces are proposed. Amend the parking arrangements to provide suitable size parking spaces.
22. The parking space for the sub-station is barely 2m x 4m. This is too small. Enlarge the parking space so its suitable to cater for the size of service vehicle.
23. What size vehicle is likely to attend the pumping station? Design the parking space accordingly.
24. Show pedestrian access to all dwellings. How do pedestrians access plots 39, 40, 77, 78, 132 & 133? In these instances the parking spaces are up close to the front doors.
25. Size 3 turning heads should have 6m radii. This is of particular importance where the size 3 turning head forms a junction e.g. adjacent plot 19. The turning heads adjacent plots 22 & 121 fall short of standard dimensions. Ensure all turning heads are of appropriate size / dimension.
26. Ensure parking spaces between walls and fences are 3m wide.
27. Plot 1 – set the garage back 11m from the rear of the footway.
28. Plot 3, 46, 117 & 118 – why do the driveways join the estate roads at an angle. Accesses should be perpendicular and there is no reason why this cannot be the case in these instances.
29. Plot 13 – in the current layout the access to this plot conflicts with the transition in adoptable road and private drive. What is the type of transition between these two road types?
30. Plots 41-44 – Investigate options to provide 2 visitor spaces to the flats.
31. Plot 47 – This property appears to have two sets of parking spaces. One set on either side. Is this an error? As plot 47 is a wheelchair accessible

- bungalow the parking spaces should be located to provide easy access to the front door.
32. Plot 65 – the parking spaces are located to the rear of the property. These could lead to undesirable on-street parking in front of the dwelling, close to the adjacent junction. Amend the parking space or re-orientate the dwelling to better relate the dwelling and its parking.
 33. Plot 73 – while not strictly a highway matter the rear pedestrian access to this plot appears to conflict with an existing tree.
 34. Plot 131 – Serve this property with an access direct onto the western side of the main loop road and the private drive serving plots 140 & 141 can be reduced in length and provided with a size 5 turning head.
 35. Plots 137 & 138 – splay/re-align the access to the driveways to make it easier for cars to manoeuvre in/out. At present vehicles are having to turn greater than 90 degrees to enter/exit these spaces.
 36. The surface water strategy is reliant on drainage into ponds/infiltration basins. These features are located behind houses with little land available around them. How will these features be accessed for future management / maintenance?
 37. The majority of the open space comprises surface water features and/or is located to the rear of dwellings behind high fences with little natural surveillance. It is likely these areas will result in personal safety concerns

Comments on amended plans:

Thank you for forwarding the revised Transport Assessment [Rev 02] (TA) which I have now had the opportunity to consider.

We must not lose sight of the development needing to gain consent for planning application 20200469 before it can be accessed from Broomhill Lane and Whitwell Road. The Highway Authority continues to have concerns with that application, most notably provision of a visibility splay in dedicated highway, south from Broomhill Lane to Whitwell Road.

We previously discussed trip rates and the inability to carry out local surveys in the current situation. The proposed trip rates that were used at the Bradwell development are noted. Whilst the development locations are rather different, I agree the figures are robust and would support their use.

I note that analysis of the Broomhill Lane junction with Whitwell Road estimated that sufficient capacity is available to accommodate the development traffic. I also note that due to the current inability to collect representative traffic data, junction analysis has not been presented for the School Road junction with Dereham Road, Station Road and Market Place at Town's End.

Section 4.2.9 of the TA highlights that the morning network peak coincides with the school travel time. Section 4.2.8 states that 4 to 6 buses attend the school at his time.

I am advised that NCC organise 12 school buses that attend Reepham, 10 of those access School Road / Whitwell Road via the town centre. The Sixth Form Centre operates a further two buses that I understand access the site via the town centre.

Anecdotally, the buses traversing Whitwell Road cause congestion at the narrower sections of the road necessitating some 'give and take', and also at the School Road junction at Town's End. That congestion will not be represented in the junction appraisals, it is a function of the mix of vehicles at constrained sections of road.

Whilst the model results at Whitwell Road / Broomhill Lane junction do not forecast an issue, the assessment as above does not account for the effect of general congestion at Whitwell Road. It is also considered that traffic associated with the development would be likely to compound congestion at Town's End.

Traffic arising from the development, particularly during the morning peak period would conflict with school transport and compound the existing concern.

Section 4.2.5 of the TA discusses the potential for travel plan funds being used to support improvements to bus service provision.

It is suggested that a higher frequency bus service to Norwich would support the wider community in addition to development residents and enable sustainable travel choices, this therefore has the potential to reduce background flows in addition to development traffic. Reduction in background flows would improve opportunity for the local highway network to support development traffic.

Support for the bus service as described as above should be viewed as mitigation for the development rather than a function of the travel plan. The travel plan is seen as a means to reduce unsustainable travel from/to the development and should not be diminished to support development mitigation.

As you are aware, there has been much local concern regarding the development, this has been focused upon congestion at School Road / Whitwell Road and lack off opportunity for sustainable travel. Supporting the bus service to enable improved frequency would in addition to providing mitigation, seem to go some way to address those concerns and I would urge your client to consider it further, in addition to delivering a full travel plan.

Comments on amended plans:

I have now had a chance to review the revised drawings, specifically drawing 013-18-0302-P23. I would make the following comments:

1. While not strictly part of this application the proposed speed cushions on Broomhill Lane south of plot 53 should be repositioned away from the access crossing.
2. Access to/from the retained section of Broomhill Lane (in between the loop road) has been raised by local residents. It is recognised that the layout of the estate roads at the eastern end of the retained section of Broomhill Lane directs users into the junction. It is recommended the estate roads/bend are re-aligned further north-east such that the route of the retained section of Broomhill Lane coincides with the pram crossing across the southern arm of the loop road. Re-positioning the bend should also help address other comments with respect to access for larger vehicles by way of providing a greater length of straight road (adjacent plot 1).
3. To accommodate access along the retained section of Broomhill Lane from the north pram crossings should be provided either side of the loop road in the vicinity of plot 54.
4. The forward visibility splay around the southern side of plot 54 provides a 4m wide footway. A verge can be provided adjacent the carriageway to maintain a uniform footway width.
5. Revised track runs do not appear to have been submitted in support of the revised layout.
6. What is the intended width of the loop road? The majority of the width is 6m, whereas the section between plots 39-47 appears to be closer to 5.5m. If a 6m wide road is proposed over the majority of the loop road, the same width should be continued around the whole loop.
7. The pinch point north of plot 38 should be provided with a raised table, to allow at level crossing of the retained sections of Broomhill Lane
8. Given the priority of traffic is likely to be to the west the turning head fronting plots 79-81 should be designed as a side t facility. With this in mind, the bend around the north-east corner of the open space should have a centreline radius of at least 20m. The radii between the main arm and the side arm (the junction serving plots 66-79) can be reduced to 6m.
9. There is still a pedestrian link at the end of the private drive adjacent plot 16. However, this does not appear to connect with anything and would be reliant on access over private land to reach it. In the absence of evidence to suggest otherwise this should be removed.
10. The pedestrian/cycle link through the cemetery extension has been re-routed. Why? The majority of users of this link are likely to want to head north toward the town centre. The current proposed alignment takes users off their desire line and provides less personal security e.g. little overlooking and through trees. The original route was direct, short and more conspicuous.

11. The type3/type 6 road transition adjacent plot 82 will need to be re-positioned slightly further west so it does not conflict with the access to plot 82.
12. What size vehicle is likely to attend the pumping station? The pumping station does not appear to have any dedicated parking provision. Design the parking space accordingly.
13. Size 3 turning heads should have 6m radii. This is of particular importance where the size 3 turning head forms a junction e.g. adjacent plot 19. The radii of the turning heads adjacent plots 17 & 58 are short of 6m.
14. Parking spaces served from type 6 roads should be 6m long.
15. While the road serving plots 121-125 would remain private, the garage for plot 121 should be set back to achieve 11m between the road edge and garage door.
16. The shared private drives serving plots 129 & 130 and 140 & 141 should have size 5 turning heads.
17. Set the garages for plots 135 & 136 back 11m from the rear of the footway, to allow two cars to park end on in front of them.

Comments on amended plans:

Thanks for your email and advising of new drawings. We have reviewed the revised site layout plan (drawing 013-18-0302-P25) together with the track runs. We would have the following comments:

1. The track runs identify multiple manoeuvres on each drawing. At times this can make it difficult to identify separate manoeuvres. For the junction adjacent plot 1 each left / right turn manoeuvre should be separated into its own viewport on the drawing.
2. The junction adjacent plot 1 remains unchanged. As you'll be aware from earlier correspondence we have raised issue with this junction in terms of its layout/alignment (primarily associated with access for larger vehicles). Local residents have also raised issues surrounding maintaining access to/from the retained section of Broomhill Lane (in between the loop road).
 - a) While there may be an acceptance that refuse (and other larger) vehicles at times have to manoeuvre within the whole width of the carriageway, the junction adjacent plot 1 is a primary point of access into the proposed residential aspect of the development, and the layout should be adjusted to minimise the potential for this to occur. The layout and track runs appear to show that there is an insufficient length of carriageway perpendicular to the primary access which results in large vehicles having to sit across the whole width of carriageway while waiting to exit onto Broomhill Lane. In turn this hinders access for other vehicles wanting to turn left and head south passed plot 1. For the type of road proposed we would normally expect the side road to be perpendicular for around 20m.
 - b) The layout of the junction adjacent plot 1 directs users exiting the retained section of Broomhill Lane into the junction. Conversely, there appears to be

no clear access desire line for users to head east-west from the improved to retained sections of Broomhill Lane.

c) To accommodate access along the retained section of Broomhill Lane from the north pram crossings should be provided either side of the loop road in the vicinity of plot 56.

d) To address the three points above it is recommended the junction/bend is re-aligned further northeast, such that the length of perpendicular carriageway on the side road is increased, and the route of the retained section of Broomhill Lane coincides with the pram crossing across the southern arm of the loop road.

3. The pedestrian/cycle link through the cemetery extension has been re-routed. Why? The majority of users of this link are likely to want to head north toward the town centre. The current proposed alignment takes users off their desire line and provides less personal security e.g. little overlooking and through trees. The original route was direct, short and more conspicuous.

4. What size vehicle is likely to attend the pumping station? The pumping station does not appear to have any dedicated parking provision. Design the parking space accordingly.

Comments on amended plans:

To be frank I am not comfortable with the stance that the applicant is taking. You will be aware that we agreed an approach to assessment and mitigation of impact of the development at a time when collection of new traffic survey data was challenging and the scope of the traffic impact assessment reflects that. Following appraisal of the submitted documents and local representations, it has become clear that the road between the development and the B1145 at the town centre is subject to width restrictions and unusually heavy use by buses (servicing the High School and College) at peak periods. There is also local concern with the route between the development and the A1067 to the south. The Transport Assessment (TA) includes a model to estimate the development impact at the Broomhill Lane junction with Whitwell Road. Whilst I acknowledge the model demonstrates the actual junction has sufficient capacity to accommodate development traffic accessing Whitwell Road, the TA does not demonstrate the local network is able to accommodate that traffic. By providing a contribution to support the existing local bus service and increase its frequency of operation, the developer would be helping to make sustainable travel a viable option to new residents, potentially reducing car trips from the development. It is not an unusual expectation that development will where required, support public transport in this way. It is also considered that improvement to the public transport offer would support existing residents to make sustainable travel choices, an increased uptake in bus travel might assist by creating space in the local network and as such help mitigate impact arising from the development. Given the concern associated with operation of the local network, if the applicant is satisfied that support for the local bus service is not justified, it would seem appropriate for

them to demonstrate this is the case. Traditional junction models would not demonstrate the effect of conflict between cars and buses over the route. I consider that a microsimulation model would be required to demonstrate the satisfactory operation of the constrained corridor. The model should include Whitwell Road and School Road, between the High School access and the town centre, along with the B1145 junction. You will also be aware that the Highway Authority is insistent that the visibility splay from Broomhill Lane to Whitwell Road must be provided prior to commencement of any work at the proposed development. It has not yet been confirmed that the required land can be secured. I hope this helps to clarify the position of the Highway Authority

Comments on amended plans:

With regard to the internal residential layout only (as per drawing 013-18-0302-P27) I can advise this is now broadly acceptable. However, since the amended plans were uploaded onto your website (03-02-2022) we have had further correspondence with the applicant and we are currently awaiting revised plans.

Final Comments made by NCC Highways 08/06/2022:

I understand that the site is allocated as REP1 in the 2016 Broadland Local Plan for up approximately 100-120 dwellings and this application represents an overage of 21 dwellings.

Satisfactory completion of the proposed highway improvements as per application reference 20200469 is essential prior to commencement of any activities at the housing development site to ensure safe operation of the highway.

Broomhill Lane whilst having the appearance of an unsurfaced footpath, is an unclassified road that connects through the site to a network of other unsurfaced roads to the west. This connection must be maintained and the historic alignment and character of the road should so far as possible be preserved where it passes through the proposed development.

An area of highway will require stopping up at plot 1 and also within the central area of open space. The stopping up must not be implemented prior to completion of the legal process.

The Transport Assessment (TA) revision 02 states that improvements will be provided to the road crossing at Reepham Primary School, this may include a road narrowing. The layout should be agreed with the Highway Authority and the improvement is required to be satisfactorily completed prior to first occupation of the development.

The TA also states that pedestrian and cycle signing will be provided between the development and town centre, this should be completed prior to first occupation.

The Highway Authority is aware of local concern regarding congestion at School Road / Whitwell Road during peak periods. It is considered the main contributors are localised road narrowing/highway constraints combined with bus transport to Reepham High School and College. These are not matters the applicant can resolve, nor are they of a severity that would justify a highway objection to the proposal.

Improved bus frequency would help to reduce impact of the development by encouraging modal shift away from private cars, this would also extend to the existing community and any resultant reduction in car use would help the network to accommodate the proposed development. The applicant has agreed a contribution of £100,000 towards bus service improvements, this should be provided prior to first occupation and secured through a S106 agreement.

The Highway Authority requires the developer to deliver a full Travel Plan in addition to the bus service contribution.

We are satisfied our layout comments have been satisfactorily addressed under drawing Number 013-18-0303 P7.

The Highway Authority would not wish to object to the proposed development subject to a S106 agreement securing the bus service contribution and the following conditions:

- SHC01
- SHC02
- SHC03A
- SHC03B
- SHC17
- SHC23
- SHC24A
- SHC24B
- SHC32
- SHC33A(1)
- SHC33B(1)
- SHC33A(2)
- SCH33B(2)
- SHC35A
- SHC35B

4.8 BDC Housing Enabling Officer:

The applicants are proposing to deliver 28 affordable dwellings which equates to 20% affordable housing. Therefore, it is noted that this is not a Policy compliant scheme. Given the complete lack of delivery of new affordable housing within the Parish (over the last decade - last affordable housing delivered within Reepham was in 2009 (x 11 units)) we would expect any scheme on an allocated site to deliver a Policy compliant scheme.

However, the proposed Affordable Housing mix does offer a good range of property types and sizes (and includes bungalows suitable for wheelchair adaptation) for rent and intermediate tenure. If the affordable housing was increased to deliver a more policy compliant scheme we would expect to see a more equal delivery of 1, 2 and 3 bedroom properties for rent. This would better meet current local and districtwide housing need.

The local housing need is an important point to take into consideration – particularly given the complete lack of affordable housing delivery within the parish in recent years. In general we would expect to see an increase in the number of applicants on the Council's housing list (with Reepham as one of their parishes of preference) should this scheme be granted planning permission. As with all allocated sites it is expected that up to a third of the affordable homes for rent would be for local lettings (at first let). Therefore giving allocation priority to Current residents of Reepham, then those who work in the parish or have a close family / welfare connection to the parish.

The main comment regarding the rented units would be to request that the applicants confirm that these meet Level 1 Space Standards. The minimum required space standards for the rental units are required so as to achieve maximal occupation in housing terms. Similarly we would prefer the delivery of the 4 bedroom unit as a 7 or 8 person house type – for the same reason.

The provision of good size affordable units will also mean that they are attractive to most RPs operating within the district. If the applicants can also confirm that all the w/c adaptable bungalows will have level access throughout (front and rear) widened doorways and corridors and will be provided with a true level access shower (with large size rectangular shower tray) or wet room. This is to ensure that they will be suitable for applicants requiring a w/c accessible property.

The only additional comment relates to whether the bin collection points for the affordable bungalows for rent will be proximal to the property. This is because, if any of the bungalows (or flats) are situated on a private drive, it must be noted that less able-bodied tenants may be unable to drag their bin to the collection point - even if drag distances have been kept to a minimum. So

if the applicants can confirm the location of the bungalows relative to bin collection points this would also be helpful.

Comment on amended plans:

I note the applicants are proposing a Policy compliant scheme of 28% Affordable Housing with a 65:35 tenure split (rent:intermediate) which is acceptable.

The proposed affordable housing mix is mostly acceptable but 2 x more 3 bedroom (6 person) houses for rent with a corresponding reduction in the 2B4P house types is requested.

For the rented units we would also require the 4 bedroom house to be 7/8 person so as to achieve maximal occupation in housing terms. We have noted that delivery of smaller 4 bedroom house types excludes larger households from being able to bid on such properties.

As the rented units all meet or approach the required space standards (Level 1) these will be acceptable to RP's within the district.

Similarly for any bungalows - as well as meeting minimum space standards - these will need to be Part M Cat 2 /3 with level access throughout, widened corridors and doorways throughout (900mm) and wet room (or true level access shower). This avoids the needs for future DFG works for w/c users nominated to the property.

Intermediate tenure as Shared Ownership x 14 (35%)

7 x 2 bed house

6 x 3 bed house

1 x 4 bed house

The proposed mix for the shared ownership units would seem to be acceptable - however as we hold no data around the need for AHO products we do not advise on the mix.

As per the Council's Housing allocation scheme (Appendix 4) up to a third of the rented units will be for local lettings (at first let) - giving allocation priority to current residents of the parish (then working in the parish and close family / welfare connection).

Comments on amended plans:

Thank you and both of these changes are greatly appreciated so as to deliver the suggested AH mix:-

Affordable units for rent x 26 (65%)
1 x 1 B2P w/c bungalow *
4 x 1 B2P flats 2 x 1B2P house
1 x 2B4P w/c bungalow * 10 x 2B4P house
1 x 3B5P w/c bungalow * 5 x 3B6P house
2 x 4B7P house (115m2)

Intermediate tenure as Shared Ownership x 14 (35%)

So the above Affordable Housing mix is now acceptable.

*Similarly for any bungalows - as well as meeting minimum space standards - these will need to be Part M Cat 2 /3 with level access throughout, widened corridors and doorways throughout (900mm) and wet room (or true level access shower). This avoids the needs for future DFG works for w/c users nominated to the property. It has been suggested that to ensure the bungalows for rent are w/c accessible this could be secured via the AH clauses within the S106 (as used for other recent sites).

4.9 Lead Local Flood Authority:

Object in the absence of an acceptable drainage strategy.

Comments on amended plans:

The email response from Rossi Long to the LLFA provides a detailed response to the points raised in the LLFA's consultation response of 4th May 2020 (Our Ref: FW2020_0321). In addition, it came to light that the Flood Risk Assessment submitted with the application quoted an incorrect number of dwellings in the text. The revised version of this report submitted corrects this typing error.

Additional infiltration testing at the depth and locations of the infiltration basins from July 2020 has been provided, and this demonstrates that the rates are viable for the basin to function as intended. An alternative strategy has not been proposed as this was dependant on the infiltration rates not being suitable. Accordingly, a greenfield run-off has not been considered as the proposal is to infiltrate.

With regards to the Surface Water Management Plan, the response from Rossi Long states that there are four small areas of surface water flooding indicated which have been considered as follows. These are generally associated with paths/tracks and field boundaries. The northern most path would be maintained on the far side of garden fences. The southernmost and westernmost are not in an area being developed and will continue to flow through POS if they are not already managed by interception by the onsite

drainage system. The remaining two are associated with the track running through the site which is in a corridor being maintained. These are also in locations where the incorporation of site drainage is likely to remove the potential for it to occur in the future. Routing arrows have been shown indicating the potential exceedance routing. In some locations the level design will need to account for potential exceedance flows and these can be seen on the attached plans.

Calculations previously provided show that there will be no flooding at 3.33% AEP and at 1% AEP events. These have not been re-modelled as the revised infiltration testing shows rates that are as good or better than anticipated. The original calculations showing no flooding are therefore validated by the subsequent testing.

We requested details of how all surface water management features were to be designed in accordance with The SuDS Manual (CIRIA C697, 2007), or the updated The SuDS Manual (CIRIA C753, 2015), including appropriate treatment stages for water quality prior to discharge. Water from driveways is to be passed through permeable paving which is appropriate mitigation for the risk. The greatest risk comes from the highway and the system incorporates a swale / forebay section to the main basin. However, the grounds give 300mm of natural filtering medium under the basins. The southern basin doesn't have a forebay but only receives water from a relatively small area of residential cul-de-sac which represents a lower risk than the main site roads. The basins also have appropriate side slop gradients and incorporate level benches for additional safety.

For the consideration of exceedance, the topography of the site means that high depths of water should not develop. The standard 150mm that FFLs are set above ground levels should be more than adequate in light of the topography.

A Management and Maintenance plan has now been submitted. The basins will be privately managed.

We can therefore remove our objection to this Full application subject to conditions.

4.10 Natural England:

Further information required to determine impacts on designated sites.

As submitted, the application could have potential significant effects on the Norfolk Valley Fens Special Area of Conservation and its nationally designated component Booton Common Site of Special Scientific Interest (SSSI), as well as on Whitwell Common SSSI. Natural England requires

further information in order to determine the significance of these impacts and the scope for mitigation. The following information is required: Further information on potential recreational impacts to Booton Common SSSI and Whitwell Common SSSI. Further information on potential hydrological effects to Whitwell Common SSSI. Without this information, Natural England may need to object to the proposal.

Comments on amended information:

The Habitats Regulations and SSSI Assessment

Norfolk Valley Fen SAC, Booton Common SSSI and Whitwell Common SSSI are within close proximity to the proposal and Booton Common is accessible via a series of public footpaths. Whilst we recognise that access to these sites is limited, it is still possible that residents will visit as they are closely located areas of accessible greenspace and space such as this has become increasingly more important over the past year.

We refer to our previous advice letter written on the 13th May 2020 (our ref: 315504) which requested further information about how onsite green infrastructure and footpaths would connect with the wider network and landscape. Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Connecting onsite footpaths with the surrounding network and accessible green space would present opportunities for recreation whilst reducing impacts at designated sites. We advise that the proposal includes advertised and signposted routes which connect to the wider network and links to alternative greenspace to reduce recreation impacts at surrounding designated sites.

Water quality

We understand from paragraph 3.15 of the Habitats Regulations Assessment that the proposal will be connected to the mains for both water supply and foul water drainage.

We support the use of sustainable drainage systems as recommended in the HRA and in line with site allocation policy REP1. These systems can be used to create wetland habitats for wildlife in an attractive aquatic setting. We

advise that this is considered and incorporated into the design, the CIRIA guidance provides useful information about integrating SUDs and biodiversity.

The maintenance of SuD's should be provided for the lifetime of the project.

We advise that the relevant water companies and Environment Agency are contacted to confirm that there is sufficient capacity to supply the proposed development.

Protected species:

Refer to standing advice.

Net gain:

Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. We draw your attention to Para 170, point d and Para 175, point d of the National Planning Policy Framework which states that:

Para 170 "Planning policies and decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures".

Para 175 "When determining planning applications, local planning authorities should apply the following principles: d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity".

Natural England considers that all development, even small scale proposals, can make a contribution to biodiversity. Your authority may wish to refer to Technical Note 2 of the CIEEM guide which provide useful advice on how to incorporate biodiversity net gain into developments.

4.11 NHS STP Estates:

The proposed development is likely to have an impact on the services of 1 GP practice and its branch surgery, the Norfolk and Norwich University Hospital, Mental and Community Healthcare operating within the vicinity of the application site which if unmitigated would be unsustainable. Healthcare contributions of £283,585 should be sought to contribute to the provision of

sustainable healthcare services in the area, particularly for the additional residents generated by development growth.

Broadland District Council has advised that Healthcare is not currently contained on their CIL123 list, consequently, until this policy is addressed, it is confirmed mitigation cannot be obtained for healthcare. The STP understands this matter is now being considered through the Greater Norwich Growth Board forum. The STP and partner organisations do not have funding to support development growth; therefore, it is essential this is resolved as a matter of priority, in order to effectively mitigate development impact and maintain sustainable primary healthcare services for the local communities of the Broadland area.

Assuming the above is considered in conjunction with the current application process, the STP would not wish to raise an objection to the proposed development.

4.12 Norfolk Constabulary:

Central Government place great emphasis on the role of the Police. The National Planning Policy Framework (NPPF) gives significant weight to achieving inclusive and safe communities (in section 8 of the NPPF).

Norfolk Constabulary have the responsibility for policing, making Norfolk a safe place where people want to live, work, travel and invest. A key element of this is ensuring that crime and disorder does not undermine community cohesion (and quality of life). To achieve this, it is necessary to ensure that the necessary police infrastructure is available. Whilst the police base is relocating in Reepham, Norfolk Constabulary have highlighted that this application represents a significant amount of growth in Reepham and this will place additional pressure on police resources. To address this, further investment will be required to enhance the capacity of the police (notably with regard to recruitment, uniform / equipment and vehicles provision). Therefore the impact on policing of the proposed development needs to be fully addressed to ensure that the developer contributes to the necessary infrastructure required by the police to deliver a safe and secure environment and quality of life (and limit crime and disorder and the fear of crime) for future residents

4.13 Norfolk Constabulary Architectural Liaison Officer:

The design and access statement makes no reference to secure homes and environment but the layout has incorporated design principles that address crime prevention. The development is not overly permeable and assists the prevention of easy intrusion. The looping access road allows for dwellings to view their surroundings and the proposed mix allows for a greater potential for

homes to be occupied throughout the day increasing the opportunity for natural surveillance.

Path next to plot 37 is not necessary. Communal areas should allow natural surveillance and there are some areas of amenity space adjacent to the rear of properties which offer less observation which can increase the potential for crime and noise/nuisance. Where dwellings abut these areas it is advised that there is a robust rear and side boundary of 1.8m. Garden gates should be lockable and the same height as the fence and located on or near the front of the property.

Windows should be provided in gable ends and or defensive planting provided.

Vehicle parking has been provided within the dwelling boundary which is secure design and wholly supported.

4.14 Norfolk County Council (Historic Environment Service):

Based on currently available information the proposed development will not have any significant impact on the historic environment and we do not wish to make any recommendations for archaeological work.

4.15 Norfolk County Council (Minerals and Waste):

The County Council in its capacity as the Mineral Planning Authority objects to the planning application unless a condition to require site investigations, assessment, and a Materials Management Plan-Minerals to be prepared for the application site (to estimate the quantities of material which could be extracted from groundworks and reused) is included in any grant of planning permission.

4.16 Norfolk County Council (Natural Environment Team):

Objection. The extent to which the badger sett and badgers will be affected by the proposals has not been fully assessed or adequately addressed through mitigation and enhancements. It is also considered likely that during operation, proposals will potentially lead to offences under the Protection of Badgers Act 1992, and in the worst case, the abandonment of the sett. We therefore object to the proposals as submitted and recommend, in accordance with the legal protection afforded to this species, Natural England guidance, national and local planning policy, that greater consideration is given to the protection and enhancement of the site for badgers.

Ecology Assessment and HRA Summary:

The ecological information submitted is broadly fit for purpose. Impacts from (street) lighting can be addressed through a suitable lighting condition, as can the inclusion of integrated bird and bat boxes, and hedgehog gaps in fences (as recommended in the Ecological Assessment, Hopkins Ecology, 2020). The HRA is broadly fit for purpose.

Badgers:

Legal protection: Badgers and their setts are protected by the Protection of Badgers Act 1992. Offences relevant to development works include: wilfully injuring or killing a badger; disturbing a badger while it is in a sett; intentionally or recklessly damaging or destroying any part of a badger sett, or obstructing access to a sett.

Survey:

The badger survey (undertaken in August and January) notes a main, active, badger sett, within the site boundary. There was no evidence of badger foraging activity onsite and it is believed that the main foraging areas are offsite.

Mitigation strategy:

The Badger Survey and Mitigation Strategy (Hopkins Ecology, 2020) details the mitigation strategy during construction only. A separate strategy will need to be prepared to address landscaping and ongoing maintenance. This could be secured at an appropriate time through a condition.

Compliance with legislation:

While the Site Plan show the scheme's design has avoided the sett as shown on DWG Dwg 013-18- 0101 we are concerned that the proposals, as submitted, will have a negative impact on the badger sett and the badgers themselves due to the proximity of the main sett to the development, disturbance during construction, disturbance during operation and potential fragmentation.

Comments on amended plans:

Despite the ecology report noting the intention to allow encroachment of the sett area by blackthorn to help deter humans and dogs this is not shown on any plans, and details of the soft landscaping proposals have not been submitted. Combined with the accommodation plan showing the area around

and on top of the sett as 'Recreation Area E', I remain concerned that badgers in their sett will be disturbed.

Subject to the removal of recreational area E is from the plans and measures put in place (e.g. fencing and signage, and landscaping) to prevent public access to this area and prevent disturbance offences being committed under the Protection of Badgers Act 1992, there are no ecological objections. In accordance with ODPM 06/20053 this should be addressed prior to determination.

Please note that consideration will need to be given to the design of the area so as to ensure that it does not become a focus for anti-social behaviour (see Norfolk Constabulary 28/04/20). Measures to enhance the area for badgers, in accordance with Policy EN1 such as appropriate planting, should be submitted in support of the application or conditioned as part of the soft landscaping scheme. Consideration also needs to be given how residents and the badgers will live side by side. The presence of badgers onsite could cause conflicts with residents if, for example, the badgers dig up the lawns searching for food or dig latrines. Buyers should be made aware of the badgers and a condition secured ensuring they are provided with guidance on badgers.

At the appropriate time, should the application be granted the following conditions would also be suggested:

- CEMP: Biodiversity (including lighting) and ECOW supervising digging within 100m of the sett
- LEMP
- Biodiversity Enhancement Plan

Please can we also be consulted on the soft landscaping plan and the detailed designs for surface water and drainage scheme (Note the Amended flood risk assessment, External Works Drainage Proposals sheets 1 of 3 (revision P5, 2 of 3 and 3 of 3 have been reviewed).

Broomhill Meadows County Wildlife Site (CWS):

I have read the comments by the owner of the CWS and would draw to her attention the amended flood risk assessment which may help explain the hydrology of the CWS. I note the LLFA have removed their objection. A review of Norfolk County Council's mapping browser confirms that there are no Public Rights of Way leading to the CWS. In this instance recreational impacts on the CWS is not a planning consideration as the site is not publicly accessible.

It is widely acknowledged that cats predate wildlife but there is no scientific evidence that cat predation is causing bird populations to decline (declines have however been brought about by habitat change or loss, particularly farmland). Mitigation and enhancements are required in accordance with planning policy, and should consent be granted, will be secured as part of the scheme. Additional nesting opportunities will be provided within the development for species such as house martins and swifts, house sparrows and additional hedge planting and trees will provide further nesting opportunities and foraging habitat. Gardens are also an important habitat for many bird species – and there is evidence that feeding birds in the garden has increased populations of an array of species.

Other: Norfolk Trails – the Marriots Way circular walk runs along an unclassified road (UCR 57279), which will be affected by the proposal. Michelle Sergeant (PROW officer at NCC) has been made aware of the application and will provide comments from a Trails perspective.

4.17 Norfolk County Council (s106 and CIL):

Education:

There is spare capacity at Reepham High School & College but there is insufficient capacity at Reepham Primary school and just two spare places in the Early Education sector. It is expected that the funding for additional places if necessary, would be through CIL as this is covered on the District Council's Regulation 123 list.

Fire:

This development will require 1 fire hydrant per 50 dwellings at a cost of £843 per hydrant, which should be dealt with through condition.

Library:

New development will have an impact on the library service and mitigation will be required to develop the service, so it can accommodate the residents from new development and adapt to user's needs.

Green Infrastructure:

Connections into the local Green Infrastructure (GI) network, including Public Rights of Way and ecological features, should be considered alongside the potential impacts of development. Direct mitigation and GI provision should therefore be included within the site proposal. Mitigation for new and existing GI features identified as strategic shall be funded by the Community Infrastructure Levy (CIL) through the Greater Norwich Investment Programme.

These requirements for consideration and implementation, for both on and off-site GI provision, will help the local GI network to facilitate the development without receiving negative impact and equally, allow the development to integrate and enhance the existing network. Green Infrastructure within this proposal should respond to the Greater Norwich Green Infrastructure Strategy (2007) which informs the Joint Core Strategy, adopted January 2014. Development proposals are expected to fit with strategic visions for the area and respond to corridors as outlined in the Joint Core Strategy. Should this development intend to be the first phase of a larger development or vision, consideration will need to be given to how the local GI network will be impacted, adapted and enhanced in the future

4.18 Norfolk Wildlife Trust:

We support the comments made by Natural England with regard to potential impacts on Booton Common SSSI and Whitwell Common SSSI, with regard for further information being required to assess the hydrological and recreational impacts on these sites. NWT manages Booton Common, which has limited public access and it is our view that increased access may lead to damage to sensitive habitats on this SSSI. These include species rich fen and wet heath, both of which are susceptible to trampling.

We understand that others have raised the issue of badgers being present in the vicinity. Impacts on badgers need to be fully addressed and if necessary there should be a greater buffer between any sett and the development.

4.19 BDC Place Shaping Manager:

Number of dwellings:

The 141 dwellings proposed within the application exceeds the 100-120 referred to in the allocation policy. I understand that as such you have advertised the application as a departure, which I think is a sensible precaution. That being said, just because there is a conflict with the allocation policy it does not necessarily mean that the application would not accord with the development plan taken as a whole. In this instance there are a number of other development plan policies that must be taken into account:

- JCS Policy 1 specifically seeks to ensure that development makes the most efficient use of land.
- JCS Policy 14 identifies Reepham as a Key Service Centre suitable for 100-200 dwellings. The particular constraints to development in Reepham being identified as school capacity and capacity at the waste water treatment works. The actual number of homes allocated in Reepham was 140 across two sites.

In respect of Policy 14 and the identified levels of development in Reepham, it should be noted that Policy 4 of the JCS identifies the requirement to identify allocations to ensure “at least” 36,820 homes can be delivered. The potential contribution of future windfall was not taken into account in establishing the level of allocation needed within the JCS. Indeed it was acknowledged that some windfall would occur in addition to planned allocations. This is specifically referenced in the Inspector’s report on the JCS. Therefore, the possibility that further development may have occurred which are consistent with, or exceed the JCS figure does not, in my mind, necessarily create any tensions with the strategic policies of the JCS. I’m minded that a strategic issue would only potentially arise when the scale of development proposed substantially exceeds that which would be appropriate for a certain settlement in the context of its status in the hierarchy.

It is also notable that the Council’s responses to the Inspectors questions on the Site Allocations DPD refer to the figure of 100-120 as a “reasonable estimate”. This was no doubt an estimate that assume on-site provision of a sports hall. In my reading of the policy and the responses to examination questions I do not see that the 100-120 was intended to be seen as a cap, indeed the policy itself refers to “approximately 100-120 homes”, which implies some degree of flexibility.

Therefore, on the basis of the information I am aware of I am not minded that the increase from 100-120 to 141 dwellings of itself means that the applications should be considered contrary to the adopted development plan when taken as a whole.

It is of course important to recognise that there may be site specific issues which may limit the overall scale of development that might be achieved on site. At the plan level, the particular issues identified included school capacity, waste water disposal and highways. It is relatively well established now that in paying their contribution to CIL, which can be used to support the provision of school facilities, and provides land as necessary for school expansion, that limitation on school capacity are not normally a justifiable reason for refusal. The situation here is slightly complicated given the proposal to provide the sport hall within the school grounds rather than on land which forms part of the allocation. I’ve address this issue separately below.

In regards to waste water capacity and/or highway safety/the satisfactory functioning of the highway network, I anticipate that consultation on the application is being undertaken with the relevant technical stakeholders who will be best placed to advise on these issues.

Provision of affordable housing:

The process for determining the acceptability of a reduction in affordable housing is well established in accordance with criteria set out in Policy 4 of the JCS. I have not reviewed the particular justification advanced for the reduction in levels of affordable housing in this instance.

Off-site provision of sports hall:

Whilst the policy of the SADPD allocates the land for residential and community facilities, I am not minded that this precludes provision of said facilities off-site, particularly if this better meets the needs of the school and the housebuilder. The guidelines for development seek the “provision of a sports hall for the High School to be located in proximity to existing school facilities”.

I anticipate that this requirement was conceived in the context of on-site provision but the off-site provision of a facility on the school site itself would seem to be consistent with the outcomes that the policy was seeking to achieve if not the same exact output.

From our conversation it would seem, in principle at least, that the provision of the new sport hall adjacent to the existing school car park would work better for the school as it would make it easier to control access and enable community access out of school hours utilising the existing school car park. It would also prevent users accessing the new sports hall via Broomhill Lane and through the new housing estate, which you advise may have highway benefits and benefits to the amenity of current occupants of Broomhill Lane and the new estate itself.

My concerns around this approach is as to whether it meaningfully reduces the potential for the school to expand in the future or if it increases risks around delivery. In respect of the former, I note that extension to Reepham high school, otherwise than in connection with a sports hall is not identified within the latest iteration of the Greater Norwich Infrastructure Plan. It may be that there is an anticipated strategic need to safeguard the expansion of the school beyond the horizon of the GNLP. However, I assume Norfolk County Council are being consulted as part of the application and will be able to advise accordingly.

In terms of deliverability, I note that the headteacher of Reepham High School has recently been quoted in the press as saying the facility would not likely be to start within 5 years, if at all. Clearly, I am not aware of the accuracy or context of this quotation. However, if the school has significant concerns over the deliverability of the proposal then it would seem sensible to give

consideration as to whether it would be better for the Council to secure land alongside a financial contribution so that it has more direct control over delivery, and that any triggers for the recovery of funds by the developer are set at a reasonable timescale given the potential complications around delivery.

Additional comments:

The site is allocated for residential development and community facilities in the Site Allocations DPD under REP1. Applications should be determined in accordance with the development plan unless other material considerations indicate otherwise. It is understood that the previous use of part of REP1 adjacent the school, as school playing fields, has already been compensated for through a land swap with the school and alternative provision by them on the land passed to the school; with the former playing fields that were "swapped" to become agricultural use, though the landowner permitted some recreational use to continue for a temporary period. Therefore, there is no material consideration in the "loss" of the former school playing fields that might outweigh the allocation in the development plan.

Also, if it is accepted that land is no longer needed within the area of REP1 for a sports hall for the school, as the school's intention is now to provide it within the school's grounds, then this would be a significant material consideration for not retaining an area for a sports hall within the REP1 area. No specific area for the Sports Hall was identified in REP1 and consequently the alternative allocated use of residential is acceptable in principle. Therefore, it is reasonable to expect that the development of REP1 can accommodate more than the approximately 100 -120 dwellings that was suggested in the allocation policy, which itself was not a maximum amount. In conclusion, although there are conflicts with the REP1 policy there are significant material considerations, relating to land for a school sports hall no longer being required, that outweigh these conflicts

4.20 BDC Senior Heritage and Design Officer:

Within the National Design Guide an important aspect of new development is to create an identity and sense of place. Under C1 development proposals should "understand and relate well to the site, its local and wider context'. Para 42 states "Well-designed new development is integrated into its wider surroundings, physically, socially and visually. It is carefully sited and designed, and is demonstrably based on an understanding of the existing situation."

The conservation area appraisal gives some information on the character and appearance of Reepham as a small Norfolk market town, formed with a compact core of historic buildings. To the south and east sides the

conservation area extends out to include areas of open countryside, and this provides a strong setting, although on the other sides of the town the appraisal states that development over the last quarter of the twentieth century has 'blurred' the old boundaries between town and country. The existing site is part characterised by this change from fairly spacious late C20 development of mainly detached buildings set back from the road within spacious curtilages, with peripheral paddocks and fields characterised by verdant tree planting and hedgerows. The school site to the south is a significant educational complex, of a sizeable scale as a more rural based school rather than solely for the residents of the town. The south parcel of land is currently part of the school playing fields. Although existing hedgerows provide strong boundaries, there are also good views from the main field towards open countryside, particularly towards the south west corner, which includes significant tree planting, some associated with the Marriots Way cycle/walking route.

Existing C20 expansion within Reepham frequently took place through building relatively small estates of housing with cul-de-sacs. Although these have combined to create quite a large area of C20th development around the more clustered historic core of the town, the result has been creating a distinctive localised character for particular areas. This has created to some extent 'pocket neighbourhoods', whether these are just streets of similar period of construction or the design of housing, or smaller housing developments, it gives a more localised feel to different parts of the town. An important consideration in the new development would therefore be to mitigate against the impact of the number of dwellings proposed through breaking down the development into smaller character areas based on creating smaller localised 'pocket neighbourhoods'. This could be done through for example prioritising certain types of houses or materials in particular parts of the development to emphasise distinctive changes at the more local level and associating areas with particular public spaces. This will help to break down the overall 'estate' feel of the development.

Being a peripheral area located close to attractive area of open countryside, the development should be considered more of a transitional area between town and country. In design terms it would be appropriate to avoid a hard rural edge as often existed in the past through regimented rigid building lines of compact housing with fencing, and instead create a more rural transition to the area where the 'rural edge' of the development has a more 'relaxed' and 'informal' rural feel as would have been the case historically. Landscaped edges utilising existing landscape features such as existing hedgerows also provides the scope for recreation such as localised recreational walking. Also, within the development, I would suggest that it would be appropriate to utilise existing landscaping features or 'borrowed landscape', for example designing views to benefit from the changing land levels and views opening out of the estate to the south west. The overall feel of the development should be

spacious and varied grain of development with emphasis on landscaping, particularly to the south and west, to lend the area a more rural than urban feel to create this transition.

The National Design Guide states that (M1) “Successful development depends upon a movement network that makes connections to destinations, places and communities, both within the site and beyond its boundaries.” The existing main field boundary is currently well used as a circular walking route, connected to a footpath which leads to the Marriots Way. The existing field benefits from lush and verdant field boundary, and this is also the case with the existing school playing fields. These provide the opportunity to create circular walking routes around the estate which are already established through permissive paths and are well connected into the existing pedestrian movement network. There are particularly good views to the south west across open countryside which is well landscaped with trees association with the Themelthorpe Loop. Whilst being mindful of preserving the badger set area, the opportunity should be taken to provide as much pedestrian access as possible to the periphery of the site so that the sides of existing hedging is publicly accessible and viewed from public areas rather than being backed onto by fencing and inaccessible.

The principal spine road leading to the central space has been designed to be spacious and wide with tree planting which reflects the existing character of Broomhill Road and will assist in creating a good sense of place with a relatively coherent layout (taking on board suggestions and recommendations below.) The main vehicular and pedestrian links are via Broomhill Lane and the development continues with generous frontage space/gardens and landscaping that will be contiguous with the existing character of the lane. Front gardens and street scenes continue the existing character of Broomhill Lane. Parking is generally to the side of properties with no frontage parking and this will help to create attractive streetscenes and assist legibility. These are all positive aspects of the current scheme.

The Design Guide advocates that well-designed places should include: • well-located public spaces that support a wide variety of activities and encourage social interaction, to promote health, well-being, social and civic inclusion; • have a hierarchy of spaces that range from large and strategic to small and local spaces, including parks, squares, greens and pocket parks; • have public spaces that feel safe, secure and attractive for all to use; and • have trees and other planting within public spaces for people to enjoy, whilst also providing shading, and air quality and climate change mitigation.

Although in a larger development it may be appropriate to have a larger central focal point space than proposed here, I consider this may give the area more of an estate feel, and with regard to the existing character of Reepham it may be better to break down the character of the development

into the smaller more distinctive local neighbourhoods with associated smaller public spaces around which the neighbourhoods can to some extent coalesce. These space can link into the existing pedestrian movement network and taking the opportunity to open out with views to the wider open countryside to the south west to provide visual links. These spaces do not necessarily have to be at the centre of areas, but could be to the edge of the development if there are benefits from existing landscaping and views as well as access to existing nature. These peripheral spaces are already partly shown, but they are not clearly accessible and also partly backed onto private 3 gardens, some with irregular fencing. They could be improved as landscaped spaces with houses actively fronting towards the spaces rather than backing onto them.

There is quite a limited palette of materials for the present plan and although these materials are spread through the development to create variation, overall it generates a great deal of uniformity. Although there is some merit in a consistency of materials across the site for the overall character of the development and sense of place, I would suggest that there is a greater variety of materials, for example three kinds of red brick, and materials are also used in different ways to emphasise more localised neighbourhood character areas. Rather than spreading house types through the estate, it would be better to have a concentration/greater proportion of some house types in one area to lend that area a more distinctive character. There are a lot of smaller terrace houses on the edge of the development whereas some of these house could be located more centrally to avoid the harder and more edge to the development.

On a more positive note the affordable housing is fairly centrally located and accessible. However, this needs to feel like it is integrated into the 'pocket' neighbourhoods.

Building for Life Comments:

Integrating into the neighbourhood.

Although the scheme is connected to existing movement network, connections could be reinforced with attention to legibility and how movement could take place around the estate and onward connections to surrounding footpath network. Particular emphasis should be given to footpath network – particularly the main landscaped footpath track which is the continuation of Broomhill Lane – and it should be questioned whether it is necessary to cross the path twice with streets. The scheme is relatively well connected with existing facilities with the village, being within walking distance of all amenities, bus stop, and particularly the secondary school and there should not be car dependency. However, within the site walking routes could be made more legible and pleasant routes to walk to avoid car use and provide

access to nature. There is a good mix of housing types and tenures. The scheme can meet local housing requirements but that is subject to housing officer comments.

Creating a place

Although the housing types can fit in with the local vernacular, the overall feel of the estate will be quite generic, and with the amount of housing proposed this could create quite an estate feel. However, the development could be broken down into more specific character areas. A good aspect of the scheme is following on the character of Broomhill Lane and the peripheral area of the settlement in terms of front gardens and landscaping for the spine road. However, more attention could then be given to relating the development to surrounding landscape areas and making more use of the existing landscape character that exists, for example views through to the open countryside to the south west. Perimeter blocks could be designed to be more outward facing and to front onto public spaces, with the potential circular walking routes alongside hedgerows and linking into the surrounding footpath network..

Although the house types are generally based on Norfolk vernacular and have been used on existing development successfully elsewhere in the county, I am concerned that there is a lack of variety of materials for this development. Most of the estate is only specified as 'red brick'. Ideally for a development of this size and its more rural location, I would suggest greater variety in materials e.g. three different types of red brick from a choice of plain textured red brick with subtle colour contrast or brick blend, a 'mottled' brick or red richer red brick multi. These could be used in different proportions in different areas to give a more distinctive 'pocket neighbourhood' character.^{67 4} Some houses have soldier course lintels whereas character could be enhanced with gauged brick flat arches to match other houses in site or segmental round arches to create some variety in the building types.

Street & home

The development is designed with loop roads and short private drives, however some consideration could perhaps be given to creating a secondary loop system in the former playing field to the south and not linking back to the main field to avoid crossing the footpath/track twice. Resident and vehicle parking is generally well integrated into the streetscene with on plot side parking. As with above, public and private spaces are not clearly defined and more could be made of the perimeter blocks fronting out towards surround landscaped features such as trees and hedgerows with perimeter walking routes (with the exception of the cemetery space) If areas need to be protected or have a buffer such as the observatory, the badger sets or the suds area to the south west, these could be separated with hedging and/or estate style railings for example. Where houses front onto the site with the

play area there should be clearly legible divisions between public and private space. The central space should be fronted onto rather than having back gardens side on to it. Generally with the house builders it has been demonstrated elsewhere with the house types and back gardens there is adequate external storage space for bins and cycling.

Specific points made in respect of housing fronting on to open spaces rather than backing on and consideration of landscaping treatment. Preferable not to cross the unmade section of Broomhill Lane twice subject to highway comments. The last character area could be the east of the development site with central green and avenue as the key elements of the neighbourhood character, with housing designed to front towards the green to emphasise it as a focal point.

Conclusion

I consider that more consideration should be given to how the development utilises existing landscape features around the site and newly created public space within the site. In terms of pedestrian movement (footpaths) and access to make both the existing landscaping (and views) and newly created public space feel more integrated and more emphasis given to it in terms of being focal point and important feature of the development. The development could be divided up into more localised neighbourhoods to break up the 'estate' feel, for example dividing it into three distinctive character areas. Although to some extent these could merge into each other using the same house types and materials but different ratios for the different areas, so that there is both an element of more localised character as well as a more unified character across the site.

The loop roads and hierarchy could be altered to avoid two roads crossing the central existing hedgerow line and path. A separate loop could be created for the former playing fields area in the southern portion of the development. Either loop roads or cul-de sacs should be designed to be outward facing towards the peripheral public spaces and footpaths, as well as the central green, with associated footpath connection to make the spaces accessible.

Comments on amended plans:

I note that the character plan has house types and accommodation schedule, rather than materials or key townscape buildings/emphasised architectural detail etc that you would expect on a character plan – maybe that would be useful before commenting? – trust they are going to change it so that different areas within the plan have slightly different ratio of the materials used?

It is difficult to comment on the character areas as shown without knowing how their character will differ....e.g. it might be better to include the housing

with the red lines in the loop character area as it make the development in these locations look more cohesive. However, would be interesting to know quite how much character areas will differ or whether it is quite a subtle transition in terms of character – it may not matter so much on the edges.

Comments on amended plans:

Detailed advice provided on the detailing of dwellings ion the character areas in respect of headers and cills, windows etc.

Comments on amended plans:

The submission on further details developing the character areas and different combinations of window types and details should provide some more informal variations along streets whilst the development as a whole will have a cohesive sense of place. I am satisfied that with regard to house types, materials and arrangement within of dwellings within the layout with regard to orientation is acceptable.

One small and relatively minor point with regards to plots 21/28, which could benefit from an additional second, smaller window to the left of the porch as this is a plain an unrelieved area of brickwork and inactive part of the elevation – or potentially some other treatment .

It is a bit unclear with the colouring on the character plan what is consider public and what is considered private space within the ownership of the plot e.g. plot 135 – is this front garden in the ownership of 135? Otherwise it does appear as left over space.

The landscape plan does show some areas to the west with publicly accessible areas to the rear of rear gardens. This is still to some extent a secure by design issue – however it is appreciated that this is quite 2 thick landscaping and not readily publicly accessible. There is also some space to the side of the substation which will have the appearance of left over space which Building for a Healthy Life does suggest needs to be avoided.

Apart from the above comments I consider that the applications will meet the requirements of the NPPF, the National Design Code and Building for a Healthy Life with regard to Design.

4.21 Sport England:

The site is considered to constitute playing field, or land last used as playing field, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). As such Sport England is a statutory consultee.

The proposal relates to residential development for 141 dwellings, with associated infrastructure and open space. 2.1 hectares of the site comprises playing fields at Reepham High School. Evidence from Google Earth shows a rugby pitch marked out on this playing field. The school has a larger playing field of 5.1 hectares to the south of the school buildings, however Google Earth shows that this is marked out extensively with pitches and could not accommodate any additional pitches.

The Planning Statement refers to a proposal to site a sports hall on the remaining playing field, which would further reduce the capacity to accommodate winter and summer sports pitches on the playing field. At present, however, this application has not been submitted. Sport England has sought to consider the application in light of the National Planning Policy Framework (particularly Para. 97) and against its own playing fields policy.

Unfortunately there is insufficient information to enable Sport England to adequately assess the proposal or to make a substantive response.

The following is required: Existing and proposed winter and summer playing pitch layouts at the school. The loss of 2.1 hectares of playing field will result in an intensification of use of the remaining playing field, which could affect the quality and quantity of playing pitches provided. This information is requested to allow an informed assessment to be made of the impact of the proposals on the use of the natural turf playing field. At present the application does not meet any of the exceptions identified in our adopted policy or para 97 of the NPPF.

The Football Foundation/Norfolk FA have confirmed that there is no community use of these playing fields for affiliated football, but are interested in the potential for the proposed sports hall to be used for futsal, as there is demand for such a facility in this area.

Sport England's continued position on this proposal is to submit a holding objection, as it will result in the loss of 2.1 hectares of playing field, without meeting any of the exceptions identified in our playing fields policy. There is also concern that the loss of this playing field, added to further loss to accommodate a new sports hall, would result in the school having inadequate playing fields to meet its needs for outdoor sports pitches.

Comments on additional information:

Thank you for the additional information and amended sports pitch plans. The fact that the local authority has allocated the site for residential development does not mean that the proposal meets Sport England policy or para 97 of the NPPF. The proposal will result in the loss of 2.1 hectares of playing field,

which is currently used for rugby, and the application is therefore considered with regard to our adopted playing fields policy. 'Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field and remains undeveloped, or
- land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.'

The application is therefore assessed against these five exceptions:

Exception E1 - there is no existing up to date playing pitch assessment for the area which indicates a surplus of playing fields in the catchment area. The playing pitch strategy for the GNDP area was carried out in 2014 and is therefore now out of date.

Exception E2 - the development does not relate to ancillary development to the principal use of the site as a playing field, such as changing rooms or storage buildings.

Exception E3 - not applicable, as the land in question has been used for the siting of sports pitches within the last five years.

Exception E4 - not applicable, as the proposal does not include replacement playing fields for those to be lost.

Exception E5 - not applicable, as the proposal does not relate to a new indoor or outdoor sports facility.

Sport England's continued position on this proposal is to object to this application, as it will result in the loss of 2.1 hectares of playing field, without meeting any of the exceptions identified in our playing fields policy. There is also concern that the loss of this playing field, added to further loss to accommodate a new sports hall, would result in the school having inadequate playing fields to meet its needs for outdoor sports pitches.

We would be prepared to reconsider our recommendation if the playing field to be lost is replaced by equivalent playing field, in accordance with exception 4.

Should the local planning authority be minded to grant planning permission for the proposal, contrary to Sport England's objection, then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, the

application must be referred to the Secretary of State, via the National Planning Casework Unit.

4.22 CPRE:

Request made for an extension of time until the publication of a screening opinion. Areas of 20200469 and 2020795 should be included within the application to assess impacts of those. Lockdown will impact people's ability to participate.

Further comments received:

CPRE Norfolk objects to this application for the following reasons:

- The application is contrary to the Local Development Plan and the Site Allocations DPD (2016.) This is because, although the proposal includes the land within site allocation REP1 (land off Broomhall Lane, Reepham) it does not follow the requirements of that allocation. This is because:
 - a) The application seeks to increase the number of houses from the approximate range of 100-120 houses in total to 141, an increase of between 17.5% and 41%.
 - b) The application does not include a Sports Hall which is listed as being part of allocation REP1. Instead, it suggests (in the Design and Access Statement) that a Sports Hall will be built on another part of Reepham High School's playing fields.
- We are concerned by the high number of inaccuracies, mistakes and out-of-date and draft information submitted.
- We contend that the application is contrary to NPPF 127c which requires planning policies and decisions to ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change'. This proposal would see an artificial extension to the settlement of Reepham, with a suburban-style design and layout, out of keeping with the setting.
- We are concerned that the Planning Statement makes no mention under 'Ecology' of the existence of and potential impacts of the development upon, Booton Common SSSI and Whitwell Common SSSI.
- We have grave concerns about various aspects of the impacts the increased traffic associated with the development would have on road safety, the local road network and congestion.
 - h) The Transport Assessment considers this 600-650m 'as being within easy walking and cycling distance for most people.' Unfortunately, this will not

- be the case for a significant minority of residents, particularly some elderly and anyone with mobility issues.
- i) The application's Design and Access Statement makes the claim that 'the nearest bus stop from the site is located on School Road approximately 0.2miles (4-minute walk) from the site entrance and this provides frequent services into Norwich, Holt, and Fakenham.' This is not the case.
 - j) A major concern with the Transport Assessment is in the way that TRICS data has been used to forecast the number of car movements to and from the proposed development. This is largely because of the extremely unusual if not unique situation of Reepham. It is a historic town and yet is set within a network of 'B' and minor roads, without any railway station or other frequent public transport to all necessary destinations.
 - k) The forecast trip generation figures are therefore called into question, as they are based on samples which are not on the whole from similar locations and situations as Reepham. It is impossible to accept that a new development of 141 dwellings in Reepham would only generate an additional 67 combined arrivals and departures in the morning peak hour (08:00-09:00) and 69 in the evening peak (17:00-18:00), given the necessity for private vehicle use to get to and from most places of employment.
 - l) Reepham is set within a network of 'B' and minor roads, making it unsuitable for major development which would bring with it a significant increase in the number of car journeys, particularly for those travelling to and from work.
 - m) The TA's Conclusions make the claim that 'the proposed residential development is located within an existing residential area which is accessible by all means of travel' (7.2.1.) This clearly is not the case as the nearest bus stop (according to 7.1.11) is 800m walking distance from the site, while the nearest railway station (Norwich) is 14.7 miles away.
 - n) Access from Broomhill Lane onto Whitwell Road is unsafe, given the wall and narrow footway giving limited visibility to the north, towards the town centre
- we strongly feel that the proposed housing would be contrary to NPPF 103 as the development would not 'be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes'
 - The development and its reliance on private vehicles will do the opposite to what is called for in NPPF 148, where 'the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change.
 - Throughout the application documentation statements are made suggesting that the proposed development is part of the settlement of Reepham, or is within the existing residential area. This is not the case. The development would be a 'bolted' on estate within land which is clearly countryside.

- Reepham Primary School is currently full.
- The failure to include a Sports Hall in the application is a major concern, in part as this makes it contrary to the Local Plan.
- The current adopted Local Plan, the Joint Core Strategy, has a policy of developments of over 16 dwellings providing at least 33% of houses as 'affordable', rather than the just less than 20% offered as part of this application.
- We are also concerned about how public consultation has been used for this application.

Comments on amended transport statement:

This amended transport statement, like its predecessor, fails to understand the nature of traffic on Whitwell Road/School Road, or fails to provide an accurate assessment of this.

- The revised transport assessment acknowledges that traffic peaks at both school drop-off and pick-up times (5.6.2), yet fails to produce survey evidence to illustrate the severity of this issue.
- The claim is made that as the proposed development is close to the primary school and high school that 'residents will be able to walk and cycle to/from school' (5.6.3.) While this is true, the transport assessment's analysis summary makes no explicit mention of the other residents of the proposed development and how their travel patterns will contribute to traffic problems at school drop-off and pick up times. It is likely that many adult residents will be travelling by private cars to work at school drop-off times, as well as immediately before those times, adding to the clearly documented problems which already exist on Whitwell Road/School Road.
- Maintains the misconception that many residents will travel to work on foot, by cycle or by public transport.
- We still strongly feel that the proposed housing would be contrary to NPPF 103 as the development would not 'be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes'.
- We contend that this proposal is relevant to NPPF 109. The increase in traffic from the development, combined with the proximity of the High School and Primary School, the poor visibility at the junction of Broomhill Lane and Whitwell Road, the parking along Whitwell Road/School Road, and reliance on private cars for transport, makes this proposal unsafe in terms of highway safety, and would lead to severe impacts on the local road network, particularly at school drop off/pick up times.

4.23 Chair of Governors of Reepham Primary School:

Reepham Primary School has no capacity for any additional pupils. Capacity would need to be created. Expanding class sizes would impact on children's education and well-being of staff. Out of catchment children on roll may not be able to send subsequent children. A full review of existing facilities to enable adjustments to be made and new buildings considered is required.

New nursery building will be required.

Concerns over road safety.

4.24 Chair of Reepham Nursery School:

Nursery operates at capacity for most of the year.

Currently working on plans to relocate to a purpose built building on Reepham Primary School site. Impact of the housing development will be detrimental to the community if local people cannot send their children to the nursery.

Concerned about traffic impacts with congestion at start and end of school day.

Other Representations

4.25 Resident comments:

- Out of character in terms of scale.
- Concerns over the ability of the existing infrastructure to cope (primary and high schools, doctor's surgery, car parking, sewerage, shops, broadband, phone signal, drainage, energy supply, policing)
- Road network incapable of taking the level of traffic and will result in safety impacts.
- Public transport is limited with 4 indirect buses to Norwich each day and take over an hour.
- Submitted transport assessment contains inaccuracies and is misleading on the following grounds: location of bus stops, frequency of busses, lack of consideration of wider highway network, likely number of vehicles which the scheme would generate, deficiencies in local highway network, unsuitable sites used for comparison
- Insufficient jobs to support the number of dwellings.
- Public footpaths need to be retained.

- Existing highway network is dangerous (alignment, road widths, visibility etc) and busy (particularly at school times).
- Increased traffic will hamper access to/egress from Reepham fire station.
- Number of dwellings exceed the 100-120 states in REP1.
- Under-provision of affordable housing.
- School does not speak for the community in terms of what benefit a sports hall may have.
- Concern over ability for residents to participate in planning process due to COVID-19 pandemic (application submitted March 2020).
- Proposed scheme ignores the 3 public highways on the edges of the site and will require a stopping up order.
- Concerns about impact on Badger sett.
- 4/5 bedroom properties are not required in Reepham as they will not help younger people get on the property ladder.
- Other sites in Reepham are more suitable.
- Visual impact on Reepham
- Disruption during construction.
- Environmental issues and understanding have moved on since current planning policies were adopted.
- Reepham is identified as deprived in terms of air quality and accidents on the Norfolk Insights webpage. How would the proposed development change these scores?
- Parking is a problem in Reepham.
- The application should not be considered separately from the road widening application (20200469) and sports hall application (20201183)
- Other scheme in the area have been refused due to highway safety issues.
- Concerns about impact on air quality associated with additional traffic.
- Development will spoil transition into countryside.
- Garden boundary to cemetery allows dogs to get through and people follow. An increase in houses will make this situation worse so a fence should be provided.
- Impact on ecology on site and off site designated features of Booton Common Site of Special Scientific Interest (SSSI), Whitwell Common SSSI and the Norfolk Valley Fens Special Area of Conservation (SAC)
- Applicants have demonstrated that the scheme is not viable.
- Providing sports hall off site does not comply with REP1.
- On-site open spaces are insufficient and not useable for informal recreation.
- Second point of access is required.
- Overcrowding of site.
- Poor public transport.
- Impact on character of the area and conflict with Landscape Character Assessment SPD.

- Loss of greenfield site and open space.
- Confidential badger report should be publicised.
- Insufficient information in respect of sewerage capacity, surface water drainage, air quality and ground contamination.
- Unsuitable visibility at junctions.
- Light pollution
- Litter pollution
- Increased use of natural resources is not sustainable.
- Noise impacts will reduce tranquillity of site.
- Drainage feature will be a safety hazard
- Outside of settlement boundary.
- Site exceeds 5ha in area therefore exceeds the EIA Schedule 2 thresholds and an Environmental Impact Assessment should be provided.
- Concern that some of the submitted documents are labelled 'draft'.
- Loss of mature hedges that surround the site.
- Drainage proposals are inadequate.
- Concerns that the associated sports hall may not be delivered.
- Application does not specified how homes will be powered.
- Loss of trees and hedges and inadequate arboricultural report
- Impact on water quality
- Concerns about delivery of sports hall
- The related applications should not be considered independently
- Contrary to Broadland's Environmental Strategy
- Concerns about site security and increases in crime.
- Adverse impact on approach to the town from the west.
- Insufficient public transport
- Permissive paths cross the site and benefits from DEFRA funding
- Access should be via Park Lane and onto Bawdswell Road (B1154)
- Design of dwellings not of sufficiently high quality and reflective of historic character of Reepham or the adjacent countryside
- Insufficient employment in the town to accommodate development resulting in high car dependency
- Inaccurate supporting documents
A sports hall should be provided on site in accordance with REP1.
- Impacts on Whitwell Common and Booton Common SSSI and Norfolk Valley Fens SAC as a result of recreational pressure and hydrological issues.
- Loss of fields to housing would impact on existing habitats for a range of wildlife.
- Insufficient open space on site
- There is not a need for the housing and the needs for Reepham can be met on smaller sites
- Understanding of environmental impacts has moved on since SA DPD was adopted.

- The development is unsustainable
- Proposed works to Broomhill Lane are out of character with the area.
- Increased carbon emissions
- No electric vehicle charging points are provided
- An excessive amount of garages are proposed
- Landscaping cannot mitigate the visual harm.
- A pumped sewerage system is required
- Detached houses are energy inefficient
- Proposed materials such as upvc are not sustainable
- The application should be referred to a design review panel.
- Insufficient easements around observatory
- Insufficient public consultation
- Works to public highways such as Park Lane and Broomhill Lane may require a stopping up order if they are to become footpath/cyclepath
- No evidence of need for an extension to Reepham cemetery
- Research into the soils for the cemetery is required.
A footpath through the cemetery could not be used at night
- No details are provided of how a vehicle would enter the cemetery
- Impact on adjacent county wildlife site particularly as a result of cats which would hunt birds and small mammals. Fences should be put in place to prevent them roaming.
- Trip generation figures in transport assessment are inadequate
- Broadland, Norwich and South Norfolk have delivered 140% under the 2019 housing delivery test so planned quotas are being met.
- GNLP proposes to allocate the site for 100 dwellings and no further allocations are proposed in Reepham.
- A sports hall on the application site would have less impact than the proposed off-site sports hall.
- Consultee comments are based on opinion rather than fact.
- Site should not benefit from a presumption in favour due to the adverse impacts outweighing the benefits.
- Viability reports are incomplete and require further work or are based on incorrect/unjustified assumptions
- Development fails to reflect the impact of climate change= and the recommendations of the 'Reducing UK emissions progress report to Parliament' June 2020 report.
- Speed bumps are ineffective at slowing vehicles
- Road widening will impacts people' trees/hedges.
- Works to Broomhill Lane will conflict with people's driveways
- Street lighting should be provided
- Insufficient tree planting
- Visibility at Broomhill Lane cannot be achieved.

5 Assessment

Key Considerations

5.1 Planning law (section 38(6) of the Planning and Compulsory Purchase Act 2004) requires that applications must be determined in accordance with the development plan unless material considerations indicate otherwise. Relevant development plan policies are detailed above. Material considerations include policies in the National Planning Framework (NPPF), and the online Planning Practice Guidance (PPG).

5.2 The key considerations for the determination of this application are:

- The principle of development and the spatial strategy for the area
- Contribution towards off-site sports hall 'vs' on site provision
- Loss of playing fields
- Highway safety and the satisfactory functioning of the local highway network
- The impact on the character and appearance of the area
- Design/layout
- The impact on residential amenity
- The impact on ecology
- The provision of recreational open space
- The sustainability of the development
- Viability
- The need for EIA/HRA
- Other considerations

Principle of development and the spatial strategy

5.3 Reepham is identified in the Joint Core Strategy (JCS) under policy 14 as a Key Service Centre where land will be allocated for between 100-200 dwellings. Key Service Centres are in the middle of the settlement hierarchy (with the Norwich urban area at the 'top' and Other Villages at the 'bottom') and have a range of facilities to meet local needs as well as the needs of residents of surrounding areas. In the case of Reepham, it contains a secondary school with a sixth form centre, primary school, doctors, local shops and services, recreational facilities and employment land.

5.4 Policy GC2 of the Development Management DPD states that new development will be accommodated within the settlement limits defined on the policies maps. Outside of these limits development which does not result in any significant adverse impact will be permitted where it accords with a specific allocation and/or policy of the development plan. The underlying

objective of GC2 is to control the location of new development to ensure that development is directed to the most sustainable locations and deliver the objectives of the JCS.

- 5.5 Whilst the site is located outside of the settlement limits as defined on the policies maps, the site is allocated under policy REP1 of the Site Allocation DPD (2016) (SA DPD). The purpose of this document is to allocate land to reflect the requirements set out in the JCS. Policy REP1 states that the land is allocated for residential and community facilities (including cemetery land, recreational open space and a sports hall) and that the site will accommodate approximately 100-120 homes in total. Included within the text of the policy are “Guidelines for the development” which identify, amongst other things that vehicular access is to be from a realigned and improved Broomhill Lane and the scheme is to make provision of a sports hall for the High School to be located in proximity to the existing school facilities.
- 5.6 In response to the policy requirements, the application proposes a residential development of 141 dwellings and a cemetery extension of 0.3ha to the north-east corner of the site adjacent to the existing cemetery.
- 5.7 A separate application has been submitted by Norfolk County Council for the widening and improvement of Broomhill Lane under application reference 20200469.
- 5.8 Furthermore, instead of making provision for a sports hall for the high school on site, the application proposes to make a contribution of £1.5 million towards the provision of a sports hall off-site. This strategy reflects the needs of the High School who have made a separate application for a sports hall under 20201183 on land to the south of the school. The high school are of the opinion that a sports hall on the application site would not meet their operational requirements and hence are pursuing a sports hall on an alternative location which better meets their needs.
- 5.9 In terms of the residential development, the 141 dwellings being proposed exceeds the figures stated in policy REP1 of “approximately 100-120” albeit it is worth noting that the policy wording does not state ‘up to’ as way of defining this as an upper limit and states “approximately” which is reflective of a degree of flexibility. Clearly given that the sports hall is no longer proposed on-site a greater number of dwellings on site is not surprising.
- 5.10 Given this increased number officers have sought input from the Council’s Place Shaping Manager who advises that just because there is a conflict with the allocation policy it does not necessarily mean that the application would not accord with the development plan when taken as a whole. In this instance there are a number of other development plan policies which must be taken into account. Policy 1 of the JCS specifically seeks to ensure that

development makes the most efficient use of land (amongst a range of other criteria). As a sports hall is not provided on site there is a greater amount of space available than was envisaged at the plan making stage and increasing the number of dwellings to 141 results in an efficient use of an allocated site. They advise that the Council's response to the Inspector's questions on the SA DPD refer to the figure of 100-120 as a "reasonable estimate", and that this estimate would have assumed on-site provision of a sports hall. In their view they do not consider that the 100-120 dwellings was intended to be seen as a cap and the incorporation of the word "approximately" in the policy implies some degree of flexibility.

- 5.11 In terms of the spatial strategy of the JCS, policy 14 identifies Reepham as capable of accommodating between 100-200 dwellings. The proposed scale of development (at 141 dwellings), in addition to committed development in the settlement, would not be particularly disproportionate with reference to Reepham's position within the settlement hierarchy (as a Key Service Centre). As such, I consider that the quantum of residential development would not undermine the spatial strategy and would comply with policy 14 of the JCS. Further consideration of the ability of Reepham's infrastructure to accommodate the scale of development proposed is provided later in the report including on the matters of school provision, bus provision and sewerage which are identified in policy 14 as potential restrictions on development.
- 5.12 Representations from residents have suggested that the presence of a 5 year housing supply and the results of the Housing Delivery Test mean that further housing does not need to be delivered or that the allocation of REP1 should be reconsidered. However, the purpose of the allocations within the development plan were to ensure that they Council delivers its housing requirements and maintains a 5 year supply of land for housing. The fact that this may now have been achieved at a specific point in time does not provide any justification for the removal of adopted allocations that will contribute to maintaining this position of the short to medium term. In determining that applications consideration should also be given to government's clearly stated objective of significantly boosting the supply of homes, which is set out in paragraph 60 of the NPPF. Moreover, this allocation has been carried forwards into the emerging Greater Norwich Local Plan (GNLP) and therefore forms part of the supply of housing land which will ensure housing needs are met to 2038. In respect of the GNLP, it should be noted that the Council has resolved that this plan, including the carried forward and new allocations within it, are "sound" and on that basis submitted the plan for examination.
- 5.13 In respect of housing land supply, the Council's most recent evidence, in the form of the Greater Norwich Area Housing Land Supply Assessment at 1st April 2021, the "2021 5YRHLS" was published in March 2022. This statement concluded that there was a demonstrable housing land supply. However, the

evidence that underpinned the 2021 5YRHLS was collected in advance of Natural England's recent advice on Nutrient Neutrality. At the time of writing the report the Council recognises that there remains a significant degree of uncertainty about the progress of a number of permitted and allocated development sites in this respect. Therefore, for purpose of determining this application at this time it would be advisable for the Council take the precautionary step of determined on the basis that there is not a demonstrable five-year supply of deliverable housing sites.

- 5.14 Such a position would in most instances engage the "tilted balance" as set out within Policy GC1 of the DM DPD and paragraph 11(d)ii. of the NPPF. However due to the fact that nutrient neutrality invokes consideration under of other policies within the NPPF concerning protected areas/assets (the Broads) then it is not required to be engaged under the aforementioned paragraph of the NPPF. In any event, the application is considered to be in accordance with the development plan when considered as a whole. Both Policy GC1 and NPPF 11(c) sets out that applications that accord with the policies of the local plan should be approved without delay, unless material considerations indicate otherwise. There are not considered any such material considerations in this instance.
- 5.15 Overall, whilst the number of dwellings exceeds the 'approximate' amount of policy REP1, I am satisfied that in principle Reepham is a sustainable location for the scale of growth proposed (subject to an assessment of impact which follows) and that the scale of development would not undermine the spatial strategy of the JCS. As such, the conflict with REP1 is reduced in the planning balance.
- 5.16 The provision of land for a cemetery is included with REP 1 and reflected in the application proposals. The location of this is well related to the existing cemetery and access issues have been addressed in conjunction with the road widening application 20200469. The Environment Agency have also assessed the site and its ground conditions and have no objections to its use as a cemetery. The cemetery land can be transferred to the Town Council who manage the existing cemetery through the s106 agreement.

Contribution towards off-site sports hall 'vs' on site provision

- 5.17 Policy REP1 includes the need for provision of a sports hall for the school 'to be located in proximity to the existing school facilities'.
- 5.18 In support of the application, the high school have confirmed that they feel strongly that the sports hall should not be located on the application site for the reasons outlined in detail in item 3 of this agenda, which in short, is that it would not be efficient for school use as well as community use "off site".

- 5.19 As outlined in the assessment for 20201183 (item 3 on this agenda) officers see merit in delivery the sports hall on the school site.
- 5.20 Likewise, I consider that the proposed contribution in lieu of on-site provision of a sports hall (£1.5m secured via S106) to be appropriate in order to deliver the objective of REP1.
- 5.21 Consequently, subject to further consideration over the potential impacts arising from the scheme which I will come to in later sections of this report, I am supportive of the principle of delivering 141 dwellings on the site and making a £1.5 million contribution towards the delivery of a sports hall off-site.

The loss of playing fields

- 5.22 Policy CSU2 of the DM DPD seeks to avoid the loss of a community facility unless in exceptional circumstances including where it is demonstrated that it is no longer viable or plans for its replacement are included within the proposal. Paragraph 99 of the NPPF echoes CSU2 and identifies that playing fields should not be built upon unless the land is assessed as surplus to requirements or the loss would be replaced by equivalent or better provision or the development is for alternative sports and recreational provision and the benefits clearly outweigh the loss.
- 5.23 The southern part of the site was last used as rugby pitches by the High School, with this use ceasing in June 2021.
- 5.24 In accordance with the Development Management Procedure Order 2015, Sport England have been consulted on the application as the scheme would result in the loss of playing fields.
- 5.25 Sport England have an adopted policy that states that they will oppose the granting of planning permission for any development which would lead to the loss of or would prejudice the use of all or part of a playing field unless one or more of 5 specific exceptions apply. These exceptions are as follows:
- 5.26 Exception 1: A robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.
- 5.27 Exception 2: The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.
- 5.28 Exception 3: The proposed development affects only land incapable of forming part of a playing pitch (subject to caveats).

- 5.29 Exception 4: The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field: of equivalent or better quality, and of equivalent or greater quantity, and in a suitable location, and subject to equivalent or better accessibility and management arrangements.
- 5.30 Exception 5: The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.
- 5.31 The proposed development would result in the construction of dwellings and residential infrastructure on the entirety of this field. Sport England object to the application on the basis that it would result in the loss of 2.1ha of playing field and would not comply with any of these exception criteria.
- 5.32 However, in reaching this conclusion Sport England has failed to acknowledge that the site is allocated for a residential led development and therefore its use as a sports field and its resultant loss to alternative uses has been accepted in principle through the plan making process.
- 5.33 Furthermore, Sport England have failed to have regard to the history of this site. By way of background, in 2008 the high school sought to create a new 6th form block to form a new science, art and music facility with associated extensions to the coach and car park. This was on land that was, at the time, playing fields. To compensate for the loss of playing field where the 6th form block would be sited, the school secured permission for the change of use of 16 ha of agricultural land to playing fields to the south of the school. These agricultural fields were not in the ownership of the school so the school entered into a deal with the landowner whereby the 16ha agricultural land would be transferred to the school and the 5ha site of the current rugby pitch (which was part of the schools playing field) would be transferred to the landowner. As a consequence, the school became owner of the 16ha agricultural field and the landowner became the owner of the 5ha land that is now the rugby pitch (and subject to this current application).
- 5.34 To ensure that the school retained sufficient playing pitches during the construction of the new 6th form block and creation of the new playing pitches on the agricultural land, the landowner allowed the school to continue using the rugby pitches during the construction works. It had been intended that this arrangement would be temporary and would cease once the new pitches were operational. However, this use did not cease and the school continued to lease the rugby pitches from the landowner. Consequently, they remained in use as playing fields until the lease expired in June 2021, in addition to the newly created playing fields to the south of the high school.

- 5.35 It is clear from this trail of events that the loss of the rugby pitch has been compensated for through the schools earlier acquisition of the 16ha of land that forms their current playing field (which also compensated for the loss of sports field where the 6th form block is now located). Consequently the proposed loss of the rugby pitch to residential development would not result in a net loss of pitches, as provision for the rugby pitch has already been accounted for in the 16ha provided historically.
- 5.36 Sport England have confirmed to officers that their policies and exceptions do not allow such history to be taken into consideration in coming to their view on the application and as such they have no option but to object given its former use as a playing field. Given this history, and that the site has already been allocated for residential led development, I do not consider that the application would result in the net loss of playing fields and the scheme would not conflict with the underlying principles of policy CSU2 of the DM DPD or paragraph 99 of the NPPF.
- 5.37 From a procedural perspective it should be noted that the objection from Sport England would mean that should the Council be minded to approve the application, it would need to be referred to the Secretary of State to review whether they wish to call it in for his determination. The recommendation is reflective of this requirement.

Highway safety and the satisfactory functioning of the local highway network

- 5.38 Policy TS2 of the DM DPD requires the application to be accompanied by a Transport Assessment and/or a Travel Plan. Developments will need to include proposals to deal with any consequences of their development in terms of maximising access by foot, cycle and public transport. Policy TS3 states that development will not be permitted where it would result in any significant adverse impact upon the satisfactory functioning or safety of the highway network. Paragraph 111 of the NPPF states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 5.39 REP1 of the SA DPD identifies in the guidelines for development that developers will need to undertake a transport assessment to assess the traffic implications of the development and that vehicular access is to be from a realigned and improved Broomhill Lane incorporating appropriate traffic management measures and footway provision with pedestrian access linking Park Lane to Broomhill Lane. It also states that off-site improvements may be necessary potentially including extension of the 30mph speed limit on Whitwell Road and consideration of extending the 20mph speed limit to the high school.

- 5.40 In accordance with REP 1, the access strategy proposes vehicular access via a realigned and widened Broomhill Lane. The works to Broomhill Lane are submitted under a separate application 20200469 and include provision for a 5.7 metre wide carriageway, 3 metre wide foot and cycle way to the southern side, a 1.8 metre wide (minimum) footpath to its northern side and traffic calming measures in the form of raised tables. Visibility splays at the junction of Broomhill Lane and Whitwell Road would be provided at 55m X 2.4m. Also proposed is the surfacing of Park Lane.
- 5.41 The merits or otherwise of that proposal are considered in more detail in the report for 20200469, but in summary, the Highway Authority have confirmed that the extent of works proposed would be necessary to deliver the allocation and that the proposed 'uplift' to 141 dwellings has not increased the scale or nature of the proposed highway works. The proposed highway works are acceptable to the highway authority and enable the delivery of the allocation. Consequently I am satisfied that the vehicular access strategy would comply with REP1.
- 5.42 In support of the application is an amended Transport Assessment which considers the transport impacts of the development on the local highway network. Concerns have been expressed by residents regarding some of the principles adopted in the Transport Assessment, including using trip rates from a development in Bradwell rather than from local surveys (which the applicant was unable to undertake owing to the COVID 19 pandemic). The Highway Authority is aware of these concerns raised by residents, however notwithstanding these they are satisfied that the submitted transport assessment, as amended, is sufficient to analyse the highway impacts of the scheme.
- 5.43 Numerous comments and objections have been received from local residents concerned that the local highway network is inadequate to cater for the scale of development proposed, citing the historic nature of Reepham's highway network and the nature of the surrounding rural roads which serve the town. Also raised in comments from members of the public is the congestion associated with Reepham High School and Sixth Form and the Primary School particularly around school opening and closing hours. It is apparent from these representations, and my own experience of the site, that the local highway network, and most significantly Whitwell Road, become congested with cars and school coaches in the morning and afternoon school pick up/drop off times. There are concerns locally that a development of 141 dwellings would increase this congestion, particularly in the morning peak when commuters may be leaving the development to work in higher order settlements at the same time as the school drop off is occurring.

- 5.44 It has been highlighted in representations that the applicant's transport assessment understates the number of coaches that attend Reepham however the highway authority is aware of this and it has been taken into consideration in the determination of the application by the Highway Authority. The Highway Authority agree with residents that traffic arising from the development particularly during the morning peak would compound the existing issues. However, the additional impact of the development on this congestion is not likely to be significant with a total of 18 arrivals and 49 departures likely to occur in the AM peak (i.e. one vehicular movement just over every minute). Consequently, whilst the scheme would likely add to the AM peak, the impact is not considered to be so significant that the development could be refused on these grounds.
- 5.45 To mitigate the impact of development, the Highway Authority requires the following package of measures to be secured and delivered:
- Widening of Broomhill Lane and provision of visibility splays in accordance with 20200469.
 - Travel Plan
 - £100,000 contribution towards supporting existing bus service
 - Improvements to pedestrian crossing at Reepham Primary School
 - Improvements to routing via Park lane/Sun Barn Walk e.g. signage
- 5.46 The delivery of the highway improvement works under 20200469 can be secured by condition. This must be undertaken prior to development commencing so that construction traffic can safely access the site. A Travel Plan can also be secured through a combination of condition and section 106 agreement. The financial contribution towards supporting the existing local bus service would be used to increase its frequency. This would be helping to make the bus a more viable option to new residents reducing car trips from the development. An increase bus service may also support existing residents to make sustainable travel choices and an increased bus uptake can assist by creating space in the local highway network and mitigate some of the impact arising from the development. The highway authority has confirmed that securing this financial contribution avoids the need for the applicant to undertake any further modelling of local highway impact. This contribution can be secured by section 106 agreement being necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale and kind to the development. The improvements to provide a pedestrian crossing at the primary school and pedestrian routing can also be secured condition.
- 5.47 Comments have been received from Cllr Beadle (on 20200469 but relevant to this application) about whether a pedestrian crossing of the B1145 is required if pedestrians are to be encouraged north on Park Lane and onto the B1145 to

head into the town. This has been discussed with the highway authority who do not consider this to be necessary to make the development acceptable and the highway available for improvements is limited and visibility along with the Smugglers Lane junction present further constraints. Instead pedestrian improvements are proposed along the route via Park Lane and Sun Barn Road.

- 5.48 Subject to the above being secured, whilst the significant level of public concern with regards to highways impacts is noted, the highway authority raise no objections. It is therefore considered that the scheme would have an acceptable impact on the local highway network and comply with policy REP1 and policies TS2 and TS3 of the DM DPD.
- 5.49 Looking at matters beyond the wider impact of the development, the proposed scheme would have a central estate loop road with footway either side. From this would be a series of shared use roads and private drives serving the remainder of the development. Pedestrian paths would be provided to Park Lane, Broomhill Lane and Back Lane. The central loop road would cross the unmade section of Broomhill Lane in two places however the road has been narrowed to reduce the impact of the second crossing and aligned at its southern end to provide for the continuation of Broomhill Lane. The application has gone through a series of changes to reflect the requirements of the highway authority who are satisfied that the proposed layout is acceptable from a highway perspective with adequate visibility around the estate roads, adequate widths and alignments of roads, appropriate connectivity for pedestrians through the site and appropriate levels of parking. Consequently, I am satisfied that the application would comply with policies TS3 and TS4 of the DM DPD.

The impact of the development on the character and appearance of the area

- 5.50 Policy 1 of the JCS seeks, inter alia, to protect environmental assets including general aspects of the countryside and rural character. Policy 2 of the JCS seeks to promote good design and respect local distinctiveness including the landscape setting of settlements, the landscape character and historic environment, townscape and the provision of landscaping. Policy GC4 of the DM DPD expects development to achieve a high standard of design and avoid significant detrimental impacts and pay adequate regard to the environment, character and appearance of the area, reinforce local distinctiveness and make efficient use of land and resources. Policy EN2 requires proposals to have regard to the Landscape Character Assessment SPD and consider impacts upon a range of landscape features. Policy REP1 in the guidelines for development states that adequate landscaping and green infrastructure should be provided, with a particular emphasis on the western and southern boundaries and potential linkages to the adjoin countryside.

- 5.51 The site is mostly comprised of an agricultural field and former playing field with the unmetalled section of Broomhill Lane dividing the two. The sites are bounded by a variety of trees, hedgerows and other soft landscaping features. Key features of the site include its topography and in particular the northern parcel which slopes down towards the south-west corner; the presence of Broomhill Lane which is an unmade section of highway which separates the northern field from the southern playing field; Park Lane to the east and Back Lane to the west of the playing field which provides connectivity to the Marriots Way to the south and the school and built up areas to the east of the site.
- 5.52 The application is supported by a Landscape and Visual Impact Assessment (LVIA) and amended Arboricultural Impact Assessment. Concern has been expressed by residents that the LVIA (and indeed other supporting documents) has been submitted with a “DRAFT” watermark and questions their validity however I do not consider that this watermark renders these documents invalid as they are otherwise complete documents.
- 5.53 The LVIA identifies that the site is within the C1 Foulsham and Reepham Farmland Plateau character area (with reference to the Landscape Character Assessment SPD). The landscape planning guidelines for this character area seek to, inter alia, conserve subtle features of the historic landscape such as ancient tracks, lanes and irregular fields, resist new development that would result in any diminution of the sparsely settled nature of the area; seek to conserve the strong, rural character of the area; seek to conserve views across open farmland; seek to conserve the landscape setting of Reepham, seek to ensure developments comprise a fully integrated landscape and urban design strategy which is consistent with local character and screen potential harsh settlement edges.
- 5.54 The applicant’s assessment identifies that the development would have a number of minor and moderate adverse landscape effects during the construction and operational phases and assess the impact of the development on a range of visual receptors. There would be a high negative impact on users of Broomhill Lane and Park Lane from a number of viewpoints, reducing to medium negative over time and other negative effects from other viewpoints.
- 5.55 The introduction of built development including houses up to two storeys high, roads, paths, fences, walls, infrastructure such as sub-stations and pumping stations and other such development will all have an urbanising impact on the application site. Consequently there will be detrimental impacts on the character and appearance of the area. However, these impacts must be viewed through the prism of the development plan which allocates the site for uses including estate scale residential development and provision of a sports hall. Whilst the number of dwellings is higher than the approximate amount in

the REP 1 allocation, no sports hall is proposed on this site which, if it were to be used by the community, would also require its own car parking. Given this allocation it has been accepted through the plan making process that the land use and therefore character and appearance of the site and surroundings will change. Consequently there cannot be an objection in principle to the urbanising impact of the development.

- 5.56 However, to try and reduce and mitigate the landscape impact of the proposal, the scheme has been designed to retain as many of the existing trees which bound the site as possible. There is the need for some tree removal, especially at Broomhill Lane to facilitate the access but as the REP1 allocation requires access in this location, whilst the loss of trees is regrettable, such tree loss is necessary to deliver the allocation. Of the proposed tree removals to facilitate the development, all are low quality Category C trees with the exception of T39 which is a Category B Oak tree. The Conservation and Tree Officer raises no fundamental objection to the proposed scheme and queries have been resolved through direct discussion between them and the applicant's tree consultant. Whilst the removal of trees is regrettable, it is ultimately necessary to deliver an estate scale residential development as has been allocated. Given the status of the trees to be removed I do not object to this aspect of the application. Where trees are to be retained, plans have been provided to demonstrate how they would be protected for the duration of construction. A condition would be required to ensure their implementation.
- 5.57 The LVIA makes a number of recommendations for site mitigation and enhancement including the need to prepare a construction management plan to minimise the impact of the development during the construction phase and the need to ensure existing trees to be retained are adequately protected from construction activities and recommendations for a detailed landscape scheme which should be implemented in a phased manner and thereafter managed in accordance with a management plan.
- 5.58 The Design and Access Statement submitted with the application identifies that individual tree planting will be arranged within public spaces and provided along site boundaries and ornamental hedgerows/shrub planting to be provided to front gardens and hedgerows elsewhere to provide native species such as field maple, dogwood, dog rose and buckthorn. In addition an indicative Landscape Masterplan has been submitted through the course of the application to reflect the suggested mitigation in the LVIA. The Conservation and Tree Officer has advised that an updated plan is required to reflect the removals in G1 and to diversify the planting stock. This is a matter which can be conditioned and it would be expected that a detailed hard and soft landscaping scheme should be submitted [prior to commencement. Conditions are also required to ensure the implementation of tree protection measures outlined in the amended AIA.

- 5.59 Overall, given the fundamental change from playing fields and agriculture to a residential land use there will be an adverse impact upon the character and appearance of the area. However, this is an allocated site and such an impact has therefore to be anticipated. The design of the development has been undertaken to minimise impact with a significant majority of the existing trees and landscape features retained and the layout arranged to reduce harm through, for example, incorporating areas for new planting to 'buffer' the development from the public realm or through creating an outward facing positive edge to the settlement. A significant number of new trees and landscape features can be provided within the site as demonstrated on the submitted landscape masterplan and full details of landscaping can be reserved for later consideration through a condition. Consequently, whilst not without landscape harm which must be weighed in the planning balance, the scheme is considered to be acceptable with regards to policies 1 and 2 of the JCS and policies GC4 and EN2 of the DM DPD.

Design/Layout

- 5.60 The guidelines for REP1 include the need for a design and layout that should respect and reflect local character and heritage. Policy 2 of the JCS seeks to promote good design and respect local distinctiveness and includes factors that should be considered in achieving this. Policy GC4 of the DM DPD expects development to achieve a high standard of design and avoid significant detrimental impacts and pay adequate regard to the environment, character and appearance of the area, reinforce local distinctiveness and make efficient use of land and resources. The NPPF advises that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve and that good design is a key aspect of sustainable development.
- 5.61 The application is accompanied by a design and access statement identifying some of the principles which have underpinned the proposed layout and design ethos of the scheme. The application has however been subject to objections from local residents regarding the proposed design of dwellings particularly with regard to the use of 'pattern book' housetypes and whether these are appropriate for the local context of Reepham as a historic market town.
- 5.62 On this matter I have sought advice from the Council's Senior Heritage and Design Officer and the application has undergone a number of amendments to reflect the comments made. The Senior Heritage and Design Officer recognised that the scale of development was large and to try and mitigate this requested that the scheme be broken down into more discrete areas. In response to this the applicant has created 3 character areas (urban central loop, transition and rural edge) where the dwellings types would have different

detailing to reflect the character area that they are within. Whilst all of the suggestions by the Senior Heritage and Design Officer have not been incorporated (for example a request to not cross the unmade section of Broomhill Lane was not possible due to highway requirements) the amendments to the scheme have resulted in the Council's Senior Heritage and Design Officer concluding that they are satisfied that with regard to house types, materials and arrangement of dwellings within the layout with regard to orientation is acceptable. As amended they consider that the application will meet the requirements of the NPPF, the National Design Code and Building for a Healthy Life with regard to design. Consequently I am satisfied that the scheme would result in a satisfactorily high standard of design in accordance with policies REP1, policies 1 and 2 of the JCS and policy GC4 of the DM DPD. Details of external materials should be subject to a condition.

- 5.63 The Norfolk Constabulary Designing out Crime Officer has commented that it is disappointing that the development makes no reference to secure homes and environment but that the layout has incorporated design principles that address crime prevention - the development is not overly permeable and thereby assists the prevention of easy intrusion by potential offenders. The looping access roads allows for dwellings to view their surroundings and the proposed mix of house types enables a greater potential for homes to be occupied throughout the day, increasing the opportunity for natural surveillance and community interaction. Notwithstanding these generally positive comments, some matters of detail have been highlighted such as the need for active gables, uncertainty over some boundary treatments and areas which could benefit from increased surveillance however these are not grounds on which the Designing Out Crime Officer has raised an objection and I am satisfied that the layout has been designed with crime prevention in mind such that it complies with policy 2 of the JCS and policy GC4 of the DM DPD.

The impact on residential amenity

- 5.64 Policy GC4 of the DM DPD requires all development to consider the impact upon the amenity of existing properties, meet the reasonable amenity needs of all potential future occupiers and create safe environments. Policy EN4 of the DM DPD requires development to assess the extent of potential pollution and provide mitigation measures where required.
- 5.65 The application proposes a range of 1 and 2 storey dwellings. Owing to the degree of separation to existing residents I consider that they would not result in significant overlooking, nor would they result in an overbearing development that would lead to a significant loss of amenity. The proposed development would result in increased car journeys and footfall along Broomhill Lane and the wider highway network and this is likely to make the immediate area somewhat busier and with a greater prospect of disturbance.

However, given the scale of development I am satisfied that these impacts are not likely to be significant with houses set back from the roadside, screened by a variety of boundary features and already subject to noise and disturbance associated with the current use of Broomhill Lane. Consequently I am satisfied that there would not be a significant adverse impact on residential amenity of existing residents as a result of the development.

- 5.66 Future residents would have access to gardens and the development provides limited informal open space on site but with connections to the wider green infrastructure network. Gardens would be a reasonable size to provide private amenity space and properties would be of a size to offer sufficient levels of amenity to future occupants. Furthermore, future residents would have access to all of the facilities and services offered in Reepham, many of which could be within walking distance. Overall I am satisfied that the development would meet the reasonable amenity needs of future residents.
- 5.67 Concern has been expressed that the development would have an adverse impact on air quality and the Council's Environmental Management Officer has requested an Air Quality Assessment is submitted to fully consider this. The submitted assessment recommends mitigation is required during the construction of the development and the Environmental Management Officer has agreed that this should be incorporated into a Construction Management Plan secured by condition. This will ensure that the construction of the development has an acceptable impact on the amenity of existing residents and those moving onto the scheme whilst it continues to be built out.
- 5.68 Comments from the public have been provided concerning the impact that the development may have on deprivation and it has been brought to my attention that Reepham, based in statistics provided under the Norfolk Insights website, has a relatively low score for 'environmental living domain' deprivation index. I understand that this index measures 2 sub-domains – the 'indoors' living environment measures the quality of housing; while the 'outdoors' living environment contains measures of air quality and road traffic accidents. The resident is particularly concerned about the impact of pollution on this deprivation score would like to know what the deprivation score would be after the development. Broadland is not however responsible for this data and therefore cannot confirm this. However, given the outcome of the air quality assessment and that the Environmental Management Officer is satisfied that there is no grounds for objection subject to a condition for a construction management plan, I consider the application to be acceptable on these grounds.
- 5.69 In addition to issues of air quality, the Council's Environmental Management Officer also requested the submission of a ground investigation to assess potential for contamination which may impact on construction workers or future residents. The submitted report identifies that for the majority of the site

no further investigation is required however to the south-west of the school playing field it is anticipated that there may be waste materials. An inspection for asbestos containing material should be undertaken and removal from site if discovered. These matters can be addressed through a planning condition as confirmed by the Environmental Management Officer.

- 5.70 Overall I am satisfied that impact on amenity of future and existing residents in respect of pollution is acceptable subject to appropriate conditions.

The impact on ecology

- 5.71 Policy 1 of the JCS seeks to, inter alia, ensure that there are no adverse impacts on international and nationally designated sites of ecological importance and minimise fragmentation of habitats and conserve and enhance existing environmental assets of regional or local importance. Policy EN1 of the DM DPD requires development proposals to protect or enhance the biodiversity of the district and avoid fragmentation of habitats.
- 5.72 In support of the application is an Ecological Assessment including a 'shadow' Habitats Regulations Assessment dated 23 March 2020 and an updated Ecological Assessment dated 24 November 2020. Also submitted are proposed layout plans and an indicative landscape masterplan. A Badger Survey and Mitigation Strategy has also been submitted but has not been made publically available owing to the protected status of Badgers, although it is clear from consultation responses that the presence of a badger sett on site is well known locally and its location has been identified on the submitted plans as it influences the proposed layout. To the south-west of the site is a county wildlife site, the owner of which has made representations objecting to the application.
- 5.73 The Natural Environment Team have advised that the submitted ecological information is broadly fit for purpose and that impacts from street lighting can be addressed through a lighting condition as can the inclusion of integrated bird and bat boxes, and hedgehog gaps in fences (as recommended in the submitted assessment). However, the Natural Environment Team raised objections in respect of Badgers as it was considered that the scheme as originally submitted would have a negative impact on the badger sett and the badgers themselves due to the proximity of the sett to development, disturbance during construction and disturbance during operation and potential for fragmentation of foraging habitat.
- 5.74 In response to these concerns the applicant submitted the updated badger survey report and mitigation strategy (November 2020) and an amended accommodation plan. The Natural Environment Team commented that subject to the removal of recreational area E from the plans (for recreational use) and measures put in place (e.g. fencing and signage, and landscaping)

to prevent public access to this area and prevent disturbance offences being committed under the Protection of Badgers Act 1992, there are no ecological objections. The applicants have subsequently amended the accommodation plan to make clear that the area around the set is not being relied upon for informal recreation and that fencing will be in place to restrict access. I consider that this resolves the issue raised by the Natural Environment Team and further detail of the landscaping (both hard and soft) can be secured by condition through a detailed landscaping scheme. A condition will also be added to require the developer to provide future homeowners with guidance on badgers as recommended by the Natural Environment Team.

- 5.75 In terms of the adjacent County Wildlife Site (CWS), objections have been received from the owner of this land concerned that the development will impact on the hydrological conditions of the site and an introduction of domestic cats will adversely impact on the ecology of the CWS. In response the Natural Environment team have considered this representation and raise no objection in respect of the potential for impact on the CWS.
- 5.76 Biodiversity enhancements can be secured through condition through a detailed landscaping scheme to introduce native hedgerows, trees and wildflower planting, bat and bird boxes, hedgehog gaps etc.
- 5.77 Overall I am satisfied that the scheme would not have a significant adverse impact on the ecology of the site or neighbouring CWS and that mitigation and enhancements can be introduced through detailed landscaping schemes and biodiversity enhancements scheme. Consequently the application complies with policy 1 of the JCS and EN1 of the DM DPD.

Impact on designated sites

- 5.78 Policy 1 of the JCS requires developments to ensure that there will; be no adverse impacts on European and Ramsar designated sites and to provide for sufficient and appropriate local green infrastructure to minimise visitor pressure. This is reiterated and expanded upon in policy EN1 of the DM DPD and policy EN3 of the DM DPD which requires the delivery of 4ha of informal open space per 1,000 population. These policies are to be read in conjunction with the Recreational Provision in Residential Development SPD. In accordance with this SPD, on a development of this scale, it is not anticipated that these requirements would be met on site.
- 5.79 In support of the application is a shadow Habitats Regulations Assessment (HRA) which was subsequently updated (dated 24th November 2020). An HRA addresses potential impacts on sites designated for their nature conservation value at the European and international scale. Where impacts cannot be readily ruled out, the Council, as the competent authority, must undertake an Appropriate Assessment.

5.80 There are two European sites within a 13km radius of the site, these being:

- Norfolk Valley Fens SAC (for which the component site is Booton Common SSSI). This is 1.1km east of the Site but upstream of Reepham Waste Water Treatment Works (WWTW). This is designated for fen vegetation, six types of other vegetation, and two species of invertebrates.
- River Wensum SAC, 4.0km south. Located 'downstream' of Reepham wastewater treatment works. This is designated for in-channel aquatic vegetation, two species of fish and two species of invertebrate.

5.81 Although not a European site, Whitwell Common SSSI is located 1.25km south, downstream of the site designated for its fen habitats including calcareous fen, grassland and carr.

5.82 The applicants shadow HRA identifies that direct impacts from the scheme are scoped out by virtue of distance. It also identifies that there are 3 pathways of potential impact, these being:

- Recreational disturbance
- Foul water disposal and water supply
- Surface water run-off.

5.83 Foul water disposal and water supply are screened out from likely significant impact as these are treated at the plan level. However recreational disturbance and surface water run-off are assessed further via an Appropriate Assessment.

5.84 Natural England has advised that as originally submitted the application could have potential significant effects on the Norfolk Valley Fens SAC and its nationally designated component Booton Common SSSI as well as on Whitwell Common SSSI. Consequently Natural England requested further information regarding:

- Further information on potential recreational impacts to Booton Common SSSI and Whitwell Common SSSI.
- Further information on potential hydrological effects to Whitwell Common SSSI

5.85 In respect of recreational impacts, Natural England identified that whilst there are paths around the proposed site that lead to a public right of way there was insufficient information on how the green infrastructure and access on site will join the wider strategic routes and green infrastructure and required a more detailed assessment of recreational impacts to be undertaken.

- 5.86 Furthermore, in respect of hydrological effects, whilst Natural England agreed that the site is sufficiently distant from the River Wensum SAC and that surface water is not likely to be directed to Booton Common/the Norfolk Valley Fens SAC there had been no assessment of potential hydrological effects in relation to Whitwell Common SSSI, which is susceptible to changes in water levels and water quality.
- 5.87 In response to these comments from Natural England the applicant submitted an amended shadow Habitats Regulations Assessment which identifies, in respect of recreational disturbance, that the extent of any increase in visitor numbers as a result of the scheme is expected to be low given distance and accessibility issues, the availability of alternative routes (including Marriots Way) providing an alternative and the existing management arrangements in place for the sites in question mitigating damage. Consequently it is concluded by the applicant that a small increase in visitor numbers is predicted and that this will not likely impact site integrity.
- 5.88 Natural England have raised no objections in their response, but highlighted the need to ensure on site green infrastructure and footpaths would connect to the wider network. In support of the application is a layout which provides for connectivity to the surrounding green infrastructure network. Furthermore, details of signposting and information boards on accessibility to local green infrastructure can be secured as part of the landscaping scheme for the site. In addition to these connections to the surrounding green infrastructure network are pockets and areas of open space. However much of the open space would not provide a recreational function and could not be included as contributing towards the EN3 requirements of 4ha per 1000 population requirements – this is an issue raised in representations from members of the public and a matter that I agree with. However, on-site informal recreation would not be expected on a development of this scale with reference to the Recreational Provision in Residential Development SPD and a contribution towards green infrastructure projects on the West Broadland GI Project Plan (or alternative projects) can be secured in accordance with the SPD and enable compliance with policy EN3. This would provide further mitigation for recreational impacts on those designated sites. In addition to this, the Council has recently adopted the requirement for residential development to contribute to Norfolk wide green infrastructure recreational avoidance mitigation (GIRAMS) and the applicant is agreeable to the payment of this secured through a section 106 agreement providing further mitigation for recreational disturbance on designated sites. Consequently I am satisfied that sufficient mitigation can be secured to ensure that there is no impact on designated sites in respect of recreational impacts.
- 5.89 In respect of hydrological impacts on Whitwell Common SSSI, the amended HRA assesses the impact as negligible owing to the level of connectivity and the inclusion of suitably designed sustainable drainage mitigation. In

response Natural England note that water supply and foul water drainage will be connected to the mains and they support the use of sustainable drainage systems. They advise that the relevant water companies and the Environment Agency are contacted to confirm there is sufficient capacity to supply the proposed development. In this regard, the responses from Anglian Water identifies that there is sufficient capacity in respect of wastewater and the Environment Agency have raised no objection to the application.

- 5.90 As noted above, impacts from foul water disposal had been screened out by the applicant and did not form part of the appropriate assessment however their report and the advice sought from Natural England pre-dated the recent advice received by Broadland District Council in respect of Nutrient Neutrality. The Council has recently been made aware by Natural England that development with the potential to have nutrient impacts on Habitats sites should now be considered when making decisions in relation to planning. Any impacts need to be identified and mitigation proposed and secured for the Council to conclude no likely significant effects under the Habitats Regulations. The Council needs time to consider the impacts of this requirement on the decision making process and therefore the officer recommendation reflects this need.
- 5.91 Given the above, I am satisfied that the development would not impact the site integrity of either Booton Common SSSI (Norfolk Valley Fens SAC) or Whitwell Common SSSI due to recreational disturbance however further consideration needs to be given to foul and surface water disposal to ensure that the application complies with policy 1 of the JCS and policies EN1 and EN3 of the DM DPD in respect of impact on national and internationally designated sites.

The provision of recreational open space, cemetery and other open spaces

- 5.92 The provision of informal recreation space in respect of policy EN3 has been considered above and it is agreed with the applicant that informal open space will be provided for through a financial contribution in accordance with the SPD secured by s106 agreement. Therefore whilst the pockets of open space which are proposed are welcomed as they aid place making and allow for the provision of soft landscaping and ecological enhancement they are not spaces which provide meaningful informal recreation other than providing access to the surrounding green infrastructure network. Policy EN3 also requires the provision of 0.16ha of allotments per 1000 population. As with informal recreation, in accordance with the Recreational Provision in Residential Development SPD this can be met through an off-site contribution secured by s106 agreement.

- 5.93 Policy RL1 of the DM DPD requires the provision of 1.68ha of formal recreation per 1,000 population and the provision of 0.34ha of children's play space per 1,000 population. No formal recreation (sports pitches etc) is provided on site but given the size of the development this would not be expected based on the SPD and can be achieved also by way of off-site contribution. Given that the scheme provides a contribution of £1.5 million towards the provision of a sports hall it is considered that no further contributions towards formal recreation need to be sought in order to comply with policy RL1. A children's play area to meet the open space requirements is being provided on site in accordance with policy RL1. The design and delivery of this will be secured in the s106 agreement.

The sustainability of the development – scale, level of local services, schools, doctors etc

- 5.94 As discussed in earlier paragraphs, I do not consider that the development would be contrary to the spatial strategy of the JCS given the scale of the proposal and Reepham's position within the settlement hierarchy. However, consideration must also be given to the extent of infrastructure and whether the proposed development, including an increase of dwellings from 'approximately 100-120' to 141, is sustainable.
- 5.95 Concern has been raised on this issue, including by consultees and residents, highlighting the lack of capacity at the doctors and schools and impacts on local policing.
- 5.96 In terms of schooling, Norfolk County Council has advised that the scheme would generate 13 early education children, 38 primary education children, 19 high school age children and 2 6th form age children. As of January 2020 there was capacity in the high school and sixth form to accommodate the development however there was insufficient capacity at Reepham primary school and within the early education sector. This reflects representations made by the primary school headteacher and by the Chairperson of Reepham Nursey.
- 5.97 Norfolk County Council has confirmed that mitigation for the early year's education and primary education can be funded through the Community Infrastructure Levy. However, they have confirmed that pupil forecasts indicate that there is a demographic decline in primary age pupil numbers so would need to consider carefully, in partnership with the school, whether they would need to expand. Given that the impacts of school capacity can be addressed by CIL this does not amount to a reason for refusal or an indication that Reepham cannot accommodate the scale of development proposed.

- 5.98 In terms of medical facilities, the Norfolk and Waveney Sustainability and Transformation Partnership (STP) has confirmed that the development is likely to have an impact on the NHS funding programme for the delivery of healthcare provision. They have identified an impact on the services of 1 GP practice and its branch surgery the Norfolk and Norwich University Hospital, Mental and Community Healthcare operating within the vicinity of the application site. The STP consider that if the impact is left unmitigated it would be unsustainable. To address the issue they advise that capacity improvements are required by way of development of primary care facilities in the area and investments into acute services. In total they are seeking contributions of £283,585. Healthcare is not in the CIL 123 list so mitigation cannot be secured by way of CIL. Whilst the STP has advised that it does not have funding to support development growth, Officers consider that the responsibility for health provision remains with the health providers, primarily with NHS England who provide funding for doctors based on the population / number of patients in an area. The residents in new developments will contribute to this national funding through taxes in the same way as existing residents. Consequently, in general terms the impact of a new residential development on existing medical facilities is managed by health providers and it is not considered that obligations could reasonably be sought through section 106.
- 5.99 In terms of policing, comments made on behalf of Norfolk Constabulary have identified the development would place additional pressure on police resources and that to address this further investment will be required to enhance the capacity of the police (with regard to recruitment, uniform/equipment and vehicle provision). No details have been provided of the amount that Norfolk Constabulary would require or how it would be used in relation to this development specifically. In a similar vein to the medical issue, the residents in new developments will contribute to Norfolk Constabulary funding through taxes in the same way as existing residents. Consequently, in general terms the impact of a new residential development on policing capacity is managed by the constabulary and it is not considered that obligations could reasonably be sought through section 106.
- 5.100 Concerns have been raised by residents about the capacity of the local sewerage network to accommodate the proposed flows from the development. It is noted in paragraph 6.58 of the JCS that the sewerage treatment works restricts development potential and may require phasing. Anglian Water (AW) and the Environment Agency (EA) have been consulted on the application. AW have advised that foul drainage from this development is in the catchment of Reepham Water Recycling Centre that will have available capacity for these flows. They have confirmed that the sewerage system at present has available capacity for these flows via a pumped conveyance to the public foul sewer and that the pump rate will need to be

confirmed at the section 106 (of the Water Industry Act 1991) stage. AW have also confirmed that as the surface water strategy does not relate to their assets so they have no objection to the surface water drainage strategy. The EA have raised no objection in respect of foul or surface water issues. Consequently I am satisfied that the foul water network is sufficiently capable of dealing with the proposed development.

- 5.101 Given the above, I am satisfied that Reepham has a sufficient capacity (or capacity can be provided) to accommodate the scale of development proposed.

Viability

- 5.102 Policy 4 of the JCS requires provision of affordable housing in accordance with the most up to date needs assessment for the plan area. In accordance with the Strategic Housing Market Assessment 2017, the Council considers that developments are required to provide 28% affordable housing to comply with policy 4 of the JCS.
- 5.103 The application was initially supported by a viability appraisal to support the applicant's proposal of 20% affordable housing being provided. The Council had this independently reviewed and the conclusion was that the scheme was viable at a policy compliant level of affordable housing. The applicant submitted a further viability assessment in rebuttal to the Council report, however they have subsequently reflected on the viability of the scheme and, owing to the increase in residential values that have occurred in Norfolk, and taking account of other factors such as increases in material prices, have agreed that the scheme is able to provide 28% affordable housing of a mix, size and tenure that has been agreed with the Council's Housing Enabler.
- 5.104 Comments from members of the public have questioned whether this should be accepted given the previous viability appraisals, however I do not consider that a further round of viability assessments is required given that a policy compliant level of affordable housing is being offered, a rationale has been provided for why the viability has changed, and the 28% will be secured through a legally binding s106 agreement that the applicant could not amend without first seeking agreement of the local planning authority. Paragraph 58 of the NPPF advises that planning applications that comply with up-to-date policies should be assumed to be viable. Given the application complies with policy 4 of the JCS in respect of affordable housing I consider that the viability of the scheme does not need to be challenged further.

The need for Environmental Impact Assessment (EIA)

- 5.105 Representations from members of the public have questioned the need for the development to be accompanied by an Environmental Statement on the basis

that they consider it to be EIA development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The aim of EIA is to protect the environment by ensuring that a local planning authority when deciding whether to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision making process. The regulations set out a procedure for identifying those projects which should be subject to an Environmental Impact Assessment, and for assessing, consulting and coming to a decision on those projects which are likely to have significant environmental effects.

5.106 The first stage of EIA is 'Screening' which determines whether a proposed project falls within the remit of the Regulations, whether it is likely to have a significant effect on the environment and therefore requires an assessment. The local planning authority (or the Secretary of State as the case may be) should determine whether the project is of a type listed in [Schedule 1](#) or [Schedule 2](#) of the 2017 Regulations:

- if it is listed in [Schedule 1](#) an Environmental Impact Assessment is required in every case;
- if the project is listed in [Schedule 2](#), the local planning authority should consider whether it is likely to have significant effects on the environment.

5.107 If a proposed project is listed in the first column in [Schedule 2](#) of the 2017 Regulations and exceeds the relevant thresholds or criteria set out in the second column (sometimes referred to as 'exclusion thresholds and criteria') the proposal needs to be screened by the local planning authority to determine whether significant effects on the environment are likely and hence whether an Environmental Impact Assessment is required.

5.108 In the case of the proposed development, it is considered to be a 10b urban development project within the first column of Schedule 2. It also exceeds the thresholds in the second column (being for more than 150 dwellings and exceeding 5 hectares in area). Accordingly, the application needs to be screened to determine whether it is EIA development.

5.109 The procedure for screening Schedule 2 projects requires the local planning authority to take account of the selection criteria in Schedule 3. These criteria include the characteristics of development, location of development and type and characteristics of potential impact.

5.110 Planning Practice Guidance advises that only a very small proportion of Schedule 2 development will require EIA. However to aid local planning authorities to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been

produced. These state that for 10(b) projects there are the following indicative criteria:

- (i) area of the scheme is more than 5 hectares; or
- (ii) it would provide a total of more than 10,000 m² of new commercial floorspace; or
- (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).

5.111 Having had regard to the criteria in Schedule 3 and the above criteria, I have undertaken a screening checklist and concluded that the development is not likely to have significant effects on the environment and that the project does not constitute EIA development.

Other considerations – drainage, archaeology, minerals, finance

5.112 The application proposes a surface water drainage scheme which relies on infiltration ensuring that there would be no increase in the risk of flooding either on site or elsewhere in accordance with policy CSU5 of the DM DPD. The LLFA have raised no objection to the application subject to conditions. The incorporation of infiltration features also presents the opportunity for ecological and landscape enhancements which can be secured as part of the soft landscaping of the site.

5.113 The Historic Environment team at Norfolk County Council have confirmed that there is no need for further archaeological works to be undertaken so no condition is required in this respect.

5.114 To ensure that any below ground mineral assets (such as sand) are not sterilised, a condition can be imposed to require a materials management plan.

5.115 In noting the representations from third parties, in addition to the assessment above which addresses issues relating to traffic, landscape impact, neighbour amenity etc which have all been highlighted as concerns, officers would also wish to make the following points:

5.116 In terms of the availability/capacity of local services it is necessary to have regard to the fact that this is an allocated site. In terms of schooling, NCC have confirmed their position in respect of education and are not objecting on capacity grounds and there is no development management policy requirement to provide increased capacity at the doctors surgery as a consequence of new residential development. Car parking has been provided to meet the needs of the development (there is no objection from the Highway Authority), the development is not required to solve any current parking issues

that may exist. It is evident that there are no outstanding objections from any technical consultees in respect of any other capacity eg water, drainage etc.

- 5.117 There is no development management policy requirement to directly secure jobs as part of the residential scheme, it is evident that job opportunities currently exist within this part of the District and the Local Plan makes positive provision for employment sites to facilitate economic growth.
- 5.118 To clarify the figure of 28% affordable housing is pursued in line with the findings of the SHMA as the most up to date data to inform the Council's view on affordable housing.
- 5.119 In terms of the consultation process to date, officers are satisfied that given the length of time this application has been submitted, coupled with the consultation processes undertaken that residents have had sufficient time and opportunity to present any views that they have on the applications.
- 5.120 The decision will put appropriate measures in place to deal with issues surrounding the Badger sett.
- 5.121 The development provides a good mix of dwelling types including a number of "smaller" units as well as 4/5 bed properties, this is consistent with the requirements of Policy 4 of the JCS.
- 5.122 The existence of other "potential" sites for housing in Reepham is not a decisive material consideration in this case given that this site is allocated for residential development in Local Plan.
- 5.123 A construction management plan will be secured via condition to minimise disruption to existing residents
- 5.124 There is no requirement as part of the allocation to provide a second access into the development, and it is apparent that the Highway Authority have not objected to the scheme having one means of access.
- 5.125 The S106 will secure a financial contribution to assist with delivering improved bus services for Reepham.
- 5.126 It is considered that the drainage features can be provided in such a way as to prevent it being a safety hazard eg appropriate fencing/treatment to its perimeter secured via the planning permission.
- 5.127 The scheme will see 10% of its schemes expected energy requirements from decentralised and renewable or low carbon energy in line with the requirements of Policy 3 of the JCS, it would be unreasonable to refuse permission on an allocated site in relation to the use of natural resources.

- 5.128 The permission includes a condition in respect of controlling external lighting.
- 5.129 There is no development management policy requirement to provide electric vehicle charging points as part of the application, however, Building regulation changes will address this point in the future.
- 5.130 There is no development management policy requirement to provide street lighting in this instance. If it were to be provided this would need to be maintained by the Town Council and it is not apparent that they are willing to take on this responsibility.
- 5.131 Whilst other schemes in Reepham may have been refused on highway grounds, it is apparent that the Highway Authority do not object to this scheme and that all applications are assessed on their individual merits.
- 5.132 Site security will be a matter for the developer deal with as part of the construction process.
- 5.133 With regard to the cemetery extension this is to be transferred to the Town Council with perimeter fencing in place and only a pedestrian access from its northern boundary (no new vehicular access from the development is proposed).
- 5.134 With regard to viability, the Council commissioned an appropriately qualified organisation (NPS) to assess the submitted viability appraisal as is frequently the case where matters relate viability.
- 5.135 Under Section 143 of the Localism Act the Council is required to consider the impact on local finances. This can be a material consideration but in the instance of this application the other material planning considerations detailed above are of greater significance.
- 5.136 This application is liable for Community Infrastructure Levy (CIL), 15% of which would be paid to Reepham Town Council.

Conclusions

- 5.117 Given the above, I consider that the application conflicts with policy REP1 of the SA DPD of the development plan given the number of dwellings exceeding that stated in the allocation and that a sports hall is proposed off site via a contribution. In turn this results in a conflict with policy GC2 of the DM DPD. However, it is considered that these conflicts do not undermine the overall objectives of the development plan and I consider that there are material considerations, as discussed in this report, which warrant a departure from these policies of the plan. Furthermore, when the development plan is

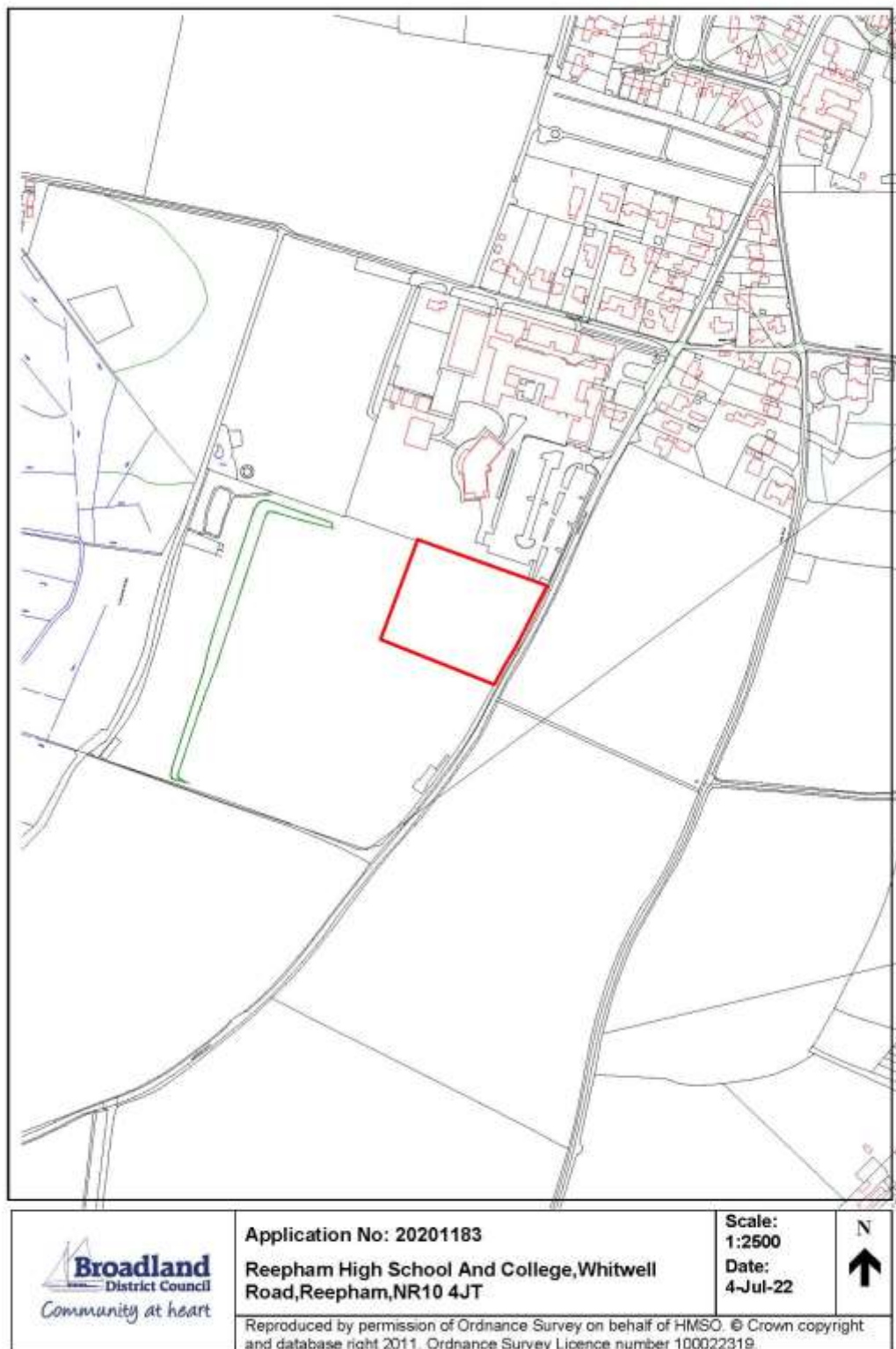
taken as a whole I consider that the application is in overall accordance with it, subject to the suggested conditions and the resolution of matter relating to nutrient neutrality the application is recommended for approval.

Recommendation:	Authorise the Director of Place to approve subject to conditions and a section 106 Agreement, subject to satisfactorily addressing the requirements under the Habitats Regulations regarding nutrient neutrality and subject to the application being referred to the Secretary of State in respect of the Sport England objection.
	<p>S106 Heads of Terms:</p> <ol style="list-style-type: none"> 1. 28% Affordable Housing (65% rent:35% intermediate) 2. Open space provision/contributions in accordance with EN3 and RL1 (and the associated Recreational provision in Residential Development SPD) 3. £1.5 million contribution towards sports hall 4. Transfer of land identified for cemetery 5. Travel Plan 6. Bus service contributions 7. Dedication of land at Whitwell Road for visibility splays 8. GIRAMS <p>Conditions</p> <ol style="list-style-type: none"> 1) 3 year commencement 2) Plans and documents 3) Delivery of highway works under 20200469 prior to commencement 4) Tree protection/retention measures (L09 and L16) 5) Detailed landscaping plan 6) Further site investigation for contamination 7) Construction management plan 8) Surface water drainage scheme 9) Minerals management plan 10) External lighting scheme 11) Badger information pack for homeowners 12) Construction Environment Management Plan: biodiversity 13) Landscape Environment Management Plan 14) Biodiversity Enhancement Plan 15) Fire hydrants (1 per 50 dwellings) 16) Details of roads, footways etc (SHC01) 17) Details of roads, footways etc (SHC02) 18) Binder course (SHC03A) 19) Phasing Plan (SHC03B) 20) Visibility Splays (SHC17) 21) Details of on-site parking for construction workers (SHC23)

	<ul style="list-style-type: none"> 22) Construction Traffic management Plan and Access Route (SHC24A) 23) Compliance with Construction Traffic Management Plan (SHC24B) 24) Stopping Up Order (SHC32) 25) Offsite highway works PRA029-GA-003 (SHC33A(1)) 26) Implementation of off site highway works (SHC33B(1)) 27) Off-site highway improvement works to improve the road crossing (with road narrowing if required) of School Road at Reepham Primary School and provision of pedestrian and cycle signs between the development and Reepham town centre SHC33A(2) 28) Implementation of off site highway works SCH33B(2) 29) Details of Interim Travel Plan SHC35A 30) Implementation of Interim Travel Plan SHC35B 31) External materials 32) Construction management plan 33) 10% renewables
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Contact Officer, Chris Raine
 Telephone Number 01508 533841
 E-mail christopher.raine@southnorfolkandbroadland.gov.uk

Application 3



3. Application No: 20201183
Parish: REEPHAM

Applicant's Name: Mr Rob Watton, Reepham High School and College
Site Address: Reepham High School And College, Whitwell
Road, Reepham, NR10 4JT
Proposal: Provision of a New Sports Hall with associated Changing
Facilities, Studio, Sports Classrooms and Parking.

Reason for reporting to committee

There are exceptional circumstances which warrant consideration of the proposal by committee given the relationship between this application and 20200469 and 20200847.

This application is on the agenda having been deferred prior to the previous meeting. The deferral was due to officers being made aware on the day before the meeting that an error may have occurred in relation to the notification process for the meeting, when it was apparent from investigations that this was indeed the case, with the agreement of the Chairman of the Planning Committee, it was agreed to defer the application so that the Council's stated procedure could be followed in advance of the next meeting.

Recommendation summary:

Approve subject to conditions.

1 Proposal and site context

- 1.1 The site is in Reepham, a market town to the north-west of Norwich. It has one high school located to the south of the town on Whitwell Road.
- 1.2 The school was built in the 1960s with buildings typical of that era, red bricked flat roofed with one and two storeys. More modern classrooms have been added including a new sixth form and a playing field to the south in 2009.
- 1.3 The original main entrance to the school is on Whitwell Road with a second access to the south serving the sixth form, car-parking and drop-off area and the sports facilities. There is a minor service access from Broomhill Lane, which runs along the northern boundary.
- 1.4 The 0.48ha site for the sports hall lies to the south of the school on land which is part of the playing field in its north-east corner, adjacent to the road. It is level and grassed and has an established line of lime trees to the north boundary with a grass verge and native hedging interspersed with trees along the Whitwell Road frontage to the east. To the east, west and south are agricultural fields with the residential allocation located to the north-west.

- 1.5 The application is in outline with all details reserved. Plans and elevations have been submitted but these are indicative only and do not form part of the application. If outline permission is granted a further application(s) would be required to deal with the details of access, design, layout, scale and landscaping which would be subject to consultation.
- 1.6 The site area is 0.48ha and the estimated floor space of the building is 1,339sqm. The identified requirements are; a 4 badminton court hall, a studio space, two teaching rooms and a flexible meeting space with associated storage, changing facilities, plant and office. The facilities are proposed to be a shared school and community facility which would be open to the public.1.7 The application has been referred to the Planning Committee for determination along with two related applications; 20200847 - proposed residential development for 141 dwellings and 20200469 - proposed widening of carriageway with traffic calming.
- 2 Relevant planning history
- 2.1 20080277 - New 6th Form Block and Science, Art and Music Extensions, Extend Existing Coach/Car Park. Reephams High school. Approved.
- 2.2 20080413 - Change of Use of Land from Agricultural to School Playing Field. Reephams High School. Approved.
- 2.3 20200847 - Proposed residential development for 141 dwellings with associated open space, highway and landscaping works. Extension to existing Reephams cemetery. Land west Broomhill Lane. Undetermined
- 2.4 20200469 - Widening of carriageway with traffic calming, revised junction configuration with Whitwell Road, shared use cycleway/footway and surfacing footpath to Park Lane. Undetermined
- 3 Planning Policies
- 3.1 National Planning Policy Framework (NPPF)
NPPF 02 : Achieving sustainable development
NPPF 03 : Plan-making
NPPF 04 : Decision-making
NPPF 08 : Promoting healthy and safe communities
NPPF 09 : Promoting sustainable transport
NPPF 11 : Making effective use of land
NPPF 12 : Achieving well-designed places
NPPF 14 : Meeting the challenge of climate change, flooding and coastal change
NPPF 15 : Conserving and enhancing the natural environment

- 3.2 Joint Core Strategy (JCS)
 - Policy 1 : Addressing climate change and protecting environmental assets
 - Policy 2 : Promoting good design
 - Policy 3: Energy and water
 - Policy 6 : Access and Transportation
 - Policy 7 : Supporting Communities
 - Policy 8 : Culture, leisure and entertainment
 - Policy 14 : Key Service Centres
 - Policy 20 : Implementation
- 3.3 Development Management Development Plan Document (DM DPD) 2015
 - Policy GC1 : Presumption in favour of sustainable development
 - Policy GC2 : Location of new development
 - Policy GC4: Design
 - Policy EN1: Biodiversity and Habitats
 - Policy EN2 : Landscape
 - Policy TS3 : Highway safety
 - Policy TS4 : Parking guidelines
 - Policy CSU1 : Additional community facilities
 - Policy CSU5 : Surface water drainage
- 3.4 Site Allocations Development Plan Document 2016
 - Policy REP1: Land off Broomhill Lane, Reepham
- 3.5 Supplementary Planning Documents (SPD)
 - Landscape Character Assessment
 - Parking Standards SPD

4 Consultations

4.1 Reepham Town Council:

Reepham Town Council wish to record that they object to this application on the grounds that the new site for the sports hall with associated changing facilities, studio, sports classrooms and parking is in contravention of Broadland District Council's Site Allocations DPD - (2016) REP 1, which forms part of the local plan and states that ' Land off Broomhill Lane, Reepham is allocated for residential development and community facilities (including cemetery land, recreational open space and a sports hall). It is noted that the site, at 0.48 hectares, is not part of Land off Broomhill Lane and instead takes up a significant proportion (one fifth) of the remaining school playing field area. REP 1 is quite specific that the sports hall is to be built on the development land off Broomhill Lane. By disregarding this and, instead, building on a further area of the School/College playing field the loss of open space available to the school is very significant. The Town Council is therefore concerned that this application deprives the School of land that it currently

occupies. This would be in addition to the loss of land to allow for an increased level of housing development, proposed under the separate planning application 20200847, on which funding for the Sports Hall depends. The use of land for the Sports Hall, on land outside the site defined in REP1, will further reduce the School's capacity for future expansion. Such expansion is likely to be necessary as the population of Reepham grows. This expansion of the school is also particularly likely as it is rated as 'good' by Ofsted.

Although this application appears to be independent of Application 20200847 it is clear that the two are inextricably linked. However, the Town Council is not privy to the terms of any Agreement between the School and the Applicant of 20200847 so is unable to assess the probability of the Sports Hall being built. The onus to provide the school with a Sports Hall should be on the developer.

4.2 Highway Authority:

I have no principle objection to this proposal but am concerned at the low level of additional on-site parking provided for a facility that apparently will be used by outside bodies/groups, possibly during school opening times, as well as the High School itself. As I am aware that off-site parking already occurs by School staff it seems unacceptable for this facility to not be at least be self-sufficient in on-site parking provision. The BDC parking standards document indicates a parking provision of one space per 22m² of GFA is required with the building being of 1339 m² (as detailed on application form) the parking provision required is 61 spaces together with cycle parking provision. The applicant's agent should be asked to address the above point and revise the application to provide suitable levels of both vehicle and cycle parking.

Comments on additional information:

It is accepted that use of the proposed sports hall by outside bodies will not necessarily overlap with school use and on this basis outside of school hours school parking facilities could be used by visitors to the sports hall.

However, my information is that school parking provision is already insufficient with staff parking on an adjacent verge on Broomhill Lane. This verge is to be removed/lost by recent proposed housing development and thereby it appears that staff/school parking will be reduced further.

As the planning applications have connection it appears unreasonable to allow an application that does not provide, to any acceptable level, its own on-site parking but relies on already stretched and reduced facilities.

Comments on additional information:

I note dedicated car parking provision has been increased to circa twenty spaces and that a pedestrian route through the site has been provided. I assume this route will be available at all times and that the operation of the sports hall has been clarified to the satisfaction of your authority.

It appears that no cycle parking is provided that is dedicated to the sports hall although this can be controlled with conditions.

This all being the case I have no grounds for objection to the proposal.

4.3 Lead Local Flood Authority:

Having reviewed the submitted information from the applicant we object to this application in the absence of an acceptable drainage strategy or supporting information.

Comments on additional information:

The applicant has now supplied an FRA and Drainage Strategy (Rossi Long Ref: 191408 – Rev 0– dated January 2021) in support of this Outline application to account for the local flood risk issues and surface water drainage at this location.

Insufficient information has been provided to demonstrate that surface water can be managed on the site and discharged to the ground via infiltration without resulting in an increase in the risk of flooding elsewhere. An alternative method of drainage has not been provided should infiltration rates in the location of the proposed soakaway prove to be unfavourable during detailed design. Hence the site has not demonstrated that there is an achievable surface water drainage proposal for this application.

It is noted from the calculations provided that the half drain times for the SuDS infiltration feature in the 1% AEP plus 40% climate change rainfall event exceed the permitted 24hrs. Any design of infiltration structure should ensure that it can discharge from full to half-volume within 24 hours in readiness for subsequent storm inflow (CIRIA SuDS Manual (C753) section 25.7 and BRE Digest 365). Where the infiltration storage is designed to accept a storm event greater than 3.33% AEP, large attenuation may be required. Where there is adequate justification (i.e. not in a high flood risk area), we may accept longer half drain down times if additional freeboard can be provided e.g. enough storage to accept a subsequent 10% AEP storm event.

Also, the drainage calculations provided demonstrate a required soakage feature of approximately 135m³, whereas the drainage strategy drawing (Ref: 191408 RLC-00-XXDR C-001 Rev P01 dated January 2021) shows a cellular soakaway of 5mx10mx0.8m. Clarification is required.

It is also unclear what the impermeable areas used in the calculations are based upon. Clarification is required.

Having reviewed the submitted information from the applicant we object to this Outline application in the absence of an acceptable drainage strategy or supporting information

Comments on amended plans:

No objection subject to conditions being attached to any consent if this application is approved and the Applicant is in agreement with pre-commencement conditions. If not, we would request the following information prior to your determination.

4.4 BDC Senior Heritage and Design Officer:

These comments relate to the design of the building in this location. Whether or not it is the best location is subject to other planning considerations so I will not comment on that aspect and I also note that it is outline. However, indicative drawings and perspectives have been submitted to demonstrate design and give an indication of design parameters which may be considered acceptable at reserved matters stage.

In term of setting in design and heritage terms the adjacent school buildings are quite modern, and I note additional screening is being provided. There is an opportunity with phase 2 to have a building which is more sympathetically designed and which will be seen from Whitwell Road in front of the sports hall and thereby could offset to some extent the impact of its bulk. Also, the tree planting proposed will help to mitigate the impact of the large structure.

With regard to the design of the building, I recognise that there are certain limitations on the design of the sports hall in order to obtain the height for the badminton courts etc. It will inevitably need to be quite a blocky structure of some height. The metal sheet panelling above is usually acceptable for this sort of construction, and if detailed well could be aesthetically acceptable with raised ribbing helping to break up the bulk. It could be designed to be more like an agricultural barn with low pitched gable roof, but that would not necessarily bring additional benefit, and a flatter monopitch roof is I consider preferable. However, the blockwork at ground floor level is utilitarian in nature, and I consider could be specified with a good rural red brick multi which would be better suited to the context and provide some interest at ground level.

With regard to the classrooms and phase 2, this presents an opportunity to have a more sympathetically designed building fronting towards Whitwell Road. The present design with the simple form, metal seam roof, vertical timber cladding and rhythm of windows does make it appear more like a temporary utilitarian construction. I would suggest this design is revisited with again brick elevations, and maybe pantiles as an option, to relate it better to the rural context and present a building of interest to the road which looks more permanent. Vertical timber cladding could be used to provide some interest, but I suggest it should be used as a secondary material to provide additional interest rather than the main material for the elevations fronting Whitwell Road.

4.5 Sport England:

Holding objection.

It is understood that the proposal could prejudice the use, or leads to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement. Unfortunately the information provided does not give Sport England sufficient information to assess the application against our adopted playing fields policy.

We require existing and proposed site plans showing winter/summer sports pitches for the whole site to assess the impact on sports pitch provision at this site. This is particularly important in this case because there is also the application to convert part of the existing playing field to residential development.

Comments on additional information:

Sport England raises no objection to the principle of this proposal, but objects to the design of the sports hall which does not meet Sport England technical guidance.

Sport England would support the addition of a planning condition requiring a community use agreement as follows:

Use of the development shall not commence until a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to the proposed sports hall and include

details of pricing policy, hours of use, access by non-school users, management responsibilities and a mechanism for review. The development shall not be used otherwise than in strict compliance with the approved agreement.

Reason: To secure well managed safe community access to the sports facility/facilities, to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy.

4.6 CPRE:

CPRE Norfolk objects to this application for the following reasons: One of recommendations for the development of the allocated site REP1 was for the developer to provide a sports hall for the school and community to use within this specific site. The proposed site for the sports hall, studio and classrooms is well away from that allocated site for development. The proposed location would lead to further loss of the playing fields and pitches.

The proposal includes 8 new parking spaces, which would be far too few to serve the new facility, particularly given that it is intended for community use. The current car park for the High School and College is already inadequate, with some parking taking place offsite, which will be compounded by a new sports hall with its demand for further parking.

The design fails to meet the recommendations of NPPF paragraph 12, “Achieving well-designed places”. Paragraph 127b states: “..planning policies should ensure that developments: are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.” Its industrial, box-like form, with monopitched roof is unimaginative. The separate, lower structural form of the changing room block, with no natural daylight, would be claustrophobic and an unpleasant space to use. Phase 2, with two classrooms and studio, appear to be an architectural afterthought.

The southern extent of the school’s built campus is defined by a long row of mature lime trees, and to build beyond this green boundary would have a negative impact on the landscape and on the open nature of the existing playing fields.

It’s unfortunate that the circumstances surrounding the viability of the housing development have resulted in such a frugal and mediocre design for the proposed Sports Hall, along with the proposal for it being sited in an inappropriate location.

Other Representations

4.7 Resident Comments:

The objections are summarised as follows:

- The sports hall is not located within the allocation REP1 which is for housing and a sports hall. This will mean additional housing land in the allocation.
 - No justification has been given for moving its location from the allocation
 - There is no funding in place and uncertainty as to whether it will actually happen
 - The need has not been adequately demonstrated, and it is a waste of public money
 - It is on a green playing field and encroaches into the countryside
 - Loss of playing field
 - How will community use be ensured
 - It will extend the built development south along Whitwell Road, this was not previously favoured
 - The works to Broomhill Lane and Whitwell Road junction will create a need for more parking and a drop-off area as this is how it is used now
 - The access is through the existing with only 8 additional spaces, there is insufficient parking and congestion will result
 - It is a highly visible, two-storey building and the design is industrial not rural in appearance. The building is a blot on the landscape.
 - It needs screening and landscaping
 - Will impact on carbon emissions through extra vehicles
 - School security will be affected
 - Congestion will affect the fire station operation
- Does not comply with the Sport England Design technical guidelines in relation to the playing space and position of windows.

5 Assessment

Key Considerations

- 5.1 Planning law (section 38(6) of the Planning and Compulsory Purchase Act 2004) requires that applications must be determined in accordance with the development plan unless material considerations indicate otherwise. Relevant development plan policies are detailed above. Material considerations include policies in the National Planning Framework (NPPF), other policy documents detailed above and any other matters referred to specifically in the assessment below.

The key considerations in the determination of this application are:

- Principle of development
- Impact on playing fields
- Impact on character and appearance
- Impact on highway safety

Principle

- 5.2 The site is located outside of the defined settlement limit for Reepham. Policy GC2 of the DM DPD states that outside of settlement limits development which does not result in any significant adverse impact will be permitted where it accords with a specific allocation and/or policy of the development plan. In this regard, policies CSU1 of the DM DPD and REP1 of the site allocation DPD are of relevance.
- 5.3 Policy CSU1 states that proposals which improve the range of community facilities and local services available within the district will be encouraged where no significant adverse impact would arise. Such proposals may be permitted outside settlement limits where it has been adequately demonstrated that a clearly defined need exists.
- 5.4 The proposal seeks to deliver the provision of a sports hall for the school identified in policy REP1 of the SA DPD. I consider that this allocation provides evidence of need for a sports hall to serve the school.
- 5.5 Whilst it is noted that the proposed siting of the sports hall is not within the boundaries of allocation REP1 as originally envisaged, the school has identified that from an operational perspective the siting of a sports hall within the boundaries of REP1 would be inefficient and consequently that they do not wish to pursue a sports hall on REP1. They have identified that locating the school in the proposed location has the benefit of allowing for the use of the existing car park and also makes use of an area of playing pitch which is little used at present. Furthermore, the school has identified that current sports facilities in Reepham are poor and the school lacks a high quality indoor space which the development could provide. In addition, the scheme would allow the current sports hall to be turned into a performing arts centre with mini theatre which would further benefit the school pupils.
- 5.6 The school have also identified that the proposed location would make for more efficient use by the community, on the basis that the school propose that the facilities would be available for local sports teams and other groups outside of school hours and that by siting it in the location proposed the community use would be operationally easier for them to manage. This community use can be secured through a condition requiring a Community Use Agreement and would ensure that the development has wider public

benefits beyond just those of the school. Sport England have confirmed that they would support the addition of a planning condition requiring a community use agreement. This would be worded as follows:

- 5.7 Use of the development shall not commence until a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to the proposed sports hall and include details of pricing policy, hours of use, access by non-school users, management responsibilities and a mechanism for review. The development shall not be used otherwise than in strict compliance with the approved agreement
- 5.8 In summary, by virtue of the allocation REP1 I am satisfied that a need for a sports hall to serve the school exists. As above, it is also noted that the school have stated that it is not their intention to take up a sports hall within REP1. Consequently, I am satisfied that the scheme would comply with CSU1, subject to there being no significant adverse impact in any other respect arising eg landscape impact, neighbour amenity etc. All other relevant planning issues are discussed in the following sections of the assessment.
- 5.9 Additionally, the principle of the development is given further weight by virtue of the support within the development plan for the delivery of infrastructure which supports communities. The scheme would provide enhanced sporting opportunities for pupils and the wider community with the associated physical and mental health benefits that this can bring. The development would also improve the educational facilities of a school and college which serves a wide catchment. Such objectives are supported by objectives 5 and 11 of the JCS.

Impact on Playing Fields

- 5.10 Paragraph 99 of the NPPF states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:
- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

- 5.11 The site is within land categorised as a playing field and Sport England are a statutory consultee in the determination of this application. Their Playing Field Policy is to oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:
- all or any part of a playing field, or
 - land which has been used as a playing field and remains undeveloped, or
 - land allocated for use as a playing field
- 5.12 unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.
- 5.13 Sport England initially provided a holding objection to the application requesting pitch layouts to allow them to assess the proposal against their playing fields policy. The applicants therefore submitted winter and summer plans of the playing fields which indicate winter layout of u16 football, u14 football, u12 football, and five mini soccer pitches, u16 rugby, u12 rugby and mini rugby and summer layout of cricket square, 400m grass running track and rounders pitch. Sport England have themselves consulted the relevant clubs/organisations that use the playing field and conclude that there is scope for community access to the playing fields (for rugby clubs) and the sports hall (for cricket), though it is not clear whether the sports hall could accommodate futsal.
- 5.14 They have advised that it would appear that the sports hall can be sited without adversely affecting existing pitch provision, and would provide the school and local community with enhanced indoor sports provision. Phase 2 would include two additional classrooms and a studio for smaller scale group work. The sports hall, subject to detailed design at reserved matters, will be able to accommodate badminton, 5-a-side football, volleyball, basketball, netball and other indoor activities such as keep fit, gymnastics, martial arts etc.
- 5.15 It is considered by Sports England, on balance, that the benefits to sport from the proposed sports hall, outweigh the detriment caused by the loss of part of the playing field, and that therefore the proposal meets exception 5 of the adopted Sport England playing fields policy which states that
- 5.16 “The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field”

- 5.17 This policy reflects paragraph 99 of the NPPF. As such, Sport England does not object to the principle and I consider that the application complies with paragraph 99 of the NPPF.
- 5.18 Concerns were raised by Sport England and a local volleyball foundation in respect of the design as it would be necessary for the scheme to meet the Sport England design guidance to cater for a range of sports. However, this is an issue to be addressed at reserved matters when the design of the building is submitted for detailed approval.

Impact on character and appearance

- 5.19 Policy EN2 of the DM DPD requires development proposals to have regard to the Landscape Character Assessment SPD and consider impacts on a range of matters as listed i-vii in the policy. Policy 1 of the JCS also seeks to protect environmental assets which include general aspects such as the countryside and rural character. The site is located within Landscape Character Type C1 (Foulsham and Reepham) with reference to the Landscape Character Assessment SPD.
- 5.20 The application is in outline and therefore the detailed comments received relating to the indicative plans cannot be taken into account in the determination of this application.
- 5.21 Notwithstanding this it is apparent that any new building will encroach southwards from the school site but it is proposed on land which is already a playing field. It is a grassed area but it is not open countryside and its use is far more intensive than any of the surrounding agricultural fields. This principle was established when the change of use application was approved in 2008. A new building in this location will have an impact on the landscape but siting it to the north-east corner means it will be seen against the backdrop of the existing school buildings and activity and closely related to these.
- 5.22 If the principle is approved the reserved matters application will allow a full consideration of scale, massing and design and ensure that the building relates well to the surrounding area through use of sympathetic materials. It is anticipated that the applicants would take into account comments already received and particularly the response of the Council's Senior Design and Heritage Officer. It is therefore considered that the application complies with Policy 2 of the JCS and Policies GC4 and EN2 of the DM DPD and has regard to the Landscape Character Assessment.

Impact on Highway Safety

- 5.23 The proposal is to access the new sports hall through the school site, using the existing access from Whitwell Road. Additional plans have been submitted

to show this and the Highway Authority has not raised an objection. Objections have been raised by local residents relating to a lack of parking and also to a resulting increase in congestion around the school, particularly on Broomhill Lane.

- 5.24 It is acknowledged that congestion occurs however it is at a level which is normally associated with a school and it is for a limited time period at the start and end of the day. The Highway Authority has not objected on highway safety grounds and it is considered that the application could not be refused for this reason.
- 5.25 In terms of the amount of parking to be provided, the plans have been revised to increase the additional new parking from 8 spaces to 20 spaces to cater for the net increase generated by the sports hall. The majority of the use during school hours will be by pupils and staff who are already on site and as such would not result in extra traffic movements. When the building is being used by the community this will be after school hours and there will be parking available as it will be a shared space and the majority of the school associated traffic will have left.
- 5.26 The concurrent application (2020/0469) will widen Broomhill to a minimum of 5.7m and make junction improvements thereby allowing easier and safer movement of vehicles. Traffic calming is also proposed to ensure speeds are kept low and a new footpath with pedestrian crossings will also improve safety for pedestrians accessing the school and sports hall from the Broomhill Lane direction.
- 5.27 Following discussion and additional information being submitted the Highway Authority is satisfied with the proposal and it is considered that the application complies with Policies TS2 and TS3 of the DM DPD and has regard to the adopted parking standards.

Other Issues

- 5.28 In terms of impact on ecology or habitats the existing use as a playing field does not lend itself to any specific natural habitat and an Arboricultural report has been submitted demonstrating no significant impact on any trees. If approved a condition would be included requiring details of ecological improvements and landscaping and additional native tree planting to soften the building which would also be of benefit to wildlife and comply with Policy EN1 of the DM DPD. The Council has recently been made aware by Natural England that development with the potential to have nutrient impacts on Habitats sites should now be considered when making decisions in relation to planning. Any impacts need to be identified and mitigation proposed and secured for the Council to conclude no likely significant effects under the Habitats Regulations. The Council needs time to consider the impacts of this

requirement on the decision-making process and therefore the officer recommendation reflects this need.

- 5.29 The site is in Flood Zone 1 where there is a low risk of fluvial flooding. A reserved matters application would deal with surface water drainage and a condition can be attached to require these details under Policy CSU5. The LLFA have no objections to the application based on the amended information which was submitted.
- 5.30 Under Section 143 of the Localism Act the Council is required to consider the impact on local finances. This can be a material consideration but in the instance of this application the other material planning considerations detailed above are of greater significance.
- 5.31 The development is not considered to fall within Schedule 2 of the EIA regulations such that this application needs to be screened, nevertheless, it should be noted that this proposed development has been given regard to in the screening of 20200847 along with 20200469 given the “in combination” effects caused by the three applications being interlinked.
- 5.32 This application is not liable for Community Infrastructure Levy (CIL).

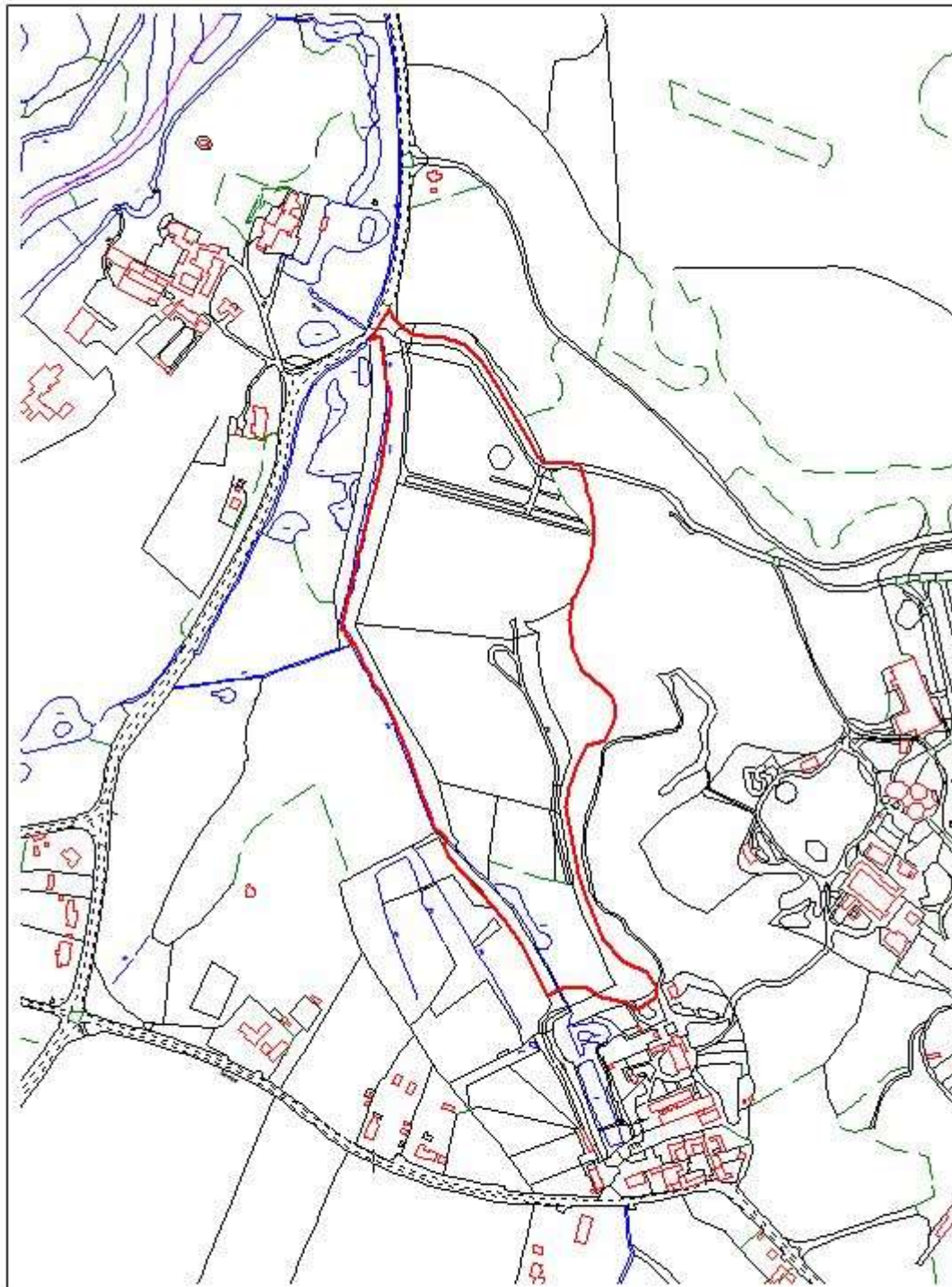
Conclusion

- 5.32 I am satisfied that the application complies with the development plan and that there are not material considerations which justify a decision otherwise than in accordance with the development plan. Accordingly, it is recommended that planning permission is granted.

Recommendation:	Approve subject to conditions
	<ol style="list-style-type: none"> 1. Reserved matters time limits 2. Details required for access, appearance, layout, scale and landscaping 3. Community use agreement 4. Tree protection details 5. Highway Condition SHC21 and SHC 22 6. Surface water drainage 7. Ecological enhancements

Contact Officer, Chris Raine
 Telephone Number 01508 533841
 E-mail christopher.raine@southnorfolkandbroadland.gov.uk

Application 4



 <p>Broadland District Council <i>Community at heart</i></p>	<p>Application No: 20220034 Norfolk Dinosaur Park Ltd, Morton Lane, Weston Longville, NR9 5JW</p>	<p>Scale: 1:3000 Date: 26-Aug-22</p>	<p>N </p>
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4. Application No: 20220043
Parish: WESTON LONGVILLE

Applicant's Name: Mr A Goymour, Norfolk Dinosaur Park Ltd
Site Address: Morton Lane, Weston Longville, NR9 5JW
Proposal: Hybrid application - Part full and part outline for the change of use of a former Deer Park to provide an extension to the Roarr Dinosaur Attraction comprising three phases of development, including a volcano feature, rides, food and beverage facilities, toilet block, entrance feature, extension to overflow carpark, ecological enhancement and landscaping

Reason for reporting to committee

The Local Member has requested that the application be determined by the Planning Committee for appropriate planning reasons as set out below in section 4.

Recommendation summary:

To authorise the Assistant Direct of Planning to approve subject to ecological matters being resolved and subject to conditions.

1 Proposal and site context

- 1.1 This application is a hybrid application that seeks full planning permission for part of the site and outline permission for part of the site. The application for full planning permission comprises two phases. The application for outline planning permission comprises the third and final phase. It is anticipated that these phases will be delivered over three to four years. Roarr has an overall area of approximately 34 hectares. The application site has an area of 8.66 hectares and is located to the west of the main site.
- 1.2 Roarr was previously known as Norfolk Dinosaur Park and as the crow flies, is approximately 9.5 miles to the northwest of Norwich in the parish of Weston Longville. It is perhaps more closely related to Lenwade and Great Witchingham though, which are approximately 500m to the north. The main vehicular access into the site is via the B1535/ Weston Hall Road, which is approximately 500m south of the A1067/Norwich Road. The B1535 ultimately connects to the A47 about 3.5 miles to the south. There is a secondary access on Morton Lane for maintenance staff.
- 1.3 Roarr opened in the 1990s as the Norfolk Dinosaur Park and since then, has undergone continuous expansion. Attractions include a woodland dinosaur

trail, indoor and outdoor play areas, cafes and restaurants, a high ropes course, a splash zone water play area, animatronic features, a theatre building and throughout October, the Primevil Halloween experience. The park currently receives 300,000 visitors a year and if this application were to be approved, it is anticipated that visitor numbers will increase by 16% a year on average until it reaches its capacity of 500,000 annual visitors.

- 1.4 The application site is to the west of the main part of the Roarr site and is the former deer park, which is now unused. For the most part, it is a mown field part of which has provided overflow parking when required. Levels vary but on the whole, decline from east to west. It can currently be accessed via locked gates at its northern and southern ends. To the north is the access drive leading to the car park with woodland beyond, to the west is woodland, to the south on Morton Lane are residential properties and a camping business, fields owned by occupiers of those residential properties and woodland. To the east is the woodland walk associated with the dinosaur trail at Roarr and other attractions within the grounds. Further to the north and east wrapping around Roarr is the Royal Norwich Golf Club at Weston Park.
- 1.5 Phase 1 occupies a roughly central position and has an area of approximately 18,534m². It comprises the following:
- A drop tower volcano ride. This will be adjacent to the western boundary and will be 10m in height (with the ride going up to 8m).
 - A tea cup ride centrally positioned along the northern boundary of Phase 1. The ride itself will be 8m in diameter but including safety barriers around it, the entrance to the ride and the extent of the canopy above it, will be 16m in diameter.
 - Two bounce pillows measuring 10.9m by 9m. The pillows will be ground level but the dinosaur themed features around them will be 3m in height. One pillow will be positioned next to the volcano ride, the other next to the boundary with Phase 2.
 - A play area positioned just west of centre within Phase 1 that includes a 6m high tower and slide, climbing nets and balance beams.
 - A 3m high play feature adjacent to pedestrian access into the site from the east that includes a platform, climbing net and slide;
 - A water play area with a canopy above;
 - A toilet and changing block will be to the south of the volcano ride and adjacent to the western boundary. This will be a maximum of 15.6m in length and 2.66m in height. Foul water from here will discharge to a package treatment plant.
 - A food and drink kiosk offering drinks and snacks adjacent to the boundary with Phase 3 with a canopy outside measuring approximately 11m by 14m and 3m in height. The canopy will be approximately 4.9m in height.
- 1.6 Phase 2 is positioned to the southeast of Phase 1 and has an area of approximately 5000m². It provides a tracked ride with dinosaur features that will be a maximum of 5m in height. The entrance feature for the ride will be based around the arrivals/departure platform.

- 1.7 Phase 3 runs diagonally across the site to the south of Phases 1 and 2 and has an area of 6160m². There are no specific plans for this area but an indication has been given that it will be a themed area that will be developed in response to the previous phases. The rides are aimed at children in the 3 to 11 age group.
- 1.8 Parking will be provided in the northern section of the site adjacent to the existing vehicular access and driveway. The applicant has explained that this is only expected to be used as overflow car parking and it is proposed that this will come forward in two phases. Phase 1 of the car park will provide approximately 515 spaces (although this is subject to demarcation any layout) and will accompany Phases 1 and 2 of the construction. Spaces are intended to be grassed but accessed via gravel tracks. Phase 2 of the car park will accompany Phase 3 of the construction phase and will provide approximately 245 spaces. Phase 2 is to provide overflow parking for cars. Habitats enhancements and reinforcements to the tree belt and woodland are also proposed a part of Phase 1.
- 1.9 Ecological enhancements include (but are not limited to) a new wildflower meadow between the car park and Phase 1 to support moths and other insects that will be food source for the Barbastelle bats that have significant roosts in nearby woodland, planting throughout the car park, an infiltration basin (which will primarily manage surface water), the installation of species appropriate bat boxes, tree planting and a commitment to ensuring a minimum of 10% biodiversity net gain.
- 1.10 Proposed hours of opening are 10:00 to 17:30. However, this development is only proposed to be used between May and October. Electronic ticketing has been introduced for customers, which allows Roarr to control the number of visitors. It also allows 'dynamic pricing' to encourage visitors at quieter times.
- 1.11 In support of the application, it has been explained that there is a strong economic justification for the proposals with the following statements made:
- Economic sustainability requires investment to promote growth and this needs to be matched with park expansion and infrastructure investment to suit.
 - An investment of millions of pounds over the coming years will attract additional tourism to the region and create new jobs within the park and Norfolk. An increase from 130 to 180 full time equivalent jobs is predicted.
 - It is vital for businesses to constantly improve and keep abreast of competition.
 - Extending the themed areas with new and different attractions adds more variety to the visitor experience, which sustains repeat visits to the park.
 - The chosen site will host new attractions at the lower part of the site which will draw people deep into the park, reducing overcrowding, smoothing visitor flow and encouraging an increase in visitor numbers

- 1.2 The proposal has been deemed to be EIA development under column 12(d) of Schedule 2 of the EIA Regulations. This applies to theme parks with an area of greater than 0.5 hectares. An Environmental Statement was submitted with the application.

2 Relevant planning history

- 2.1 20211198 EIA Scoping Opinion for volcano feature, three rides, food and retail outlets and toilets. Scoping opinion provided on 22 October 2021.
- 2.2 The wider site has extensive planning history over the last 30 years as various buildings and features have been erected or extended. However, with the exception of 2.1 above, there is no planning history directly relating to the application site.

3 Planning Policies

- 3.1 National Planning Policy Framework (NPPF)
NPPF 02 : Achieving sustainable development
NPPF 04 : Decision-making
NPPF 06 : Building a strong, competitive economy
NPPF 08 : Promoting healthy and safe communities
NPPF 09 : Promoting sustainable transport
NPPF 12 : Achieving well-designed places
NPPF 14 : Meeting the challenge of climate change, flooding and coastal change
NPPF 15 : Conserving and enhancing the natural environment
NPPF 16 : Conserving and enhancing the historic environment
NPPF 17 : Facilitating the sustainable use of minerals
- 3.2 Joint Core Strategy (JCS)
Policy 1 : Addressing climate change and protecting environmental assets
Policy 2 : Promoting good design
Policy 5 : The Economy
Policy 6 : Access and Transportation
Policy 8 : Culture, leisure and entertainment
Policy 17 : Small rural communities and the countryside
- 3.3 Development Management Development Plan Document (DM DPD) 2015
Policy GC1 : Presumption in favour of sustainable development
Policy GC2 : Location of new development
Policy GC4 : Design
Policy EN1 : Biodiversity and habitats
Policy EN2 : Landscape
Policy EN4 : Pollution

Policy TS2 : Travel plans and transport assessments

Policy TS3 : Highway safety

Policy TS4 : Parking guidelines

Policy CSU5 : Surface water drainage

3.4 Supplementary Planning Documents (SPD)

Landscape Character Assessment

The site is within the A1: River Wensum Valley landscape character type

3.5 Statutory duties relating to setting of listed buildings:

Section 66(1) Planning (Listed Buildings and Conservation Areas) Act 1990 provides that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority, or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

4 Consultations

4.1 Weston Longville Parish Council (in summarised form)

Concerns raised in relation to noise, visual intrusion, impacts on nearby residential properties, highway safety and access along Weston Hall Road, and noise and visual disruption during the construction period. Unable to support the application in its present form without the implementation of conditions that address the following:

- A condition that requires a new 'Existing Ambient' noise baseline to be made which accounts for the changes already being implemented as part of the Noise Management Strategy to address existing complaints. This should have measurement points which are at the boundaries of the development site AND at each of the sensitive residences. This is because the topography of the land is such that the houses along Morton Lane sit elevated relative to the site boundaries and residents should be able to enjoy the whole of their properties unhindered.
- A condition that requires the earth bunding to bound the whole perimeter of the site where it abuts the land owned by the properties of Morton Lane and that it should be no lower than 4m high to provide the screening required.
- A condition that requires the implementation of timber acoustic fencing on the bunding between the south of the park and the residential properties on Morton Lane, to supplement the tree and hedge planting.

- A condition that requires the applicant to institute a noise monitoring strategy – which includes mitigation requirements during the construction and operation of the park in order to confirm that the cumulative noise levels do not exceed those predicted in the report. The test points to be agreed between Roarr and the affected residents adjacent to the park.
- A condition that requires the replacement of any trees and hedging installed should it fail within 5 years of being planted.
- A condition that requires the installation of the visual and noise mitigations outlined above to appear in the early part of the Construction Management Plan.
- Construction work – including deliveries and removals from the site – fall within the hours of Monday to Friday 07:30 – 17:30hrs, Saturdays 08:00 – 14:00hrs, no working Sundays or Bank Holidays
- A condition that construction traffic will be directed to use the B1535 and the main entrance from Weston Hall Road and not the minor road network and secondary access located off Morton Lane (which is currently reserved for maintenance staff).
- Provide a safe access path to facilitate walking and cycling from the A1067 to the entrance to Roarr.

4.2 Great Witchingham Parish Council

Although welcoming the growth of a local business, the Parish Council has concerns that need to be addressed before they are able to support this application.

Noise: Share the concerns raised by Weston Longville Parish Council. Existing levels of noise are heard across the village, particularly during evening events. It can be reasonably anticipated that the proposed 10m Drop Tower Volcano attraction will generate noise. Despite placement towards the bottom of the site, and the statement that the noise will be limited to the Roarr site, screams could be expected to travel along the valley with the currently proposed earth bunding / fencing / trees making little to no difference given its height. The application does acknowledge the need to resolve existing issues, and we request a clear strategy as part of the Noise Management Plan. This needs to accurately baseline noise levels and to determine what measures will ensure that the expansion operates within stated parameters with minimal impact on local residents. There appear to be an increase in evening events scheduled throughout this year (including Roarrfest) so the Noise Management Plan should include evening music and live events as well as day to day operations.

Transport: Although the B1535 is designated as a HGV route the volume of vehicles turning onto the A1067 already causes tailbacks and has been the site of several accidents (not all of which appear in the report). We note that there is a proposal to utilise pre-booked ticketing to smooth entry and exit times and would welcome further detail on the impact this will have on vehicle

numbers. The nearest bus stop is on the A1067 and there is no safe access route along Weston Hall Road for pedestrians or cyclists. The report indicates that only 50-100 people a year don't arrive by car which feels very conservative. Parish Council members have witnessed groups of young people walking down the road from the bus stop in the dark to attend PrimEvil as well as family groups, including with pushchairs, walking along the road. There should be measures in place that support non-vehicle access to the site and we request that a condition of approval is added to include the provision of a safe access path from the A1067 to the park entrance. The Royal Norwich Golf Club has previously indicated they'd be supportive of permitting a right of access and Weston Hall may also be open to discussion. We'd also suggest that the speed limit from Morton Lane to the A1067 is reviewed alongside this application as it may be appropriate to slow traffic through this section given the increased volumes expected to use the entrance.

Environmental Impact: We welcome the commitment to ensure that there will be a 10% biodiversity net gain from the development. The visual impact of the proposal is of concern and we would welcome more clarity on year round screening as the existing tree belt is primarily deciduous.

4.3 Ward Member
Cllr P Bullman

I would be grateful if could include these should the application proceed to Planning Committee. Also, should it proceed, can you please ensure that a site visit is included in the considerations as this is vital to understand the impact this development would have.

Noise Levels

I am concerned that the baseline level noise monitoring in the application provides a misleading impression of the actual impact that noise has on the local community. The baseline used is considered significantly higher than is currently acceptable and has already been the subject of considerable disquiet. Hence, the baseline needs to be established at level lower than is stated to ensure that the local residents due not suffer unreasonably. Only then can a true evaluation of the proposal be considered. Furthermore, in the event that this application be approved, continuing monitoring of noise is needed both in the construction and operation phases.

Noise Screening

The application does not give sufficient consideration to the impact of the development for local residents. In particular, more earth bunding is required as well as acoustic fencing to ensure that intruding noise is minimised. To assist in this, it should be mandatory that any trees or hedges that are removed are replaced with mature like for like.

Visual Intrusion

Given that it is difficult to assess the visual impact that this development would have on the surrounding countryside based on modelling, it is essential that,

should this application proceed to the Planning Committee stage, their considerations must include a site visit where the full impact of the proposal can be assessed.

Construction

Should this application be approved, it essential that construction is limited to reasonable hours, avoiding Sundays and bank holidays. Also, construction traffic should avoid the minor road networks and be restricted to using the B1535.

Access

Given that pedestrian and cycling access would be via a busy road, it is imperative that consideration be given to installing a footpath from the main A1067 to the entrance.

4.4 Ecology & Biodiversity Officer

First comments

Comments provided and clarification requested on the connectivity of the site to the River Wensum SSSI and SAC, Natural England's advice on nutrient neutrality and how this relates to tourist attractions, how long the surveys are valid for, the reduction of minor impacts following mitigation to negligible, Biodiversity Net Gain, how much of an enhancement the infiltration basin will be if surrounded by trees, details of planting, positions of badger sets, how water levels within the adjacent County Wildlife Site will be affected by foul and surface water discharges and the monitoring of water levels and quality.

Recommendations also made in regard to operational hours, ongoing water level and water quality monitoring, a lighting design strategy, a construction environmental management plan for biodiversity and ecological design strategy.

Second comments

Conditions suggested in relation to mitigating impacts on amphibians, monitoring water quality and levels and landscaping and ecology within Phase 3. Comments made regarding potential impacts on the veteran Oak tree within the existing overflow car park, that a Habitats Regulations Assessment will need to be undertaken and advice should be sought from Natural England on impacts on Habitats Sites, include in relation to nutrient neutrality.

4.5 Environmental Management Officer

First comments

Noise: Public comments challenge the position of measuring locations. The disputed position is U1 Fairfield House, and this challenge should be

answered. The difference in distance could be of significance to the ambient survey. A technical note submitted by residents and carried out by Sharpes Redmore suggest that the character of noise likely to be created has not sufficiently been modelled in particular, the screams and shouts of children playing on the rides and that these characteristics may be of significance when taking into consideration the full use of the residential garden areas that bound the site. The actual recorded levels by Sharpes Redmore would suggest that possible mitigation may be required or further modelling of the character of noise needs to be carried out.

Another risk to amenity as per current complaints is due to that of recorded or amplified music and recordings. A Noise Management Plan is to be submitted to manage this. This should be conditioned.

It is stated that normal construction hours are 08:00-14:00 on Saturday, this is incorrect and is until 13:00. The Construction Environmental Management Plan (CEMP) states that site works are from 07:00 -19:00 with construction activities taking place between 08:00 -18:00. It should be noted that deliveries and traffic arrival at the site should be between the construction times and not the earlier hours.

Construction Traffic should as per public comments avoid minor roads and use the B1535. Other than the above comments on construction hours and access, the CEMP is satisfactory and should be carried out as approved. The CEMP is however a dynamic document and should be updated as the development proceeds and construction methods change. Any significant changes should be submitted for approval before implementation.

Contaminated Land Assessment: The Preliminary Risk Assessment is satisfactory and I am in agreement with the authors in that the risks from potential contamination are very low. No further investigation, risk assessment or remediation is required.

Commercial Food Venues: The positioning and location of the food venues do not raise concerns from an environmental protection point of view with respects to odour and noise. Any new food venues should be registered with Environmental Health.

Second comments

Do not wish to object subject to the imposition of conditions relating to the implementation of the submitted noise management plan and the submission of a construction management plan

Third comments following further submissions by neighbouring property owners:

The additional information has not changed my previous comments and as such these remain valid.

4.6 Landscape Architect

I generally concur with the findings of the Landscape and Visual Impact Assessment. There are a few points of design detail that might be worth checking with regard to the more significant trees on site, in particular the treatment around the veteran oak within the car park area, which some drawings appear to show parking in very close proximity. Trees such as this need particular care are many of the features that make them interesting (visual, biodiversity etc) are also the same features that risk assessors fear, such as dead branches.

4.7 Senior Heritage & Design Officer

The proposal will not have any direct impact on any built heritage assets – (Old) Weston Hall lies to the northwest and there is separation from the planned proposal by the road and extensive mature landscaping that will screen the development. Although the volcano attraction is of some height, it is quite far to the southeast of the hall and with the landscape screening should not affect its setting.

The land was formerly part of the (new) Weston House estate, Weston House to the east demolished in 1926 with the remaining stables converted to a house and now in use as the golf club function suite. The area is within the area identified on the county historic parks register. The HER says the park was extended in the C19 with '27,000 trees planted'. Although there are existing tree belt plantations around the site, the historic tithe map and the enclosure maps from c1840 shows this area divided up into field parcels and later maps and photos show there are no parkland trees with the space, so it can be presumed this has always been agricultural fields – probably pasture as Dairy Farm was located to the south east? It does not appear to be part of the main parkland that provided the immediate setting to the house which was more to the east, and more a case if a peripheral part of the estate land separate from the main hall by plantation planting.

4.8 Natural England

As submitted, the application could have potential significant effects on the following designated sites:

- River Wensum Special Area of Conservation (SAC)
- The Broads SAC
- Broadland Ramsar and
- River Wensum Site of Special Scientific Interest (SSSI).

Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation. The following information is required:

- A detailed Habitats Regulations Assessment (HRA) informed by the Nutrient Neutrality Methodology to determine the impacts on water quality by nutrients on European sites. This should be consistent with Natural England's overarching advice on this matter. Without this information, Natural England may need to object to the proposal.

The River Wensum is fed by both ground water and surface water, and some of the ditches on the periphery of the attraction drain into the Wensum via a network of surface ditches. With the expansion of the attraction, visitor numbers are projected to increase from the current 300,000 per annum to around 500,000 per annum in the future. Surface water runoff from hardstanding areas will be discharged into an infiltration system, which will comprise of an infiltration basin in the west of the site. It is proposed that the foul water will be treated by a sewage treatment plant, which will drain to a foul water drainage field under the overflow parking area, in the north of the site, and that the impact will be neutral. Evidence is required to demonstrate how phosphates present in the treated discharge will remain in situ underground in the long term. It would be helpful if it could be confirmed that there are no plans for any discharges to surface waters. This information will be required to help you undertake a HRA.

The River Wensum is fed by both ground water and surface water, and some of the surface ditches on the periphery of the attraction drain into the Wensum further downstream. It is important that the water in the ditches does not become polluted.

4.9 NCC Lead Local Flood Authority

I can confirm that the substantive response to this consultation is that the LLFA have no comments to make.

4.10 NCC Highway Authority

Provision of satisfactory off-carriageway walking / cycling facilities at B1535 Weston Hall Road, between the site and the A1067 would enable access to the existing regular bus service between Norwich and Fakenham, along with walking and cycling from Great Witchingham. Recognising that such a facility would not be feasible within the existing highway corridor, the Highway Authority agreed with the applicant at the pre-application stage, they should seek to secure an off-highway pedestrian / cycle route to the A1067. The Transport Assessment Addendum discusses potential off-highway routes and states that agreement to access the required land has not been possible either side of the B1535 Weston Hall Road. It is disappointing that a route for active travel between the park and A1067 does not appear to be achievable. Whilst such a facility would offer benefit to visitors, it would also assist staff to travel actively and sustainably. It is understood that the proposed development is intended to operate during May to October and given the nature of the attraction, visitors numbers would peak at times when background traffic is naturally suppressed e.g. during the school summer

holiday period. The applicant advises that the Dinosaur Park operates with an electronic ticketing system and that also serves to reduce traffic peaks by distributing customer arrivals over the morning. It is noted that during the 2019 season, Roarr! operated a private bus between Norwich Bus Station and the park but did not feel the level of patronage justified future provision of the service. The attraction is strongly encouraged to support sustainable travel to the park by providing a courtesy bus from/to Norwich bus and potentially train stations during peak season. Considering the above, the Highway Authority would not wish to object to the application.

Recommended conditions relate to the submission of a scheme for on-site parking for construction workers, the submission of a construction traffic management plan and access route, and adherence to the construction traffic management plan.

4.11 NCC Historic Environment Service

As far as I can tell none of the documents submitted with the application addresses the potential impact of the development on Weston Park and other undesignated heritage assets including potential for impacts on below-ground archaeology. We suggest a Heritage Statement including Archaeological Desk-Based Assessment is submitted with the application. Geophysical surveys should also be considered.

Comments following reconsultation:

In general terms we broadly concur with conclusions of the archaeological desk-based assessment submitted with the application. There is potential for previously unidentified heritage assets with archaeological interest (buried archaeological remains) to be present within the current application site and that their significance would be affected by the proposed development.

If planning permission is granted, we therefore ask that this be subject to a programme of archaeological mitigatory work in accordance with National Planning Policy Framework (2021), Section 16: Conserving and enhancing the historic environment, para. 205.

In this case the programme of archaeological mitigatory work will commence with geophysical survey and informative trial trenching to determine the scope and extent of any further mitigatory work that may be required (e.g. an archaeological excavation or monitoring of groundworks during construction).

4.12 NCC Minerals & Waste

While the application site is partially underlain by a Mineral Safeguarding Area (Sand and Gravel), it is considered that as a result of the nature of proposed development, in that area, it would be exempt from the requirements of Policy CS16-safeguarding of the adopted Norfolk Minerals and Waste Core Strategy

4.13 NCC Public Rights of Way

No objection on Public Rights of Way grounds as there are none in the vicinity.

4.14 Norfolk Wildlife Trust

The proposal is immediately adjacent to Weston Meadow & Common Meadow Carr County Wildlife Site (CWS), designated for its grassland, wet grassland and wet woodland habitats. The proposal also lies within the core sustenance zone of a nationally significant colony of barbastelle bats, a legally protected species. We have no objection in principle to this proposal but request further details on elements of the ecological assessment and make recommendations on additional boundary vegetation screening and the

inclusion of a long-term management plan secured by condition to ensure delivery of the mitigation measures set out in the application.

Further details recommended regarding any changes in water flows and impacts to water based habitats.

Boundary planting with County Wildlife Site does not appear to be substantial enough to mitigate disturbance impacts from noise and light.

Support the recommendation that opening hours are set to daylight hours as barbastelle bats populations appear to be tolerant of the existing daytime recreational use of the site.

A Landscape and Ecology Management Plan should be produced for the operational phase of the development. The Construction Environmental Management Plan should also be updated to include the water quality monitoring recommendations in the ecology chapter of the Environmental Statement.

4.15 Other representations

29 letters/emails comments received objecting to the application on the following summarised grounds:-

- The proposal is in a rural location in a river valley abutting a peaceful residential community and glamping site. Any development should be done in a controlled and sympathetic manner so as not to destroy resident's rights to a peaceful enjoyment of their property nor endanger existing businesses such as Round the Woods, within meters of the boundary. This application raises concerns re size, height and nature of the attractions. At 33 feet, the previously mooted volcano attraction, would overlook other properties, with permission already granted for glamping pods within 40m of the proposed development.
- Roarr has land available well away from the proposed site. Any expansion should be done there.
- Visual impact of the development within the surrounding area and on neighbouring properties.
- Children's amusement park would be totally out of character and destroy this greenfield site full of flora and fauna.
- The site can be seen from parts of Morton Lane and the B1535. It is very visible to and from neighbouring properties.
- Noise from the running of the equipment, music, PA systems, customers and during the construction phase.
- This planning application intends to put a theme park, including a massive volcano, right alongside the woodland play space at Round the Woods, sending lots of noise into the woods. This will really impact on the experience we enjoy in this woodland and the developers don't appear to be taking any steps to reduce this impact.
- No noise impact levels have been recorded at boundaries with adjacent properties.

- Roarr has received numerous noise complaints from local residents over the last 3 to 4 years. Old noise levels have been used as part of this acoustic report. Current noise levels should be used and details provided on proposed rides, machinery, displays and pumping stations.
- It would appear that the noise impact is inaccurate owing to mapping errors shown within the application.
- There is no indication what the noise increase will be at other points of the properties, including alongside the proposed development.
- Noise will be noticeable and disruptive in the construction phase and intrusive during the operational phase. Distances mentioned do not refer to paddocks, fields and grounds that form a huge part of residents' enjoyment of their properties.
- No details have been provided of how any potential noise nuisance will be screened. A 10m high volcano ride, toilet block and pumping station will be close to the boundary. The plans show only a native hedge to be planted.
- Consideration has not been given to whether the development pays adequate regard to the character and appearance of the area as required by Policy GC4 of the Development Management DPD.
- The development will affect our human rights and peaceful enjoyment to our home.
- Users of the volcano ride will have a clear view of the adjacent property and the play area higher up the slope could create a similar problem.
- Object on the grounds of noise, visual and light pollution and loss of privacy. Also concerned about leakage from toilet block, litter blowing off site, odours from food.
- Common Meadow Carr CWS is not within the applicant's ownership yet is being relied upon to provide a visual barrier between it, neighbouring properties and roads.
- Unfortunately this application is misleading, vague and fails to fully consider the impact on local families and their livelihoods.
- No details have been provided of the tree planting scheme.
- Concerned about a prospective 4m high bund along the southern boundary. It will not address the visual and noise impacts on local residents.
- Any expansion should not negatively impact on local residents, including their living standards and free use of their gardens and properties.
- A 4m high bund with a 2m high acoustic fence and hedging should be provided along the south, west and short return leg of the northern boundaries.
- Construction should only take place during winter months.
- Devastating impact on enjoyment of property.
- Without suitable bunding, local residents will be negatively affected.
- The proposed development is located at virtually the bottom of a valley and neighbouring properties overlook it from their elevated positions. The backdrop of ancient woodland and parkland also amplifies any noise coming from the "Visitor Attraction" straight back up the valley to surrounding areas and houses.

- The development would have a negative visual impact on surrounding areas and properties, in contradiction to what is being stated.
- The promised planting of trees, scrubs and vegetation is positive BUT it takes years for these to mature and provide the intended protection. What are the provisions in between?
- There is no evidence to suggest that the extension will be a commercial success.
- Concerned at the impact of increased visitor numbers on road safety.
- Careful mitigation is required to cope with the stated increase in visitor numbers.
- Any signage should be installed before development takes places.
- Query whether the traffic and accident data is correct.
- No walking route is available from the site to Lenwade. The need for a footpath should be a condition of any approval.
- How will construction traffic access the site?
- Is the road network suitable to cope with the proposed increase in visitor numbers?
- Concerned about the impact of the development on the glamping retreat that operates adjacent to the site.
- Any potential road improvements in the area will not less the impact on surrounding villages.
- Concerned about disturbance from events during the evening and night.
- Morton Lane is the main HGV entrance for the park. It would not be able to cope with 20 daily HGV movements during the construction phase.
- The surrounding narrow country lanes are already stretched to capacity with regards to local traffic in addition to people taking shortcuts through them from the A47, HGV Route, and the A1067. This development will only add to an already overstretched and dangerous situation. At present the crossroads where the B1535/Weston Hall Road meets with the A1067 already experiences extensive queues and long wait times at certain periods of the day with people and HGVs trying to access the A1067 to either turn left towards Fakenham, right towards Norwich or straight on towards Reepham. This will cause traffic gridlock.
- The company also seriously needs to stop encouraging people walking along the dangerous HGV route to its entrance. Guests with children and prams have very recently been spotted walking from the Lenwade bus stop to Roarr this is a very dangerous thing to do.
- Roarr has claimed that it is not possible to provide a safe cycle and walkway from the A1067 to the front gate. We are at a loss to understand why Roarr may have told Highways it cannot provide safe passage by means of a footpath/cycleway to its main entrance. In the past Royal Norwich and Round-the-Woods have actively tried to encourage Roarr to do it - with Royal Norwich providing access to the land at the side of the highway. It is our view that this proposal is opaque and speculative. It lacks thought and detail. It centres on profit over meaningful regard to safety or the environment. We ask that this serious point of safe sustainable access to the site is a mitigating factor to the whole proposal.
- Have all ecological parameters been considered?

- Concerned about the impact on the River Wensum.
- Concerned about the impact of the development on biodiversity and the ecology of the area, including a County Wildlife Site.
- The site where they intend to build is so close to the largest Barbastelle Bat colony in the UK, its conservation status is on the red list of endangered species and listed as near threatened! Roarr seem to think that providing a few bushes that moths can live in to help with food supply for them will be enough to warrant this massive disturbance of their habitat. It is also only meters from an active badger sett. There are so many insects, amphibians and birds that will simply disappear from this beautiful wildlife area once construction starts.
- Do not consider that all correct ecology surveys have been carried out.
- It is known there are bats around the Dinosaur Park as we have seen them and they confirmed this when consulting the neighbours, as they have been monitoring the bats since 2018. This area would be part of their feeding ground.
- A detailed business plan should be requested from the applicant to demonstrate that the expansion is economically sustainable.
- There is no guarantee that increased customer numbers will materialise and the long-term sustainability of the park should rely upon them.
- I cannot see how introducing a few fairground rides are going to boost visitor numbers by nearly 70%.
- The woodland to the south at Common Meadow Carr is regularly used by residents and holidaymakers. There are views into the site. Seriously concerned about the impact of the development in visual and noise terms on the adjacent Round the Woods Glamping business.

5 Assessment

Key Considerations

- 5.1 Principle of development
Impact on the character and appearance of the area
Heritage impacts
Impact on neighbouring properties
Transport impacts and highway safety
Ecology
Economic benefits

Principle of development

- 5.2 The site is located outside of any defined settlement limit and thus for planning policy purposes, is in the countryside. Policy GC2 of the DM DPD permits new development in the countryside where it does not result in any significant adverse impact and where it accords with a specific allocation and/or policy of the development plan. Policy 5 of the JCS is generally supportive of developing the local economy in a sustainable way to support

jobs and economic growth in rural and urban locations. It seeks to promote tourism, leisure, environmental and cultural industries and with specific reference to the rural economy. Policy 5 states that the rural economy and diversification will be supported by promoting the development of appropriate new and expanded business which provide either tourism or other local employment opportunities. Policy 8 of the JCS is also relevant. It states that existing cultural assets and leisure facilities will be maintained and enhanced.

- 5.3 Taking account of the policy context outlined above, the general principle of extending Roarr into the former deer park is acceptable subject to further consideration being given to those other key considerations.

Impact on the character and appearance of the area

- 5.4 It is clear that the character of the site will permanently change as a result of this development and so there will be some level of harm to its appearance. However, the themed rides are in keeping with the offer of the park and in design terms, the appearance of the new structures and their layout are acceptable. That being said, regard must be given the impacts of the development on immediate and wider area and as part of the Environmental Statement, a Landscape and Visual Impact Assessment (LVIA) was submitted.
- 5.5 The LVIA initially considered a study area of 2km from the centre of the site but explained that during field investigations, the visual influence of the site was limited to a much smaller area as a result the topography of the site and substantial existing vegetation cover. Instead, views are restricted to locations immediately adjacent to the site. My own experience of the site bears this out and photographs provided within the LVIA show this too. It is worth noting that these photographs were taken when trees were not in leaf. In distant views, it will be screened thanks to the undulating topography within which the site sits with woodland and plantations adjacent to and beyond the site limiting views of it. There are views of varying types from the entrance into Roarr from Weston Hall Road, from Morton Lane and from properties on Morton Lane.
- 5.6 The LVIA acknowledges that within the deer park, there will be a high magnitude of change that will have a major/moderate adverse effect that is significant. Within the overflow car park, given the intention to maintain much of this with a grassed surface and planting of trees, the works in this area has been assessed as having a low magnitude of change.
- 5.7 Additional tree planting is being proposed for the parking area along with strengthening the tree belt between the car park and the ride/attractions area. This will contribute towards softening the appearance of development and mitigating the localised impacts.

- 5.8 From properties along Weston Hall Road and other locations outside of the application site, impacts have been assessed as being negligible or neutral.
- 5.9 The site is visible to varying degrees from properties along the northern side of Morton Lane to the south of the application site. Those properties include the dwellings but also land under the ownership of these properties that is not residential curtilage e.g. paddocks, fields. Effects have been assessed as ranging from moderate adverse with a low magnitude of change to major/moderate adverse effects with a medium magnitude of change, which are significant. To some extent, there is some crossover between this and the impact of the development on the amenity of these properties. I shall consider this further elsewhere in the report.
- 5.10 From the highway of Morton Lane, there are glimpsed views of the site between properties and vegetation. There is considered to be a negligible magnitude of change with minor adverse effects which are not significant. Having walked up and down Morton Lane to consider this, I agree with this assessment.
- 5.11 As part of considering the landscape impacts, the following mitigation measures are proposed:
- Retention of existing on Site trees.
 - Retention and enhancement of boundary hedgerows and trees.
 - Proposals include for new high quality landscaping throughout.
 - The main attractions and infrastructure such as the volcano have been positioned within the Site as to be screened behind Common Meadow Carr woodland.
 - Taller elements, such as the volcano have been positioned within the lower elevations of the Site and have been restricted in height as to not break the canopies of the surrounding woodlands.
 - A new bund with landscaping and new tree planting will be provided to close the gap in the vegetation at the southern end of the Site, screening views from the residential properties to the south of Phase 2 and Phase 3 of the development.
 - A new dense, native hedgerow / screen planting to screen the development from adjacent residential properties running the entire length of the Sites western boundary with Common Meadow Carr and at the south, joining with planting on the proposed bund. The hedgerows would contain mixed native hedgerow species with additional large tree planting such as Oak and Sweet Chestnut to make an immediate impact.
 - An additional native tree belt and a substantial ecological area and has been proposed immediately alongside the main themed area of the Site separating the attractions from the overflow car park and once mature further enclosing the Site.
 - New tree planting is provided across the overflow car park increasing canopy tree cover and helping to break up and soften built form.
 - Enhancement of the existing woodland within the south of the Site with extensive understorey planting.

- 5.12 The Council's Landscape Architect has considered the LVIA and was in general agreement with its findings.
- 5.13 While these measures outlined above are unlikely to make the development invisible from every vantage point from which the site is currently visible, in time they will contribute towards mitigating its impacts and allow the development to be absorbed into its surroundings without having a significant adverse impact on the character and appearance of the surrounding area or its landscape character. As such, the application complies with Policies 1 and 2 of the JCS and Policies GC4 and EN2 of the DM DPD.

Heritage impacts

- 5.14 There is a spread out group of Grade II listed buildings within the grounds of Weston Hall to the northwest of the site. As the Council's Senior Heritage and Design Officer has noted, in view of the level of separation between the site and those buildings along with the existing planting, there will not be any direct impact on these heritage assets. When having special regard to the desirability of preserving these buildings or their setting or any features of special architectural or historic interest which they possess (as required by section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act), my assessment is that those buildings, their setting and historic interest will be preserved. By the same token, the application complies with Policy 1 of the JCS insofar as it relates to conserving the historic environment.
- 5.15 Following the submission of further information on the archaeological interest of the site, the County Council's Historic Environment Service has recommended the use of a planning condition that requires further investigations to be carried out in the form of geophysical work and trial trenching. This is not particularly unusual for a development of this type and is considered to be reasonable and necessary to make the development acceptable.

Impact on neighbouring properties

- 5.16 In large part, the key factors when considering impacts on neighbouring properties are the visual impacts and impacts arising from noise and vibrations.
- 5.17 In terms of visual impacts, as discussed above, the properties from the site is most visible lie to the south on Morton Lane. At present, these properties enjoy long views towards and into the deer park. Consequently, the development will be visible. In time though and with the landscaping proposed, the visibility of the application site will diminish. When taking account of that, the level of separation between the dwellings and the application site and while recognising that some structures are not

insignificant in their size, I do not consider that their massing or position will be so harmful to those neighbours to render the application unacceptable.

- 5.18 In respect of Fairfield House and the Round the Woods glamping site the operates from that property, it is true to say that the volcano drop ride will be close to the common boundary between that property and Roarr. When within the woodland, which visitors to the glamping site evidently use along with the occupiers of Fairfield House, the ride and other features will be visible particularly as levels rise up. Close to the boundary and through the fence to the deer park, views are more open. Appreciating the concerns that have been raised, given the extensive grounds within which Fairfield House sits and the distance from the dwelling, as with other properties on Morton Lane and elsewhere, I do not consider the massing or position of these features will be result in conditions that are sufficient to warrant refusal of the application.
- 5.19 The development will bring park activities closer to a number of neighbouring properties and especially on Morton Lane. This includes noise from customers, PA systems, plant and machinery, rides and increased traffic for example. It is understood that there have been and are concerns over noise from existing park operations and neighbours are worried that these will increase as a result of this development.
- 5.20 The noise assessment set out the main source of source will be general hubbub from customers but moreover that predicted noise levels will be well below the threshold for the onset of moderate annoyance set out the WHO guidelines. No specific mitigation measures were recommended other than for noise to amplified music and dinosaur roars to be controlled by a Noise Management Plan.
- 5.21 A separate assessment was commissioned on behalf of the local community and this, the original noise assessment and correspondence submitted subsequent to that on noise levels, measurement locations, methodologies and assessment criteria have been considered by the Council's Environmental Management Officer. As set out above in the Consultation section of this report, he does not wish to object to the application subject to the use of planning conditions relating to the Noise Management Plan and Construction Management. While recognising that the concerns of the local community remain, based on the advice of the Environmental Management Officer, the application is acceptable in respect of noise.
- 5.22 Having regard to all of the above, the application complies with Policies GC4 and EN4 insofar as they relate to residential amenity and potential noise pollution.

Transport impacts and highway safety

- 5.23 A Transport Assessment was submitted in support of the application. As referred to in the introductory section, this confirmed that the customer access

is from Weston Hall Road, where visibility splays in both directions meet the 120m requirement in both directions.

- 5.24 Data was provided for visitor numbers and vehicular movements for pre-COVID 2019. There were 254,340 visitors to the park with 82,847 vehicular movements. The peak month for visitors was August. The capacity of the park will increase from 300,000 to 500,000 as a result of this development – an increase of two thirds – and these customers will need to book in advance of being able to visit so that capacity can be controlled. The associated increase in capacity means that total annual vehicular movements have been calculated as 142,897.
- 5.25 During the construction phase, there is likely to be an average of 20 construction vehicles accessing and exiting the site per day between Monday and Friday only. The intention is for construction to take place during quieter periods to avoid congestion on busy days.
- 5.26 At present there are 758 spaces in the main car park and 577 spaces in the overflow car park (1355 in total). As part of the expansion project, it is intended to demarcate the spaces in the existing car park to increase capacity in this area and for the overflow car park to open once this capacity is exceeded. The total car parking provision will be 2196 spaces.
- 5.27 Concerns have been raised over the ability for non-car customers to access the site and the dangers this presents with them walking along Weston Hall Road from the A1067. There is no footpath provision along this road and this application does not propose to provide one. There is insufficient space within the verge to provide a footpath. Discussions have also been held between the applicant and the Royal Norfolk Golf Club about agreeing a route through the golf club. However, it was not possible to agree a route.
- 5.28 The nearest bus stop is on the A1067 and previously, Roarr paid for a private hire bus service for customer from Norwich bus station with pick up locations along the way. However, this ceased as the operators did not consider that the level of patronage justified the provision.
- 5.29 In commenting on the application in its capacity as Highway Authority, Norfolk County Council registered its disappointment that a route for active travel (pedestrians for example) does not appear to be achievable and encouraged the operators to provide a courtesy bus during peak season. However, it did not ultimately object to the application on these grounds or any other grounds. Instead, it recommended the use of planning conditions relating to the submission of a plan for construction workers' parking, the submission of a construction traffic management plan and access route along with details of wheel cleaning facilities along with a condition that requires that requires that

plan to be complied with. These conditions are necessary to achieve compliance with Policy TS3 of the DM DPD.

- 5.30 In respect of parking, the layout shown is indicative and is likely to need adjusting to take account of the veteran tree within the parking area. With that in mind, a condition is proposed to require details of the layout and demarcation of the parking to be submitted for approval, which will contribute towards the application complying with Policy TS4 of the DM DPD.

Ecology

- 5.31 In light of the characteristics of the site and it being close to the River Wensum SSSI and SAC, an Ecological Impact Assessment was submitted with the application. It noted that most of the ecological interest is around the periphery of the site rather than within the grassed area and this assessment considered the potential impact of the development on ecological parameters. Amongst the items considered were a colony of barbastelle bats, water voles, badgers, grass snakes, breeding birds, Herpetofauna, Great Crested Newts and flora/vegetation. A commitment to achieve a minimum of 10% Biodiversity Net Gain (BNEG) was also made.
- 5.32 The barbastelle bats form part of the country's only super-colony for that species. While most roosts are at Weston Park, a maternity roost is present at Roarr. No roost trees are proposed for removal but nevertheless, without mitigation, impacts on these are predicted to moderate. Impacts on badgers were also considered to be moderate while impacts on all other species were considered to be minor.
- 5.33 To address these predicted impacts, a series of mitigation and enhancement measures have been recommended. These include (but are not limited to) measures relating to external lighting, the timing of construction activity, the use of construction equipment, the position of the site compound and site access routes, the storage of material, the creation of a wildflower meadow to support moth, providing a wetland area adjacent to the infiltration pond, tree planting and other landscaping and the installation of bat boxes. BNEG calculations predict a 10.45% gain in habitats and a 75.28% gain in hedgerow units.
- 5.34 Clarification has been sought by the Ecology and Biodiversity Officer on a series of matters as noted in her consultation response. Further information has been submitted by the agent and a response is awaited from Natural England on this in respect of nutrient neutrality and nutrient calculations. A Habitat Regulations Assessment will need to be undertaken prior to the application being determined to ensure that the conservation objectives of Habitats Sites are not negatively impact upon but this has not yet been carried out pending the response from Natural England.

- 5.35 In the main, the Ecology and Biodiversity Officer's more recent comments relate to potential impacts on Habitats Site and other matters relating to mitigations and enhancements can be secured via conditions. However, while the wider ecology issue remains ongoing and some matters may be subject to change, delegated authority is sought from Members to authorise officers to draft these pending further contact with Natural England.

Economic benefits

- 5.36 As previously stated, when complete, the number of full-time equivalent employees will increase from 130 to 180. This figure however does not include those who will be employed during the construction phase of the development and those employed in supply chains during the construction and operational phases, which is admittedly more difficult to quantify. The extension to Roarr will also attract visitors to the area who will help to support the local economy through expenditure at the park and surrounding area. Combined, these economic benefits are considered to be of significant weight in favour of the application.

Other matters

- 5.37 Concerns have been raised about the impact of the development on the Round the Woods glamping site operates from land to the west of the application site. This site includes accommodation within the woodland adjacent to the application site and provides guests with opportunities to explore, play and learn in the woodland and the watercourse that runs between both sites. The proprietor of Round the Woods and other residents have expressed deep concern that the development and its proximity to her business will change the experience that she wishes to offer her guests and have an adverse impact on her business. While appreciating the concerns that have been raised, on amenity grounds I am unable to recommend the application is refused as guests are present for a relatively short period of time and the glamping units are not dwellings. Neither am I able to intervene in respect of the potential impact on the Round the Woods business. The market place will determine the future of the business and I cannot base my recommendation on the potential future development of that.
- 5.38 As the site area exceeds 1 hectare, a Flood Risk Assessment was submitted with the application. The site is within Flood Zone 1 for fluvial flooding and save for a some small slithers of land adjacent to the water course that runs alongside the western boundary, is at very low risk from surface water drainage too. The site is suitable for infiltration and a 1m deep infiltration basin is proposed to be provided in the western part of the site to deal with run-off from areas of hardstanding. Within the car park, water will infiltrate through the ground. The LLFA commented that it has no comments to make on the application. Subsequent discussions with the LLFA confirmed that this

is not an indication that it does not wish to review and comment on the application, more that it has reviewed the Flood Risk Assessment and having done that, has no items or comments to raise. In light of that, the application is deemed to comply with Policy 1 of the JCS and Policy CSU5 of the DM DPD.

- 5.39 The Environmental Statement considered air quality from vehicular emissions and construction phase dust. This recognised the potential for air quality impacts as a result of fugitive dust emissions from the site. Assuming good practice dust control measures are implemented, the residual effect of potential air quality effects from dust generated by earthworks, construction and trackout activities was predicted to be not significant.
- 5.40 Potential impacts during the operational phase may also occur due to road traffic exhaust emissions. These were assessed in accordance with the relevant assessment guidance and methodologies, the outcome of which indicated that impacts on both human and ecological receptors were predicted to be not significant.
- 5.41 An Environmental Statement was submitted under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for this application. I am satisfied that adequate information has been submitted in the Environmental Statement to assess the environmental impact of the proposal, and appropriate consultation and publicity has been undertaken to comply with the above Regulations. Consideration has been given to the relevant matters as part of this report.
- 5.42 Under Section 143 of the Localism Act the Council is required to consider the impact on local finances. This can be a material consideration but in the instance of this application the other material planning considerations detailed above are of greater significance.
- 5.43 This application is liable for the Community Infrastructure Levy as it includes buildings with a floor area of 100sqm or more.

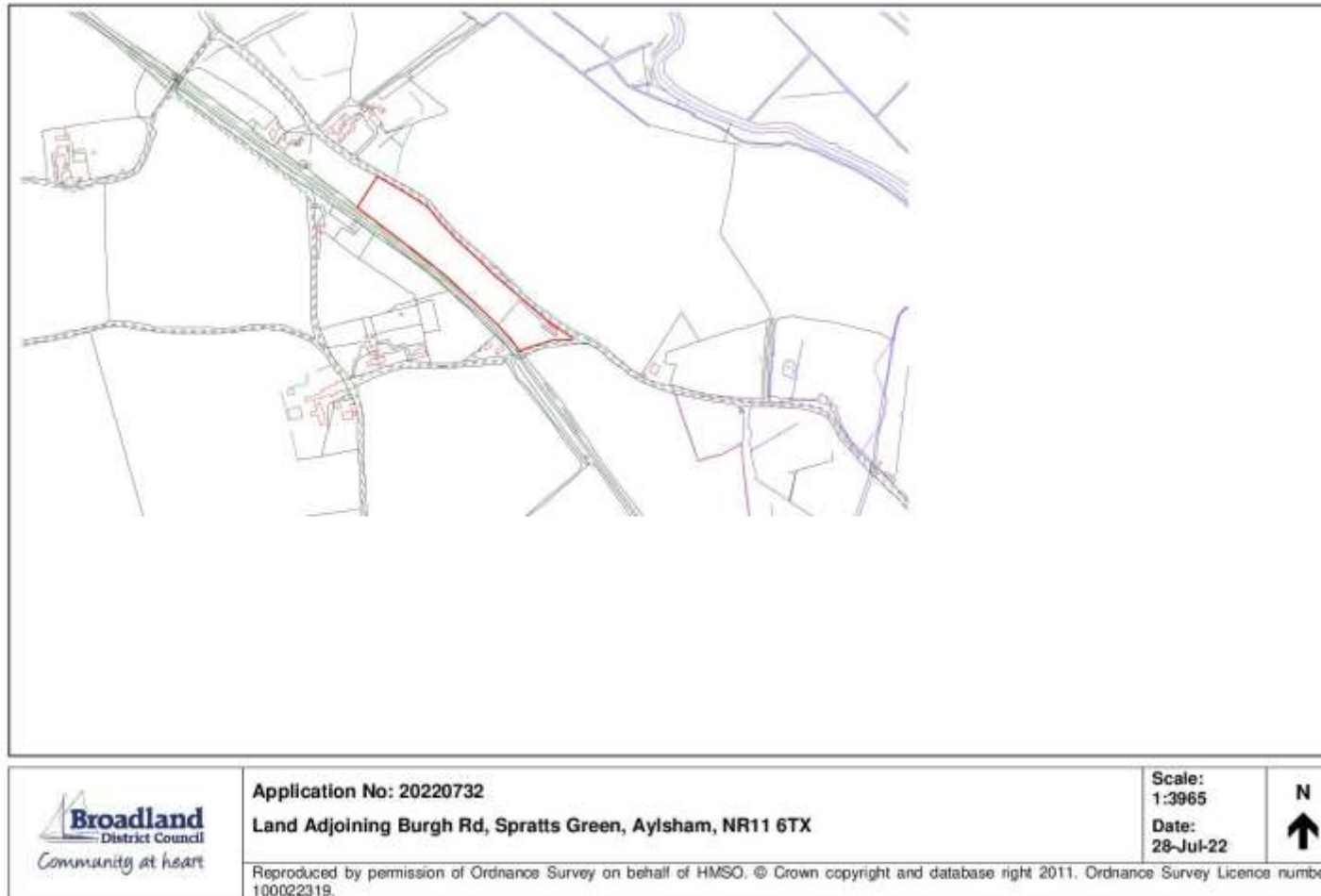
Planning balance and conclusion

- 5.44 In having regard to those matters that this application raises, the principle of the type of development being proposed is generally acceptable in this location and subject to further consideration being given to the ecology matters raised, I consider that impacts on the appearance of the surrounding area, landscape character, residential amenity, highway safety, heritage assets, air quality and flood risk are either acceptable or can be satisfactorily mitigated. The application complies with the development plan when read as a whole and thus is recommended for approval.

Recommendation:	To authorise the Assistant Direct of Planning to approve subject to ecological matters being resolved and subject to conditions.
	<p>Full permission</p> <ol style="list-style-type: none"> 1 Time limit – full permission 2 In accordance with submitted drawings 3 On-site parking for construction workers 4 Construction traffic management plan and access route with details of wheel cleaning facilities 5 Compliance with construction traffic management plan and access route 6 Details of layout and demarcation of parking to be submitted for approval 7 Tree protection 8 Archaeology 9 Customers to visit with electronic tickets only 10 Lighting 11 Hours of operation 12 Adhere to noise management plan 13 Submission of construction management plan 14 Landscaping scheme 15 Surface water drainage 16 Foul water to package treatment plant 17 Any appropriate conditions relating to ecology <p>Outline permission</p> <ol style="list-style-type: none"> 1 Time limit – outline 2 Submission of reserved matters 3 In accordance with submitted drawings 4 On-site parking for construction workers 5 Construction traffic management plan and access route with details of wheel cleaning facilities 6 Compliance with construction traffic management plan and access route 7 Submission of updated ecological surveys 8 Archaeology 9 Customers to visit with electronic tickets only 10 Lighting 11 Hours of operation 12 Adhere to noise management plan 13 Landscaping scheme 14 Surface water drainage 15 Details of foul water drainage 16 Any appropriate conditions relating to ecology

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Contact Officer, Glen Beaumont
Telephone Number 01508 533821
E-mail glen.beaumont@southnorfolkandbroadland.gov.uk



5. **Application No:** **20220732**
 Parish: **AYLSHAM**

Applicant's Name: MGF Norfolk
Site Address: Land Adjoining Burgh Rd, Spratts Green, Aylsham, NR11 6TX
Proposal: Formation of Means of Access to Burgh Road and
Erection of Double Five Bar Timber Gates and Timber
Post and Rail Fencing (Retrospective)

Reason for reporting to committee

The Local Member has requested that the application be determined by the Development Management Committee for appropriate planning reasons as set out below in section 4

Recommendation summary:

Full Approval, subject to conditions.

1 Proposal and site context

- 1.1 The application seeks retrospective consent for the formation of a new access to Burgh Road by opening the existing hedgerow and erection of double five bar timber gates across the access and timber post and rail fencing either side.
- 1.2 The site is a long rectangular field outside settlement limits within the wooded estate-lands landscape character area and adjacent the River Bure river valley landscape character area to the east of Aylsham. The field is used as paddocks and includes two mobile stables on skids.
- 1.3 The north-eastern site boundary adjoins Burgh Road and is treated with a hedgerow that has been opened to form the new access. The south-eastern boundary adjoins Burgh Lane and is treated with a hedgerow with an opening that was the original access. The south-western boundary adjoins the Burgh Valley Railway and is treated with a post and barbed wire fence and hedgerow. The north-western boundary adjoins agricultural land and is treated with a timber post and rail fence and hedgerow.

- 1.4 Burgh Road is classified C273. Therefore the formation of a new access to this road requires retrospective planning permission. The erection of the double five bar timber gates and fencing also require planning permission given these are greater than 1 metre in height and adjacent the highway.
- 1.5 It was argued that a former access in the same position was simply reopened. However a hedgerow had been planted along the boundary with Burgh Road more than ten years ago closing the former access. It is considered that this showed no intent to reuse the former access at the time therefore this is now considered a new access requiring retrospective planning permission.
- 1.6 There is another access in the southern boundary to an unclassified lane. It is advised that this is insufficient given access to the site can only be made from one end where the site level inclines; making it difficult to access the far end of the site during winter conditions.

2 Relevant planning history

- 2.1 No relevant history.

3 Planning Policies

- 3.1 National Planning Policy Framework (NPPF)
 - NPPF 02 : Achieving sustainable development
 - NPPF 04 : Decision-making
 - NPPF 09 : Promoting sustainable transport
 - NPPF 12 : Achieving well-designed places
 - NPPF 14 : Meeting the challenge of climate change, flooding and coastal change
 - NPPF 15 : Conserving and enhancing the natural environment
 - NPPF 16 : Conserving and enhancing the historic environment
- 3.2 Joint Core Strategy (JCS)
 - Policy 1 : Addressing climate change and protecting environmental assets
 - Policy 2 : Promoting good design
- 3.3 Development Management Development Plan Document (DM DPD) 2015
 - Policy GC1 : Presumption in favour of sustainable development
 - Policy GC2 : Location of new development
 - Policy GC4 : Design
 - Policy EN4 : Pollution
 - Policy EN1 : Biodiversity and habitats

Policy EN2 : Landscape
Policy TS3 : Highway safety
Policy CSU5 : Surface water drainage

3.4 Aylsham Neighbourhood Plan

Policy 9 : Flood risk

3.5 Supplementary Planning Documents (SPD) and Guidance

Design Guide
Burgh Conservation Area Character Statement
Landscape Character Assessment (SPD)

3.6 Statutory duties relating to Conservation Areas:

S72 Listed Buildings Act 1990 provides: "In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of [the Planning Acts], special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."

4 Consultations

4.1 Aylsham Town Council:

Responded in objection to the access on the grounds of highway function and safety given the road is narrow and busy, the new access has poor visibility, is close to a blind bend.

There was concern raised about the potential use of the site as a camping and caravan site as it is considered that the new access would have an adverse impact upon highway function and safety due to the increase and type of traffic generated.

The new access is considered unnecessary given the existing safer access to Burgh Lane which has far less traffic. Furthermore it was advised that there have been previous enforcement issues which should also be considered.

4.2 District Councillors:

The application is reported to Committee as it has been called in by Councillors Sue Catchpole and Steve Riley due to concern about the change of use of the land to a camping and/or caravan site given the resulting impact

of the associated traffic generated upon highway function and safety. It is understood this concern relates to an application for the site to become a certified camping and caravan site that was rejected on the grounds that the original access was not sufficient. The concern is therefore that the new access is to overcome the reason for the rejection of the application seeking certification.

4.3 NCC Highway Authority

Responded with no objection on the basis that the land is in equine use and the condition that the use of the land is agricultural and gates set back to allow vehicles to draw in off the highway before opened.

4.4 Other Representations

Nineteen public comments made in objection to the access on the grounds of highway function and safety given the road is narrow and busy; traffic is fast moving; the new access has poor visibility as it is close to a blind bend; and the gates are too close to the edge of the carriageway leading to the obstruction of the road by vehicles waiting to access the site whilst the gates are opened, holding traffic up and increasing the risk of a collision. Furthermore it was considered that the use of the access would cause pollution and its formation will lead to an increased risk of surface water flooding.

There was concern raised about the potential use of the site as a camping and caravan site as it is considered that such would have an adverse impact upon highway function and safety due to the increase and type of traffic generated in addition to the issues aforementioned. There was also concern raised about disturbance caused by noise and light generated by a camping and caravan site; the impact upon the character of the landscape and nearby conservation area; and the impact upon biodiversity and habitats. Furthermore it was advised that there have been previous enforcement issues which should also be considered.

5 Assessment

5.1 Key Considerations

1. Principle of development
2. Impact upon highway function and safety
3. Design and impact upon the character and appearance of the area
4. Impact upon neighbour amenity and the natural environment

- 5. Impact upon biodiversity and habitats
 - 6. Impact upon surface water flood risk
- 5.2 Planning law (section 38(6) of the Planning and Compulsory Purchase Act 2004) requires that applications be determined in accordance with the Development Plan, unless material considerations indicate otherwise. This point is reinforced by the NPPF, which itself is a material consideration.
- 5.3 In accordance with both the Council's adopted development plan and the NPPF, in cases where there are no overriding material considerations to the contrary, development proposals that accord with the development plan should be approved without delay.

Principle of Development

- 5.4 The site is located within the countryside, outside but opposite the defined settlement limit. Policy GC2 of the DM DPD states that new development which does not result in any significant adverse impact will be permitted outside settlement limits where it accords with a specific policy of the development plan.
- 5.5 Although there is no specific policy of the development plan, the principle of development is considered acceptable subject to no significant adverse harm to the character and appearance of the area or highway safety.
- 5.6 Representations on this application have included concerns that the access will result in a change of use of the land. As part of this proposal no change of use of the land is proposed. A planning application would be required should the owners wish to change the use of the land from paddocks in the future, Any implications of such a change of use would be assessed as part of that future application.

Impact upon Highway Function and Safety

- 5.7 Policy TS3 of the DM DPD states that development will not be permitted where it would result in any significant adverse impact upon the satisfactory functioning or safety of the highway network.
- 5.8 Concern has been expressed about the impact upon highway function and safety given the road is narrow and busy; traffic is fast moving; the new access has poor visibility as it is close to a blind bend; and the gates are too close to the edge of the carriageway leading to the obstruction of the road by vehicles waiting to access the site whilst the gates are opened, holding traffic

up and increasing the risk of a collision. Additional concerns have also been raised in relation to the potential use of the site as a caravan and camping site.

- 5.9 The highway authority has no objection to the new access based on the existing use of the land. However this is on the condition that the gates are set 8 metres back from the near channel edge of the carriageway to allow vehicles to draw in off the highway before they are opened.
- 5.10 After consideration of the impact upon highway function and safety it is concluded that, given the use of the land has not changed and subject to the condition that the gates are set back, the new access would comply with Policy TS3 of the DM DPD.

Impact upon the Character and Appearance of the Area (including biodiversity)

- 5.11 Policy 1 of the JCS states that the environmental assets of the area will be protected, maintained, restored and enhanced; all new development will ensure that there will be no adverse impacts on European and Ramsar designated sites and no adverse impacts on European protected species in the area and beyond including by storm water runoff or sewage discharge; and, in areas not protected through international or national designations, development will minimise fragmentation of habitats and seek to conserve and enhance existing environmental assets of acknowledged regional or local importance.
- 5.12 Policy 2 of the JCS states that all development will be designed to the highest possible standards, creating a strong sense of place and respect local distinctiveness including the landscape character, use of sustainable and traditional materials, the need to design development to avoid harmful impacts on key environmental assets and, in particular SACs, SPAs and Ramsar sites.
- 5.13 Policy GC4 of the DM DPD states that proposals should consider the impact upon the character and appearance of the area.
- 5.14 Policy EN1 of the DM DPD is that development proposals will be expected to protect and enhance the biodiversity of the district and avoid fragmentation of habitats.
- 5.15 Policy EN2 of the DM DPD states that, in order to protect the character of the area, development proposals should have regard to the Landscape Character Assessment SPD and, in particular, consider any impact upon as well as seek

to protect and enhance natural and semi-natural features which make a significant contribution towards defining the character of an area.

- 5.16 Concern has been expressed about the impact upon the character of the landscape and nearby conservation area and the impact upon local biodiversity and habitats.
- 5.17 As part of the proposal a small section of hedgerow has been removed to provide the access. The existing hedgerow is not considered an important hedgerow given it is less than 30 years old. Therefore a hedgerow removal notice would not have been required. Furthermore, having regard to the short length of section removed it is not considered to result in a significant impact upon ecology and biodiversity.
- 5.18 The gates and fencing are not prominent given their location within the remaining hedgerow. Furthermore their height and appearance is considered acceptable given their function, timber construction and simple post and rail design.
- 5.19 It is considered that the character and appearance of the conservation area is preserved given the degree of separation and acceptable height and appearance.
- 5.20 It is considered that there is no significant detrimental impact upon the inherent landscape sensitivities of the wooded estate-lands or river valley landscape character areas given their acceptable height and appearance.
- 5.21 After consideration of the impact upon the character and appearance of the area and biodiversity and habitats including the nutrients of protected habitats it is concluded that the application accords with Policies 1 and 2 of the JCS and Policies GC4, EN1 and EN2 of the DM DPD.

Impact upon Neighbour Amenity and the Natural Environment

- 5.22 Policy 2 of the JCS states that all development will be designed to the highest possible standards.
- 5.23 Policy GC4 of the DM DPD states that proposals should pay adequate regard to considering the impact upon the amenity of existing properties.
- 5.24 Policy EN4 of the DM DPD states that development will only be permitted where there will be no significant adverse impact upon amenity, human health or the natural environment.

- 5.25 It is considered that the use of the access would have no significant noise impact upon the amenity of any dwellings in the area given the degree of separation. Furthermore it is considered that simply using the access would be unlikely to lead to significant levels of pollution therefore its use would have no significant adverse impact upon human health or the natural environment.
- 5.26 After consideration of the impact upon neighbour amenity and the natural environment it is concluded that the application complies with Policy 2 of the JCS and Policies GC4 and EN4 of the DM DPD.

Impact upon Surface Water Flood Risk

- 5.27 Policy CSU5 of the DM DPD states that the proposed development should not increase the vulnerability of the site or wider area to surface water flooding.
- 5.28 Policy 9 of the Aylsham Neighbourhood Plan states that proposals should demonstrate that it would not increase the flood risk to the site or wider area.
- 5.29 Concern has been raised about an increased risk of surface water flooding caused by the formation of the access.
- 5.30 The access does not include any form of hard surfacing and there is no hard surfacing within the site. Therefore it is considered that the access would not increase surface water flood risk by a significant degree.
- 5.31 After consideration of the impact upon surface water flood risk it is concluded that the application would comply with Policy CSU5 of the DM DPD and Policy 9 of the Aylsham Neighbourhood Plan.

Other Issues

- 5.32 The Local Planning Authority has taken a proactive and positive approach to decision taking in accordance with the requirements of paragraph 38 of the National Planning Policy Framework.
- 5.33 This application has been assessed against the conservation objectives for the protected habitats of the River Wensum Special Area of Conservation and the Broads Special Area of Conservation and Ramsar site concerning nutrient pollution in accordance with the Conservation of Species and Habitats Regulations 2017 (as amended) (Habitats Regulations). The Habitat Regulations require Local Planning Authorities to ensure that new development does not cause adverse impacts to the integrity of protected

habitats such as the River Wensum or the Broads prior to granting planning permission. This site is located within the catchment area of one or more of these sites as identified by Natural England and as such the impact of the of the development must be assessed. The development proposed does not involve the creation of additional overnight accommodation and as such it is not likely to lead to a significant effect as it would not involve a net increase in population in the catchment and is not considered a high water use development. This application has been screened, using a precautionary approach, as is not likely to have a significant effect on the conservation objectives either alone or in combination with other projects and there is no requirement for additional information to be submitted to further assess the effects. The application can, with regards nutrient neutrality, be safely determined with regards the Conservation of Species Habitats Regulations 2017 (as amended).

- 5.34 Under Section 143 of the Localism Act the council is required to consider the impact on local finances. This can be a material consideration but in the instance of this application the other material planning considerations detailed above are of greater significance.
- 5.35 This application is not liable for Community Infrastructure Levy (CIL)
- 5.36 This application is not liable for Green Infrastructure Recreational Avoidance Mitigation Strategy (GIRAMS)

Conclusion

- 5.37 It is evident from the above that the principle of an access is acceptable and that the scheme would not cause any particular concerns in terms of the impact upon the character and appearance of the area; neighbour amenity, human health or the natural environment; local biodiversity or habitats; highway function and safety; or surface water flood risk.
- 5.38 It is considered that the application accords with Policies 1 and 2 of the JCS and Policies GC2, GC4, EN1, EN2, EN4, TS3 and CSU5 of the DM DPD. Therefore, the application is recommended for approval subject to the conditions listed below.

Planning Committee

Recommendation:	Authorise the Director of Place to approve with conditions.
	<ol style="list-style-type: none">1. 3 year time limit2. Development shall be carried out in accordance with the amended plans and documents3. Access gates – configuration

Contact Officer: Philip Baum

Telephone Number: 01603 430 555

E-mail: philip.baum@southnorfolkandbroadland.gov.uk

Planning Committee

Planning Appeals: 1 August 2022 to 30 August 2022

Appeal decisions received

Ref	Site	Proposal	Decision maker	Officer recommendation	Appeal decision
20210224	Keston, 8 & Orenda, 10 Panxworth Road, South Walsham, NR13 6DY	Raising of roof ridge height to create upstairs accommodation including dormer windows in both number 8 and 10 Panxworth Road	Delegated	Full Refusal	Dismissed
20211316	54 Freeland Close, Taverham, NR8 6XR	Single storey side extension	Committee	Full Approval	Allowed
20212183	48 Mansel Drive, Old Catton, NR6 7NB	Single Storey dwelling	Delegated	Outline Refusal	Dismissed
20220082	9 Overstone Court, Old Catton, NR6 7EN	Single storey side and two storey rear extension. Side window inserted into north elevation.	Delegated	Full Refusal	Dismissed
20220620	1 Roundtree Way, Sprowston, NR7 8SH	New single illuminated 48-sheet digital advertisement display	Delegated	Full Refusal	Dismissed

Appeals Lodged - None

PLANNING COMMITTEE

7 September 2022

Final Papers

	Page No
Supplementary Schedule	172

Attached is the Supplementary Schedule showing those representations received since the Agenda was published and other relevant information.

DEMOCRATIC SERVICES

Broadland District Council

Thorpe Lodge, 1 Yarmouth Road, Norwich, NR7 0DU

Tel: 01603 430404

Email: [committee.services@southnorfolkand](mailto:committee.services@southnorfolkandbroadland.gov.uk)

broadland.gov.uk



SUPPLEMENTARY SCHEDULE OF APPLICATIONS TO BE CONSIDERED

Plan No	Application No	Location	Update	Page Nos
1	20200469	Broomhill Lane, Reepham, NR10 4JT	The reference to Natural England's advice in paragraph 5.22 in relation to nutrient neutrality does not necessitate the Council to further consider this issue, unlike the residential application (20200847) given that this development (roadway, cycleway, footpath etc) would not have any likely significant effect on the relevant habitats site(s) as is evident from the recommendation to approve.	10
2	20200847	Land west of Broomhill Lane, Reepham	For the avoidance of doubt the recommendation in the table on page 8 is a summary of the "full" recommendation as set out in the conclusion of the main report.	32
3	20201183	Reepham High School And College, Whitwell Road, Reepham, NR10 4JT	The reference to Natural England's advice in paragraph 5.28 in relation to nutrient neutrality does not necessitate the Council to further consider this issue, unlike the residential application (20200847), given that this development (sports hall) would not have any likely significant effect on the relevant habitats site(s) as is evident from the recommendation to approve.	116
4	20200034	Dinosaur Park, Morton Lane, Weston Longville, NR9 5JW	Further comments from Natural England: Natural England has previously commented on this proposal and made comments to the authority in our letter dated 29 July 2022 Reference number 381132. The advice provided in our previous response applies equally to this amendment. The proposed amendments to the original application are unlikely to have significantly different impacts on the	132

			<p>natural environment than the original proposal. Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.</p>	
5	20220732	Land Adjoining Burgh Rd, Spratts Green, Aylsham, NR11 6TX	<p>Addition of background information:-</p> <p>The application is made as a result of a planning enforcement case regarding formation of a new access to Burgh Road from the land, erection of double five bar timber gates and timber post and rail fencing.</p> <p>In respect of the site being used for camping and caravans, it was concluded that the temporary use of the land for camping for no more than 28 days in total within any calendar year and provision of a moveable toilet block for the purposes of camping was permitted by Class B (Temporary Use of Land) under Part 4 (Temporary Buildings and Uses) of the GPDO. The use of the land as a caravan site for up to 5 caravans is permitted by Class A (Use of Land as Caravan Site) of Part 5 (Caravan Sites and Recreational Camp Sites) of the GPDO subject to certification of the site by an organisation exempt from a caravan site licence as per Paragraph of the Caravan Sites and Control of Development Act 1960.</p> <p>In terms of the access to Burgh Road, the applicant advised that they considered it simply the reinstatement of a former access. However the planning enforcement case officer considered that, given the planting of a hedgerow along Burgh Road closed the former access, the act of removing a section of this hedgerow to form the current access to Burgh</p>	160

			<p>Road was development and would require retrospective planning permission given Burgh Road is a C class road.</p> <p>In respect of the recommendation on page 169 this should be Approval subject to conditions and in light of this application being retrospective condition 1: 3 year Time Limit has been removed.</p>	
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